

**Minnesota Department of Agriculture  
Food and Feed Safety Division**

Document FOOD.30.08	Page 1 of 11
Version #: <b>2.1</b>	Effective Date: 1/18/2017
Title: <b>Manufacturer and Distributor Risk Category SOP</b>	

**Table of Contents**

1. PURPOSE
2. SCOPE
3. BACKGROUND
4. RESPONSIBILITY
5. DEFINITIONS
6. PROCEDURES
7. RELATED DOCUMENTS (includes References, Attachments)
8. EQUIPMENT/MATERIALS NEEDED
9. SAFETY
10. CIRCULATION
11. APPROVAL/DOCUMENT HISTORY

## **1. PURPOSE**

The purpose of this policy is to provide guidance for uniformly determining overall risk category and inspection frequency for food manufacturing and distributing operations that are currently regulated by the Minnesota Department of Agriculture Food and Feed Safety Division (MDA-FFSD).

## **2. SCOPE**

This policy applies to MDA-FFSD regulated food establishments that are considered manufacturers or distributors as defined in this policy. This policy does not apply to meat or dairy firms regulated under MDA-FFSD who fall under the United States Department of Agriculture (USDA) or equal-to inspection programs or the Pasteurized Milk Ordinance.

## **3. BACKGROUND**

In 2000, a risk-based inspection approach was developed which included prioritizing inspections based on the risk category assigned to all food establishments (retail and wholesale). The risk category was based on the establishment's operation as it related to the risk of causing foodborne illness. The division developed criteria for high, medium, and low risk categories. The inspection frequency was determined based on the risk category of the food establishment. This was developed in part by using the U.S. Food and Drug Administration (FDA) Retail Food Code Annex 5: "Conducting Risk-based Inspections". There is a separate procedure, *FOOD.30.16 – Retail Risk Category SOP*, that applies to retail food operations based on the Retail Food Regulatory Program Standards (RFRPS).

## **4. RESPONSIBILITY**

**Manufactured Food Program Manager** – The Manufactured Food Program Manager will assist in the determination of an increased inspection frequency as needed.

**Manufactured Food Supervisor** – The Manufactured Food Supervisor will assist in the determination of an increased inspection frequency as needed and update the inspection frequency in the electronic inspection system.

**Manufactured Food Inspector** – The Manufactured Food Inspector will determine and select appropriate risk classifications and overall risk category for a facility during each inspection and

**Minnesota Department of Agriculture  
Food and Feed Safety Division**

Document FOOD.30.08	Page 2 of 11
Version #: 2.1	Effective Date: 1/18/2017
Title: <b>Manufacturer and Distributor Risk Category SOP</b>	

determine need for an increased inspection frequency in consultation with the supervisor and compliance officer as needed.

**Compliance Officer** – The Compliance Officer will assist in determining the need for an increased inspection frequency in consultation with the inspector and supervisor.

## 5. DEFINITIONS

**Amenable** – products that are subject to the USDA Meat Products Inspection Act and Poultry Products Inspection Act. See *Appendix B – Amenable and Non-Amenable Food Items*.

**Chronic Violator:** A chronic violator is a legal entity that has an approved enforcement action equal to or greater than a Warning Letter and that has had a prior enforcement action equal to or greater than a Warning Letter issued in the last three (3) years.

**Cold storage warehouse:** An enclosed cold space or group of cold rooms located within a building in which foods are stored and held for 30 days or more. Ref MN Statute 28.01 Subd 3.

**Distributor:** any individual, firm, corporation, company, association, cooperative, or partnership who sells food to others for re-sale (warehouse, wholesale food handler), stores or handles food for another, including buildings, trucks, trailers or other portable structures. Additionally, for the purpose of establishing the appropriate risk category, any firm that is a distributor as described above is considered a distributor, no matter the licensing category. A Distributor (as defined in this policy) does not manufacture or process any food. Additionally, a firm that is licensed as a Manufacturer, but whose only operations is storage of food (no processing), is considered a Distributor when establishing the risk category (i.e. Cold Storage Warehouses).

