



SQF Food Safety Audit Edition 9

Brewster Heights Packing & Orchards dba Gebbers Farms - Apple House Warehouse and Storage

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
111525 | 155183

AUDIT RATING

DECISION DATE
06/10/2022

AUDIT TYPE
RECERTIFICATION



RECERTIFICATION DATE
05/07/2023

AUDIT DATES
04/27/2022 - 04/28/2022

Excellent

EXPIRATION DATE
07/21/2023

ISSUE DATE
06/10/2022

Facility & Scope

Brewster Heights Packing & Orchards dba Gebbers Farms (45855)

Apple House Warehouse and Storage
491 Industrial Way
Pateros, WA 98846
United States

Web Site: <http://www.gebbersfarms.com>

Food Sector Categories:

4. Fresh Produce, Grain, and Nut Packhouse Operations

Products:

Apples & Cherries

Scope of Certification:

Fresh Produce and Nuts Packhouse Operations

Certification Body & Audit Team

EAGLE Food Registrations, Inc.



EAGLE Food Registrations Inc.
SERVICE • INTEGRITY • VALUE

40 N Main Street
Suite 1880
Dayton, OH 45423
United States

Phone #: 937-293-2000

Email: info@eaglecertificationgroup.com

Web Site: <https://www.eaglecertificationgroup.com/>

CB#: CB-1-Eagle

Accreditation Body: ANSI

Accreditation Number: 0894

Lead Auditor: Bustos, Leonardo (202230)

Technical Reviewer: Stafford, Lindsey (202593)

Hours Spent on Site: 16

Hours of ICT Activities: 0

Hours Spent Writing Report: 8

NAME	ADDRESS
Al Aguilar	Wenatchee, WA 98801
Angel Valdovinos	Mattawa, WA 99349
Applecore Orchards LLC	Brewster, WA 98812
Blue Moon Orchards	Manson, WA 98831
Brewster 9	Brewster, WA 98812
C and G Orchards LLC	Brewster, WA 98812
CGM Farms, LLC	Oroville, WA 98844
CJC Farms	Tonasket, WA 98855
Coble Farms LLC	Mattawa, WA 99349
CWAC and CWAC Ranch LLC Totals	Brewster, WA 98812
Dan Agapo Orchards	Malott, WA 98829
Daranda Orchards	Mesa, WA 99343
David Schmelzer	Kennewick, WA 99336
Dimity Orchards LLC	Monse, WA 98812
DMC Detering LLC	Brewster, WA 98812
DMG Holdings LLC	Brewster, WA 98812
Double A Orchards	Omak, WA 98841
GRB Investments LLC, GRB Cherries LLC	Bridgeport, WA 98813
HMJD Collins, LLC	Chelan, WA 98816
Gutierrez Orchards	Oroville, WA 98844
GVL Orchards, WLP, GVL Cherries LLC	Brewster, WA 98812
Hawkins & Franco Orchards LP	Brewster, WA 98812
Hawkins Gebbers	Brewster, WA 98812
HMJD Orchards, LLC, HMJD Cherries LLC	Brewster, WA 98812
J & J Enterprises	Brewster, WA 98812
JBM Orchards	Bridgeport, WA 98813
JD Cherries LLC, Dan Bayha	Brewster, WA 98812
JHG Land LLC	Brewster, WA 98812
Mac & Randy-Roys, LP, Mac & Randy Cherries LLC.	Brewster, WA 98812
Mac & Cass Partnership LP, Mac & Cass Cherries LLC, MC Stenn	Brewster, WA 98812
Mac and Ed Orchards, LP	Chelan, WA 98816
Mac & Franco Orchards, LP, Mac & Franco Cherries LLC	Brewster, WA 98812
Mac & Kevin, LP, Mac & Kevin Cherries, LLC	Brewster, WA 98812
Mac & Tom Fruit, LP, Mac & Tom Cherries LLC	Malott, WA 98829

NAME	ADDRESS
Mac and Travis LLC	Manson, WA 98831
Mac Orchards, LLC	Brewster, WA 98812
Moser Orchards LLC - Triple M	Orville, WA 98844
Moser Ranch, LLC	Orville, WA 98844
Ophir Orchards LLC, Ophir Orchards Partnership	Malott, WA 98831
Orchard Management	Brewster, WA 98812
Oro Vista Orchards	Brewster, WA 98812
Pedro Guzman	Brewster, WA 98812
Pioneer Ranch, LP	Brewster, WA 98812
Solomon Rodriguez	Wenatchee, WA 98801
St. Hilaire & Sons	Kennewick, WA 99337
Taylor Orchard Group LP	Brewster, WA 98812
Chacon Orchards	Mattawa, WA 99349
V & J Orchards	Mattawa, WA 99349
Tony's Orchard	Mattawa, WA 99349

Non-Conforming

2.5.4 Internal Audits and Inspections (Mandatory)

The site's procedure for scheduling and conducting internal audits to assess the effectiveness of the SQF system has been documented and implemented per document QP-04-07 Internal Audits, dated 4/19/22. The Internal Audit Program is maintained by B.T., SQF Practitioner. Facility and equipment inspections were not performed during the last twelve months. All applicable SQF Code requirements, using the SQF checklist or a similar tool, are part of the internal audit program. Documented on Primary Plant Production Edition 9 Checklist, dated 2/16/22, performed by 13 Business Solutions, external consultants. The frequency of the audits is communicated to management C.R., Production Manager is responsible to see that corrective actions are implemented and verified. Personnel conducting audits have been properly trained and where practical, audit areas independent of their function. Records of regular internal audits were not available for review. 2.5.4.3. Minor NC: At the time of the audit, records of regular inspections in the building and equipment were not available for review; this verification activity has not been performed last year, for Good Operating Practices within the facility.

- 2.5.4.3** Regular inspections during growing and harvesting of products, packing of products, plant production, and/or equipment used shall be planned and carried out to verify Good Agricultural/Operating Practices and building/equipment maintenance are compliant to the applicable SQF Food Safety Code. The site shall: i. Take corrections or corrective and preventative actions; and ii. Maintain records of inspections and any corrective actions taken.

RESPONSE: MINOR

EVIDENCE: 2.5.4.3. Minor NC: At the time of the audit, records of regular inspections in the building and equipment were not available for review; this verification activity has not been performed last year, for Good Operating Practices within the facility.

ROOT CAUSE: Monthly walk through are completed and findings reported to the HACCP Team, however we were not aware of these requirements.

CORRECTIVE ACTION: Monthly Food Safety Inspection form created to be completed each month.

