



FACTA

Animal Welfare Assurance, Certification & Training

FACTA, LLC – No Anti-biotics Ever (NAE) Audit Program for Broiler Operations

***Any major nonconformance will result in immediate failure of the audit. Audit will still be completed in its entirety, but a re-audit must occur on any major nonconformance within 30 days. Anything less than the total score of 80.0% is failure of the FACTA, LLC (“FACTA”) audit. Points are not awarded on a sliding scale unless otherwise specified. Each section of the audit does not stand alone, and the entire audit is scored as one sample. (Sections within the audit do not stand alone).**

Hatchery NAE Audit Section #1

Q#	Audit Tool	Notes/Comments	Numerical Value (Points Awarded)
1.1.0	Is someone responsible for NAE in the hatchery?	Verify the employee and credentials. Document the name and title of the employee	5 (5)
1.2.0	Signature of the site manager ensures corrective action is taken when the NAE program is compromised.	Obtain the NAE statement signature from the employee. This should be obtained as a statement from the company.	5 (5)

1.3.0	<p>Are employees trained in NAE?</p> <p>1.3.1: Are on-site workers going through an orientation program, i.e., are employees trained in NAE before handling live animals?</p> <p>1.3.2: Does the hatchery have a documented NAE training program conducted annually for all employees involved (multilingual, if necessary; verbal translation of materials at time of training is acceptable)?</p>	<p>Select 5 employees to verify training records. (No sliding scale, all points are only awarded if all criteria are met).</p> <p>Auditor should assess if the training is up-to-date and provide knowledge of the NAE program.</p>	10 (10)
1.4.0	Do the medication records confirm no antibiotics supplied to the NAE chicks?	Review the medication records to verify no antibiotics were given.	10 (10)
1.5.0	<p>Is there a policy to separate NAE chicks from non-NAE chicks?</p> <p>1.5.1: Is there a procedure to identify and separate NAE chicks from non-NAE chicks during the hatchery process?</p>	<p>Review the policy of separating NAE from non-NAE chicks.</p> <p>What is the procedure used to prevent comingling of NAE and non-NAE chicks?</p>	10 (10)
1.6.0	Is there documentation of daily recordings of NAE and/or non-NAE chicks in hatchery?	Verify there are daily records of chicks in the hatchery and should be designated as NAE or non-NAE.	10 (10)
	Hatchery NAE Audit Section #1		50 (50)

Housing Requirements and Farm GMP Audit Section #2

Q#	Audit Tool	Notes/Comments	Numerical Value (Points Awarded)
2.1.0	Is someone responsible for NAE in the live operations department?	Verify the employee and credentials. Document the name and title of the employee.	5 (5)
2.2.0	Signature of the farm worker or grower ensures corrective action is taken when the NAE program is compromised.	Obtain the NAE statement signature from the employee.	5 (5)
2.3.0	Are contractors/employees trained in NAE? 2.3.1: Are on-site workers going through an orientation program, i.e., are employees trained in NAE? 2.3.2: Do on-farm employees have a documented NAE training program conducted annually for all employees involved in NAE (multilingual, if necessary; verbal translation of materials at time of training is acceptable)?	Select five contractor/employees to verify training records. (No sliding scale, all points are only awarded if all criteria are met).	10 (10)
2.4.0	Driver/transport records are kept for each delivery that include: • Designation of NAE chicks or non-NAE chicks.	Records must be reviewed by auditor for compliance.	10 (10)
2.5.0	Does the farm/Company have a documented brooding program in place for NAE? 2.5.1: Is the brooding program for NAE being followed?	Document the on-farm conditions are following company guidelines.	10 (10)
2.6.0	Do the feed delivery tickets note NAE?	Review feed tickets for notation of NAE.	5 (5)
2.7.0	Is there a written procedure for flushing designated feed bins before NAE feed is delivered?	There should be a standard operating procedure stating how a feed bin is flushed and then listed thus.	10 (10)

	2.7.1: Is there documentation showing feed bins was flushed out before NAE feed was started?	Verify the on-farm records show the date the bins were flushed out.	
2.8.0	What is the corrective protocol if non-NAE feed is delivered to an NAE site?	Should be a written plan in place in the event non-NAE feed is placed into an NAE feed bin.	10 (10)
2.09.0	Are house structural integrity, biosecurity and rodent control in place to exclude broilers from predators of all kinds? Is there a rodent control program in place? Is there evidence of rodent infestation or rodent feces?	Describe what is in place and if there is any documentation of rodent control, etc.	15 (15)
2.10.0	Feed formulations for NAE birds are approved by an animal nutritionist.	Document the nutritionist's name. This can be verified by : <ol style="list-style-type: none"> 1 Direct contact with the nutritionist 2 Contract between company and nutritionist 3 Feed formulation order showing nutritionist name 	10 (10)
	Housing Requirements and Farm GMP Audit Section #2		90 (90)