**Enforcement Actions:** Enforcement actions are informal (non-appealable) or formal (appealable) actions taken outside of an inspection to achieve compliance with regulations. These actions include, but are not limited to, Letters of Information, Warning Letters, Corrective Action Orders, Administrative Meetings, issuance of penalties (civil or administrative), Criminal Prosecution, License Limitation or Revocation, Injunction, or other court actions. These actions are initiated by a firm's non-compliance with regulatory requirements as evidenced by an inspection report, violative sample results, or other collected documentation of conditions.

**Field Compliance Actions:** Field compliance actions are actions performed during an inspection to achieve compliance with regulations. These actions include, but are not limited to, reinspections, cease and desist orders, and embargos. These actions are initiated by a firm's non-compliance with regulatory requirements as evidenced by an inspection report, violative sample results, or other collected documentation of conditions.

**Food Broker:** a food broker is a person who buys and sells food and who negotiates between a buyer and a seller of food, but who at no time has custody of the food being bought and sold. (28A.05d).

**Food Salvor:** a food salvor or salvage food processor is any individual, firm, corporation, company, association, cooperative, or partnership who performs the act of cleaning, culling, sorting, scouring, labeling, relabeling, or in any way treating "distressed food" so that it may be deemed to be "reconditioned" or "salvaged food" and therefore is acceptable for sale or use as

**Minnesota Department of Agriculture  
Food and Feed Safety Division**

Document FOOD.30.08	Page 3 of 11
Version #: 2.1	Effective Date: 1/18/2017
Title: <b>Manufacturer and Distributor Risk Category SOP</b>	

human food, animal feed, or seed as provided therefor by the commissioner. (MN Statute 31.495 Subd 1).

**Highly Susceptible Population:** persons who are more likely than other people in the general population to experience foodborne disease because they are: immunocompromised, children age 9 and younger, adults age 65 and older, and that obtain food at a facility that provides services such as custodial care, assisted living such as a child or adult day care center, kidney dialysis centers, hospital, nursing homes, or nutritional/ socialization services such as a senior center.

**Manufacturer:** any individual, firm, corporation, company, association, cooperative, or partnership who processes or manufactures raw materials and other food ingredients into food items, or who reprocess food items, or who package food for sale to others for resale. This includes those who extract, ferment, distill, pickle, bake, freeze, dry, smoke, grind, mix, stuff, pack, bottle, recondition, or otherwise treat or preserve food for sale to others for resale and also to salvage food processors.

Additionally, for the purpose of establishing the appropriate risk category, any firm that conducts manufacturing operations as described above is considered a manufacturer, no matter the licensing category. For example, a firm that manufactures food but is licensed as a Wholesale Food Handler as prescribed by MN Statute 28A.05 because wholesaling/distributing is their principal mode of business is considered a Manufacturer when establishing the risk category. The same would be true for a licensed Retail Food Handler that also manufactures food for sale to others for resale.

**High Risk Food:** A manufactured food where there is a high potential risk for microbiological or chemical contamination or when consuming a particular food will result in illness or injury due to contamination of the food. There is historical data for the food being epidemiologically associated with foodborne illness outbreaks.

**Non-Amenable** – products that are NOT subject to the USDA Meat Products Inspection Act or the Poultry Products Inspection Act

**Packaged:** Packaged means bottled, canned, cartoned, securely bagged, or securely wrapped.

**Potentially Hazardous Food (PHF):** A food or a food ingredient consisting in whole or in part of: milk products, eggs, meat, fish, raw shell eggs, poultry or other food or food ingredient which is capable of supporting growth of infectious or toxigenic microorganisms. PHF food requires time and temperature control to limit pathogenic microorganism growth or toxin formation.

**Process:** Process is the treatment of food substances in such a manner to change its properties with a view to preserving it, improving its quality or making it functionally useful.

**Ready-To-Eat (RTE):** "Ready-to-eat food" means food that is in a form that is edible without washing, cooking, or additional preparation by the firm or the consumer to achieve food safety, and that is reasonably expected to be consumed in that form.