VERIFICATION OF CLOSEOUT: Accepted

COMPLETION DATE: 05/24/2022 **CLOSEOUT DATE:** 06/08/2022

10.1.2 Building Interior

Product contact surfaces, surfaces not in contact with food and storage areas are constructed of suitable materials including stainless steel, food grade plastic and aluminum. They were observed during the audit to be properly maintained so that food safety is not compromised. Floors are constructed of smooth and dense impact resistant material and properly graded for effective drainage of overflow or waste water. Waste trap systems are located outside in the drainage system, which is away from food handling areas. Waste water during the audit was observed to be properly discharged. Drains were observed to be located and constructed for ease of cleaning and inspection. Walls, ceilings and doors are of durable construction with smooth and light-colored surfaces. These areas were observed to be clean during the audit tours; however, a non-conformance was raised in this section. Wall to wall and wall to floor junctures were observed to be sealed and free of debris. Ducting, piping and conduit conveying services were observed to be properly designed and installed to prevent contamination and for ease of cleaning. Overhead cleaning was found to be part of the master cleaning schedule. Overhead waste water pipe installations did not pose a hazard of contamination to food, materials or food contact surfaces. Doors, windows and frames in product areas were observed to be properly constructed of materials with the same functional requirements as internal walls and partitions. The ceilings in all food processing and handling areas are constructed of aluminum and concrete, which are easily cleaned and prevent product contamination. Drop ceilings were not observed into the facility. There are no drop ceilings in the food manufacturing areas. N/A Stairs, catwalks and platforms were observed during facility tours to be constructed and designed so that food contamination is avoided, and with no open grates above exposed product surfaces. Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting is either covered or is shatter-proof. Suitable areas are provided for inspection and quality control activities, that are suitable for the examination and testing of the product. The area has easy access to hand washing; appropriate waste handling; and is kept clean. 10.1.2.3. Minor NC: During the plant walk, the auditor observed broken concrete walls, cracks and exposed insulation material in the north wall of the Common warehouse, and west wall of the Packing room. These rough surfaces are not easy to clean and sanitize.

10.1.2.3 Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have even, smooth light-colored finishes, be impervious to liquids, and shall be kept clean (refer to 10.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

RESPONSE: MINOR

EVIDENCE: 10.1.2.3. Minor NC: During the plant walk, the auditor observed broken concrete walls, cracks and exposed insulation material in the north wall of the Common warehouse, and west wall of the Packing room. These rough surfaces are not easy to clean and sanitize.

ROOT CAUSE: Damage caused to wall from bins hitting wall. Pieces put in place to protect the wall were damaged allowing for the wall to get damaged.

CORRECTIVE ACTION: A 1 foot thick wall 4 feet up will be poured to protect this area. Cracks will be mortared in with mortar mix. Removed metal that is bent on walls.

VERIFICATION OF CLOSEOUT: Accepted

COMPLETION DATE: 05/25/2022 **CLOSEOUT DATE:** 06/08/2022

10.4.1 Personnel Practices

Documented on QP-01-07 Personnel Processing Practices, dated 3/21/22. A Good Manufacturing Practice policy for all employees has been documented and implemented. Employees are prohibited from working in food handling or open food storage areas who are suffering from, or who are or were carriers of, an infectious disease that may be passed through food. The site has documented measures to prevent contact of product materials with bodily fluids and respond appropriately to any bodily fluid spillage. The policy includes the prohibition of any food handling activity for persons with exposed cuts, sores or lesions and requires that minor cuts or abrasions be covered with a waterproof, metal detectable, colored bandage or dressing. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements. A policy defining jewelry use has been written in QP-01-07 Personnel Processing Practices, Section 28 Jewelry, dated 3/12/22, and implemented. However, a non-conformance was raised in this section. Jewelry and other loose objects are prohibited in food processing and handling areas. Employees were not observed to comply with the jewelry policy during the audit tours. Plain bands are allowed by the facility's policy. Prescribed Medical Alert bracelets are allowed by policy when approved by management. Food handling procedures for all employees are documented and implemented. Personnel are required to access the processing areas through personnel doors only and doors were observed closed. False fingernails or fingernail polish, long nails, false or extended eyelashes are prohibited and no violations were noted. Hair restraints were observed to be worn where the product is exposed. Ingredients were in appropriate, labeled containers and kept off the floor. Wash down hoses were observed to be properly stored on racks when not in use. The GMP policy prohibits smoking, eating, drinking (except for water under acceptable, controlled conditions) or spitting in the facility. Smoking is permitted only in designated areas. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements. Amendment # 1: the facility has a procedure in place to screen all personnel and contractors in direct contact with food or food contact surfaces. 10.4.1.1. Minor NC: An operator in the sorting area was observed to have a cell phone in the back pocket; an operator in the shipping area wearing a necklace and another employee wearing a bracelet. The GMP jewelry policy for personnel hygiene rules, does not allow employees in the processing areas with jewels or cell phones.

10.4.1.1 A documented and implemented procedure for personal hygiene and personnel practices shall ensure that personnel engaged in the handling of product use appropriate personal hygiene practices. The procedure shall include instructions that: i. Jewelry and other loose objects that pose a threat to the safety of the product are not worn or taken into any product handling or storage operations. ii. Fingernail polish, artificial nails, and long nails are not permitted where product is handled with bare hands; iii. False eyelashes and eyelash extensions are not permitted; iv. Hair restraints are used where product is exposed; and v. Smoking, chewing, eating, drinking (except for water which shall be available to all personnel), or spitting are not permitted in any packing or storage areas. Note: The wearing of plain bands with no stones or jewelry accepted for religious or cultural reasons and prescribed medical alert bracelets can be permitted; however, the site will need to consider its customer requirements and the applicable food legislation. Personnel and visitor practices, including all those listed in 10.4.1, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices. Code Amendment #1 A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

RESPONSE: MINOR

EVIDENCE: 10.4.1.1. Minor NC: An operator in the sorting area was observed to have a cell phone in the back pocket; an operator in the shipping area wearing a necklace and another employee wearing a bracelet. The GMP jewelry policy for personnel hygiene rules, does not allow employees in the processing areas with jewels or cell phones.

ROOT CAUSE: Employees chose not to follow company policies for various reasons. Employee with necklace forgot he was wearing it, and employee with phone in pocket was waiting for a phone call due a sick child. Employees chose not to follow rules for various reasons.

CORRECTIVE ACTION: Training was completed with the Apple House staff on following company policies. Supervisors went over with staff Personnel Processing Practices QP-01-07.

