

April 2022

## Re: Preventative Action Plan and Control Measures to Avoid Pests: Flour

Ardent Mills proactively takes many steps to avoid pest contamination in the products supplied to customers. The details of our programs and controls for specific areas are listed below.

1. Pest Control
  - Each Ardent Mills facility engages a licensed Pest Control Operator (PCO).
  - Every location incorporates proactive measures known as Integrated Pest Management to prevent the harborage and occurrence of insects and pests.
  - All openings (doors, windows, loading docks, etc.) shall be rodent and insect proof.
  - Pipes, conduits, vents, etc. that penetrate the outside walls or roofs shall be fitted with collars, gaskets, or seals that prevent pest entry.
2. Cleaning and Housekeeping
  - Every location follows a cleaning schedule for all equipment in the mill, which includes opening equipment, blowing it out or taking it apart to access dead spots, and looking for insect harborages.
  - All storage and load out bins are inspected and cleaned on a set frequency.
  - Trash in all areas of the plant is kept at a minimum and is frequently removed.
  - Stored equipment is cleaned before going into storage and kept orderly.
3. Storage and Handling Practices
  - All packing materials, micro ingredients, and finished products shall be stored in designated areas.
  - All stored items shall be placed a minimum of 18 inches from all walls.
  - All materials shall be stored off the floor on pallets or in racks.
  - Torn or damaged material shall be removed from storage the same day damage occurs.
  - All packing materials, micro ingredients, and finished products shall be rotated on a first-in/first-out basis.
4. Environment Control
  - Quality Managers and other trained employees conduct a Food Protection Audit every 30 days to assess overall conditions of the plant. All findings are noted and corrected within 30 days of the audit.
5. Premises Inspection
  - Every Ardent Mills facility is serviced weekly by a PCO.
  - All employees are instructed to fill out a pest and rodent sighting log and report findings to a supervisor when sightings are observed/found at the facility.
  - All evidence of pests inside or outside the building shall be removed immediately.
  - If a trend is noted, additional inspections may be conducted by Regional Leaders and/or the Director of Sanitation.
6. Fumigation or Fogging
  - All pesticides and chemicals related to pest management are approved by corporate before use.
  
  - All pesticide applications are recorded in the Pesticide Usage Log.

- General fumigations and/or fogging will be done as needed. This will be determined by plant management and the Director of Sanitation.
7. Holding Period of Ingredients
    - All packing materials, micro ingredients, and finished products shall be rotated on a first-in/first-out basis.
    - Packaging materials and micro ingredient age and condition shall be documented every 30 days on the Food Protection Audit.
    - Ingredients that are past their shelf life shall be properly disposed.
  8. Checking of Flour Tailings
    - Final Product Sifter tailings are inspected after each load.
    - Tailings thresholds have been established for each location and are monitored on a daily basis.
  9. Equipment Silos and Bulk Tanker Cleaning
    - All storage and load out bins are inspected and cleaned on a set frequency.
    - Bulk trailers are inspected before every load and are washed at a minimum of every 28 days.
  10. Trend of Pest Control Activity
    - Tailings are trended daily and weekly.
    - Regional Operations Managers, Regional Directors of Food Safety and Quality, and the Director of Sanitation review all location's trends on a weekly basis and follow up with any plants that are exceeding their limits.
  11. Inspection and Testing
    - Sifter tailings are inspected after the load of flour has passed through the final product sifter and before release of the product for shipment.
    - Every load of flour is tested to ensure the product meets all analytical customer requirements before a Certificate of Analysis is generated and the flour is released for shipment.

**Corrective Action initiated when abnormal Pest Issues are detected**

When a customer complaint occurs, the Regional Operations Manager, the Regional Director of Food Safety and Quality, and the Director of Sanitation is notified. The root cause and corrective action process begins immediately to identify the source of the issue and correct the issue in a timely manner. Once a source is identified, the customer is notified of the findings.

Sincerely,  
**Ardent Mills Regulatory Team**  
[AMRegulatoryRequest@ardentmills.com](mailto:AMRegulatoryRequest@ardentmills.com)

Applicable Facilities

Albany, NY	Decatur, AL	Martins Creek, PA	Port Redwing, FL
Alton, IL	Denver, CO	Mississauga, ON	Saginaw, TX
Ayer, MA	Fairmount, ND	Montreal, QC	San Bernardino, CA
Chattanooga, TN	Galena Park, TX	Mount Pocono, PA	Saskatoon, SK
Chester, IL	Harvey, ND	Newton, KS	Sherman, TX
Colton, CA	Hastings, MN	Ogden, UT	Stockton, CA
Columbus, OH	Kenosha, WI	Omaha (A), NE	Wichita, KS
Commerce City, CO	Lake City, MN	Omaha (B), NE	York, PA
Culpeper, VA	Mankato, MN	Port Allen, LA	