**Retail food establishment:** any individual, firm, corporation, company, association, cooperative, or partnership who sells food directly to a consumer to include the following definition of a "food establishment" (in-part) from the proposed 2016 MN Retail Food Code 4626.0020 1-201.10 Subp 35:

**Minnesota Department of Agriculture  
Food and Feed Safety Division**

Document FOOD.30.08	Page 4 of 11
Version #: 2.1	Effective Date: 1/18/2017
Title: <b>Manufacturer and Distributor Risk Category SOP</b>	

- A. "Food establishment" means an operation that stores, prepares, packages, serves, vends, or otherwise provides food for human consumption where consumption is on or off the premises and regardless of whether there is a charge for the food, and relinquishes possession either directly or indirectly to a consumer.
- B. "Food establishment" includes:
- (1) an element of the operation such as a transportation vehicle or a central preparation facility that supplies a vending location or satellite feeding location unless the vending or feeding location is licensed by the regulatory authority;
  - (2) retail operations located within the following establishments:
    - (a) wholesale food processors, wholesale food handlers, food manufacturers, or food brokers as classified in MN Statutes, section 28A.05 paragraphs (b), (c), and (d)
    - (b) custom processors as defined in Minnesota Statutes, section 28A.03 subdivision 8 or custom processing as defined in section 31A.02 subdivision 5; or
    - (c) animal food manufacturers as defined in MN Statutes 31A.02 subdivision 8.

**Risk Category (Level):** Risk category (risk level in USAFS) is the overall risk determination for a facility and includes High (H), Medium (M), and Low (L).

**Risk Classification (Facility Classification):** Risk classification (facility classification in USAFS) is the specific product produced by, or process conducted by, the facility that helps define the overall risk category for the facility.

**Specialized Process:** Includes Seafood HACCP (21 CFR 123), Juice HACCP (21 CFR 120), Low Acid Canned Foods (21 CFR 113), and Acidified Foods (21 CFR 114).

## 6. PROCEDURES

### 6.1. Select Risk Classifications (Facility Classifications)

- 6.1.1. Determine all appropriate risk classifications using the current version of *Appendix A: Risk Categories – Manufacturing and Distributing* based on the manufacturing food establishment's food business operations during every inspection.

Example: A firm that washes, cuts, and packages produce. The firm also repackages salads including a seafood salad and therefore would receive **all** the following risk classifications based on *Appendix A: Risk Categories – Manufacturing and Distributing*

MH4, MH7, MH11

- 6.1.2. Determine if the establishment also conducts retail operations. If yes, refer to *FOOD.30.16 - Retail Risk Category SOP* and associated appendix to identify the appropriate risk classifications for the retail operations.

**Minnesota Department of Agriculture  
Food and Feed Safety Division**

Document FOOD.30.08	Page 5 of 11
Version #: 2.1	Effective Date: 1/18/2017
Title: <b>Manufacturer and Distributor Risk Category SOP</b>	

6.1.3. Record all specific risk classifications associated with the establishment in USAFS, both Manufacturing/Distributing and Retail. Refer to the applicable USAFS guidance for entering this information.

**6.2. Determine the Overall Risk Category (Level)**

6.2.1. Select or review the overall risk category (level) for the establishment, High (H), Medium, (M) or Low (L) based on the highest risk classifications that apply during each inspection. Refer to the applicable USAFS guidance for entering this information into USAFS.

6.2.2. If the highest risk classification is associated with the retail operations, refer to *FOOD.30.16 - Retail Risk Category SOP* to identify the appropriate risk category. The highest risk product or process should be the determining factor for selection of risk category, *not the predominant mode of business*.

**6.3. Inspection Frequency**

Food Inspector

6.3.1. Use the baseline frequencies listed below to identify the proper frequency for the establishment:

High Risk Manufacturer/Distributor: High risk manufacturer/distributors are inspected at a baseline frequency of once every twelve months.

Medium Risk Manufacturer/Distributor: Medium risk manufacturer/distributors are inspected at a baseline frequency of once every eighteen months.

Low Risk Manufacturer/Distributor: Low risk manufacturer/distributors are inspected at a baseline frequency of once every twenty-four months.

Food Supervisor

6.3.2. Increase the routine inspection frequency by six months from the last routine inspection for at least one inspection cycle if the establishment:

6.3.2.1. Had a sanitary notice issued during the current inspection; or

6.3.2.2. Had a FIELD COMPLIANCE ACTION occur during the previous inspection that was not complied with and was referred to the Compliance Unit; or

6.3.2.3. Has had an ENFORCEMENT ACTION greater than a Warning Letter, with recommendation for increased frequency upon case closure, in the past twelve months; or

6.3.2.4. Upon notification from the Compliance Officer, meets the definition of a CHRONIC VIOLATOR; or

6.3.2.5. Is referred to the Compliance Unit and further discussions between inspector, supervisor, program manager, and the Compliance Unit determines that increased inspection frequency is needed.