VERIFICATION OF CLOSEOUT: Accepted

COMPLETION DATE: 06/01/2022 **CLOSEOUT DATE:** 06/06/2022

10.5.2 Control of Foreign Matter Contamination Operations

Policy QP-03-37 Foreign Matter, Glass and Hard Plastic, dated 6/20/09 defines the methods and responsibilities to prevent foreign material contamination. The policy's implementation was demonstrated by pre-operational inspections and regularly scheduled maintenance inspections, that are conducted and documented for the condition of equipment and any potential contaminants. A glass register has been documented with glass, brittle plastic and ceramic sources included in all areas of the plant. The glass register is registered on QP-04-11 Glass and Hard Plastic Register and current as of 3/1/22. Periodic inspections with documentation are made of these areas to ensure breakage has not occurred, and items are not missing or moved. The last inspection conducted on 4/4/22 was reviewed and found to be completed as scheduled. Wood pallets were clean and in good condition, and the facility has a policy controlling wooden pallets in processing/food handling areas; however, this policy was observed not to be completely implemented in the food handling areas; a non-conformance was raised. The site has documented a knife policy, and knives are controlled, cleaned and required to be in good condition. Periodic maintenance inspections include looking for loose objects and potential contaminants from overheads. 10.5.2.1. Minor NC: Broken wood pallets were observed to be in use in the warehouses. These are in bad condition and have splintered wood. A risk of foreign matter contamination in the food handling areas was determined during the plant tour.

10.5.2.1 The methods and responsibility for the prevention of foreign matter and glass contamination shall be documented and implemented. Procedures and resulting records shall ensure: i. Containers, equipment, and other utensils made of glass, porcelain, ceramics, brittle plastic, or similar materials are not permitted where exposed product is handled, unless clearly identified, required for effective operational controls, and regularly inspected; ii. Regular inspections are conducted to ensure food handling/contact zones areas are free of glass and brittle plastic and any items made from the previously identified materials are in good repair; iii. Wooden pallets and other wooden utensils or tools used in food handling/contact zones are dedicated for that purpose. Their condition is subject to regular inspection, and they are cleaned and maintained in good order; iv. Product handling areas are routinely inspected to remove risks from foreign material, such as debris, wood, stones, metal, detached/deteriorated equipment, and other physical hazards; and v. Personnel are to be made aware of their responsibility to adhere to the site's foreign matter and glass controls.

RESPONSE: MINOR

EVIDENCE: 10.5.2.1. Minor NC: Broken wood pallets were observed to be in use in the warehouses. These are in bad condition and have splintered wood. A risk of foreign matter contamination in the food handling areas was determined during the plant tour.

ROOT CAUSE: The house pallets are old, and have been damaged over the years. No attention was given to the condition of the pallets.

CORRECTIVE ACTION: New wood house pallets are being ordered to replace damaged pallets. Attention will be paid to the condition of the pallets in the future and they will be removed if in fragmented poor condition.

VERIFICATION OF CLOSEOUT: Accepted

COMPLETION DATE: 06/01/2022 **CLOSEOUT DATE:** 06/08/2022

Audit Statements

SQF Practitioner Name	Name the designated SQF Practitioner RESPONSE: Brian Thompson, SQF Practitioner.
SQF Practitioner Email	Email of the designated SQF Practitioner RESPONSE: thompsonb@gebbersfarms.com
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) RESPONSE: Leonardo Bustos, Lead Auditor; Brian Thompson, SQF Practitioner; Corey Riggan, Production Manager; Robert Grandy, Food Safety Director
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details) RESPONSE: Apple House Warehouse Inc. is a company dedicated to the packaging and storage of apples and cherries. The company was established in 2007. The process includes operations as receiving of apples and cherries, Dump tank (chlorinated 650 Mv to 950 Mv), pre-sorting area, brush bed (addition of soap, water and Peracetic Acid-70 ppm), rinsed and dried, wax bed, drier, sorting (for defects, sizer, color), stickers in apples, tray or bag fill, boxing, quality control, information stamp (lot number, variety pack, date and CA room), storage in segregated room, place in pallets and shipping. Cherries go to a cluster cutter after the dump tank step, to separate cherries, maintaining the stem. The size of the facility is 185,125 sq-ft and is located in a rural area in Pateros, WA. 23 Controlled Atmosphere rooms are used for storage of raw materials and finished products. The production is running one shift from 5:00 am to 3:30 pm, with 75 full time employees. No sources of contamination were observed in the surroundings of the facility.
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) RESPONSE: Leonardo Bustos, Lead Auditor; Brian Thompson, SQF Practitioner; Corey Riggan, Production Manager; Robert Grandy, Food Safety Director
Auditor Recommendation	Auditor Recommendation RESPONSE: Apple House Warehouse and Storage Inc. has been SQF certified since 2010. The facility has updated their SQF Food Safety System to Edition 9. There were raised 4 minor non-conformances and the auditor recommends recertification following closure of the non-conformances.

Section Responses

2.1.1 Management Responsibility (Mandatory)

The site has a food safety commitment statement, called QP-01-05 Quality Policy Statement, dated 4/18/22, that senior management has implemented. It is signed by a senior manager, C.R., Production Manager. The Policy statement covers customer and regulatory requirements, the use of continuous improvement of the system and the review of food safety objectives. The Policy is communicated to the facility's staff by at hiring training and is in languages used in the site, English and Spanish. The policy was observed to be posted in the Walkway. An organizational chart, dated 4/26/22 outlines the structure of staff having responsibility for food safety. Senior management has communicated this to the organization and provides the resources for implementation of the food safety systems. B.T., SQF Practitioner is the designated SQF Practitioner, is a full-time employee of the facility and has a HACCP food safety training course, as evidenced by Certificate of Accomplishment, issued for Brian Thompson, dated 2/23/2021; HACCP food safety training course, as evidenced by the NSF Training and Education, HACCP Refresher Online, dated on 2/23/21. Certificate of Attendance, Implementing SQF Systems, dated on 5/23-24, 2011. FSPCA, Certificate of Training, issued for Brian Thompson, dated 02/01/17. The SQF Practitioner is responsible for the development, implementation and maintenance of the SQF System. The designated substitute SQF Practitioner is B.G., Food Safety Director, is a full-time employee of the facility and has a HACCP food safety training course, as evidenced by the certificate, The National Environmental Health Association, HACCP Basics for the Fresh and Fresh Cut Produce Industries, NEHA HACCP Manager, dated 9/2018. FSPCA, issued for Robert Grandy, dated 3/16/17. Job descriptions are written for staff responsible for food safety, with coverage for absenteeism assigned. Job descriptions for C.R., Production Manager, J.S., Line Supervisor, P.B., Tray Line Supervisor and H.M., Maintenance Supervisor were reviewed. Plant staff is required to report food safety issues to management, as evidenced by the policy Management Commitment and interviews with M.M., Maintenance, H.M., Maintenance, P.B., Supervisor, B.X., Sorting Operator, J.S., Supervisor and A.P., Shipping. No blackouts dates are reported; the company works the whole year round and this was an announced audit. The food safety culture presentation is communicated to all staff in the facility and is documented on Food Safety Policy Statement, Section 7 Food Safety Culture; interviews with key personnel in the plant, demonstrated that food safety culture is implemented and practiced within the facility.

