









FOOD SAFETY MANAGEMENT SYSTEM CERTIFICATION

AUDIT TYPE: SURVEILLANCE





Checklist version number: 6.0.0

IAR issue number: 6.1

1 ORGANIZATION DETAILS

1.1 ORGANIZATION PROFILE

Registered legal name	Viterra Canada Inc Becancour
Legal or official company registration number	Quebec agriculture department license – Exp Jul 31, 2025
COID	CAN-1-5675-216493
Location	555 Boul. Alphonse-Deshaies Becancour, Québec G9H 2Y8, Canada
Technical contact name*	Nancy
	Lessard
Technical contact Email*	Nancy.lessard@viterra.com
Commercial contact name*	Michelle
	Boyd
Commercial contact Email*	Michelle.boyd@viterra.com
General description of the audited organization	In North America, Viterra is a marketer and handler of grains, oilseeds and pulses. They partner with growers in Canada and the US to connect them to markets in 60 countries. Viterra's North American business is headquartered in Regina, Saskatchewan, with marketing, facilities, logistics, and processing capabilities, including a large global network of marketing offices in over 30 countries. Viterra operates a state-of-the-art canola and soybean processing and refining plant in Bécancour, Québec. Situated in the Bécancour Industrial Park, in the Québec Centre region, the plant began operations in 2010. The facility was purchased by Viterra in November 2015. With a crushing capacity of approximately 1.05 million metric tons per year, this is one of the largest oilseed processing plants in Eastern Canada and is the only major crushing and refining facility of its kind in the province of Québec. The plant produces vegetable oil destined for food and industrial markets, as well as meal for the livestock industry. Crush capacity is approximately 3,000MT per day – the facility can only process one commodity at a time but can crush and refine different products at the same time. Seed delivery is facilitated through shipments by CN Rail but also

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	by truck. The plant crushes soybean and canola seed throughout the year. It produces RBD (refined, bleached and deodorized) soy and canola oil for edible oil re-packers, food processors to be used in food manufacturing mainly in the Northeast American market. RBD product is shipped by truck and rail car. The facility can also produce degummed oil for bio-diesel production and feed manufacturing into North America, Europe and the South American markets. The soy and canola meal are sold to feed mills, distributors, and animal farms in North America and shipped by truck and rail car. Staff level at the plant is currently 110 staff. Production operates 356 days per year with 4 rotating crews on 12-hour shifts. Receiving and shipping operates on both shifts. Most maintenance activities take place during the day shift. The plant equipment includes seed receiving and primary cleaning, seed crush equipment and a hexane extraction process, refining, bleaching and deodorizing process equipment, and finished oil and meal storage and shipping. The facility produces oil products with very low water activity making them low risk foods that are unlikely to contain pathogenic organisms and will not normally support the growth of pathogens. As a result, the risk regarding food safety is low.
Seasonal activities (Y/N)	□Yes ⊠No
Seasonal activities	N/A
(If yes, add description)	
Significant changes since last audit*	The facility was shut down for several months last year due to a strike by the production staff. During that period, management staff continued shipping activities until inventory was depleted, but production did not occur. There have been no significant equipment changes to the facility in the last year and program updates included changes required for the update to FSSC version 6.

1.2 HEAD OFFICE (WHERE APPLICABLE)

Head Office applicable*	□Yes ⊠No		
Registered legal name	Please enter text		
Location	Please enter text		
Date of Head Office audit	Please select a date from the ca	alendar dropdown	
Duration of Head Office audit/s in hours	Please enter a number Hours	Please enter a number Minutes	

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Number of sites	Please enter a numeric value only
Reduction applied (max 20%)*	□Yes □No
Description of Head Office functions	Please enter text

1.3 OFF-SITE ACTIVITIES (WHERE APPLICABLE)

Off-site activities applicable*	□Yes ⊠No		
Site name	Please enter text		
Location	Please enter text		
Date of Off-site activity audit	Please select a date from the calendar dropdown		
Duration of off-site audit/s in hours	Please enter a number Hours	Please enter a number Minutes	
Activities at location/s	Please enter text		





1.4 MULTI-SITES (WHERE APPLICABLE)

Multi-Site certification applicable	□Yes ⊠No		
Registered legal name of the Group	Please enter text		
Legal or official company registration number	Please enter text		
Location of multi-site organization	Please enter text		
Date of Central Functions audit	15/5/2025		
Duration of Central Functions audit	Please enter a number Hours	Please enter a number Minutes	
Overview of Central Functions	Please enter text		
Number of sites in the group	Please enter a numeric value only		
List of sites included, with addresses, date/s of audit and activity (scope)	To be added in an Addendum to this report		

2 AUDIT DETAILS

CB Name (if different from main CB)	NSF International Strategic Registrations.
CB office location (if different from main CB)	789 n. Dixboro Road Ann Arbor, MI 48105, USA
Accreditation*	ANAB
Audit language	English
Audit objectives	To confirm the continued conformity and effectiveness of the management system, and its continued relevance and applicability for the scope of certification. Including: a) information and evidence about conformity to all requirements of the applicable management system standard or other normative documents; b) performance monitoring, measuring, reporting and reviewing against key performance objectives and targets (consistent with the expectations in the applicable management system standard

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	or other normative document)		
	c) the client's management sys regarding meeting of applicabl	tem ability and its performance	
	contractual requirements;	e statutory, regulatory and	
	d) operational control of the client's processes;		
	e) internal auditing and management review;		
	f) management responsibility f	or the client's policies.	
Audit criteria*	⊠ FSSC 22000 Additional Requ	irements (Version 6.0)	
	☑ ISO 22000:2018 Food Safety	Management Systems	
	⊠ ISO/TS 22002-1:2009 – Food	Manufacturing	
	□ ISO/TS 22002-2:2013 - Cater	ing	
	☐ ISO/TS 22002-4:2013 - Food	Packaging Manufacturing	
	☐ ISO/TS 22002-5:2019 - Trans	sport & Storage	
	☐ ISO/TS 22002-6:2016 - Feed	& Animal Food Production	
	☐ BSI/PAS 221:2013 Food Reta	ail	
Announced/Unannounced*	□Announced ⊠Unannounced		
Audit complexity*	□Combined/integrated with another standards.		
	⊠ Standalone FSSC		
Audit complexity details	N/A		
Verification of effectiveness	⊠Yes □No		
of corrective actions			
previous nonconformities*			
Audit delivery*	⊠Onsite □Full Remote □	ICT	
Audit start date*	18/3/2025		
Audit end date*	20/3/2025		
Total audit duration in hours*	20 Hours 0 Minutes		
Deviation from audit duration*	□Yes ⊠No		
duration			
Deviation from audit	No deviation.		
	No deviation.		
Deviation from audit	No deviation. □Yes ⊠No		





Detail on Product recalls since the previous audit	N/A	
Product withdrawals (food safety) since the previous audit*	□Yes ⊠No	
Detail on Product withdrawals since the previous audit	N/A	
Addendums included as part of the audit	□Yes ⊠No	
Addendum/s included	☐ FSMA ☐ Costco Module ☐	HAVI GQSR
2.1 AUDIT SCOPE		
Food Chain Category*	□ BIII	□Е
	□ C0	□ FI
	□ CI	□ FII
	□ CII	□G
	□ CIII	
	⊠ CIV	□К
	□D	
Scope statement*	Canola and Soybean processing bleached and deodorized) canol unprocessed by-products for use	a and soybean oil and
Exclusions*	⊠Yes □No	
Exclusion detail (if applicable)	Soybean hull pelleting process.	
Verification of the scope statement*	⊠Yes □No	
Scope statement remark (If verification No, add description)	Yes, scope statement was verifie	d.
2.2 AUDIT PROGRAM AI	ND PLAN	
Deviation from audit program*	□Yes ⊠No	

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Deviation from audit program remark*	There was no deviation from the three-year matrix.
Deviation from audit plan*	□Yes ⊠No
Deviation from audit plan remark*	The duration for this audit which was calculated according to the FSSC requirements was accurate.
ICT audit approach/ full remote used due to a Serious Event (Only if delivery of the audit is ICT approach or full remote)	□Yes ⊠No
Serious event justification (If ICT approach set to Yes)	Non applicable
Serious event justification explanation (If ICT approach set to Yes)	N/A

2.3 AUDIT TEAM

Name*	Auditor number*	Function*	Delivery*	Date*	Hours*	Minutes*
Todd Boorse	C264	Lead Auditor	Onsite	18/3/2025	8 Hours	0 Minutes
Todd Boorse	C264	Lead Auditor	Onsite	19/3/2025	8 Hours	0 Minutes
Todd Boorse	C264	Lead Auditor	Onsite	20/3/2025	4 Hours	0 Minutes

Note: The table shall be completed per audit date and per audit team member in the case of an audit team and reflect the actual audit time. Where an auditor is being witnessed, the role of lead auditor, and witness shall be assigned, resulting in two entries in the audit team table above.

Where the time differs from the audit plan, the justification shall be recorded under deviation from audit plan section – 2.2 Audit program and plan.





2.4 PREVIOUS AUDIT

2.4.1 AUDIT DETAILS PREVIOUS AUDIT

Audit type	☐Stage 1 ☐Stage 2 ☒Surveillance ☐Recertification
	□Transition
Announced / Unannounced	⊠Announced □Unannounced
Audit start date	17/1/2024
Audit date end	18/1/2024
CB conducting previous audit if different to current CB	NSF International Strategic Registrations
Actions taken on NCs raised at previous audit	The organization addressed the one minor non-conformance from the surveillance audit conducted Jan 17-18, 2024. The non-conformance from the previous audit was reviewed and found to have been effectively addressed. The organization's identification of root cause, corrective action and verification for the previous finding appears to be adequate to effectively address the identified issue indicating that the overall corrective action process is acceptable.

3 AUDIT RESULTS

3.1 EXECUTIVE SUMMARY

Audit summary	This was an unannounced surveillance audit to the FSSC 22000
-	version 6.0 standard. The audit was conducted over 2.5 days (20-
	man hours) by one auditor at the Becancour, Quebec location,
	while the site was in full production and all activities could be
	suitably reviewed.
	The scope of certification was:
	"Canola and Soybean processing facility producing RBD (refined,
	bleached and deodorized) canola and soybean oil and
	unprocessed by-products for use in the feed industry".
	There was an exclusion for the Soybean hull pelleting process. A
	process-based approach was followed, auditing all activities on
	the site according to the audit plan. Audit methods followed
	were interviewing of staff, especially those responsible for the
	PRPs as well as other activities affecting the FSMS, observation
	of activities and review of documentation and records.
	The audit itself and this report represent only the extent of
	assessment that took place within the time available and is
	therefore a sample that covers only what became evident at the

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Confirmation that audits objectives have been	time. The company has a very strong understanding of the program requirements and demonstrated the effective implementation of the version 6 standard requirements. This was demonstrated through long term certification at this site as well as company monthly food safety / quality meeting minutes, the corporately established food safety objectives, a review of internal and customer non-conformances (there have been no significant food safety related non-conformances or customer issues since the last external audit), as well as the demonstration of traceability. The organization achieved their 2024 objectives and is well positioned to achieve their food safety objectives in 2025. There was no significant food safety issues identified. The internal audit program and management review process were well established, effective and detailed. There was one minor non-conformity from the last audit on Jan 17-18, 2024, that was reviewed and had been effectively addressed. A total of 0 critical non-conformities, 0 major nonconformity and 3 minor nonconformities were raised during this audit. The organization is being recommended for continued certification / upgrade to version 6 of the standard.
objectives have been fulfilled [*]	MIES LINO
Unresolved issues	No unresolved issues.

3.2 **SUMMARY OF AUDIT FINDINGS**

# Critical nonconformities*	0
# Major nonconformities*	0
# Minor nonconformities*	3



3.3 NONCONFORMITIES

Number (#)	Requirement Reference (Standard)	Clause Number	Grade	NC statement (incl. objective evidence)	Acceptance of correction, CAP, and evidence (auditor and date)
1	ISO 22000:2018 Food Safety Management Systems	6.1.2	Minor	Statement of Non-Conformance: The location did not fully plan actions to address risks and opportunities identified during the Oilseed Group Planning session conducted Dec 16 & 17, 2024. Objective Evidence: During a review of the SWOT analysis conducted by the Oilseed Group on Dec 16 & 17, 2024 - a weakness/ risk was identified for the Becancour location in relation to challenges with the internal document structure (i.e. electronic record storage and retrievability). There was no evidence that actions to address this risk were planned, integrated and evaluated for effectiveness. Evidence of correction required.	14/4/2025 Deidre February
2	FSSC 22000 Additional Requirements	2.5.6	Minor	Statement of Non-Conformance: As more than one product is produced in the same production area that have different allergen profiles, the results of the verification testing conducted were not available. Objective Evidence: During a review of the location allergen management program and the Résumé des tests externes annuels qualité / Summary of annual external quality tests, it was	10/4/2025 Deidre February

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				noted that the schedule outlines the requirement for annual testing of finished RBD Canola and Soy Oil for gluten and soy allergens. The records of the 2024 tests could not be provided during the audit even though the 2024 schedule indicated the samples were sent on 28-02-2024. The risk is considered low as the Worldwide Food Safety Agencies recognize RBD oil as not representing any	
3	FSSC 22000 Additional	2.5.11	Minor	allergenic risk due to the deodorization process. Evidence of correction required. Statement of Non-Conformance:	11/4/2025
	Requirements			The organization did not have controls in place for foreign matter management including procedures for the management of all breakages linked to potential physical contamination (e.g., metal, ceramic, hard plastic). Objective Evidence: Although the organization addressed glass breakage in the corporate PreReq 10 - Measures for Cross Contamination - the prerequisite only indicated that glass breakage would need to be recorded in the non-conformance log but did not outline procedures for the management of all breakages linked to potential physical contamination. Evidence of correction required.	Deidre February

Note: Root Cause Analysis, Correction and Corrective Action Plan to be recorded on the Nonconformity record supplied to the client and uploaded to the FSSC Assurance Platform.

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3.4 AUDIT RECOMMENDATION(*)

Audit Recommendation*	☐ (Re-)Certification granted
	⊠ Certification maintained
	□ No Certification granted
	☐ Certification suspended
	□ Certification withdrawn

3.5 AUDIT DURATION^(*)

On-site audit time calculation 5.2 and 5.3	– refer Table B.1 in ISO 22003-	1: 2022 and V6 Part 3, clause 4.3,
Audit preparation time in hours*	2 Hours	0 Minutes
Audit reporting time in hours*	8 Hours	0 Minutes
Existing Management system certification in place (Y/N)*	□Yes ⊠No	
Detail of existing Management system certification in place (Name of scheme or standard)	N/A	
Number of HACCP studies* (linked to product groups)	1	
Number of employees used in the audit duration calculation (FTEs)*	57	
Number of shifts*	2	
Description of activities per shift if different from main shift	All processes occur on both shi	fts.