**Minnesota Department of Agriculture  
Food and Feed Safety Division**

Document FOOD.30.08	Page 6 of 11
Version #: 2.1	Effective Date: 1/18/2017
Title: <b>Manufacturer and Distributor Risk Category SOP</b>	

Example: A firm is classified as overall Medium Risk and is issued a Sanitary Notice on 1/2/2014. The firm was found in compliance on the reinspection conducted 1/6/2014.

- a) Increase frequency to every twelve months for one year. So an inspection will need to take place by 1/2/2015.
  - b) After this inspection, if no other compliance events occur, the firm can be moved back to a baseline 18 month inspection frequency.
- 6.3.3. Evaluate the need for an increased routine inspection frequency in situations where there is an extended enforcement case (i.e.-case is not closed by the mid-way point of the routine inspection frequency of the firm) in consultation with the Program Manager, Inspector, and the Compliance Unit to assess the firm's overall compliance status.

Example: A firm is classified as overall High Risk and has an open enforcement case related to food adulteration orders issued during a routine inspection on 3/15/16. By 8/15/16, the case remains open due to non-compliance by the firm. A discussion is held between the program manager, inspector, supervisor, and the compliance unit and the routine inspection frequency is increased by 6 months, so an inspection will take place by 9/15/16.

- 6.3.4. Document this change by adding an internal note with the reason for the increased inspection frequency per the applicable USAFS Guidance/Work Instruction.

## **7. RELATED DOCUMENTS (includes References, Attachments)**

FOOD.30.16 - Retail Risk Category SOP

USAFS Guidance/Work Instruction

## **8. EQUIPMENT/MATERIALS NEEDED**

N/A

## **9. SAFETY**

N/A

## **10. CIRCULATION**

Document will be provided to the following: Manufactured Food Program Inspection Staff, Manufactured Food Supervisors, Manufactured and Retail Food Program Managers, Compliance Unit, and Food Standards Coordinator. The current version will be stored electronically on the FFSD document control site.

## **11. APPROVAL/DOCUMENT HISTORY**

**Minnesota Department of Agriculture  
Food and Feed Safety Division**

Document FOOD.30.08	Page 7 of 11
Version #: 2.1	Effective Date: 1/18/2017
Title: <b>Manufacturer and Distributor Risk Category SOP</b>	

Document History		
Version #	Status (I, R)	Change History
1	I	Initial Policy Drafting.
2	R	Updated division name from DFID to FFSD; added definitions of risk category (level), risk classifications (facility classifications), enforcement actions, field compliance actions, chronic violator; updated section 6.3 to further clarify increase in inspection frequency; removed term "risk code" from the SOP.  Appendix changes include addition of high risk (facility) classifications MH14-MH18 and medium risk (facility) classifications MM19-MM21.
2.1	R	Section 6.3.3 added to provide further increased inspection frequency language.
DocuSigned by: 		1/18/2017
Approved By:		Date
Approved By:		Date

I = Initial document; R = Revised document

**Minnesota Department of Agriculture  
Food and Feed Safety Division**

Document FOOD.30.08	Page 8 of 11
Version #: 2.1	Effective Date: 1/18/2017
Title: <b>Manufacturer and Distributor Risk Category SOP</b>	

**Appendix A**

**Risk Categories – Manufacturing and Distributing**

**HIGH RISK MANUFACTURERS**

High risk manufacturing establishment category consists of firms that complete one or more of the following:

1. Produce potentially hazardous foods (PHF) that are considered ready to eat or are considered specialized processes as defined in the definitions section of this SOP;
2. Conduct high risk production such as canning, low acid foods, acidifying foods, vacuum packaging, salvaging, smoking for preservation, or curing;
3. Process potentially hazardous food frequently implicated in foodborne illness such as sprouts, unpasteurized juices, raw shellfish, cream filled pastries, or filled macaroni products.

MDA-FFSD considers these manufactures to be high risk based on the type and processing of foods (potentially hazardous foods or foods associated with foodborne illness), their ready-to-eat status (likelihood that there will not be a further kill or wash steps to eliminate risk potential), or these manufacturers engage in production and processing that is defined by regulation as specialized processing.