2.1.1.1 Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to: i. Supply safe food; ii. Establish and maintain a food safety culture within the site; iii. Establish and continually improve the site's food safety management system; and iv. Comply with customer and regulatory requirements to supply safe food. The policy statement shall be: v. Signed by the senior site manager and displayed in prominent positions; and vi. Effectively communicated to site personnel in language(s) understood by all staff.

RESPONSE: COMPLIANT

2.1.1.2 Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment and documentation of clear and concise food safety objectives and performance measures and their communication to all relevant staff; ii. Adequate resources are available to meet food safety objectives and performance measures; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Staff are informed and are aware of their food safety and regulatory responsibilities; v. Staff are informed and held accountable for their food safety and regulatory responsibilities; vi. Staff are positively encouraged and required to notify management of actual or potential food safety issues; and vii. Staff are empowered to act to resolve food safety issues within their scope of work.

RESPONSE: COMPLIANT

2.1.1.3 The reporting structure shall identify and describe the site personnel with specific responsibilities for tasks within the food safety management system and identify backup for absence of key personnel. Job descriptions for the key personnel shall be documented.

RESPONSE: COMPLIANT

2.1.1.4 Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review, and maintenance of the SQF System, including Good Agricultural/Operating Practices outlined in 2.4.2, and the food safety plan outlined in 2.4.3. ii. Take appropriate action to ensure the integrity of the SQF System; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System

RESPONSE: COMPLIANT

2.1.1.5 The primary and substitute SQF practitioner shall: i. Be employed by the site; ii. Hold a position of responsibility related to the management of the site's SQF System; iii. Have completed a HACCP training course; iv. Be competent to implement and maintain HACCP based food safety plans; and v. Have an understanding of the SQF Food Safety Code: Primary Plant Production and the requirements to implement and maintain an SQF System relevant to the site's scope of certification.

RESPONSE: COMPLIANT

2.1.1.6 Senior site management shall ensure the training needs of the site are resourced, implemented, and meet the requirements outlined in system elements 2.9 and that site personnel have met the required competencies to carry out those functions affecting the legality and safety of food products.

RESPONSE: COMPLIANT

2.1.1.7 Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.

RESPONSE: COMPLIANT

2.1.1.8 Senior site management shall designate defined blackout periods that prevent unannounced re-certification audits from occurring out of season or when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed-upon unannounced audit.

RESPONSE: COMPLIANT

2.1.2 Management Review (Mandatory)

The entire SQF System is reviewed annually by the site's 5 members of the Food Safety Team with the last review documented and completed on 4/19/22, System Review Checklist. The review includes the food safety manual, internal and external audit findings, the investigations and resolutions of corrective actions and customer complaints with investigations and resolution. Food safety plans, Good Manufacturing Practices and the rest of the SQF system are reviewed by management when any potential changes are made in products and processes. The SQF Practitioner has updated senior site management C.R., Production Manager title on a monthly basis, by means of Monthly HACCP Meeting/Monthly Verification Audit (SQF System Records), dated January 2022, February 2022 and March 2022, on any matters that impact the site's SQF System.

2.1.2.1 The SQF system shall be reviewed by senior site management at least annually and include: i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan); ii. Food safety culture performance; iii. Food safety objectives and performance measures; iv. Corrective and preventative actions and trends in findings from internal and external audits, customer complaints, and verification and validation activities; v. The hazard and risk management system; and vi. Follow-up action items from previous management review. Records of all management reviews and updates shall be maintained.

RESPONSE: COMPLIANT

2.1.2.2 The SQF Practitioner(s) shall update senior site management on at least a monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented.

RESPONSE: COMPLIANT

2.1.3 Complaint Management (Mandatory)

The site's written Complaint policy is found in the document QP-04-09 Customer Complaints, dated 7/9/09. It defines the methods and responsibilities for handling customer complaints and has been implemented. The investigation of complaints is handled by C.R., Production Manager, with corrective actions and records kept of each complaint and resolution. Records of complaints were reviewed for Decay in Extra Fancy Apple, dated 4/25/22; Chelan Organic Gala Apples, with 2.5-5% defects as bruising, splitting and skin break, dated 4/13/22 and showed that investigation and corrective actions of the complaints had been put into place. Trending graphs of complaints for the time period September 2021 to April 2022 were also reviewed.

2.1.3.1 The methods and responsibility for handling, investigating, and resolving complaints from commercial customers, consumers, and authorities arising from products grown or handled on-site, shall be documented and implemented.

RESPONSE: COMPLIANT

2.1.3.2 Adverse trends of customer complaint data shall be investigated and analyzed, and root cause established by personnel knowledgeable about the incidents.

RESPONSE: COMPLIANT

2.1.3.3 Corrective and preventative action shall be implemented based on the seriousness of the incident and the root cause analysis as outlined in 2.5.3. Records of customer complaints, their investigation and resolution shall be maintained.

RESPONSE: COMPLIANT

2.2.1 Food Safety Management System (Mandatory)

A food safety manual has been developed and is maintained in hard copy and electronically form, called SQF Manual Policies and Procedures/Apple House Warehouse and Storage 2014, last actualized on 4/26/22; also, in the company's shared drive, named Food Safety, and maintained by B.T., SQF Practitioner. The food safety manual contains the scope of the certification, a list of products in the scope, the organizational chart and food safety policies, programs and procedures that make up the site's SQF System. It is made available to all relevant staff by means of company's server, called Food Safety and printed copy in the Apple House Office.

2.2.1.1 The methods the site uses to meet the requirements of the SQF Food Safety Code: Primary Plant Production shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include: i. Food safety policies and organization chart; ii. Products covered under the scope of certification; iii. Food safety regulations that apply to the site and to the country of sale if known; iv. Agricultural inputs/materials, packaging materials, and finished product specifications; and v. Written procedures and programs (Good Agricultural Practices and/or Good Operational Practices) and other documentation necessary to support the development, implementation, maintenance, and control of the SQF System (e.g., food safety plans, validation, and verification).

RESPONSE: COMPLIANT

2.2.1.2 Food safety plans, Good Agricultural/Operating Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any potential changes implemented have an impact on the site's ability to deliver safe food. The reason for the change shall be documented.

RESPONSE: COMPLIANT

2.2.2 Document Control (Mandatory)

The site has implemented its policy called QP-05-01 Document and Data Control, dated 4/13/22, defining the methods and responsibilities for document control. Records were found during the audit to be readily accessible and properly stored. A current list of all SQF documents is maintained and documents were observed to be stored securely and are accessible. The register of SQF documents is called Table of Contents TOC, Revision 20, and is found in the SQF Manual and in the company's shared drive Food Safety.

2.2.2.1 The methods and responsibility for maintaining document control, including records, shall be documented and implemented. They shall ensure that documents and records are i. Controlled; ii. Current; iii. Safely stored to prevent unauthorized access, loss, damage, and deterioration; iv. Organized in a registry or listing form; and v. Readily accessible in a manner that ensures employees use up-to-date and current policies, procedures (work instructions/task lists), and forms when documenting food safety related activities.