Feedmill NAE Audit Section #3

Q#	Audit Tool	Notes/Comments	Numerical Value (Points Awarded)
3.1.0	Is someone responsible for NAE in the feed mill department?	Verify the employee name and credentials. Document the name and title of the employee.	5 (5)
3.2.0	Signature of the manager ensures corrective action is taken when NAE feed is not separate from non-NAE feed.	Obtain the NAE statement signature from the employee.	5 (5)
3.3.0	<p>Are employees trained in NAE?</p> <p>3.3.1: Are on-site workers going through an orientation program, i.e., are employees trained in NAE?</p> <p>3.3.2: Does the feed mill department have a documented NAE training program conducted annually for all employees (multilingual, if necessary; verbal translation of materials at time of training is acceptable)?</p> <p>3.3.3: What type of training is conducted for personnel sampling feed?</p>	<p>Select five employees to verify training records. (No sliding scale, all points are only awarded if all criteria are met).</p> <p>Verify there is an NAE training program for employees.</p>	10 (10)
3.4.0	<p>Is there a written procedure to cleanout ingredient bins before ingredients for NAE feed is received?</p> <p>3.4.1: Is there documentation showing cleanout on ingredient bins before NAE feed is received?</p>	Review the SOP to clean out bins to ensure no residue is left from ingredients that have not been verified free of antibiotics.	10 (10)
3.5.0	<p>Is there a written procedure to verify ingredients used for NAE feed are free of antibiotics?</p> <p>3.5.1: Is there documentation showing verification that incoming feed ingredients are free of antibiotics?</p>	<p>Review the SOP to test ingredients to verify they are free of antibiotics.</p> <p>Review from the test results obtained from</p>	10 (10)

	<p>3.5.2: What antibiotics are tested for in the last 30 days?</p> <p>3.5.3: How long are the test results kept?</p>	<p>outside labs.</p> <p>Test results should be kept for 12 months or since the program (whichever is shorter).</p>	
3.6.0	<p>Is there a written procedure for storing feed ingredients used for NAE feed separately from ingredients used for non-NAE feed?</p> <p>3.6.1: Is there verification the feed ingredients used for NAE feed are stored separately from ingredients used to produced non-NAE feed??</p>	<p>Review the SOP in place that ensures feed ingredients for NAE feed (bulk, bagged, or liquid) are not comingled with ingredients with ingredients for non-NAE feed.</p> <p>Verify the documentation showing the ingredients for NAE feed are not comingled with ingredients for non-NAE feed.</p>	10 (10)
3.7.0	<p>Is there documentation of antibiotics used in the feed mill only in non-NAE flocks?</p>	<p>If antibiotics are used in the feedmill, verify the inventory sheet shows usage is only in non-NAE feeds.</p>	10 (10)
	Feedmill NAE Audit Section #3		60 (60)

Transportation NAE Audit Section #4

Q#	Audit Tool	Notes/Comments	Numerical Value (Points Awarded)
4.1.0	Is someone responsible for NAE in the live haul department?	Verify the employee name and credentials. Document the name and title of the employee.	5 (5)
4.2.0	Signature of the site manager ensures corrective action is taken when NAE birds are comingled with non-NAE birds.	Obtain the NAE statement signature from the employee.	5 (5)
4.3.0	<p>Are transportation employees trained in NAE?</p> <p>3.3.1: Are on-site transportation workers going through an orientation program, i.e., are employees trained in NAE?</p> <p>3.3.2: Does the live haul department have a documented NAE training program conducted annually for all employees involved in transporting of NAE birds (multilingual, if necessary; verbal translation of materials at time of training is acceptable)?</p>	Select five transportation employees to verify training records. (No sliding scale, all points are only awarded if all criteria are met).	10 (10)
4.4.0	Is there a written procedure on not comingling the 2 types of birds during transportation to the processing plant?	Review the SOP to verify it shows steps to prevent the NAE birds from being comingled with the non-NAE birds.	10 (10)
4.5.0	<p>Transport records must be kept by flock and include:</p> <ul style="list-style-type: none"> • NAE or Non-NAE birds. 	Verify the transport records note whether the flock is NAE or non-NAE.	20 (20)
	Catching and Transportation NAE Audit Section #4		50 (50)