**SPECIFIC PROCESS TYPE HIGH RISK/FACILITY CLASSIFICATIONS**

MH1 - Low Acid Canned Foods

MH2 - Acidified Foods

MH3 - 100 % Juice - a Juice HACCP plan is required

MH4 - Fish/Seafood products - a Seafood HACCP plan is required

MH5 - Seed sprouts

MH6 - Sandwiches

MH7 - Salads

MH8 - Vegetable freezing plants

MH9 - Foods that are vacuum packaged, cured or smoked for preservation

MH10 - Food Salvors

MH11 - Fresh cut produce (produce items, peeled, cut, chopped on-site)

MH12 - Repackaging PHF only

MH13 - Other foods that are ready to eat potentially hazardous foods (RTE PHFs) not listed above such as a bakery or USDA inspected facilities with non-amenable RTE PHFs.

MH14 - Peanut or other Nut Butters

MH15 - Firm is subject to 117 Part C as of Sept 2016

MH16 - Firm is subject to 117 Part C as of Sept 2017

MH17 - Firm is subject to 117 Part C as of Sept 2018

MH18 - Medical Foods or other foods consumed only by Highly Susceptible Populations

**MEDIUM RISK MANUFACTURERS**

Medium risk manufacturing establishment category consists of manufacturers that process food products that are either ready to eat foods or potentially hazardous, but not both. MDA-FFSD considers these manufacturers to be medium risk because the food product being processed has some risk associated with it, but it does not rise to the risk level associated with foods that are both potentially hazardous and ready-to-eat or require special processes to control risk.



**Minnesota Department of Agriculture  
Food and Feed Safety Division**

Document FOOD.30.08	Page 9 of 11
Version #: 2.1	Effective Date: 1/18/2017
Title: <b>Manufacturer and Distributor Risk Category SOP</b>	

**SPECIFIC PROCESS TYPE MEDIUM RISK/ FACILITY CLASSIFICATIONS**

- MM1 - Candy manufacturer
- MM2 - Snack food manufacturer- potato chips, pretzels, nuts, granola bars, etc.
- MM3 - Bottled water
- MM4 - Beverage manufacturer (soft drinks, beverages containing less than 100% juice, soy/rice milk)
- MM5 - Brewery
- MM6 - Food Banks repackaging foods
- MM7 - Cereal manufacturer
- MM8 - Fermented and Acid Food Processors (such as kraut, mayonnaise, BBQ sauce, salsa, salad dressings, and other condiments that receive a heat treatment)
- MM9 - Ice manufacturers
- MM10 - Bakeries with Non-PHF's
- MM11 - Sugar (and other sweeteners) processors
- MM12 - Dietary supplements
- MM13 - Edible oil processors or extractors
- MM14 - Repacking non-PHF only
- MM15 - Dry ingredients/mixes/spices
- MM16 - Maple syrup processors
- MM17 - Honey processors
- MM18 - Other foods not previously listed that are non-PHF and RTE, and PHF that is not RTE
- MM19 - Winery
- MM20 - Distillery
- MM 21 - Spray Drying (Salmonella as pathogen of concern)

**LOW RISK MANUFACTURERS**

Low risk manufacturers consist of firms which do not process products that are ready-to-eat or potentially hazardous. MDA-FFSD considers these manufacturers to be low risk because the food product being processed is not potentially hazardous and there will be a further kill, wash or other processing step prior to consumption.

**SPECIFIC PROCESS TYPE LOW RISK/ FACILITY CLASSIFICATIONS**

- ML1 - Flour mills
- ML2 - Malting plants
- ML3 - Dry bean cleaning or packaging plants
- ML4 - Coffee or tea (dry)
- ML5 - Wild rice processors
- ML6 - USDA plants that manufacture only amenable food products
- ML7 - Other processors of non-PHF not listed above

**Minnesota Department of Agriculture  
Food and Feed Safety Division**

Document FOOD.30.08	Page <b>10</b> of <b>11</b>
Version #: <b>2.1</b>	Effective Date: 1/18/2017
Title: <b>Manufacturer and Distributor Risk Category SOP</b>	

**HIGH RISK DISTRIBUTORS**

High risk distributors consist of distributors that are required to have a Seafood HACCP plan. MDA-FFSD considers these distributors to high risk because they require a HACCP plan due to possible risks associated with seafood.