RESPONSE: COMPLIANT

2.2.3 Records (Mandatory)

The site has implemented its policy for verifying and retaining records found in the document called QP-05-01 Records, dated 4/13/22. The facility has documented procedures for recording production as well as the proper correcting and initialing of errors. These are based on customer, company and regulatory requirements. Records were observed to be readily accessible, legibly filled out, securely stored to prevent damage and have documented retention times. Records are retained for 2 years in the Vault Room, and then shredded and discarded. Shelf Life for apples is 3 months with suitable storage conditions and 2 to 4 weeks for cherries in cold storage.

2.2.3.1 All manual or electronic/digital records shall be legible, suitably authorized, and/or signed by those undertaking activities to demonstrate that inspections, supervisory reviews, testing, and other essential activities have been completed.

RESPONSE: COMPLIANT

2.2.3.2 Records shall be retained in accordance with periods specified by a customer or regulations or at a minimum no less than product shelf life.

RESPONSE: COMPLIANT

2.3.1 Plant Variety/Hybrid or Product Development

2.3.1.1-2.3.1.4 Product Development is not carried out at this site. N/A

2.3.1.1 The methods and responsibility for designing, developing, and converting product concepts (e.g. new varieties, hybridization, crops, species) to commercial realization shall be documented and implemented and comply with regulatory and customer requirements. Records for new products testing, shelf life, and final approvals shall be maintained.

RESPONSE: NOT APPLICABLE

2.3.1.2 The food safety plan shall be reviewed and revised accordingly for each new product and its associated process through conversion to commercial production and distribution, or where a change to inputs, process, or packaging occurs that may impact food safety.

RESPONSE: NOT APPLICABLE

2.3.1.3 New products shall be tested and inspected to ensure they meet stated shelf life, maximum residue limits (MRLs), and other regulatory and customer requirements (e.g., potency, strength, purity).

RESPONSE: NOT APPLICABLE

2.3.1.4 The process flows for all new and existing processes shall be designed to ensure that products meet specifications and to prevent cross-contamination.

RESPONSE: NOT APPLICABLE

2.3.2 Specifications (Agricultural Inputs, Packaging, Harvested Product, and Contract Services)

Specifications for raw materials, packaging, additives and chemicals have been documented. Current registers were reviewed for raw materials, packaging materials and labels. Specifications for raw materials: Honey Crisp including specifications of computer code, sticker, color, stem russet, shape, scab, insect damage, hail damage, sunburn, thinning bruises and bruises; Early Gold-Supreme, Braeburn, Cameo, Jonagold Gala and Export Fuji, were reviewed. Packing materials: pouch bag DP 12, display box, cherry clamshells, poly bags 1,5 lb, Poly Liners MA Life Span and Soaker Pads. Additives: Carnauba Wax and Shelac Wax, were reviewed and found to be current. A policy defining the methods and responsibilities for developing and maintaining specifications has been documented and implemented in QP 02-01b, Apple House General Specifications- Approved Suppliers, actualized on 3/19/21. Raw and packaging materials are verified to ensure product safety, regulatory requirements and fit for purpose requirements are met. These are done by means of testing the raw materials by QC Harvest Procedure, including analysis of starch, sugar pressure, color and size. Letters of Guaranty for packing materials are provided by suppliers: Statement of Commitment, Sonoco Plastics, supplying the clamshells; Commencement Bay Corrugated with Letter of Guaranty, showing compliance to regulation section 303 (c) (2) of the Federal Food, Drug and Cosmetic Act; Packaging Corporation of America, showing that their products are made only with materials cleared for use by the US FDA food additive regulations 21 CFR 176.170 and 176.180. All food contact packaging, have a certificate of conformance from FDA, indicating that it does not present a risk of chemical migration to food products. Product labels are approved by D.B., Chelan Fresh, who is qualified to ensure they are accurate and meet regulatory requirements. There is a register of raw material, ingredients and packaging specifications, called Chelan Fresh Marketing for finished products/Apple House General Specifications-Approved Suppliers, that was found to be current. Descriptions of services provided by all contract service providers having an impact on food safety are documented in SQF Manual/2.3.2.1. Specifications/Contracted Services Register dated 4/26/2. A list of current contract service providers is maintained in Apple Warehouse and Storage Contracted Services Register 4-26-21, and found to include providers of services including Hygiena, Zippy Garbage Disposal, IEH Labs, Western Scale and Sprague Pest. Contract arrangements for Sprague and Pace International were reviewed during the audit and found to be satisfactory. Finished product specifications are current, documented and approved by the site's customers. Specifications include chemical parameters (MRLs before harvest performed by B.G., Food Safety Director), labeling, sensory (color, stem russet, russet, shape, lenticels, scab, blemish, hail damage, sunburn, thinning bruises and bruises) and packaging requirements. A register of all current finished product specifications is maintained in the SQF Manual. Finished product specifications for Golden Delicious Apple, Granny Smith and Export Fuji were reviewed during the audit and contained the required information.

2.3.2.1 Specifications and/or descriptions for seeds, agricultural inputs, packaging, and contract services that impact finished product safety shall be documented, approved, comply with relevant legislation, and kept current through a review process.

RESPONSE: COMPLIANT

2.3.2.2 Food contact packaging, seeds, and agricultural inputs shall be verified to ensure product safety is not compromised and the material is fit for its intended purpose. Verification shall include certificates of conformance, certificate of analysis, or sampling and testing (refer to 2.4.4.1).

RESPONSE: COMPLIANT

2.3.2.3 Finished product specifications shall be documented, approved by the site and its customer where applicable, accessible to relevant staff, and kept current through a review process. Specifications shall include, where applicable: i. Microbiological, purity, strength, composition, and agricultural chemical limits; ii. Maximum residue limits (MRLs) for pesticides; and iii. Labeling and packaging regulatory and customer requirements.

RESPONSE: COMPLIANT

2.3.2.4 The methods and responsibilities for managing contract farms, services (e.g., spraying), packers, or storage and distribution facilities shall be documented and implemented to ensure the following are being met: i. Contract farms and services shall comply with the SQF Food Safety Code: Primary Plant Production and relevant regulatory and customer requirements; ii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel; and iii. Records of all contract reviews and changes to contractual agreements and their approvals are maintained.

RESPONSE: COMPLIANT

2.3.2.5 A register or listing of all specifications and/or descriptions for seeds, agricultural inputs, packaging, and labels, finished products, and contract services shall be maintained and kept current.