Note: The audit duration calculation shall be uploaded to the FSSC Assurance Platform, in addition to the data entered above.



4 CHECKLISTS

FSSC 22000 - ADDITIONAL REQUIREMENTS

FSSC 2200 Requireme	0 - Additional ents	Confo	rm	Grade	If No – detail NC If a clause is N/A, provide a	NC#
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
2.5.1	Management of Services and Purchased Materials					
2.5.1	Management of Services and Purchased Materials	\boxtimes				

Summary:

Verified qualification documentation available on the corporate "Our Place" site – verifies compliance to ISO 17025.

All external laboratories used for micro analysis are approved to ISO 17025.

Viewed laboratory C - pesticide testing - expiry Jan 6, 2027 - ISO 17025.

Viewed laboratory E - salmonella and environmental swabs - ISO 17025- expiry Mar 12, 2026.

Viewed laboratory E - water testing - ISO 17025 - expiry Jun 20, 2026.

Viewed laboratory B - expiry Jul 4, 2027- ISO 17025.

PRP 9.0 - Management of Services & Purchased Material- Rev Apr 2, 2024 – section 3.4 outlines the company requirements for buying from a non-approved supplier in an emergency which ensures that products still conform to specified requirements and the supplier has been evaluated. There has been no use of this procedure in the past year since the last external audit in Jan 2024.

c) This element does not apply as the organization does not procure animals, fish or seafood.

The process for the review of raw material and finished product specifications to ensure continued compliance with requirements is outlined within PRP 9.0 - Management of Services & Purchased Material – section 3.1 and may include an annual review of the suppliers' letter of guarantee or the scope of service agreement to verify conformance. All incoming raw seed is inspected and graded as per CGC specifications and documented within the receiving records (SIPS). There were procedures in place that showed how the facility implements and maintains a review process for product specifications to ensure continued compliance with food safety, legal and customer requirements.

All outbound finished oil tanks are sampled and approved daily – testing for Peroxide and Fatty Acids at the RBD tank.

Finished oil shipments are sampled and assessed for quality parameters, customer specifications and regulatory specs and documented on the outbound CofA.

Finished oil samples are tested for Moisture, flavor, filter, IV and color from a sample taken from every outbound truck and rail car.

Viewed Enregistrement Automatique – tracking daily testing of finished RBD tanks and daily shipments for Mar 17-18, 2025.

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Customer specifications are reviewed when they request a change or when customers conduct their vendor evaluation process or when they request a letter of guarantee. Viewed Client Specification Register - tracking customer specifications outside of regular Viterra specifications.

Finished product specifications for meal are reviewed annually.

Canola meal labelled for - Min Crude Protein, Min Crude Fat, Max Crude Fiber, Max Moisture, Max Erucic Acid and Max Glucosinolates.

Soya Meal labelled for - Min Crude Protein, Min Crude Fat, Max Crude Fiber, Max Moisture. Annual meal testing completed Feb 11, 2025, for Canola meal and soya meal to validate label claims.

The Company kept up to date with legislation and relevant activities that might be affected by food safety hazards, through membership associations and government web sites. All regulatory bodies and requirements the company must comply to is located on Our Place as well as the corporate organizational knowledge document. Regulatory changes addressed at corporate level, and this is communicated to each facility. Regulatory compliance is a continual ongoing review by corporate and customer requirements reviewed on an ongoing frequency by quality assurance at the facility level.

SFCR - 7Y3BRX8R - Exp Jun 24, 2026

Quebec agriculture department license – Exp Jul 31, 2025

FDA Registration # XXXXX5437 - Dec 31, 2026

Halal - expired Dec 31, 2025

One customer audit completed in 2025 - no nonconformances issued.

CFIA – no audits in the past year just regular meal monitoring.

Kosher Certificate Expiry - Jul 31, 2025.

FSSC 2200 Requirem	00 - Additional ents	Confo	rm	Grade	If No – detail NC If a clause is N/A, provide a	NC#
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
2.5.2	Product Labelling and Printed Materials					
2.5.2	Product Labelling and Printed Materials					

Summary:

RBD oil - For feed purpose, it shall comply with CFIA Feeds Regulations, 2024 and Canadian Feed Ingredients Table and Feed Regulations Schedule IV, section 4.5.3 or 4.5.6.

Canola Meal & Vegetable Oil Deodorizer Distillate complies with CFIA Feeds Regulations, 2024 and Canadian Feed Ingredients Table. Canola Meal comply with CFIA Feed Regulations Schedule IV Section 5.3.3: Soybean meal - complied with CFIA Feed Regulations Schedule IV Section 5.3.27 VEGETABLE OIL DEODORIZER DISTILLATE - As per schedule IV 4, section 4.5.10 of the CFIA Feed Regulations

VEGETABLE OIL SOAPSTOCK (SODIUM SALTS OF FATTY ACIDS) – complies with CFIA Feed Regulations Schedule IV Section 8.101

Viewed client specification spreadsheet – available to the lab to outline client specific specifications that link to template CofAs for those clients.

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Viewed Oil Shipment analysis records – test records of final oil samples. Results used to generate CofAs – truck loads of oil are held, and CoA emailed to the customer.

Rail car shipments – CofAs are e-mailed to clients prior to receipt of the rail cars. CofAs are generated for all outgoing oil product.

Viewed example oil CofA for Mar 11, 2025 - Truck Shipment- truck # 257– includes seal numbers, analysis results and specifications. Viewed additional examples as part of the vertical trace exercise.

Standard feed tags are issued with all outgoing meal products – recorded on BoL and within SIPs. Viewed example for soya meal and canola meal shipped from Jan and Feb 2025.

Viewed BoL for canola meal and soya meal – includes label information:

Canola meal labelled for - Min Crude Protein, Min Crude Fat, Max Crude Fiber, Max Moisture, Max Erucic Acid and Max Glucosinolates, liquid mold inhibitor addition and maximum VOD addition. Soya Meal labelled for - Min Crude Protein, Min Crude Fat, Max Crude Fiber, Max Moisture, liquid mold inhibitor addition and maximum VOD addition.

Annual meal testing completed Feb 11, 2025, for Canola meal and soya meal to validate label claims.

There is no product claims made on any finished products although the organization does maintain Halal and Kosher certification.

d) This element does not apply to this client who is food chain category CIV.

FSSC 22000 - Additional Requirements		Conform		Grade	If No – detail NC If a clause is N/A, provide a	NC#
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
2.5.3	Food Defense					
2.5.3	Food defense	\boxtimes				
2.5.3.1	Threat assessment	\boxtimes				
2.5.3.2	Plan	\boxtimes				

Summary:

Verified PRP 18.0 - Food Defense, Biovigilance and Bioterrorism - in place to define the assessment process.

Viewed Food Defense – US FDA Food Defense Plan Builder - Key Activity Type Method – conducted Oct 18, 2024 – this an update to the previous assessment method.

Training has been conducted with all the QA managers and Coordinators who will oversee these assessments at all locations.

Food Defense team includes G.G. – General Manager, M.B. – Director, Food Safety & Quality, N.L. – Quality Manager - last updated Oct 18, 2024 – qualifications are included in the Food Safety Team Qualification Document.

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Viewed Corporate Food Security Measures for Food Defense and Food Fraud manual developed corporately to drive a consistent approach among all locations – Mar 1, 2024.

Actionable items get ranked according to severity and likelihood. The program requires an annual review of the Food Defense Plan during the HACCP team meeting and to redo the assessment every three years.

The questions and risk ranking are applied to any gaps identified. Revision date on Food defense plan – Oct 18, 2024.

CBT course was implemented Jan 2018 by the organization – Food Security – and was recently changed to a 5-year retraining frequency.

Verified all staff are current on the one-time training and have 90 days to work through retraining based on the new frequency.

Security office with swipe card turnstiles is the only access to the plant during regular office hours. Identification checks are conducted, and visitor orientation provided prior to allowing access to the facility. The facility is staffed 24/7.

Bins and loading points are locked and secured from external access – verified chemical receiving shed. The facility has cameras in critical locations that are recorded as required. Oil cars and trucks going in and out are sealed and verified.

Annual scheduling is tracked through the internal audit and HACCP Team meeting which includes the annual review of the threat assessment and the food defense plan.

Based on the records reviewed, the implementation of the food defense plan appears to be effective as there have been no food defense issues in the past year.

FSSC 22000 Requireme Clause	O - Additional ents Requirement	Confo Yes	No	Grade Minor/ Major/ Critical	If No – detail NC If a clause is N/A, provide a justification	NC#
2.5.4	Food Fraud Mitigation					
2.5.4	Food Fraud mitigation	\boxtimes				
2.5.4.1	Vulnerability assessment	\boxtimes				
2.5.4.2	Plan	\boxtimes				

Summary:

Viewed Corporate Food Security Measures for Food Defense and Food Fraud manual developed corporately to drive a consistent approach among all locations. Assessment done according to commodity. Last update completed Mar 1, 2024, by the corporate office.

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Viewed food fraud minutes - Dec 17, 2024, and full food fraud was reviewed on Nov 28, 2023. No mitigation strategies are required based on the outcome of the assessment.

A new template was used for the assessment called SSAFE. The vulnerability estimate of the products were assessed to be low risk, and there has been no history of any activities of food fraud within the system.

Food fraud includes a vulnerability assessment, meeting minutes and the overall assessment and conclusion.

Food fraud incidents would be handled by the Food Safety Emergency Response Plan. No history of fraud identified in meal. No major controls required. Planned review of the assessments and reports each year and redoing the assessment at least every three years.

Annual scheduling is tracked through the internal audit and HACCP Team meeting which includes the annual review of the vulnerability assessment and the food fraud plan.

Based on the records reviewed, the implementation of the food fraud plan appears to be effective as there have been no food fraud issues in the past year.

as there have b	been no food fraud is	sues in	the pa	ast year.		
FSSC 22000 - A	dditional	Confor	m	Grade	If No – detail NC	NC#
Requirements					If a clause is N/A, provide a	
Clause Re	quirement	Yes	No	Minor/	justification	
				Major/		
				Critical		
2.5.5 Lo	go Use					
2.5.5 Lo	go use				N/A	
					The organization is not using	
					the logo.	
Summary:						
N/A						
	on is not using the log	-			Lien Lie Haid	N.G.
FSSC 22000 - A	dditional	Conform		Grade	If No – detail NC	NC#
Requirements					If a clause is N/A, provide a	
Clause Re	quirement	Yes	No	Minor/	justification	
				Major/		
				Critical		
2.5.6 Ma	anagement of Allerg	gens				
2.5.6 Ma	anagement of	П	\boxtimes	Minor	Statement of Non-	2
alle	ergens	_			Conformance:	
					As more than one product is	
					produced in the same	
					production area that have	
					production area that have	
					different allergen profiles,	

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testing conducted were not available. Objective Evidence: During a review of the location allergen management program and the Résumé des tests externes annuels qualité / Summary of annual external quality tests, it was noted that the schedule outlines the requirement for annual testing of finished RBD Canola and Soy Oil for gluten and soy allergens. The records of the 2024 tests could not be provided during the audit even though the 2024 schedule indicated the samples were sent on 28-02-2024. The risk is considered low as the Worldwide Food Safety Agencies recognize RBD oil as not representing any allergenic risk due to the deodorization process. Evidence of correction required.

Summary:

Viewed Corporate Allergen Control Plan – Rev Feb 15, 2024 – defining the corporate requirements for allergen control at all company facilities.

Viewed Allergen / Sensitivity Assessment (Soya Oil and Canola Oil) last updated Jul 16, 2024, to be sent to customers upon request.

Soybeans, soya dust and dockage found in incoming seed are the only contaminates used on site. Allergen training is included for all staff as well.

Viewed additional allergen risk assessment completed by the facility Sept 6, 2023.

Allergen Control Program Includes identification of soya receiving / segregation and risk of dust contamination at finished oil filter change.

Control measure is identified within the HACCP plan through filter changes procedures.

Worldwide Food Safety Agencies recognize RBD oil as not representing any allergenic risk.

The facility is testing RBD Canola and Soya oil annually for allergens.

Viewed Inspection & Test Plan – Indicates Annual Testing of RDB Canola and Soya Oil for gluten and soya allergens.

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Sep 17, 2024 – an additional test was conducted of soya RB oil for gluten and soya allergens to help determine what the risk was prior to deodorization. The allergens were not detected. During a review of the location allergen management program and the Résumé des tests externes annuels qualité / Summary of annual external quality tests, it was noted that the schedule outlines the requirement for annual testing of finished RBD Canola and Soy Oil for gluten and soy allergens. The records of the 2024 tests could not be provided during the audit even though the 2024 schedule indicated the samples were sent on 28-02-2024. The risk is considered low as the Worldwide Food Safety Agencies recognize RBD oil as not representing any allergenic risk due to the deodorization process. See minor CAR.

Allergen awareness training conducted annually by all staff through the CBT training. The frequency of the training was changed Mar 5, 2025, from every 5 years to every 2. All employees are current on the previous frequency and have been given 90 days to redo the training module now on the 2-year frequency.

The allergen program is reviewed annually as part of HACCP Team meeting for continued effectiveness and suitability - conducted Feb 4, 2025. The annual review is to ensure the effectiveness of existing control measures and the need for additional measures. The Corporate Allergen Control Plan is reviewed annually by the Director, Quality Affairs and Food Safety – the current annual review is underway.

h) This element does not apply to this client who is food chain category CIV.

One minor non-conformance identified within this element of the standard.

FSSC 22000 - Additional Requirements		Conform		Grade	If No – detail NC If a clause is N/A, provide a	NC#	
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification		
2.5.7	Environmental Monitoring (Only for categories BIII, C, I & K)						
2.5.7	Environmental monitoring	\boxtimes					

Summary:

Viewed corporate SOP-OIL-10, Rev 3 - Environmental Monitoring Program.

4 zones defined and testing frequencies determined corporately – scheduled to test every two weeks. Testing for Salmonella and Enterobacteriaceae.

Viewed tracking spreadsheet.

Zone 2 – 5 samples every two weeks.

Zone 3 – 3 samples monthly for salmonella.

Zone 4 – 2 samples monthly.

Sampling and testing process in place for micro (salmonella) in meal every switch over (weekly). Sampling taken place at set locations throughout the process where there may be issues of concern.

Viewed Micro Sample Results log – tracking results / trends. High risk serotypes are identified within the document. Viewed example results from Jan through Mar 2025 – some areas tested

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positive for salmonella. Summary of results were reviewed for 2024 found no new trends. Results in the fall were all negative.

Viewed example results from Jan 2025 through Mar 2025 – some areas tested positive for salmonella. No detection of Entero. Positive areas are recleaned and retested.

Summary of results were reviewed at year end 2024.

% compliance 2024

Z2 - 89,5%

Z3 - 79,3%

Z4 - 100%

The strike in 2024 resulted in additional cleaning, and even though additional areas were sampled in 2024, the results still improved.