**SPECIFIC PROCESS TYPE HIGH RISK/ FACILITY CLASSIFICATIONS**

DH1 - Food warehouses requiring a Seafood HACCP plan

**MEDIUM RISK DISTRIBUTORS**

Medium risk distributors consist of distributors that have refrigerated storage or distribute perishable food products such as produce distributors (refer to 28A.03 (5) (a)). MDA-FFSD considers these distributors to be medium risk because they are required to maintain temperature control of their refrigeration, or they are distributing product that is more susceptible to adulteration during storage and distribution. Additionally, Seafood HACCP regulations apply, but a seafood HACCP plan is not required.

**SPECIFIC PROCESS TYPE MEDIUM RISK/ FACILITY CLASSIFICATIONS**

DM1 - Food warehouses with refrigerated or frozen seafood/fishery storage that includes only foods not requiring a Seafood HACCP plan

DM2 - Non-seafood refrigerated food storage

DM3 - Cold Storage warehouse (refrigerated)

DM4 - Produce warehouses without any processing

DM5 - Food Banks without any processing

**LOW RISK DISTRIBUTORS**

Low risk distributors consist of distributors that have frozen storage or ambient, shelf-stable storage. MDA-FFSD considers these distributors as low risk because there is a lower risk for temperature abuse with these types of storage facilities.

**SPECIFIC PROCESS TYPE LOW RISK/ FACILITY CLASSIFICATIONS**

DL1 - Freezer warehouses without foods subject to the Seafood HACCP regulation.

DL2 - Food warehouses with ambient storage only such as beverage, bakery and snack food warehouses

DL3 - Food wholesalers that are mobile units only with no warehouse storage

DL4 - Food Broker

**Minnesota Department of Agriculture  
Food and Feed Safety Division**

Document FOOD.30.08	Page 11 of 11
Version #: 2.1	Effective Date: 1/18/2017
Title: <b>Manufacturer and Distributor Risk Category SOP</b>	

**Appendix B: Amendable and Non-Amendable Food Items**

**Amenable species – products under USDA Jurisdiction**

- Cattle, sheep, swine, goats, horses, mules or other equines, ratites and squab.
- Domestic chickens, turkeys, ducks, geese, and guineas.
- Products containing 2% or more cooked poultry; 10% or more cooked poultry skins, giblets, fat and poultry meat in combination.
- Products containing more than 3% raw meat; 2% cooked meat; or 30% or more fat, tallow or meat extract; includes tamales, convenience meals, egg rolls meat salads, sambusas
- Open face sandwiches – wraps, burritos
- Meat pizzas and meat sauces (3% red meat or more); spaghetti sauce with meatballs; open face roast beef sandwiches; hot dogs; corn dogs; beef/vegetable pot pies.
- Chicken sandwich – open face; chicken noodle soup
- Shell egg of domesticated chicken, turkey, duck, goose or guinea.
- Egg breaking and pasteurizing operations.
- Egg products including dried, frozen, or liquid eggs with or without added ingredients.
- Catfish

**Non-amenable species – products under FDA Jurisdiction**

- Non-specified red meats: bison, rabbits, game animals, zoo animals, Cervidae (deer, elk, moose) – EXCEPT when USDA Inspection is required under MN Statute
- Non-specified birds: wild turkeys, wild ducks, wild geese
- Products with 3% or less raw meat; 2% or less cooked meat; or less than 30% fat, tallow, or meat extract.
- Products with 2% or less cooked poultry meat; less than 10% cooked poultry skins, giblets, fat
- Closed face sandwiches –i.e. between 2 slices of bread or on a bun
- Labels/labeling of shell eggs. Egg washing, sorting, packing.
- Freeze dried egg products, imitation egg products, egg substitutes, dietary foods, dried np-bake custard mixes, egg nog mixes, acidic dressings, noodles, milk and egg dip, cake mixes, French toast, sandwiches containing eggs or egg products, and balut or other ethnic delicacies.
- Cheese or vegetable pizza
- Meat flavored spaghetti sauce with less than 3% red meat; meat flavored spaghetti sauce with mushroom and less than 2% meat; pork and beans; sliced egg sandwich (closed face); frozen fish dinner, rabbit stew; shrimp-flavored noodles; venison jerky; buffalo burgers; alligator nuggets; noodle soup chicken flavor.