RESPONSE: COMPLIANT

2.3.3 Approved Supplier/Input Purchasing Program (Mandatory)

The site has a written supplier approval policy QP-02-02 Approved Supplier/Input Purchasing Program /Supplier Approval, Evaluation and Management, dated 4/19/22, which has been implemented and covers the procedures for approving suppliers of raw materials, ingredients, packaging materials and services. The policy includes a review of the specifications of products, the supplier's food safety controls, procedures for granting and monitoring approved suppliers, the level of risk of products to the site and details of requirements for Pure Food Guarantees and testing of raw materials, made by Chelan Fresh, the sales company. Approved supplier performance and status is reviewed using suppliers' evaluations, suppliers historically been deemed acceptable and completion of the form F-02-01 Supplier Evaluation Form. Letters of Guarantee are required for fruit trays, boxes, plastic bags, clamshells and foam box liners. The procedures for emergency use of non-approved suppliers have been documented. Per the supplier approval policy, incoming materials from sister facilities are subject to the same specifications and supplier approval requirements. It was observed that the food defense plan contains methods to secure incoming products from sabotage, the food fraud vulnerability assessment identifies threats to incoming product substitution, mislabeling and dilution, and the food fraud mitigation plan demonstrates these threats are controlled. A register is maintained of all current approved suppliers, which was reviewed during the audit and found to be acceptable. Raw materials: Crisp Sweet Miniature Apple, Granny Smith and Organic Gala Sport, found in the storage warehouse were verified to have come from suppliers on the Approved Supplier List. Supplier audits are not performed by the facility. Gebbers Farms are all Global GAP Certified, which represents about 95 % of all incoming raw materials. Apple House Warehouse and Storage Inc. has in place the General Specifications for Approved Suppliers (raw materials and services), dated 4/22/21, including the emergency suppliers, in case they need them.

2.3.3.1 Seeds, agricultural inputs, harvested product, market-ready product, and packaging materials that impact finished product food safety shall be supplied by an approved supplier. The methods and responsibility for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented. The approved supplier program shall contain at a minimum: i. A risk level assigned to each supplier that is based on the past performance of the supplier, criticality to the site, food safety risk, and other relevant factors determined by the site; ii. Agreed specifications; iii. A summary of the food safety controls implemented by the approved supplier, including regulatory compliance and licensing where applicable; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers, which may include testing, receiving inspection, and/or supplier audits; vi. Methods and frequency of reviewing approved supplier performance and status. Where supplier audits are used as a monitoring tool, they shall be based on risk and conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques. A register or list of approved suppliers and records of monitoring activities shall be maintained. Code Amendment #2 Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered.

RESPONSE: COMPLIANT

2.3.3.2 The receipt of seeds, agricultural inputs, harvested product, market-ready product, and packaging materials from non-approved suppliers shall be acceptable in an emergency situation, provided they are inspected or analyzed before use.

RESPONSE: COMPLIANT

2.3.3.3 Agricultural inputs, harvested product, market-ready product, and packaging materials received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and receiving inspections as all other material providers.

RESPONSE: COMPLIANT

2.4.1 Food Legislation (Mandatory)

The site has ensured that products delivered to its customers comply with regulatory requirements in the country of use. Regulatory compliance for this operation includes food safety requirements, additive (wax), labeling, sensory, Physical (pressure, size, weight) and nutritional requirements; documented on QP-03-43 Legislative Connection to QMS. The site keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by means of communications with the Washington State Department of Agriculture, WSDA, SQF website and Washington State Tree Fruit Association. The site has a written provision that Eagle Certification Group, the certification body, and SQFI will be notified within 24 hours if a food safety event requiring public notification occurs.

2.4.1.1 The owner/senior site manager shall ensure that, at the time of delivery to its customer, the food supplied shall comply with food safety and production legislation applicable in the country of use and sale, if known. Any specific licensing requirements or commodity-specific regulations shall be maintained and kept current.

RESPONSE: COMPLIANT

2.4.1.2 The methods and responsibility for ensuring the organization is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.

RESPONSE: COMPLIANT

2.4.1.3 SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

2.4.2 Good Agricultural/Operating Practices (Mandatory)

Documented on 2.4.2. Good Agricultural/Operating Practices. The property, buildings and equipment are located, constructed and designed to ensure food is manufactured in a safe, hygienic environment. The site has written and implemented those Good Manufacturing Practices applicable to the scope of this certification. These food safety pre-requisite programs are found in SQF Binder, Module 10. The effectiveness of the pre-requisite programs has been verified based on a schedule, which is found in Monthly Verification Audit (SQF System Records), dated 4/1/22.

2.4.2.1 The site shall ensure the applicable Good Agricultural Practices described in modules 7, 8, or 18 and the Good Operating Practices described in module 10 of this Food Safety Code are documented and implemented (refer to 2.2.1.1), or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised.

RESPONSE: COMPLIANT

2.4.3 Food Safety Plan (Mandatory)

Two Food Safety Plans have been developed, implemented and maintained by the site. They are kept on file in HACCP Plan Validation and Summary CCPs in the SQF binder, dated 4/27/22 and maintained by B.T., SQF Practitioner. The Food Safety Plans have been prepared in accordance with the 12 steps identified in the Codex Alimentarius Commission HACCP guidelines. A multi-disciplinary Food Safety Team has been identified and trained, with documentation found in QP-03-05 HACCP Team members (5 members). The Plans include a list of all products in the scope of the certification, a complete product description, intended product use (no vulnerable populations identified) and flow diagrams for each process including all input and output steps in the process. The process flow has been verified by the site per onsite inspection. The food safety team has analyzed all hazards reasonably likely to occur including physical, chemical and microbiological hazards for each process step, ingredient and packaging. Control measures are in place to eliminate or reduce the food safety risk to acceptable levels. A Critical Control Point has been identified as Dump Tank - CCP Chlorine ORP: Chlorine kills bacteria with a target concentration of 650 Mv-950 Mv. Peracetic Acid (PAA) Bar with a target concentration of 70 ppm. The PAA spray bar, becomes the CCP in case that Dump Tank Chlorine is not used or fails (concentration below 650 Mv); in this case the PPA bar is used as a backup. For cherries the line has 4 tanks with addition of chlorine solutions, CCP; no PAA is added to cherries. Cherries HACCP Plan is documented on: HACCP Hazard Analysis Worksheet Process Steps (Apple House). The Critical Limit for CCP Chlorine is 650 Mv, and 70 ppm for PAA (minimum concentrations). These are monitored and verified in the Food Safety plans. Any deviations found in monitoring of established control limits are documented and investigated, with proper disposal of involved products. The plans are verified as part of the SQF System and reviewed annually or when changes occur, by the food safety team with the last review date on 4/27/22.

2.4.3.1 A HACCP-based referenced food safety plan, developed by a responsible authority, shall be implemented in the absence of a specifically developed food safety plan for the site. The site shall: i. Maintain current records indicating that the food safety plan has been reviewed and its scope of hazard analysis, risk assessments, and control measures, such as Good Agricultural or Operational Practices, cover all products produced and sold by the site and are within the scope of certification; and ii. Document when changes in the food safety plan have impacted their Good Agricultural or Operational Practices. Note: Sites shall choose either 2.4.3.1 or 2.4.3.2 with the subsequent 2.4.3 requirements as the mandatory element.