Viewed Master Inspection and Test Plan – outlining routine sampling, frequency and test methods as well as location of results.

EMP program is reviewed annually as part of HACCP Team meeting program for continued effectiveness and suitability - conducted Feb 4, 2025. Testing sites reviewed for 2025 - no positive results in the past year.

	<u> </u>	1		1	results in the past year.									
FSSC 22000 - Additional		Confo	rm	Grade	If No – detail NC	NC#								
Requireme	Requirements				If a clause is N/A, provide a									
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification									
2.5.8	Food safety and Quality Culture													
2.5.8	Food Safety and Quality Culture	\boxtimes												

Summary:

Overall food safety and quality culture objectives have been established for all areas of the business as part of the food safety and quality culture plan.

The following objectives have been established:

- Food Safety Team Meetings targeting 10 monthly meetings per year with a standard agenda. 2024 achieved met target. Maintained objective for 2025.
- Food Safety Training for all staff cannot exceed 60 days overdue. On target in 2024 except for when there was a strike. The objective maintained for 2025. Currently on target except for a few modules that have had the frequency changed.
- Internal Audit Performance targeting 88-94% score. Last year achieved 98.48% on internal audit in Oct 21-23, 2024. Maintained objective for 2025.
- Mock Recall / incident 1 oil and 1 meal exercise to be completed once per year and one of them scored by the Food Safety Coordinators Target 90-94%. Mock recalls were completed for Nov 2024 scored at 100%. Objective maintained for 2025.
- Third Party Audit Performance targeting 90-94% score for certification audits and 85 94% for customer or regulatory audits. Last year NSF 97%, CFIA 100%, and no customer audits during 2024. Objective maintained for 2025.
- Customer Complaints Target 0.15% of total
- Internal KPI for pest control established at <13 per week.

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- Internal KPI for minimum 78% in each department on internal inspections. The KPI was achieved 89.15% in 2024 and maintained for 2025.

Objectives include action items, targets and timelines.

There have been many surveys conducted in the past year due to an ongoing merger discussion so senior management has decided to not implement a food safety culture survey at this point.

Food safety and quality culture is also incorporated into the internal audit checklist - questioning staff about buy in and feedback on the food safety program.

Food safety culture has been a focus of the organization as well as this location over the life of the FSMS.

A food safety bulletin board is used within the facility to provide common communication regarding the program – minutes are posted, corporate management review, objectives etc. There is strong support from corporate management and the food safety coordinators. Strong corporate support for the food safety program is evident through support of the program in relation to capital expense for repairs and improvements that can have a food safety impact. The facility was well maintained and employee interviews and observations during the audit all indicated strong employee engagement, understanding and buy in to the food safety controls implemented at the facility.

Toolbox meetings are conducted daily by the supervisors with operations staff, and this is the function used to communicate information about food safety and quality and to solicit feedback.

Production Supervisors e-mail a daily Production Report highlighting key production parameters and activities, issues, housekeeping activities and the toolbox topics from the previous day and daily QA testing results spreadsheets are also attached and sent out to all supervisors and management staff.

Daily manager's meetings are held at 9 each day – to review the results from the Production Report.

The organization has been continuously developing the food safety culture at this location since the implementation of a food safety management program.

There is strong communication throughout all departments of the facility. There is strong support from corporate management and the food safety coordinators for the program.

Communication of all food safety requirements and incidents to all staff is helping to drive improvement in the food safety culture within the facility. The engagement of the employees in addressing identified issues and updates to documents, procedures and activities is also helping drive improvements to the culture along with ongoing food safety training with all staff and strong staff involvement within internal audits.

Management support for the food safety program is evident through support of the program in relation to capital expense for repairs and improvements that can have a food safety impact. The facility is generally well maintained and employee interviews and observations during the audit all indicated strong employee engagement, understanding and buy in to the food safety controls implemented at the facility. The food safety objectives are also well defined and communications with actions, responsibilities and due dates and are targeted to improve food safety culture overall. No non-conformances identified within this element of the standard.

FSSC 22000 - Additional	Conform	Grade	If No – detail NC	NC#
Requirements				

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Clause	Requirement	Yes	No	Minor/ Major/ Critical	If a clause is N/A, provide a justification	
2.5.9	Quality Control					
2.5.9	Quality Control	\boxtimes				

Summary:

Verified the corporate food safety and quality policy in place meets the requirements of the standard. The food safety policy was last reviewed May 2024 – no changes required. The policy was last updated Sept 25, 2019, to ensure it addresses the requirements of the ISO 22000:2018 standard.

The policy is signed by the CEO and posted within the facility. The policy is reviewed annually during the corporate management review process.

Quality control procedures and parameters are integrated in operational procedures as well as lab procedures, receiving and load out procedures.

The following regular testing is conducted:

Meal and Oil - tested for residual hexane.

Oil tested once per shift and meal tested daily. Viewed records from Mar 2025.

Crude oil tested twice per day for specifications on the spec sheet.

RBD tank is tested daily for the full specifications on the spec sheet – results are recorded on the Testing Register (specification are built into the spreadsheet) – and results are also sent daily to all plant staff.

Results would be used to create CofA – viewed example from Mar 20, 2025 – Lot 250320056431 – levels are verified twice before signing off and distribution of the record.

Meal is tested twice per week for protein, moisture, fiber.

Meal samples are maintained for 2 months.

Finished oil samples are kept preload for 6 months.

GC verification conducted twice per year – viewed last results from Sep 2024.

Quality objective has been established for customer complaints.

No customer complaints (above target), – Target < 0.15% of the total number of shipments. This is the baseline target set for 2025.

Calibration:

Viewed Master Calibration List - Tracking Flow Meters and Scale Calibrations.

Viewed scale for load out for weighing of additives Oct 6, 2024 – annual.

Viewed Foss and GAC completed internally, and results sent to Regina corporate lab - monthly verification – viewed records from Jan through Mar 2025 – checking moisture on the GAC and doing protein and oil on the FOSS.

Finished Oil Samples - Karl Fisher - Annual Service - Jan 13, 2025.

Small balance scales - conducted by third party contractor Oct 6, 2024. External calibration completed at least annually.

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All temperature controls in the plant are maintained through the plant operating system that can track operational trends.

Temperature sending units are verified annually during maintenance shutdowns by third party contractor – Nov 2024.

Line change over procedures is recorded in the Canola to Soy Product Change List or the Soya to Canola Product Change List – (P-AE-1.004.fr-Liste de changement de produit Canola vers Soya-1.0.1 and P-AE-1.005.fr- Liste de changement de produit Soya vers Canola-1.0.1).

Viewed record completed for the Mar 19, 2025, change over.

There is no packaging used by this organization.

FSSC 22000 - Additional Requirements		Conform		Grade	If No – detail NC If a clause is N/A, provide a	NC#
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
2.5.10	Transport, Storage an	d Ware	housi	ng		
2.5.10	Transport, Storage and Warehousing	\boxtimes				

Summary:

Finished goods are stored at ambient temperatures. Procedures were established for the receiving of materials that was identified and records were available for the management of warehouse/storage activities.

A specified stock rotation system was in place to ensure a First-In, First-Out rotation for raw materials, and finished materials.

Prerequisite 16 Warehousing and Prerequisite 05 Layout of Premises and Workspace both address the organizations requirements for a FIFO stock rotation process. Statement within PRP 16 states: "where an input has an expiry date, it must be rotated based on a first expiry, first out (FEFO) basis."

b) & c) - element do not apply to this organization's food chain category.

Food safety risk plan - transportation Oilseed Processing - corporately developed – (Version 1 – Mar 13, 2024) that assesses potential risks and defines control measures in place such as, carrier agreements, previous load monitoring, wash certificate requirements and vehicle inspections prior to loading.

Carrier agreements that include previous load and clean out requirements are in place with any organization hired to haul product to or from a Viterra location.

FSSC 22000 Requireme) - Additional nts	nal Conform		Grade	If No – detail NC If a clause is N/A, provide a	NC#
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
2.5.11	Hazard Control and Measures for Preventing Cross-contamination					

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2.5.11	Hazard Control and	\boxtimes	Minor	Statement of Non-	3
	Measures for			Conformance:	
	preventing cross-			The organization did not	
	contamination			have controls in place for	
				foreign matter management	
				including procedures for the	
				management of all breakages	
				linked to potential physical	
				contamination (e.g., metal,	
				ceramic, hard plastic).	
				Objective Evidence:	
				Although the organization	
				addressed glass breakage in	
				the corporate PreReq 10 -	
				Measures for Cross	
				Contamination - the	
				prerequisite only indicated	
				that glass breakage would	
				need to be recorded in the	
				non-conformance log but did	
				not outline procedures for	
				the management of all	
				breakages linked to potential	
				physical contamination.	
				Evidence of correction	
				required.	
Summary	··				

Summary:

a) The facility does not package product.

Elements b), c) do not apply to this food chain category.

d) The organization has completed a detailed risk assessment included within their food safety (HACCP) plan and has determined there is no need for metal detection as this is a liquid process utilizing significant filtration prior to final shipping.

Oil Filtration – physical hazard – improper filtering of oil by allowing the impurities to pass through due to damage or improperly installed filter. Controlled through work instruction for Filter Change and the final oil inspection and test plan.

There has been a history of no significant foreign material found either internally or via customer complaints. Any impurities found in filters are very small <1mm and most customers also screen at offload.

Viewed:

Rail Car Load Out filter change recorded on L-FO-9.002.FR Liste Chargement Wagon 7.2 – tracking filter change and inspection after every 14 cars – includes an inspection of the filter at removal as well as tracking the lot# of the filter going in.

Viewed Liste de Chargement Camion Station (L-FO-8.002.FR, Rev Jan 28, 2021) 1 & 2 record of loading and filter change at oil truck loading station. Changing after 40 trucks or if an increase in pressure is identified.

See records reviewed in TS section 10 of this report.



Glass and Brittle Plastic:

Although the organization addressed glass breakage in the corporate PreReq 10 - Measures for Cross Contamination - the prerequisite only indicated that glass breakage would need to be recorded in the non-conformance log but did not outline procedures for the management of all breakages linked to potential physical contamination. See minor CAR.

Breakage would be recorded in the Non-Conformance log in Service Now – monitoring monthly during the facility inspection. There has been no breakage recorded in 2024 or YTD 2025.

Viewed glass and brittle plastic inventory maintained for the plant.

The inventory is audited as part of the monthly housekeeping audits – viewed Glass and Brittle Plastic Tour Guidance (S-PR-13.0002) – inspections completed as part of the monthly facility inspections.

Viewed example inspection – from Jan through Mar 2025.

One minor non-conformance identified within this element of the standard.

FSSC 22000 - Additional Requirements		Conform G		Grade	If No – detail NC If a clause is N/A, provide a	NC#		
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification			
2.5.12	2.5.12 PRP Verification (Food Chain Categories BIII, C, D, G, I & K)							
2.5.12	PRP Verification	\boxtimes						

Summary:

The organization has various established routine site inspection/PRP checks to verify that the site production environment and processing equipment are maintained in a suitable condition to ensure food safety.

Monitoring Effectiveness of Sanitation managed through Monthly Housekeeping Checklists. Viewed Monthly housekeeping inspection records completed by QA. The checklist also includes employee observations and other GMP inspections including glass and brittle plastic inspections. There is a set schedule for what area is being audited each month. Tracking closure of deficiencies through the monthly food safety meeting minutes. Areas of the facility audited as per the schedule include load out, receiving, plant, utilities (G&P) etc.

Internally trying to keep the housekeeping score above 78% - target achieved for 2024, target was maintained for 2025.

Viewed Refinery Internal Inspection Nov 2024 - 82.07%

Preparation Inspection - Dec 2024 - 100%

Preparation Inspection - Sep 2024 - 93.9%

Truck Load Out - Apr 2024 - 87.5%

Refinery - Feb 2025 - 2 items still open.

Satisfactory, Observation or NC results are sent to the manager of the department.

Pictures are included for clarity.

Observations or NCs are compiled in the summary file - viewed records for Jan through Mar 2025.

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Annual internal audit conducted Oct 21-23, 2024, by the Director, Quality Affairs and Food Safety.									
FSSC 22000) - Additional	Conform		Grade	If No – detail NC	NC#			
Requireme	nts				If a clause is NI/A provide a				
Clause	Requirement	Yes	No	Minor/ Major/ Critical	If a clause is N/A, provide a justification				
2.5.13	Product Design and D	evelopr	nent (Food Chai	n Categories BIII, C, D, E, F, I &	K)			
2.5.13	Product Design and Development	\boxtimes							
Summary: The organization has change control Process – VIT-PL-005 – in place. This procedure has been updated to address the requirements of this element of the standard focused typically on bringing in new commodities to a location. The use of this procedure has not been required at this location within the last year. The shelf life of finished product is monitored routinely for quality specifications – testing year old finished product monthly. There is no regulatory requirement for expiry dates on this bulk product.									
	does not produce any re			oroducts.					
FSSC 22000) - Additional	Confo	rm	Grade	If No – detail NC	NC#			
Requireme	nts				If a clause is N/A, provide a				
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification				
2.5.14	Health Status (Food C	hain Ca	tegor	y D)					
2.5.14	Health Status				N/A Not applicable to this				
Summary: N/A									
	able to this category. O - Additional	Confor	rm	Grade	If No – detail NC	NC#			
Requireme		Como		Grade	If a clause is N/A, provide a	14011			
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification				
2.5.15 Equipment Management (All Food Chain Categories, excluding FII)									

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2.5.15	Equipment Management	\boxtimes				
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Summary:

PRP 8.0 Equipment Suitability, Cleaning and Maintenance – has been updated to include a purchase specification that will be included in the planning process so that the food safety team will be involved. Evidence of the commissioning of new equipment must be maintained. This includes the tracking of waste or other material used to flush through the new equipment. The prerequisite further defines the standardization of the commissioning of new equipment to include the tracking of waste or other flush material through the new equipment. Addressed through QR-087 Commissioning Checklist, QR-088 Post Commissioning Checklist and Viterra-QR-083 Summary of Commissioning Activities.

At the time of this audit, this process has not yet been required by this location in the past year.

FSSC 22000 - Additional Requirements		Conform		Grade	If No – detail NC If a clause is N/A, provide a	NC#		
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification			
2.5.16	Food Loss and Waste (All Food Chain Categories, excluding category I)							
2.5.16	Food Loss and Waste	\boxtimes						

Summary:

Viewed Food Loss and Waste Policy and Objective - updated Jan 16, 2025.

Objective is for (Year 2) – Site will track the amount of product that is not fit for purpose and must be discarded as waste (sent to landfill).

Site is tracking this in SIPS as all disposal product is sent to a contract disposal organization that recycles the product into compost or industrial products – date, type of product for disposal, weight, destination.