Plant and Processing NAE Audit Section #5

Q#	Audit Tool	Notes/Comments	Numerical Value (Points Awarded)
5.1.0	Is someone responsible for NAE in the plant?	Verify the employee name and credentials. Document the name and title of the employee.	5 (5)
5.2.0	Signature of the site manager ensures corrective action is taken when NAE and non-NAE birds or products are comingled.	Obtain the NAE statement signature from the employee.	5 (5)
5.3.0	<p>Are employees trained in NAE?</p> <p>4.3.1: Are on-site workers going through an orientation program, i.e., are employees trained in NAE before handling birds or products?</p> <p>4.3.2: Does the plant have a documented NAE training program conducted annually for all employees (multilingual, if necessary; verbal translation of materials at time of training is acceptable)?</p>	Select five employees to verify training records. (No sliding scale, all points are only awarded if all criteria are met).	10 (10)
5.4.0	<p>Is there a procedure to prevent comingling - of NAE and non-NAE birds at the plant?</p> <p>5.4.1: Is there a flow diagram showing steps to prevent comingling of NAE and non-NAE birds?</p>	Review SOP for steps to prevent comingling to NAE and non-NAE birds.	20 (20)
5.5.0	Is there verification (at least daily) the birds are checked to ensure no comingling?	Review documentation for supervisor review of birds to verify no comingling has occurred.	10 (10)
5.6.0	Is there an internal audit program in place?	Verify the document showing daily audit of the separation.	10 (10)
5.7.0	Is there a written procedure on identifying and maintaining separation of NAE products and non-NAE products?	There should be an SOP on how to identify NAE and non-NAE products as well as steps to prevent comingling.	15 (15)

	5.11.1: Verify the storage diagram showing finished product kept separately.	There should be designated areas for storage of NAE products separate from non-NAE products.	
5.8.0	Is there a written procedure to maintain shipment records of NAE vs non-NAE products? 5.13.1 Is there documentation of shipment records with notation of NAE vs non-NAE?	There should be an SOP on shipping NAE and non-NAE products (company or common carrier) to prevent comingling of the products. Review and verify documentations of shipment records showing separation of NAE and non-NAE products.	15 (15)
5.9.0	Is there a written procedure to prevent comingling of NAE and non-NAE products if returned by a customer? Is there documentation of procedure keeping NAE and non-NAE products separate if returned from customers?	There should be an SOP on handling returns to prevent comingling of NAE and non-NAE products. Review and verify documentation of forms to prevent comingling of NAE and non-NAE products in event of return from customer.	10 (10)
	Plant and Processing NAE Section #5		100 (100)

Corporate Review and Responsibility Audit Section #6

Q#	Audit Tool	Notes/Comments	Numerical Value (Points Awarded)
6.1.0	Does the Company have a written program for NAE with a clear understanding of how the program is operated throughout the Company?	Document and verify.	Major nonconformance (PASS)
6.2.0	Does current senior management sign off on the NAE program annually? Is there a review of documented operating procedures being performed annually?	Document and verify.	Major nonconformance (PASS)
6.3.0	Does the Company have an internal auditing inspection for NAE in place? If so, how frequently is it completed?	The company must have an internal auditing inspection in place at least annually. Document and verify this is being followed consistently.	Major nonconformance (PASS)
6.4.0	Does the Company have a licensed veterinarian available for consultation as needed?	Verify the veterinarian-client relationship by one of the following ways: <ol style="list-style-type: none"> 1 Documented letter signed by the veterinarian pertaining to the veterinarian-client relationship 2 Viewing vaccination/medication prescriptions 3 Veterinarian-client contract 	Major nonconformance (PASS)
6.5.0	The Company must have a process in place whereby NAE violations can be reported without threat of retaliation.	The company must have a process in place whereby NAE violations can be reported without threat of retaliation. Signs stating the importance of NAE with contact information to report incidents should be posted prominently in locations where birds or products are handled.	Major nonconformance (PASS)
	Corporate Review and Responsibility Audit Section #6		Pass/Fail (PASS)

Summary Sheet and Score

Date Completed	Audit Section	Possible Points/ Actual Points
	Hatchery NAE Audit Section #1	50 ()
	Housing Requirements and Farm GMP NAE Audit Section #2	90 ()
	Feedmill NAE Audit Section #3	60 ()
	Catching and Transportation NAE Audit Section #4	50 ()
	Plant and Processing NAE Audit Section #5	100 ()
	Corporate Review and Responsibility NAE Audit Section #6	Pass/Fail
Total Score:		350 ()
Total %:		_100_ %