RESPONSE: COMPLIANT

2.4.3.2 Where a site has developed its own food safety plan, either by choice or due to product(s) not included within the scope of a HACCP-based model as per 2.4.3.1, it shall be implemented and maintained and outline how the organization controls and assures food safety of the products or product groups and their associated processes that are included in the scope of the SQF certification. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

RESPONSE: COMPLIANT

2.4.3.3 The food safety plan(s) shall be developed and maintained by a team that includes the SQF practitioner and those site personnel with agricultural, technical, and/or machinery knowledge relevant to the commodities and products. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.

RESPONSE: COMPLIANT

2.4.3.4 The scope of each food safety plan shall be developed and documented including the start and endpoints of the processes under consideration and all relevant inputs and outputs.

RESPONSE: COMPLIANT

2.4.3.5	<p>Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. These shall reference and/or include: i. The finished product specifications; ii. Information relevant to product safety, such as it is ready-to-eat, requires further processing, and/or storage conditions; and iii. The intended use of each product, which includes target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative use of the product.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.6	<p>The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process of primary production, all agricultural inputs, packaging material, service inputs (e.g., water, steam, gasses as appropriate), process delays, and all process outputs, including feed, waste, and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.7	<p>The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including agricultural inputs.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.8	<p>The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.9	<p>The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.10	<p>Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.11	<p>For each identified CCP, the food safety team shall identify and document the critical limits that separate safe from unsafe product. The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures, individually or in combination, effectively provide the level of control required (refer to 2.5.2.1).</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.12	<p>The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the test frequency.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.13	<p>The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.14	<p>The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs, or other changes affecting product safety occur.</p> <p>RESPONSE: COMPLIANT</p>
2.4.3.15	<p>Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5).</p> <p>RESPONSE: COMPLIANT</p>

2.4.3.16 Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.

RESPONSE: COMPLIANT

2.4.3.17 Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements.

RESPONSE: COMPLIANT

2.4.4 Product Sampling, Inspection and Analysis

The site's procedures and criteria for sampling, inspecting and analyzing raw materials, work-in-progress and finished product have been documented and implemented in QP-04-13 Apple Inspection In-Process Packed Storage and Final, dated 2/11/13. Letter of Guaranty are required for ingredients Carnauba Wax, Global GAP for apples and cherries provided by suppliers (farms) and Letters of Guaranty for boxes, trays, clamshells boxes, poly Liners and bags. Apples and Cherries are tested by Gebbers Farms in the Orchards, for sugar, color, size, firmness, defects and cull analysis. Size and color (grade standards) are checked during process in quality areas in the processing line. All analyses are conducted to nationally recognized standards or by an equivalent validated method. Apple House does not conduct product or environmental testing. Product evaluation and testing records were reviewed for Granny Smith Apple, Golden Apple and Honey Crisp Organic Apple, during the audit and found to be conducted per procedures.

2.4.4.1 The sampling, inspecting, and/or analyzing of agricultural inputs and finished product shall be documented and implemented. The procedures applied shall ensure: i. Inspections and analyses are completed at regular intervals as required and to agreed specifications (e.g., MRLs, purity, strength, composition as per 2.3.2) and regulatory and labeling requirements; ii. Records of all inspections and analyses are maintained; and iii. All analyses are conducted to nationally recognized methods or alternative methods which are validated as equivalent to the nationally recognized methods. Where external laboratories are used to conduct input or product analyses, the laboratories shall be accredited to ISO 17025 or an equivalent national standard, licensed or recognized by a regulatory authority if required, and shall be included on the site's contract service specifications register (refer to 2.3.2.1). Where internal laboratories are used to conduct input or product analyses, sampling and testing methods shall be used in accordance with the applicable requirements of ISO/IEC 17025 or an equivalent national standard, including annual proficiency testing for personnel conducting analyses.

RESPONSE: COMPLIANT

2.4.4.2 On-site laboratories conducting chemical and microbiological analyses that may pose a risk to product safety shall ensure the following: i. Be located separate from any food handling or packaging activity and designed to limit access only to authorized personnel; ii. Provisions shall be made to isolate and contain all laboratory waste and to manage laboratory waste separately from food waste; iii. Laboratory wastewater outlets shall at a minimum be downstream of drains that service food processing and handling areas; and iv. Signage is displayed that identifies the laboratory area as a restricted area, accessible only by authorized personnel.

RESPONSE: COMPLIANT

2.4.5 Non-conforming Agricultural Inputs and Products

The site has written procedures for withholding non-conforming products, raw materials, work-in-progress, packaging and equipment in document QP-03-03 Corrective and Preventive Action embedded in Procedure 4.1 Non-Conforming Product, dated 6/19/09, which were found to be properly implemented in the facility. Methods to segregate, identify, handle and dispose of product include Orange on Hold Tag and designation of a segregated area in PN 12 CA Room, and were observed to minimize any inadvertent use. Nonconforming products is identified, segregated or disposed of, with records maintained by C.R., Production Manager. This was observed during the audit by a review of the Hold Log for items: Organic Honey Crisp and Organic Gala. Relevant staff is aware of the site's Hold policy, as evidenced by interviews with B.T., SQF Practitioner and C.R., Production Manager.

2.4.5.1 The methods and responsibility for how to control non-conforming products, agricultural inputs, and packaging shall be documented and implemented. The procedures shall ensure: i. Items are quarantined (held), identified, handled, re-worked, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; ii. All relevant personnel are aware of the site's hold and release instructions and approvals; and iii. Records of non-conforming product holds, release, and dispositions are maintained.

RESPONSE: COMPLIANT

2.4.6 Product Rework

Documented on: QP-03-03 CAR Procedure and Packaging. The site's policy for reworking (recycling or recouped) product has been implemented. Reworked product is clearly identified, traceable, inspected and analyzed before release. Rework operations were observed to be supervised by qualified personnel. Records are maintained for all reworked product. These records were reviewed during the audit for Organic Honey Crisp Apple and Organic Gala Apple.

2.4.6.1 The responsibility and methods outlining how harvested or packaged product or packaging are reworked shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are supervised by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Each batch/lot of reworked product is inspected or analyzed as required before release; iv. Inspections and analyses conform to the requirements outlined in element 2.4.4.1; and v. Records of all reworking operations are maintained.