Viterra is exploring strategies to repurpose, recycle, or recover product lost to the landfill where sites have seen excessive loss of product intended for human or animal consumption and where this makes sense.

Oil leakage procedure has been created: put back in the truck oil loading reception pit instead of the soap stock retention basin: improvements in loss management.

There is currently no applicable legislation regarding this product.

The processes are reviewed at least annually as part of the internal audit process.

FSSC 22000 - Additional Requirements		Confo	rm	Grade	If No – detail NC If a clause is N/A, provide a	NC#
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	

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2.5.17	Communication Requirements								
2.5.17	Communication Requirements	\boxtimes							
Summary:		4) a.a.d E	CEDD ((roy Mar 7, 2024) was up dated t	_			

FSP 27 Communication (Mar 7, 2024) and FSERP Contact list (rev. Mar 7, 2024) was updated to clarify the requirement to notify the certification body within 3 days of the commencement of the events or situations that affect food safety, legality and/or the integrity of certification.

The organization did inform the registrar within 3 days of the commencement of the strike that began last May 2024.

Also addressed in FSP 29 - Emergency Preparedness and Response.

EHS Emergency Response Plan and a Food Safety Emergency Response Plan are in place.

Viewed Food Safety Emergency Response Plan – Version Apr 6, 2018.

Viewed appendix A: Emergency contact list- oilseed processing- version Jun 13, 2023.

Verified Food Safety Emergency Contact List for the site – verified current list including contact information for the registrar and regulatory bodies. Last updated Aug 19, 2024.

Verified Emergency Response Plan – Last updated Apr 2024 and verified as posted throughout the facility.

FSSC 22000 - Additional Requirements		Conform		Grade	If No – detail NC	NC#	
Clause	Requirement	Yes	No	Minor/ Major/ Critical	If a clause is N/A, provide a justification		
2.5.18	Requirements for Organizations with Multi-site Certification (Food Category E, F & G)						
2.5.18.	Requirements for Organizations with Multi-site Certification				N/A Not applicable to this category.		
2.5.18.1	Central Function				N/A Not applicable to this category.		
2.5.18.2	Internal Audit Requirements				N/A Not applicable to this category.		
Summary: N/A Not applica	able to this category.		•				



ISO 22000:2018 - FOOD SAFETY MANAGEMENT SYSTEMS

ISO 22000:2018 - Food Safety Management Systems		Conform		Grade	If No – detail NC If a clause is N/A, provide a	NC#
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
4	Context of the organi	zation				
4.1	Understanding the organization and its context	\boxtimes				
4.2	Understanding the needs and expectations of interested parties	\boxtimes				
4.3	Determining the scope of the food safety management system	\boxtimes				
4.4	Food safety management system	\boxtimes				

Summary:

VITERRA has established a Food Safety and Quality Management System (FSQMS) to address the requirements of the FSSC 22000 Standard. The FSQMS determines external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended result(s) of its FSQMS. The FSQMS will:

- Identify the core business processes and their application.
- Determine external and internal issues relevant to its purpose and strategic direction.
- Monitor and review information on external and internal issues.
- Implement actions necessary to achieve planned results towards continual improvement of FSQMS.

The organization determines relevant interested parties, their requirements relevant to the FSQMS and monitors and reviews information about these parties. This includes relevant interested parties that provide significant risk to organizational sustainability if their needs and expectations are not met.

Viewed interested parties posted on Our Place – (includes farmers, corporate, regulatory bodies, etc.) and includes an outline of the parties' needs and expectations, inputs and outputs. The document was reviewed during the last planning session Dec 16-17, 2024.

Climate change assessment introduced corporately across all of Viterra - created May 10, 2024 - includes definition of the climate change, interested parties were reviewed as part of the environmental assessment, the goal of the assessment was to understand how climate change

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impacts their interested parties and their relationship. The list of interested parties was reviewed to determine who was impacted, how they were impacted and if there were any specific requirement from them. Includes impacts of farmers - including expectations, impaction and action to come out of assessment.

Farmers, Regulators, investors, customers, competitors, industry associations, top management. Through the assessment all interested parties have been reviewed and action plans in place to address the expectations and requirements. Currently there are no changes required to the Viterra food safety management system program.

The scope of the FSMS of certification is "Canola and Soybean processing facility producing RBD (refined, bleached and deodorized) canola and soybean oil and unprocessed by-products for use in the feed industry."

Generically the scope of the FSMS is described within the FMQMS Manual but the scope of the Becancour system is also described in the product description sections of the HACCP Plan.

The FSMS of Viterra Oilseed Processing – Becancour has five levels of documented information as outlined below:

- Food Safety and Quality Systems Manual (FSQSM) and Food Safety Policy
- System Procedures (MSPs and FSPs) & Risk Planning Documents
- HACCP Plan / Prerequisites (PRP's)
- Standard Operating Procedures (SOP's)
- Food Safety and Quality Records

The FSQMS has the following management and food safety system procedures that include:

- MSP-10 Control of Documents
- MSP-11 Control of Records
- MSP-12 Management Review
- MSP-13 Human Resources
- MSP-14 Internal Audit
- MSP-15 Control of Non-Conformances
- MSP-16 Continual Improvement
- MSP-17 Corrective Action
- MSP-18 Risk Based Thinking
- FSP 20 Customer Requirements and Communications
- FSP 21 Management of Purchased Materials
- FSP 22 Monitoring and Measuring
- FSP 23 Hazard Analysis and Verification Planning
- FSP 24 Prerequisite Program
- FSP 25 Traceability

SFCR - 7Y3BRX8R - Exp Jun 24, 2026

Quebec agriculture department license - Exp Jul 31, 2025

FDA Registration # XXXXX5437 - Dec 31, 2026

Halal – expired Dec 31, 2025

One customer audit completed in 2025 - no nonconformances issued.

CFIA - no audits in the past year just regular meal monitoring.

Kosher Certificate Expiry - Jul 31, 2025.

ISO 22000:2018 - Food Safety	Conform	Grade	lf No – detail NC	NC#
Management Systems				



Clause	Requirement	Yes	No	Minor/ Major/ Critical	If a clause is N/A, provide a justification	
5	Leadership					
5.1	Leadership and commitment	\boxtimes				
5.2	Policy	\boxtimes				
5.2.1	Establishing the food safety policy	\boxtimes				
5.2.2	Communicating the food safety policy	\boxtimes				
5.3	Organizational roles, responsibilities and authorities	\boxtimes				
5.3.1	Top management shall ensure that responsibilities and authorities for relevant roles are assigned, communicated and understood within the organization					
5.3.2	The food safety team leader shall be responsible for: a) - d)					
5.3.3	All persons shall have responsibility to report problem(s) with regards to the FSMS to identified person(s)					

Summary:

The overview of 'Leadership and Commitment' was covered in the FSQMS Manual and Management System Procedures and Food Safety Procedures that address the ISO 22000:2018 requirements of this section. Significant management commitment was demonstrated through the course of the audit.

Facility management clearly demonstrated an understanding and commitment to the FSMS during this audit. Interviews were conducted with the General Manager, Operations Managers, and the Director, Quality Affairs & Food Safety. The QA Manager and Lab Supervisor were fully involved in the entire audit process.

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Verified the corporate food safety and quality policy in place meets the requirements of the standard. The food safety policy was last reviewed May 2024 – no changes required. The policy was last updated Sept 25, 2019, to ensure it addresses the requirements of the ISO 22000:2018 standard.

The policy is signed by the CEO and posted within the facility. The policy is reviewed annually during the corporate management review process.

The commitment of resources included capital projects, preventive and corrective maintenance, monies and human resources for training and training materials.

The responsibility and authority of personnel in Viterra are depicted in the organizational chart (included in the FSQMS Manual) identifying typical reporting responsibilities along with an organizational structure at the plant level.

All staff members are responsible for awareness of their activities and how they contribute to the achievement of food safety and established objectives. The responsibilities outlined within this section of the manual also assist in the identification of training needs.

N.L is the Quality Assurance Manager and designated as the food safety team leader working in conjunction with Facility General Manager. The Quality Assurance Manager works closely with the Corporate Director, Quality Affairs and Food Safety in all areas of this Standard. This was explained as well as general food safety leader responsibilities were detailed in FSQMS manual.

All staff members are responsible for awareness of their activities and how they contribute to the achievement of food safety and established objectives. The responsibilities outlined within this section of the manual also assist in the identification of training needs.

All personnel are also empowered to initiate immediate action to prevent the occurrence of any non-conformances relating to the products, process and the FSQMS, stop and/or control further processing and shipping until the deficiency or unsatisfactory condition has been corrected or the hazard has been reduced to an acceptable tolerance. All employees will have the responsibility to report problem(s) regarding the FSQMS to their supervisor or the food safety team leader.

			Grade	If No – detail NC	NC#	
ISO 22000:2018 - Food Safety Management Systems		Conform		Grade	If a clause is N/A, provide a	NC#
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
6	Planning					
6.1	Actions to address risks and opportunities	\boxtimes				
6.1.1	When planning for the FSMS, the organization shall consider the issues referred to in 4.1 and the requirements in	\boxtimes				

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	4.2 and 4.3 and determine the risks and opportunities that need to be addressed to: a) - d)				
6.1.2	The organization shall plan: a) - b)		Minor	Statement of Non-Conformance: The location did not fully plan actions to address risks and opportunities identified during the Oilseed Group Planning session conducted Dec 16 & 17, 2024. Objective Evidence: During a review of the SWOT analysis conducted by the Oilseed Group on Dec 16 & 17, 2024 - a weakness/ risk was identified for the Becancour location in relation to challenges with the internal document structure (i.e. electronic record storage and retrievability). There was no evidence that actions to address this risk were planned, integrated and evaluated for effectiveness. Evidence of correction required.	1
6.1.3	The actions taken by the organization to address risks and opportunities shall be proportionate to: a) - c)	\boxtimes			
6.2	Objectives of the food safety management system and planning to achieve them	\boxtimes			
6.2.1	The organization shall establish objectives for the FSMS at	\boxtimes			

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	relevant functions and levels. The objectives of the FSMS shall: a) - f)				
6.2.2	When planning how to achieve its objectives for the FSMS, the organization shall determine: a) - e)				
6.3	Planning of changes	\boxtimes			

Summary:

The organization, when planning the FSQMS, considers external and internal issues, risks and opportunities to be addressed to:

- Provide assurance that the FSQMS can achieve its intended results.
- Enhance desirable effects.
- Prevent or reduce undesirable effects.
- Achieve improvement.

Viewed the SWOT analysis conducted Dec 16, 2024 – with the Oilseed Quality Group. Weaknesses, threats, and opportunities included:

- Opportunity PM program needs to improve, technical expertise to help with issues, standardized technical data sheets.
- Weakness lack of accountability from Union staff, update of all sites specific procedures required, internal document structure, data management (lacking ability to trend daily analysis).
- Threats Mentally overwhelmed management team, industrial water into oil, noise around the safety of canola oils.

Viewed meeting minutes from the annual review – Dec 16 & 17, 2024.

Prerequisites were reviewed by the oilseed group – only a minor change to PRP 13 in relation to portable bathrooms.

Food fraud vulnerability assessment was reviewed.

Inspection and test plans reviewed – focus on third party testing for label approval.

Viterra spec sheets reviewed.

Salmonella audit – conducted per site, annually.

Nuvolo work order update to standardize the cleaning sign off.

Rodent control trends – setting site specific KPIs – max 13 per week in Becancour).

Review of the training matrix frequencies – food defense training every 5 years and salmonella training to every 2 years.

The organization plans actions to address risks and opportunities and integrate, implements and evaluates actions within the FSQMS. Actions taken to address risks and opportunities are proportionate to the potential impact on food safety requirements, conformity of food products and services to customers and requirements of interested parties.

Action items (risk management plans) were to be addressed at individual plants during their HACCP Team meetings.

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During a review of the SWOT analysis conducted by the Oilseed Group on Dec 16 & 17, 2024 - a weakness/ risk was identified for the Becancour location in relation to challenges with the internal document structure (i.e. electronic record storage and retrievability). There was no evidence that actions to address this risk were planned, integrated and evaluated for effectiveness. See minor CAR.

Food Safety Objectives have been established corporately for the locations and tied to performance objectives for the location staff.

- Food Safety Team Meetings targeting 10 monthly meetings per year with a standard agenda. 2024 achieved met target. Maintained objective for 2025.
- Food Safety Training for all staff cannot exceed 60 days overdue. On target in 2024 except for when there was a strike. The objective maintained for 2025. Currently on target except for a few modules that have had the frequency changed.
- Internal Audit Performance targeting 88-94% score. Last year achieved 98.48% on internal audit in Oct 21-23, 2024. Maintained objective for 2025.
- Mock Recall / incident 1 oil and 1 meal exercise to be completed once per year and one of them scored by the Food Safety Coordinators Target 90-94%. Mock recalls were completed for Nov 2024 scored at 100%. Objective maintained for 2025.
- Third Party Audit Performance targeting 90-94% score for certification audits and 85 94% for customer or regulatory audits. Last year NSF 97%, CFIA 100%, and no customer audits during 2024. Objective maintained for 2025.
- Customer Complaints Target < 0.15% of total number of shipments
- Internal KPI for pest control established at <13 per week.
- Internal KPI for minimum 78% in each department on internal inspections. The KPI was achieved 89.15% in 2024 and maintained for 2025.

Change Control Process:

Viterra has established and maintains a food safety management system plan, which starts with long term planning, risk assessments and an annual review. Resources, responsibilities and authorities will be arranged and planned to meet business objectives. To maintain integrity of the planning process, the plan will be discussed, changes identified, and interactions between processes will be documented and communicated prior to execution. Risk assessments are completed at a Food Safety plan level to address changes to biological, chemical and/or physical hazards.

Viewed management of change 2025-01 – Mar 7, 2025 – New external storage facility to be approved for meal storage. Third Party hired to conduct an audit of the facility. Outstanding action item to providing labels to be attached to the manual BoLs and additional training. This facility was used in the past, so the risks associated with this change are considered minor. Viewed management of change 2024-17 – May 26, 2024 – risk assessment was created, and an extensive list of action items was created. The strike ended Sept 2024.

Notification was made to the registrar – May 28, 2024, by the Director of Quality.

Viewed allergen risk assessment completed for soybean reviewing all steps of the process from receiving to shipping. There were no significant risks identified as the product is fully refined and allergen free. This assessment was completed on Sept 6, 2023.

There have been no other significant changes or upgrades to the facility or system since the last external audit in 2024 that would require the use of a management of change.

One minor non-conformance identified within this element of the standard.



ISO 22000:20 Managemen	018 - Food Safety	Confo	rm	Grade	If No – detail NC	NC#
Clause	Requirement	Yes	No	Minor/	If a clause is N/A, provide a justification	
				Major/ Critical		
7	Support					
7.1	Resources	\boxtimes				
7.1.1	General	\boxtimes				
7.1.2	People	\boxtimes				
7.1.3	Infrastructure	\boxtimes				
7.1.4	Work environment	\boxtimes				
7.1.5	Externally developed elements of the FSMS	\boxtimes				
7.1.6	Control of externally provided processes, products or services					
7.2	Competence	\boxtimes				
7.3	Awareness	\boxtimes				
7.4	Communication	\boxtimes				
7.4.1	General	\boxtimes				
7.4.2	External communication	\boxtimes				
7.4.3	Internal communication	\boxtimes				
7.5	Documented information	\boxtimes				
7.5.1	General	\boxtimes				
7.5.2	Creating and updating	\boxtimes				



7.5.3	Control of documented information	\boxtimes			
7.5.3.1	Documented information required by the FSMS and by this document shall be controlled to ensure: a) - b)				
7.5.3.2	For the control of documented information, the organization shall address the following activities as applicable: a) - d)				

Summary:

The organization has determined the resources needed for the establishment, implementation and maintenance of the FSMS. The organization considers the capabilities and constraints internally and needs to be obtained from external resources.

People:

Viterra determines and provides the human resources necessary for the effective implementation of the FSQMS and control of its processes. Where the assistance of external experts is required, evidence of agreement or contracts defining the competency, responsibility and authority of external experts is retained as documented information.

Infrastructure:

Viterra provides the resources for the establishment, management, and maintenance of the work environment needed to implement the requirements of the standards they have adopted. The maintenance program will be reviewed during the onsite portion of the audit and records reviewed will be in section 8 of the TS checklist.

Work Environment:

A H & S department is in place corporately to provide and maintain the resources for the establishment, management and maintenance of the work environment necessary to achieve conformity with the requirements of the FSQMS.

Control of externally provided processes, products or services:

Addressed in PreReq 9 Management of Purchased Material. The purpose of this program is to ensure that all purchased materials and contracted services are provided by an approved vendor/supplier or in an emergency, appropriate procedures are followed when using non-approved suppliers.

The program describes the type and extent of controls applied to supplier selection, assessment and retention to ensure that suppliers being used have the capability to meet specified and verifiable requirements. Details of records reviewed is in section 9 of the TS checklist.

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Competence / Awareness:

Viterra ensures that all personnel, including the food safety team, performing work and/or who are responsible for the operation of the HACCP Plan, can affect food safety performance and effectiveness of the FSQMS (including external providers), are competent for the same based on appropriate education, training, skills and experience.

The food safety team has a combination of multi-disciplinary knowledge and experience in developing and implementing the FSQMS (including, but not limited to, the organization's products, processes, equipment and food safety hazards within the scope of the FSQMS). Food safety team training – N. L. Quality Assurance Manager – HACCP trained, PCQI certified. Verified the qualifications recorded on the HACCP Team Qualifications record.

Food Safety training is completed online in the LMS system Workday. Training requirements are established based on positions within the organization. Monthly an email is generated with all status of employee training to be completed.

Viewed Oilseed Processing Employee Training Matrix Established corporately – Viterra QR005A – Revised Mar 10, 2025.

Food Safety Management System Module, Prerequisite Module, Food Security Module, HACCP Training (every 3 years, for the HACCP Team), Non-conformance training. Viewed Workday training report – verifying compliance for all required computer-based training for all management / supervisor staff.

Verified the management team is current on all required modules as of Mar 2025. Some upcoming retraining due in the next 90 days because of the adjustment of frequencies in the latest training matrix.

New employee orientation process conducted with all new staff. Viewed program established for orientation training.

Viewed Training tracker - Work Day Report - sent weekly to all managers - listing expired and outstanding training. Mar 17, 2025 - no food safety training expired. Food Defense and Food Fraud Training re-assigned to most employees due to a change in frequency on the training matrix.

New employee - start date Dec 2, 2024 - Lab Tech - J.H. - Allergen training due Mar 2, 2025 - complete.

Lab Procedure training completed - Programme de Formation - sign off by employee when the procedure has been reviewed and sign off by the trainer when the procedure has been demonstrated proficiently.

Employee training conducted with all management staff used to load oil and meal during the strike. Signed off May and Jun 2024.

Viewed Contractor Training completed with all staff brought on site for repair work addressing additional food safety requirement. An orientation video is provided at the guard shack for all subcontractors and visitors who are not accompanied by a Viterra employee and is renewed every year. Viewed records tracking the last time each contractor was oriented.

Communications:

External communication concerning food safety (regulatory, statutory, customer, etc.) is managed corporately – and fed back to the plant during the monthly QA meetings or more frequently as required. Communication internally is addressed through monthly food safety meetings. Communication with staff can be facilitated with pre-shift meetings held daily.

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Monthly calls are held with the quality managers of the three crush plants to review ongoing food safety issues.

Food Safety Team Meetings – targeted monthly – corporately established agenda items – Form QR-037 – verified minutes in place for the last 12 months.

Previous action items, non-conformance, customer complaints, audits, pest control, maintenance, housekeeping etc. Key points are communicated to Corporate Manager monthly during regularly scheduled call.

Viewed Mar 5, 2025 - monthly meetings include review of previous action items, corrective and preventative action (review of customer complaints), nonconformance log reviewed, review of audits including external audits and internal audits conducted, review of pest control, review of monthly housekeeping- target minimum 78%, review of calibrations- all up to date as of current meeting, document revisions, food safety training, EMP follow up, MOC review, quality discussion, loss management (waste) review, and action items established.

Minutes are stored on the server with access for most managers.

Documented information:

Document revisions discussed monthly at food safety team meetings.

Corporate documents run through quality department and are available on Intranet.

Site specific documents are tracked by the location – Viewed QA Document Revision Log for 2024 - tracks corporate DRNs as well as site specific document changes.

Viewed records:

Chargement camion d'huile - L-FO-8.00.fr - Révision Déc. 2, 2024

Chargement wagon d'huile - L-FO-9.004.fr - Révision 1.07 Déc. 12, 2021

Liste de Chargement Camion Station - L-FO-8.002.FR - Révision Jan 28, 2021

Liste de changement de produit de soya vers canola - P-AE-1.005.fr - Révision 1.0.0 - Mar 14, 2023 Corporate SOP-OIL-10, Rev 3 - Environmental Monitoring Program

Viewed example of communication of document change for the product records - sent to all supervisors.

Viewed example DRN sent from corporate:

DRN93 Management Review Jun 20, 2024

DRN 87 - Food Safety Emergency Response Plan Appendix - Notification List - Mar 7, 2024 - updated to address AR 2.5.17.

DRN# 100 - Mar 10, 2025 - Training Matrix - updated frequencies of Allergen, Food Security and Salmonella training.

Verified links to the required external documents maintained on the Service Now internal site.

ISO 22000:2018 - Food Safety Management Systems		Conform		Grade	If No – detail NC	NC#			
Clause	Requirement	Yes	No	Minor/ Major/ Critical	If a clause is N/A, provide a justification				
8	Operation								
8.1	Operational planning	-		1		r			
	and control								



8.2.1	The organization shall establish, implement, maintain and update PRPs to facilitate the prevention and/or reduction of contaminants (incl food safety hazards) in the products, product processing and work environment				
8.2.2	The PRPs shall be: a) - d)	\boxtimes			
8.2.3	When selecting and/or establishing PRPs, the organization shall ensure that applicable statutory, regulatory and mutually agreed customer requirements are identified. The organization should consider: a) - b)				
8.2.4	When establishing PRPs the organization shall consider: a) - l)				
8.3	Traceability system	\boxtimes			
8.4	Emergency preparedness and response				
8.4.1	General	\boxtimes			
8.4.2	Handling of emergencies and incidents	\boxtimes			
8.5	Hazard control	\boxtimes			



8.5.1	Preliminary steps to enable hazard analysis	\boxtimes			
8.5.1.1	General	\boxtimes			
8.5.1.2	Characteristics of raw materials, ingredients and product contact materials	\boxtimes			
8.5.1.3	Characteristics of products	\boxtimes			
8.5.1.4	Intended use	\boxtimes			
8.5.1.5	Flow diagrams and description of processes	\boxtimes			
8.5.1.5.1	Preparation of the flow diagrams	\boxtimes			
8.5.1.5.2	On-site confirmation of the flow diagrams	\boxtimes			
8.5.1.5.3	Description of processes and process environment	\boxtimes			
8.5.2	Hazard analysis	\boxtimes			
8.5.2.1	General	\boxtimes			
8.5.2.2	Hazard identification and determination of acceptable levels	\boxtimes			
8.5.2.2.1	The organization shall identify and document all food safety hazards that are reasonably expected to occur in relation to the type of product, type of process and process environment. The				



	identification shall be based on: a) -e)			
8.5.2.2.2	The organization shall identify step(s) (e.g. receiving raw materials, processing, distribution and delivery) at which each food safety hazard can be present, be introduced, increase of persist. When identifying hazards the organization shall consider: a) - c)			
8.5.2.2.3	The organization shall determine the acceptable level in the product of each food safety hazard identified, whenever possible. When determining acceptable levels, the organization shall: a) - c)			
8.5.2.3	Hazard assessment	\boxtimes		
8.5.2.4	Selection and categorization of control measure(s)	\boxtimes		
8.5.2.4.1	Based on the hazard assessment, the organization shall select an appropriate control measure or combination of control measures that will be capable of preventing or reducing the identified significant food safety hazard to			



	defined acceptable levels				
8.5.2.4.2	In addition, for each control measure, the systematic approach shall include an assessment of the feasibility of: a) - c)				
8.5.3	Validation of control measure(s) and combination of control measures	\boxtimes			
8.5.4	Hazard control plan (HACCP/OPRP plan)			N/A as there are no CCP(s) or OPRP(s)	
8.5.4.1	General	\boxtimes			
8.5.4.2	Determination of critical limits and action criteria	\boxtimes			
8.5.4.3	Monitoring systems at CCPs and for OPRPs	\boxtimes			
8.5.4.4	Actions when critical limits or action criteria are not met	\boxtimes			
8.5.4.5	Implementation of the hazard control plan	\boxtimes			
8.6	Updating the information specifying the PRPs and the hazard control plan				
8.7	Control of monitoring and measuring	\boxtimes			
8.8	Verification related to PRPs and the hazard control plan	\boxtimes			
8.8.1	Verification	\boxtimes			



8.8.2	Analysis of results of verification activities	\boxtimes		
8.9	Control of product and process nonconformities	\boxtimes		
8.9.1	General	\boxtimes		
8.9.2	Corrections	\boxtimes		
8.9.2.1	The organization shall ensure that when critical limits at CCPs and/or action criteria for OPRPs are not met, the products affected are identified and controlled about their use and release			
8.9.2.2	When critical limits at CCPs are not met, affected products shall be identified and handled as potentially unsafe products (see 8.9.4)			
8.9.2.3	Where action criteria for an OPRP are not met, the following shall be carried out: a) - c)			
8.9.2.4	Documented information shall be retained to describe corrections made on nonconforming products and processes, including a) - c)			
8.9.3	Corrective actions	\boxtimes		



8.9.4	Handling of potentially unsafe products	\boxtimes		
8.9.4.1	General	\boxtimes		
8.9.4.2	Evaluation for release	\boxtimes		
8.9.4.3	Disposition of nonconforming products	\boxtimes		
8.9.5	Withdrawal/recall	\boxtimes		

Summary:

Prerequisite programs are established corporately within the crush division and rolled out to all plants – several updates rolled out Mar and Apr 2024 based on updates required for version 6. Prerequisites were reviewed by the oilseed group – Dec 16 & 17, 2024 - only a minor change to PRP 13 in relation to portable bathrooms.

Prerequisite 3.0 – Addresses the terms and definitions used within prerequisite documents and identifies how the programs are established to meet the requirements of ISO 22000 Clause 8.2 and ISO TS 22002-1.

The PRPs are designed to control hazards related to the personnel and to the environment (plant) and the likelihood of occurrences.

Food safety team is established and includes relevant functions from the plant including maintenance, purchasing etc. Team members and their qualifications are documented within the HACCP Plan.

Hazard Analysis HACCP Plan Verification Planning – online training module is conducted with all food safety team members – verified training complete with all members – requires 3-year refresher. Food safety team lead PCQI certified. Verified all team members current on required training.

Significant experience in the industry with the production manager and process supervisor. Verified Food Safety Team knowledge and experience record maintained in the system.

Traceability:

Traceability of the additives used in truck load out is tracked on the Liste De Consommation D'Additif – L-FO-7.777 to allow for traceability of the anti-foam and antioxidant used. Records for beta carotene addition are maintained on a spreadsheet within the lab as measurements are made and validated in the lab for these additions. Verification of volume is conducted each usage based on starting and ending inventory of the raw material. Traceability of processing aids into production is managed through Fiche consummation de poudres pendant le blanchiment - FFO-5.0031FR, Rev 1.05) - viewed records from Jan through Mar 2025.

Seed is traced through production batch records from SIPs receiving records. See section TS 15 Product Recall.

Emergency Preparedness and Response:

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EHS Emergency Response Plan and a Food Safety Emergency Response Plan are in place.

Viewed Food Safety Emergency Response Plan – Version Apr 6, 2018.

Viewed appendix A: Emergency contact list- oilseed processing- version Jun 13, 2023.

Verified Food Safety Emergency Contact List for the site – verified current list including contact information for the registrar and regulatory bodies. Last updated Aug 19, 2024.

Verified Emergency Response Plan – Last updated Apr 2024 and verified as posted throughout the facility.

Emergency response plan test conducted Dec 18, 2024 – successful exercise - viewed IIR4041955. Drill included a fictitious fire, the drill included assessment of food safety within the action items of the IIR.

Hazard Control:

There was a written HACCP procedure. Hazard Analysis / HACCP Plan / Verification Planning Procedure is contained within the FSP documents that gave a detailed overview of the HACCP Program. It had followed the guide of Codex Alimentarius and aligned according to the ISO 22000 Standard.

HACCP Plan – RBD Soya / Canola Oíl and Soya / Canola Meal – Mar 30, 2023. Observed signed, verified flow diagram signed off and maintained – Feb 4, 2025.

HACCP Team Review Meeting targeted at least annually.

Viewed HACCP Team Meeting – minutes recorded Feb 4, 2025 – includes a review of the food defense and food fraud assessments. Includes review of team member qualifications, review of incident reports/nonconformances and trends, review of internal and external audits, review of lab results for EMP, supplier issues of concerns, changes that may affect the program, planned changes, review of food security and food fraud- review of food defense plan- updated to address management changes.

Form 1 – Product descriptions in place addressing product characteristics, labeling instructions, allergens, shelf life, etc. The product has no shelf life related to food safety but will develop off flavor and odours within 1 year depending on storage conditions.

Form 2 identifies all incoming materials, ingredients, processing aids.

Oil filters are included as a product contact material in the HACCP Plan, verification of the product for food contact according to CFR 177.1520 – is on file.

COPA – Canadian Oilseed Processors - Residual limit of hexane is 10 PPM in finished oil. Testing extraction oil and meal for residue. Testing once per day in the crude oil and once per day for the meal.

RBD Soya Oil - no allergens as per CFIA requirements.

Canola Meal – sold into the animal feed market. Regulatory labeling requirements identified. Flow diagrams - shows where degummed oil, VOD and vegetable oil soap stock are released or removed from the process.

Hazard Analysis:

Seed receiving – biological hazard – presence/growth of pathogenic bacteria – controlled through PRP-016, previous load hauled and further processing. Verified Previous Load Matrix in use. Ingredient receiving – chemical hazard – cross contamination from the transport truck – controlled through PRP-016 Warehousing.

Raw Material Receiving Inspection Record – Verifies seal number on incoming truck and condition of truck and product (as applicable) at receiving.

Biocide addition (if needed) – biological hazard – presence of pathogenic bacteria due to inadequate application – microbial control program.

Viewed example reconciliation results:

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Verification of the application rate was last conducted Mar 17, 2025 – validating 2kg per ton and 5KG per ton.

Viewed spreadsheet tracking application rate – various dates through Dec 2024 through Mar 2025 – verified access to the Smart Tank tracking system used to calculate daily usage. Regulatory limits on Biocide Termin-8 liquid – mold inhibitor. Limit is <5kg per ton of finished meal.

Viewed Oil Shipping Truck Inspection record – showing evidence of tank inspection (wash certificate) incoming seal number verification and source tank.

Shipping - CoA – includes tank number, trailer number, seal numbers, and guaranteed analysis – sent with all truck load and e-mailed on rail shipments. See records in section 16 of TS Checklist.

Loading of Canola/Soybean Meal – Biological hazard – Possible pathogen contamination due to inadequate inspection of transport prior to loading – controlled through PRP 16 Warehousing. Reference document posted indicating acceptable and unacceptable previous loads within the scale house.

Load out filter change – Physical hazard – contamination from dust and other hazardous extraneous materials – controlled through PRP 11 and Filter Change Work Instruction and Allergen Control Program.

Rail Car Load Out filter change recorded on L-FO-9.002.FR Liste Chargement Wagon 7.2 – tracking filter change and inspection after every 14 cars – includes an inspection of the filter at removal as well as tracking the lot# of the filter going in.

Viewed Liste de Chargement Camion Station (L-FO-8.002.FR, Rev Jan 28, 2021) 1 & 2 record of loading and filter change at oil truck loading station. Changing after 40 trucks or if an increase in pressure is identified.

See records reviewed in TS section 10 of this report.

Calibration:

Viewed Master Calibration List – Tracking Flow Meters and Scale Calibrations.

Viewed scale for load out for weighing of additives Oct 6, 2024 – annual.

Viewed Foss and GAC completed internally, and results sent to Regina corporate lab - monthly verification – viewed records from Jan through Mar 2025 – checking moisture on the GAC and doing protein and oil on the FOSS.

Viewed Termin - 8 calibration records – third party contractor on site for PM check – Nov 1, 2023 – verification samples conducted annually.

Finished Oil Samples - Karl Fisher - Annual Service - Jan 13, 2025.

Small balance scales - conducted by third party contractor Oct 6, 2024. External calibration completed at least annually.

All temperature controls in the plant are maintained through the plant operating system that can track operational trends.

Temperature sending units are verified annually during maintenance shutdowns by third party contractor – Nov 2024.

Dockage tester verified by Quebec Ag annually – last completed Jul 17, 2024.

Handling of potentially unsafe products:

No CCPS or OPRPs within the HACCP plan.

The organization maintains a process to handle nonconforming products by taking action(s) to prevent the nonconforming product from entering the food chain until it can be determined if additional control is required or if the product still meets the defined acceptable level of the food safety hazard of concern despite the nonconformity. All finished product is placed on hold and



release based on testing/QA results. Once product specifications are confirmed, the product is released and made available within the inventory system.

Withdrawal / recall:

Mock recall exercise conducted twice per year. See TS report section 15.

Auditor ver	ification of CCP(s) and OPR	P(s)*						
CCP#/ OPRP#	Description of process step:	Critical limits or action criteria			Monitoring procedure, correc	Monitoring procedure, correction, and corrective action		
None identified.								
SO 22000:2	2018 - Food Safety	Confo	orm	Grade	If No – detail NC	NC#		
Management Systems		333		S. 5. 6. 5	If a clause is N/A, provide a			
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	1		
9	Performance evaluati	on						
9.1	Monitoring, measurement, analysis and evaluation	\boxtimes						
9.1.1	General	\boxtimes						
9.1.2	Analysis and evaluation	\boxtimes						
9.2	Internal audit	\boxtimes						
9.2.1	The organization shall conduct internal audits at planned intervals to provide information on whether the FSMS conforms to: a) - b)							
9.2.2	The organization shall a) - g)	\boxtimes						

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9.3	Management review	\boxtimes		
9.3.1	General	\boxtimes		
9.3.2	Management review input	\boxtimes		
9.3.3	Management review output	\boxtimes		

Summary:

Monitoring, Measuring, Analysis and Evaluation:

The organization conducts analysis and evaluation of appropriate data and information arising from monitoring and measurement, including the results of verification activities related to PRPs and the food safety plan (i.e., Monthly Housekeeping Inspections, objective tracking including the facility, daily housekeeping requirements, maintenance records, non-conformances (IIRs), internal audits and external audits). The results are reported to management and used as input to the management review and Food Safety team meetings to evaluate the effectiveness of the FSQMS and to ensure procedures and frequencies are followed, and effective, corrective actions are taken when issues occur, and staff are properly trained.

Internal Audit:

Internal Audit procedure established – MSP14 – Outlines Plan for audit program – managed corporately.

Viewed schedule – outlines target for Becancour – each Oct / Nov. The location is targeted at least once per year – auditing all elements every year.

Internal Audit – Conducted October 21-23, 2024, by the Director, Quality Affairs and Food Safety. Verified auditor training / qualifications and verified impartiality was addressed. The internal audit checklist was updated Oct 21, 2024, by the corporate group to address changes required from the past audit cycle.

The audit was scored at 98.48%.

The lowest scores were documented in Load out, laboratory, process facilities. 0 minor non-conformances were noted.

Concern:

- 1) Environmental samples are not being taken as required on the Zone 4 or raw materials.
- 2) There was an excessive number of cobwebs noted in the loadout areas. There was some loose insulation noted in the truck oil load out office.

OFIs:

- 1) Consider adding cleaning of the loading arm into your sanitation plan somewhere as the arm in rail oil loadout had some debris on it.
- 2) An overhead door at the meal shed has gaps along the bottom and the one side.
- 3) During the tour we noted some hoses and air wands with the ends touching or laying on the ground.
- 4) Evidence of the inspection of the work area is not available in the Nuvolo PM task list (it is found in the Safe Work Permits). Discuss adding this with automation.
- 5) As discussed during the audit, consider adding reference to the PO # on the receiving inspection forms so there is a clear connection between the PO and the inspection of the product ordered.



The OFIs and reminders have all been addressed within the action item list. The audit was reviewed during the food safety meeting in Nov 2024.

Management Review:

The Corporate management review is communicated from the Director, Quality Affairs and Food Safety annually. The management review procedure is outlined within MSP 12 which meets the requirements of the standard. Top management will review the organization's food safety management system at planned intervals to ensure its continuing suitability, adequacy, and effectiveness.

Reviews are hosted in three forums:

- A. Corporate Management Review
- B. Monthly Food Safety Team meetings at the locations.
- C. Annual HACCP Team Meeting at the location.

Viewed the May 28, 2024, report summarizing the period of May 1, 2023, through Apr 30, 2024. This was the overall corporate review of the food safety program targeting senior management and the board of directors. Verified access to the report on Our Place and communication of the report through a Document Revision Notice from corporate. The document is further reviewed by the location Food Safety Team.

The document is further reviewed by the location management.

Verified review of DRN# 449 issued Jun 17, 2024, was reviewed by the plant management Jun 21, 2024, and posted on the food safety bulletin board.

A HACCP Team Meeting was conducted Feb 4, 2025 - qualifications of the HACCP team were reviewed (Food Safety Team Qualifications Document), previous action items, review of incident reports (16 documented in the past year - no significant food safety incidents in the past year), non-conformance review – no trends identified, audit results, pest management trends, laboratory results and updates this year and magnet cleaning results, lab results (EMP results & baseline residue testing), supplier issues (pest control results), risk assessment review, capital project review (equipment updates), HACCP Plan review (sign off of the flow diagram), food defense and food fraud assessment and action items established. Action items are all complete. In depth review of the HACCP plan to be undertaken throughout the next year to ensure adequacy.

Food safety meeting minutes were reviewed under ISO section 7 of this report.

ISO 22000:2018 - Food Safety Management Systems		Conform		Grade	If No – detail NC	NC#
Clause	Requirement	Yes	No	Minor/ Major/ Critical	If a clause is N/A, provide a justification	
10	Improvement					
10.1	Nonconformity and corrective action	\boxtimes				
10.1.1	When a nonconformity occurs, the	\boxtimes				

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	organization shall: a) - e)			
10.1.2	The organization shall retain documented information as evidence of: a) - b)			
10.2	Continual improvement	\boxtimes		
10.3	Update of the food management system	\boxtimes		

Summary:

Incident Reports are recorded within the "Service Now" corporate database.

The procedure is addressed in MSP 15 – Control of Non-Conforming Product.

Viewed Incident reports in Service Now for the past year.

IIR#4042496 – Mar 12, 2025 – customer complaint – their filters have small particles following two railcar unloads. Flagged the car for inspection when it returns to sight. Reviewed retained samples and nothing found and filter tests results from last year were reviewed. Awaiting the customer to submit a sample of the particulate that was found. No other similar complaints have been received.

IIR#4042251 – Jan 14, 2024 – customer complaint – COA for a truckload of oil identified additives when the customer did not order additives. The logistics order and paperwork identified that no additives were used. The issue was that the lab used the wrong template for the CofA as the customer changed their order during the day. The issue was reviewed / retrained with the lab technicians. Issue closed

IIR#4041989 – Dec 23, 2024 – customer complaint – Load of canola meal was observed to be lighter than other orders. Testing verified the product was on spec, so the customer accepted the load.

IIR#4041862 – Nov 14, 2024 – customer complaint – customer found a piece of metal/plastic on their grid after unloading soya meal. The load out conveyor was inspected an no pieces were missing. Closed Feb 10, 2025.

Viewed Non-Conformance Log within Service Now – records from Apr 2024 through Mar 2025. Typically, documentation issues but the system is also used to record glass breakage when it occurs.

5 issues in 2025 related to lumps in the soybean meal shipments. The issues were elevated to an IIR – the decision was made to empty the soybean meal silo – and inspect for possible issues. There was no broken glass or brittle plastics issues recorded in 2024 or YTD 2025.

Continual Improvement:

Ongoing changes occurring throughout the year to the food safety management system. Changes are documented through the facilities change control processes and revision notices. Update of the food safety management system:

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The systems in place showed that there was a culture of 'Continual Improvement', and there were clear plans to make sure that the Food Safety Management System will be updated according to the requirements of the FSSC Standard. The system and program are updated based on indications from:

- -annual HACCP team meeting,
- -annual prerequisite program review,
- -input from internal and external communications indicating changes needed,
- -input from verification processes where changes are needed/required (i.e., management of change)
- -outputs from Management Reviews and food safety meetings, outputs from internal and external audits

All the issues from the internal audit, external audits and complaints from the last year were addressed successfully.

ISO/TS 22002-1:2009 - FOOD MANUFACTURING

Manufact		Confo		Grade	If No – detail NC If a clause is N/A, provide a	NC #
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
4	Construction and layout	of build	dings			
4.1	General requirements	\boxtimes				
4.2	Environment	\boxtimes				
4.3	Locations of establishments	\boxtimes				

Summary:

This element is addressed in Prerequisite 4 - Construction and Layout of Buildings.

The site boundaries are clearly identified and fenced with access to the buildings controlled through locked doors with swipe card access.

Access to the site is through the guard shack with ID verification required.

The site was maintained in good order. Roads, yards and parking areas were being maintained and designed with basic drainage to prevent issues with cross contamination.

Grounds were clearing of winter snow cover but overall, well maintained.

Location buildings are surrounded by pavement and gravel which helps to facilitate cleaning and prevent rodent infestation.

No surrounding hazards observed in this industrial setting.

ISO/TS 22 Manufact	2002-1:2009 - Food	Confo	rm	Grade	If No – detail NC	NC #
Clause	Requirement	Yes	No	Minor/ Major/ Critical	If a clause is N/A, provide a justification	"

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5	Layout of premises and	worksp	ace			
5.1	General requirements	\boxtimes				
5.2	Internal design, layout and traffic patterns	\boxtimes				
5.3	Internal structures and fittings	\boxtimes				
5.4	Location of equipment	\boxtimes				
5.5	Laboratory facilities	\boxtimes				
5.6	Temporary or mobile premises and vending machines	\boxtimes				
5.7	Storage of food, packaging materials, ingredients and non- food chemicals	\boxtimes				
manufact	nal design, layout and traffic	•			n a manner that allowed for goo of people around the equipment	
in proces The ceilin The equip considere The labor	sing areas. gs in the processing area ar oment in the processing are ed to be well maintained.	e cleana as was i n the fa	able. in goo	d conditior	essible directly from the product	
	ing machines were in the m I did not appear to pose a ri				om; these appeared to be in go	od
_	_			•	ate area sufficient for this purpondle any packaging materials.	ose,
	.002-1:2009 - Food	Confo	rm	Grade	If No – detail NC	NC
Manufact	uring				If a clause is N/A, provide a	#
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
6	Utilities – air, water, ene	rgy				



6.1	General requirements	\boxtimes		
6.2	Water supply	\boxtimes		
6.3	Boiler chemicals	\boxtimes		
6.4	Air quality and ventilation	\boxtimes		
6.5	Compressed air and other gases	\boxtimes		
6.6	Lighting	\boxtimes		

Summary:

Water - source for water is the town of Becancour.

Facility testing the water annually. Viewed water testing – Feb 27, 2025 - no issues or concerns. Annual 2024 test sent out and awaiting results. Testing for total coliforms, TPC and E Coli. Negative. All results were acceptable based on Health Canada standards.

Testing lab was E – verified compliance to ISO 17025- expiry Jun 20, 2026.

Boiler Chemical – verified products maintained on the Approved Ingredient and processing Aid Supplier Matrix.

Supplier S. – approved for boiler chemicals - verified Letter of Guarantee updated annually. Verified current documents available on the summary spreadsheet. Viewed Amercor 8750, Amersite 99 and Amertrol HT3010- boiler chemicals used for food contact. Approved within the system as food grade. Viewed Appendix 1: supplier documentation matrix- G6 rating- food grade approved.

Ventilation openings observed were filtered, all exhaust ports observed were screened to prevent entry by pests. Air compressors are included in the maintenance schedule and include water separators and oil filters. Compressed air poses no risk to food safety.

Compressed Gas – Nitrogen for blanketing storage tanks and rail cars at shipping. Supplier –L – LOG - Oct 5, 2022 (updated every three years) and third-party certification FSSC 22000 - current.

Viewed Approved Ingredient and Processing Aid list – updated regularly by QA and used by procurement. Identifies primary and secondary suppliers with links to all approval documentation.

Light fixtures observed during the facility tour were protected with shatter proof globes or covers. Lighting level were deemed to be adequate to the nature of the operations and adequate for cleaning and inspection purposes.

ISO/TS 22 Manufact	2002-1:2009 - Food Euring	Confo	rm	Grade	If No – detail NC If a clause is N/A, provide a	NC #
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	

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7	Waste disposal					
7.1	General requirements	\boxtimes				
7.2	Containers for waste and inedible or hazardous substances	\boxtimes				
7.3	Waste management and removal	\boxtimes				
7.4	Drains and drainage	\boxtimes				
Waste co for their i All waste company There is r	rs observed in the plant are rs observed in the Oil intended purpose. is transferred to external dur. no packaging material used s pass over any production a	Truck lumpste	oad Ors and	ut Shed an removed b	e. Indicrush plant were clearly label By an approved waste removal Indicate the special second disposal. Indicate the special second disposal of the special second disposal of the special second disposal.	
	2002-1:2009 - Food	Confo	rm	Grade	If No – detail NC	NC
130,13 ==					ii iio actaii iic	110
Manufact						#
		Yes	No	Minor/ Major/ Critical	If a clause is N/A, provide a justification	
Manufact	turing			Major/ Critical	If a clause is N/A, provide a justification	
Manufact Clause	Requirement			Major/ Critical	If a clause is N/A, provide a justification	
Manufact Clause 8	Requirement Equipment suitability, cl	eaning		Major/ Critical	If a clause is N/A, provide a justification	
Clause 8 8.1	Requirement Equipment suitability, cl General requirements	eaning		Major/ Critical	If a clause is N/A, provide a justification	
Clause 8 8.1 8.2	Requirement Equipment suitability, cl General requirements Hygienic design	eaning		Major/ Critical	If a clause is N/A, provide a justification	
Manufact Clause 8 8.1 8.2 8.3	Requirement Equipment suitability, cl General requirements Hygienic design Product contact surfaces Temperature control and monitoring	eaning		Major/ Critical	If a clause is N/A, provide a justification	
Manufact Clause 8 8.1 8.2 8.3	Requirement Equipment suitability, cl General requirements Hygienic design Product contact surfaces Temperature control and monitoring equipment Cleaning plant, utensils	eaning		Major/ Critical	If a clause is N/A, provide a justification	



All areas of the plant have surfaces designed for ease of cleaning. All food contact surfaces observed were designed and constructed to not be affected by the cleaning system. No pitting or rust were observed – observed seed receiving pit, presses, flakers and decanter open for maintenance.

The chemicals used in the oil truck loading shed were clearly identified as food grade and non-food grade and stored in a clean, labeled cabinet.

All equipment was designed to promote ease of cleaning and to minimize contact by employees – the system is almost entirely enclosed.

All temperature controls are maintained through the plant operating system that can track operational trends. Temperature sensors are calibrated annually during shut down – calibration report on file – Nov 11-21, 2024. Last shut down was Nov 2024 targeted for next shut down Sept 2025.

Air compressors used within the facility are not food contact.

Maintenance staff includes 11 mechanics, 5 electricians, 6 boiler house and 6 supervisors. Maintenance staff are required to complete food safety refresher training specific to maintenance staff. Viewed Training tracker - Work Day Report - sent weekly to all managers - listing expired and outstanding training. Mar 17, 2025 - no food safety training expired.

Maintenance PM'S are recorded in Nuvolo.

A master list of equipment has been established with identified frequencies and required inspection tasks.

Just finished a complete review of mechanical PMs to clean up the information.

Two type or PMs – routes when equipment is running and full inspection when equipment is shut down.

Generating hard copy work orders – technicians fill out and return the work order to the supervisors to completed and close within Nuvolo.

Additional work would trigger a corrective work order.

Corrective work orders can also be triggered by operations.

Daily meeting at 2:30 to discussion planned corrections and new requests with operations. The meeting involves supervisors, logistics manager and production supervisor and manager.

Lubrications are included in the PM tasks lists.

Viewed example PM work order – 193227 – Planned Jan 2025 – completed and closed. Includes lubricants required for specific tasks. Closed and signed off on Nuvolo.

Viewed Corrective Work Order – 212296 – Planned Apr 23, 2025 – pending repair on the flaking Mill.

Contractors – are assigned to an area supervisor, orientation is conducted at the guard house, and they are always working under a safe work permit. Includes H & S and food safety orientation. Viewed spreadsheet used to track the annual renewal of the contractor orientation.

Viewed Nuvolo dashboard – 21 open PM routes and 319 open Corrective Work Orders (list is being reviewed and cleaned up).

Viewed weekly Maintenance scheduled that is reviewed daily during the operations meetings.



The schedule is coordinated through the maintenance scheduler, this is created weekly. Some equipment is monitored for run time through the PLC to trigger maintenance frequencies. The planner distributes PMs to the supervisors.

Monthly an equipment reliability specialist completes ultrasound checks throughout the facility. When equipment is opened and/or for food contact an inspection is completed and disinfected (where required).

Food grade lubricants are used in areas of risk – e.g., DTDC. Most bearings are external to the process therefore lower risk.

Viewed the approved chemicals- Viewed Amercor 8750, Amersite 99 and Amertrol HT3010- boiler chemicals used for food contact. Approved within the system as food grade.

The procedure for releasing maintained equipment back to production is well defined with records to support the required activities. Records of inspection are recorded on a checklist on the work order from Avantis and or Nuvolo or on the work permit. Safe Work Permits are used to manage risk assessment and include evidence of cleaning and inspection. Viewed 5 example SWP from Jan 2025.

ISO/TS 22 Manufact	2002-1:2009 - Food turing	Confo	rm	Grade	If No – detail NC If a clause is N/A, provide a	NC #	
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification		
9	Management of purchased materials						
9.1	General requirements	\boxtimes					
9.2	Selection and management of suppliers	\boxtimes					
9.3	Incoming material requirements (raw/ingredients/ packaging)	\boxtimes					

Summary:

Addressed in Food Safety Management Procedure - PRP - 9.

Some corporate control through FSP 21 – defining corporate and location responsibilities.

Critical versus non-critical suppliers – identified within the system.

Viewed 2024 Approved Ingredient / Supplier Matrix spreadsheet used to manage status of vendor approval and documentation on hand. Tracking annual review of approval status and documentation collected from all suppliers. List is reviewed monthly by QA to assess upcoming requirements. All required documents continuously being updated for certifications etc.

Perlite Supplier – G.F. – LOG – Feb 11, 2025, Questionnaire completed Oct 20, 2023, no certification and updated specification sheet on file.



Viewed anti foam supplier- U- last updated- supplied questionnaire- Dec 12, 2023, third party audit certificate - ISO 9001- expiry Aug 6, 2025, LOG and Specification on file).

Viewed bleaching clay- supplier O - last updated Oct 5, 2022, HACCP certification - expiry Jul 23, 2027, LOG – Dec 13, 2024.

Viewed BHT- supplier C - supplier questionnaire expiry Oct 4, 2027, LOG Aug 2025, SQF certified-expiry Dec 25, 2025.

There were no new suppliers added for 2024.

Suppliers are evaluated at least annually using the stakeholder evaluation and results are fed into the Supplier Scorecard to assess results year over year and to identify trends. Stakeholder evaluations are completed by the Purchasing Manager with input from the QA Manager to assess annual performance. An issue log within the scorecard is used to track minor occurrences throughout the year. Viewed stakeholder evaluations completed for all the third-party labs used by the location and sent to corporate QA how evaluates the labs for the entire company.

Viewed stakeholder evaluations for the suppliers used at the plant level – completed Jan 2, 2025. Viewed supplier O (pest control) stakeholder evaluation - scored lower from previous year as the food safety was decreased due to technician performance.

Viewed scorecard last updated Jan 16, 2025, for the annual review. Supplier Stakeholder Evaluation used by the Procurement Manager and QA Manager to provide ranking. Viewed evaluations for 18 suppliers.

Purchase orders are sent to suppliers for approved ingredients. A CofA is received in advance of product delivery and stored on the server for the lab to have access to approve incoming ingredient samples.

Incoming Loads are inspected by the receiving staff prior to unload and recorded on the appropriate inspection record. Pre-unload tests are completed by the lab prior to unloading for select ingredients.

Unload sheet – Reception et refus de Matieres Premieres camions (f-fo-5.003.fr) - used to inspect the product prior to unloading. Scale house has list of approved suppliers and raw material orders to verify when trucks arrive.

Viewed receiving of phosphoric acid on Jan 9, 2025 - included COA for each lot received. Viewed receiving of caustic Soda on Jan 6, 2025 - included COA for the lot received as well as the lab check on the concentration.

Viewed receiving of bleaching clay from Jan 21, 2025, and Jan 3, 2025.

Viewed additional receiving records for processing aids from Jan through Mar 2025.

Vendor issues identified within the receiving inspection would be brought back to the quality department and the Procurement Manager.

Management of Services Documents are maintained to outline service providers, what the control measures are and who manages those requirements.

Transportation service providers are managed by the commercial risk management group. Any maintenance services will work with onsite maintenance staff who will manage the maintenance activities. No packaging material used at this site.

All external laboratories used for micro analysis are approved to ISO 17025.

Observed truck seed receiving within the seed shed.

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Interviewed scale house staff in relation to previous load hauled verification prior to sending the truck to the grading shack.

Seed receiving truck - collect order number, transport company, previous load. Any out of tolerance loads are verified by a supervisor prior to unload – viewed numerous example emails circulating during the audit.

Viewed Feuille Entrée Camionneur records used to record previous load hauled – linking to the SIPs receiving record. Traceability of the unloaded truckload is managed in SIPs linked through the order number on the Truck Entry Sheet. Viewed example records – Feuille Entrée Camionneur (L-FO-13.3.001.FR, Rev 6.3) – previous load records – viewed records from Jan through Mar 2025 - evidence of previous load and clean out acceptable based on the acceptable load list posted in the scale house.

Manufac		Confo		Grade	If No – detail NC If a clause is N/A, provide a	NC #
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
10	Measures for prevention	of cros	ss con	taminatio	n	
10.1	General requirements	\boxtimes				
10.2	Microbiological cross contamination	\boxtimes				
10.3	Allergen management	\boxtimes				
10.4	Physical contamination	\boxtimes				

Summary:

Sampling and testing process in place for micro (salmonella) in meal every week. Sampling taken place at set locations throughout the process where there may be issues of concern.

Viewed Micro Sample Results log – tracking results / trends. High risk serotypes are identified within the document.

Viewed example results from Jan through Mar 2025 – some areas tested positive for salmonella. Summary of results were reviewed for 2024 found no new trends. Results in the fall were all negative.

Viewed Master Inspection and Test Plan – outlining routine sampling, frequency and test methods as well as location of results.

Viewed daily sampling reports including testing for residual hexane once daily for crude oil and twice daily for meal. Viewed tracking results from the daily lab report from Jan through Feb 2025 – results within tolerance. Oil results are always within tolerance.

Viewed Corporate Allergen Control Plan – Rev Feb 15, 2024 – defining the corporate requirements for allergen control at all company facilities.

Viewed Allergen / Sensitivity Assessment (Soya Oil and Canola Oil) last updated Jul 16, 2024, to be sent to customers upon request.

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Soybeans, soya dust and dockage found in incoming seed are the only contaminates used on site. Allergen training is included for all staff as well.

Viewed additional allergen risk assessment completed by the facility Sept 6, 2023.

Allergen Control Program Includes identification of soya receiving / segregation and risk of dust contamination at finished oil filter change.

Control measure is identified within the HACCP plan through filter changes procedures.

Worldwide Food Safety Agencies recognize RBD oil as not representing any allergenic risk.

Physical Contamination controlled through - magnet use for meal and filters for oil.

Equipment protection only. No magnets used in finished product flow. Magnets are being cleaned and inspected during product changeover.

Product change over record to include documenting of magnet inspections. Viewed record from Mar 19, 2025.

Viewed magnet pull tests being completed every two weeks - viewed results from Jan 2024 through Mar 2025 – monitoring for a drop in strength.

Viewed Liste de Chargement Camion Station (L-FO-8.002.FR, Rev Jan 28, 2021) 1 & 2 record of loading and filter change at oil truck loading station. Changing after 40 trucks or if an increase in pressure is identified. Viewed records from Jan through Mar 2025. Includes a record of the lot number of the replacement filters as well as the condition of the filters being removed and an inspection to ensure there are no holes as well as evidence of traceability to source tank for load out.

Rail cars filters are changed at least every 14 rail cars (L-FO-9.002.FR Liste chargement wagon 7.2, Oct 6, 2022) Viewed records from Jan through Mar 2025 – included filter inspection at the time of change.

Viewed glass and brittle plastic inventory maintained for the plant.

The non-conformance log would be used to track breakage. There has been no breakage recorded in 2024 or YTD 2025.

Breakage procedure is partly defined in PRP 10 - Measures for prevention of cross contamination. The inventory is audited as part of the monthly housekeeping audits – viewed Glass and Brittle Plastic Tour Guidance (S-PR-13.0002) – inspections completed as part of the monthly facility inspections.

Viewed example inspection – from Jan through Mar 2025.

ISO/TS 22 Manufact	2002-1:2009 - Food turing	Confo	rm	Grade	If No – detail NC If a clause is N/A, provide a	NC #
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
11	Cleaning and sanitizing					
11.1	General requirements	\boxtimes				

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11.3	Cleaning and sanitizing programmes	\boxtimes		
11.4	Cleaning in place (CIP) systems	\boxtimes		
11.5	Monitoring sanitation effectiveness	\boxtimes		

Summary:

Program established by area within the plant. Schedules are established outlining required tasks. Employee's sign off on completion of the tasks and supervisors verify daily.

Viewed example records for the following areas from Oct 2024 through Feb 2025:

Preparation Area

Extraction Area

Refinery

Seed receiving/ meal load out

Oil Load Out

New meal loads out

CIP systems in place for economizer, centrifuge, deodorizer (as required) and piping typically once per month. No set frequency viewed CIP calendar for 2024.

Process manager records evidence of the CIP's when they occur within the CIP calendar.

Viewed CIP- centrifuge Jul 24, 2024 (F-PR-2.001.FR, 1, Nov 9, 2016). If an improper CIP is completed this will be captured within the overall final oil sample.

Monitoring Effectiveness of Sanitation managed through Monthly Housekeeping Checklists. Viewed Monthly housekeeping inspection records completed by QA. The checklist also includes employee observations and other GMP inspections including glass and brittle plastic inspections. There is a set schedule for what area is being audited each month. Tracking closure of deficiencies through the monthly food safety meeting minutes. Areas of the facility audited as per the schedule include load out, receiving, plant, utilities (G&P) etc.

Internally trying to keep the housekeeping score above 78% - target achieved for 2024, target was maintained for 2025.

Viewed Refinery Internal Inspection Nov 2024 - 82.07%

Preparation Inspection - Dec 2024 - 100%

Preparation Inspection - Sep 2024 - 93.9%

Truck Load Out - Apr 2024 - 87.5%

Refinery - Feb 2025 - 2 items still open.

Comparing monthly results to previous inspections to ensure proper closure of items that were found deficient.

Also now monitoring effectiveness through the environmental monitoring process – see FSSC Additional requirements section 2.5.7.

ISO/TS 22002-1:2009 - Food	Conform	Grade	lf No – detail NC	NC
Manufacturing				#



Clause	Requirement	Yes	No	Minor/ Major/ Critical	If a clause is N/A, provide a justification
12	Pest control				
12.1	General requirements	\boxtimes			
12.2	Pest control programs	\boxtimes			
12.3	Preventing access	\boxtimes			
12.4	Harborage and infestations	\boxtimes			
12.5	Monitoring and detection	\boxtimes			
12.6	Eradication	\boxtimes			
external Contract Verified Verified	y O- third party contractor – bait stations. reviewed Oct 18, 2024. The site map updated Feb 19, 20	contrac 25. update	t outli	nes /scope 2024 – Cor	internal traps and monthly for of service as well as approved bait. htract Block, Dragnet, Maxforce, etc. y 18, 2026

Company License current until Jun 3, 2025.

Verified trap placements in refinery and oil load out.

Insurance current to Jan 1, 2026.

Annual program audit completed by the service provider Sep 26, 2024 – highest level of capture on the second floor of crush. The technician is working to determine if there is any reason for this.

Viewed pesticide usage log- viewed Jun and Aug 2024 - includes method, quantity, target pest and dosage for spider treatment.

Viewed service reports available online – Jan through Mar 2025.

Viewed trending on the online portal provided by the third-party company. Trending for all pest monitored throughout the year i.e. house flies, beetles, mice etc.

Internal tracking spreadsheet also created for tracking the KI that been established to maintain less than 13 captures per week. Currently trending below the established trend.

Verified technician performance recently by placing business cards in random traps.

Work has been working ongoing for pigeon control – particularly near the load out building as numbers increased during the strike last year.

ISO/TS 22002-1:2009 - Food	Conform	Grade	If No – detail NC	NC
Manufacturing				#



Clause	Requirement	Yes	No	Minor/ Major/ Critical	If a clause is N/A, provide a justification	
13	Personnel hygiene and e	mploye	ee faci	lities		
13.1	General requirements	\boxtimes				
13.2	Personnel hygiene facilities and toilets	\boxtimes				
13.3	Staff canteens and designated eating areas	\boxtimes				
13.4	Workwear and protective clothing	\boxtimes				
13.5	Health status	\boxtimes				
13.6	Illness and injuries	\boxtimes				
13.7	Personal cleanliness	\boxtimes				
13.8	Personal behaviour	\boxtimes				
before re	ooms have hand washing si	ea. All e	mploy	ee facilities	n on proper washing techniques swere observed to be clean and	well

stocked and in sufficient locations for the number of staff on site.

Employee locker rooms are located away from the production floor and observed to be clean and orderly during facility tour.

There is a lunchroom for all employees away from the production floor. The facility was well

Uniforms are provided to all staff, and a laundry service is used to maintain them.

GMP training is conducted for all employees on hygiene and illness.

Staff interviewed communicated a good understanding of the food safety program and requirements. Employees at oil load out were observed to be wearing hair coverings as required by the hazard assessment.

Health status of employees addressed in GMPs – supported by hazard analysis.

Contractors and visitors required to comply with GMP requirements. Training or monitoring are provided prior to entry to the facility.

ISO/TS 22 Manufact	002-1:2009 - Food uring	Confo	rm	Grade	If No – detail NC	NC #
Clause	Requirement	Yes	No	Minor/ Major/ Critical	If a clause is N/A, provide a justification	

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D F33	22000					
14	Rework					
14.1	General requirements	\boxtimes				
14.2	Storage. identification and traceability	\boxtimes				
14.3	Rework usage	\boxtimes				
maintaine	ets returned to the plant car ed to allow for traceability of ework log – viewed Oct 15, 2	f such p 024 - Lo	oroduc ot # 86	t. 31205 - tar	ne crude oil tank. A rework log i nk 6440 on Oct 15, 2024 - n started leaking so it had to be	
	and reprocessed.	la 1 a al1 a a	-1			
Out of sp	ec oil could also be sold for	biodies	eı.			

Meal cannot be reprocessed. If issue occurs with meal, bins or flat storage can be identified but any further processing would be outsourced to contract organizations.

Manufact	-	Confo		Grade	If No – detail NC If a clause is N/A, provide a	NC #
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
15	Product recall procedure	es				
15.1	General requirements					

Summary:

Mock recall exercise conducted twice per year. One exercise with finished oil (including an additive) and one with meal.

Traceability exercise initiated on the morning of the second day.

Recall procedure in place PRP 15.0 - Product Recall - May 10, 2023, rev 4.

Food safety emergency response plan in place April 6, 2018.

Viewed oil exercise conducted Nov 7, 2024 – scored at 100% for oil potentially contaminated. The scenario was a contaminated processing aid filter aid. 99.8% of the product was accounted for in 3hrs.

Meal exercise was conducted Oct 10, 2024 – 100.35% of the product was accounted for. The mass balance was above 100% due weighing from bulk weigher and platform scale. All documents accounted for within 2hr 32minutes.

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Traceability exercise initiated at 9:45 AM the second day of the audit:

An oil truck shipped Jan 16, 2025, was chosen for the trace exercise.

Viewed Chargement Camion d'uile (inspection record) – showing previous load hauled, cleanout (wash certificate), incoming seal verification, outgoing seal numbers, source tank (6431) – RBD Canola Oil.

The tank was last empty Jan 10, 2025, and was empty again on Jan 23, 2025.

COA - Jan 16, 2025, includes lot no. 250116136431, tank #643, seal numbers, truck # 525, information included color yellow, red, free fatty acids, peroxide value, iodine value, moisture.

Production total for lot in question was 4926.92 MT. This production was produced into both finished oil tanks, so all shipments had to be reviewed. A theoretical inventory available for shipping was 6280.92 MT. Total shipments were 4079MT and remaining inventory when tank 6431 went empty was 2189 MT. 99% of the product was located which is acceptable given that the production volume is from a flow meter and shipments are by scale weights.

Viewed receiving of phosphoric acid on Jan 9, 2025 - included COA for each lot received. Viewed receiving of caustic Soda on Jan 6, 2025 - included COA for the lot received as well as the lab check on the concentration.

Viewed receiving of bleaching clay from Jan 21, 2025, and Jan 3, 2025.

Viewed consumption for bleaching clay for product in question (Fiche consummation de poudres pendant le blanchiment - FFO-5.0031FR, Rev 1.05) - viewed records from Jan through Mar 2025. Viewed additional shipments from 6431 and 6403 for rail and truck from Jan 10 through Jan 23, 2025 – this identifies all the potentially contaminated loads.

Reviewed random examples of truck shipments records to include truck inspection records, additive levels, previous load, wash out and seal verification of outbound loads.

Viewed raw receiving bins involved 2404 (Sept 15, 2023) and 2405 (Aug 26, 2023).

All documentation was provided to the auditor within 3h 30min of initiating the exercise.

		1		1	in or initiating the exercise.	
ISO/TS 22 Manufac	2002-1:2009 - Food turing	Confo	rm	Grade	If No – detail NC	NC #
Clause	Requirement	Yes	No	Minor/ Major/ Critical	If a clause is N/A, provide a justification	
16	Warehousing					
16.1	General requirements	\boxtimes				
16.2	Warehousing requirements	\boxtimes				
16.3	Vehicles, conveyances and containers	\boxtimes				
1						

Summary:

Warehouse for materials is segregated to hold different types of processing aids.

Meal shed segregated for canola meal and soymeal- no issues or concerns noted during facility tour. Dedicated loader inside load shed for meal.

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Canola Meal Inspection Record (Blue) – I-fr-5.004.fr – 5.06, or Soymeal Inspection Record (L-FO-5.005 fr-1.06) (Yellow) as well guard house asking last three loads and recorded on Feuille entrée camionneur-L-FO-13.3.001.FR-Rev 6.3.

The records include the three previous loads, verification of no medicated feed and seal numbers as required. Reference document posted indicating acceptable and non-acceptable previous loads. Viewed records from Dec 2024 through Feb 2025.

Consistent evidence of the record of the truck inspection prior to loading and consistent evidence of recording the inquiry about the previous load containing medication as required.

Viewed Oil Shipping Truck Inspection record (Chargement camion d'huile- l-fo-8.001.fr) – showing evidence of tank inspection (wash certificate) incoming seal number verification and source tank. The record also shows evidence of the additive amounts added during the truck loading process as applicable. Previous load is verified on inbound vessels at the scale house prior to sending the truck to the loading bay.

Viewed sample oil truck shipping records (includes inspection records, CofA, wash certificate) Viewed loads from Jan through Feb 2025 (pulled from mock recall initiated). Evidence of truck inspection, seal numbers and additive usage. Includes reference to source tank number. Interview conducted with oil load out personnel.

Viewed Chargement wagon d'huile (l-fo-9.004.fr, Rev 1.07, Dec 12, 2021) - viewed records from Dec 2024 and Jan 2025 - evidence of incoming seal number recording, inspection results and outgoing rail car seals.

Viewed CofAs for random shipments from Jan 2025 as part of the recall.

Viewed CofA for Dec 26, 2024 - load 8732029 - rail car.

Viewed CofA for Dec 27, 2024 - load 8732030 - rail car.

Viewed CofA for Jan 20, 2025 - load 8869009 - truck.

Viewed CofA for Jan 16, 2025 – load 8854840 – truck.

Customer Specifications are stored within a Spreadsheet within the lab - viewed current version. Then CofA templates are established in the lab folder for each customer. The completed PDF version of the CofA is sent to the scale house to leave with the truck and sent to the customer if requested or for rail shipping. Outbound samples retained for 6 months for each outbound truck and railcar.

ISO/TS 22 Manufact	2002-1:2009 - Food turing	Confo	rm	Grade	If No – detail NC If a clause is N/A, provide a	NC #
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
17	Product information/consumer awareness					
17.1	Product information and consumer awareness	\boxtimes				

Summary:

RBD oil - For feed purpose, it shall comply with CFIA Feeds Regulations, 2024 and Canadian Feed Ingredients Table and Feed Regulations Schedule IV, section 4.5.3 or 4.5.6.

Canola Meal & Vegetable Oil Deodorizer Distillate complies with CFIA Feeds Regulations, 2024 and Canadian Feed Ingredients Table. Canola Meal comply with CFIA Feed Regulations Schedule IV Section 5.3.3: Soybean meal - complied with CFIA Feed Regulations Schedule IV Section 5.3.27

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VEGETABLE OIL DEODORIZER DISTILLATE - As per schedule IV 4, section 4.5.10 of the CFIA Feed Regulations

VEGETABLE OIL SOAPSTOCK (SODIUM SALTS OF FATTY ACIDS) – complies with CFIA Feed Regulations Schedule IV Section 8.101

Viewed client specification spreadsheet – available to the lab to outline client specific specifications that link to template CofAs for those clients.

Viewed Oil Shipment analysis records – test records of final oil samples. Results used to generate CofAs – truck loads of oil are held, and CoA emailed to the customer.

Rail car shipments – CofAs are e-mailed to clients prior to receipt of the rail cars. CofAs are generated for all outgoing oil product.

Viewed example oil CofA for Mar 11, 2025 - Truck Shipment- truck # 257– includes seal numbers, analysis results and specifications. Viewed additional examples as part of the vertical trace exercise.

Standard feed tags are issued with all outgoing meal products – recorded on BoL and within SIPs. Viewed example for soya meal and canola meal shipped from Jan and Feb 2025.

Viewed BoL for canola meal and soya meal – includes label information:

Canola meal labelled for - Min Crude Protein, Min Crude Fat, Max Crude Fiber, Max Moisture, Max Erucic Acid and Max Glucosinolates, liquid mold inhibitor addition and maximum VOD addition. Soya Meal labelled for - Min Crude Protein, Min Crude Fat, Max Crude Fiber, Max Moisture, liquid mold inhibitor addition and maximum VOD addition.

ISO/TS 22 Manufac	2002-1:2009 - Food turing	Confo	rm	Grade	If No – detail NC If a clause is N/A, provide a	NC #
Clause	Requirement	Yes	No	Minor/ Major/ Critical	justification	
	Food defense, biovigilance and bioterrorism					
18	Food defense, biovigilan	ce and	bioter	rorism		
18.1	Food defense, biovigilan General requirements	ce and	bioter	rorism		

Summary:

Verified PRP 18.0 - Food Defense, Biovigilance and Bioterrorism - in place to define the assessment process.

Viewed Food Defense – US FDA Food Defense Plan Builder - Key Activity Type Method – conducted Oct 18, 2024 – this an update to the previous assessment method.

Training has been conducted with all the QA managers and Coordinators who will oversee these assessments at all locations.

Food Defense team includes G.G. – General Manager, M.B. – Director, Food Safety & Quality, N.L. – Quality Manager - last updated Oct 18, 2024 – qualifications are included in the Food Safety Team Qualification Document.

Viewed Corporate Food Security Measures for Food Defense and Food Fraud manual developed corporately to drive a consistent approach among all locations – Mar 1, 2024.

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Actionable items get ranked according to severity and likelihood. The program requires an annual review of the Food Defense Plan during the HACCP team meeting and to redo the assessment every three years.

The questions and risk ranking are applied to any gaps identified. Revision date on Food defense plan – Oct 18, 2024.

CBT course was implemented Jan 2018 by the organization – Food Security – and was recently changed to a 5-year retraining frequency.

Verified all staff are current on the one-time training and have 90 days to work through retraining based on the new frequency.

Security office with swipe card turnstiles is the only access to the plant during regular office hours. Identification checks are conducted, and visitor orientation provided prior to allowing access to the facility. The facility is staffed 24/7.

Bins and loading points are locked and secured from external access – verified chemical receiving shed. The facility has cameras in critical locations that are recorded as required. Oil cars and trucks going in and out are sealed and verified.