RESPONSE: COMPLIANT

2.4.7 Product Release (Mandatory)

The site has written procedures QP-04-13 Apple Inspection in Process, Packed Storage and Final, dated 4/23/19, implemented for releasing finished products. WSDA is licensed by the USDA to conduct inspections as a regulatory Agency for the State of Washington and all varieties packed are inspected each day. Chelan Fresh Marketing (sales and Marketing company for Apple House) is responsible for final inspection which determines if the load ships. These release procedures include ensuring that all product inspections and analyses have been verified and documented by authorized personnel to show that all food safety and quality controls have been met. A review of records for product releases were done: registered in Quality Assurance Report, dated 4/19/22 testing bruising, skin break and splitting; Organic Gala, dated 4/13/22 reviewed during the audit showed they had been conducted per procedures.

2.4.7.1 The methods and responsibility for releasing finished products shall be documented and implemented. The methods applied shall ensure: i. The product is released by authorized personnel; ii. The product is released only after all inspections and analyses have been successfully completed, reviewed, and documented; and iii. The product meets regulatory and other established food safety controls. Records of all product releases shall be maintained.

RESPONSE: COMPLIANT

2.4.8 Environmental Monitoring

The site has implemented a risk-based environmental monitoring program, which is described in the document called Environmental Monitoring Program Version 1, dated 4/11/2016. The sampling and testing program include: samples are collected on a monthly basis; zone 1: direct Product Contact Surfaces, ATPs are performed but not swabbed for pathogens; zone 2: Indirect near product contact surfaces, 15 samples are taken in this zone; 11 swabbing's in zone 3; 6 samples in zone 4. Zone 3: non-product contact surfaces (walls floors doors etc.); zone 4 areas remote from product contact surfaces (bathrooms, cafeteria, hallways, coolers, etc.). Records reviewed show that corrective actions were taken when unsatisfactory trends were found. Records reviewed from IEH Laboratories and Consulting Group, Certificate of Analysis, Gebbers Farms Apple House, dated 1/19/22 showing results for "Process Control Testing". Another record from 10/30/21, swabbing zones 2, 3, and 4; all records showed results under 9; 9 or above, is in an indicator of possible presence of Listeria or Salmonella; in this case the company reclean and retest again at least three times, until the result is less than 9.

2.4.8.1 A risk-based environmental monitoring program shall be in place for all products grown indoors and packhouse operations and include all processes and immediate surrounding areas. The methods and responsibility for the environmental monitoring program shall be documented and implemented.

RESPONSE: COMPLIANT

2.4.8.2 An environmental sampling and testing schedule shall be prepared. It shall at a minimum: i. Detail the applicable pathogens or indicator organisms to test for in that industry; ii. List the number of samples to be taken and the frequency of sampling; iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and iv. Describe the methods to handle elevated or undesirable results.

RESPONSE: COMPLIANT

2.4.8.3 Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) implemented where unsatisfactory trends are observed.

RESPONSE: COMPLIANT

2.5.1 Validation and Effectiveness (Mandatory)

The methods, responsibilities and criteria for ensuring the effectiveness of Good Manufacturing Practices, critical food safety limits and all other applicable elements of the SQF System have been documented and implemented. These methods are documented on QP-03-01 Food Plans Summary and Validation, section 5 Validation, dated 4/12/22, including review of records, and Scientific Data on chemical efficacy, such as chlorine or Perasan A. Daily monitoring of chlorine and PAA concentrations, registered on the Chemical Monitoring Log checking mV (minimum 650 for chloride), CHL concentrations (20 ppm to 24 ppm) , pH 7.9, temperature 60 F average and PAA (70 ppm); monthly calibrations of ORP machines (Oxidation Reduction Potential) are performed by Pace International, and were found to ensure that each has been implemented effectively. Methods to ensure that procedure or process changes are still effective in controlling food safety are in place and documented in QP-03-01 Food Plans Summary and Validation, dated 4/12/22. Critical food safety limits are re-validated at least annually. Records of all verifications of effectiveness and validations are maintained by the B.T., SQF Practitioner.

2.5.1.1 The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall ensure that: i. Good Agricultural/Operating Practices are confirmed to ensure they achieve the required results; ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and iii. Changes to the processes or procedures are assessed to ensure the controls are still effective. Records of all validation activities shall be maintained.

RESPONSE: COMPLIANT

2.5.2 Verification Activities (Mandatory)

The site has established a verification schedule, dated 4/4/22, outlining the verification steps, procedures and responsibilities for each verification activity. The schedule is found in Monthly Verification Audit (SQF System Records) and maintained by the SQF Practitioner. The procedures for verifying Good Manufacturing Practices, critical control points, other food safety controls and regulatory compliance include utilizing authorized personnel to verify all monitoring activities. Records of verification of monitoring activities including Chemical Log, Calibration of ORPs, Sanitation records and Internal Audits were reviewed.

2.5.2.1 The methods, responsibility, and criteria for verifying monitoring of Good Agricultural/ Operating Practices, critical control points, other food safety controls, and the legality of certified products shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record.

RESPONSE: COMPLIANT

2.5.2.2 A verification schedule outlining the verification activities, their frequency of completion, and the person responsible for each activity shall be prepared and implemented. Records of the verification of monitoring activities shall be maintained.

RESPONSE: COMPLIANT

2.5.3 Corrective and Preventative Action (Mandatory)

The site's Corrective and Preventative Action program is written in QP-03-03 Corrective and Preventative Action. It describes the methods and responsibilities for investigating, resolving and managing corrective actions. The identification of root causes and resolutions to deviations of critical control limits are documented. Records of investigations and corrective actions were reviewed for: registered on Corrective and Preventative Action Log, showing records from 2/16/22, Food Safety Back Up procedure update; Insect device over a packaging material, dated 2/16/22; knives in the Segregated room not being controlled, dated 3/24/22. These were found to have reviews, investigations, corrective and preventative actions and resolutions documented.

2.5.3.1 The methods and responsibility for outlining how corrective and preventative actions are determined, implemented, and verified shall be documented and implemented. The procedures shall include: i. The identification of the root cause, and ii. Resolution of non-compliances of critical food safety limits and deviations from food safety requirements that are deemed significant. Records of all investigation and resolution of non-conformities, including their corrections and preventative actions, shall be maintained.

RESPONSE: COMPLIANT

2.5.4 Internal Audits and Inspections (Mandatory)

The site's procedure for scheduling and conducting internal audits to assess the effectiveness of the SQF system has been documented and implemented per document QP-04-07 Internal Audits, dated 4/19/22. The Internal Audit Program is maintained by B.T., SQF Practitioner. Facility and equipment inspections were not performed during the last twelve months. All applicable SQF Code requirements, using the SQF checklist or a similar tool, are part of the internal audit program. Documented on Primary Plant Production Edition 9 Checklist, dated 2/16/22, performed by 13 Business Solutions, external consultants. The frequency of the audits is communicated to management C.R., Production Manager is responsible to see that corrective actions are implemented and verified. Personnel conducting audits have been properly trained and where practical, audit areas independent of their function. Records of regular internal audits were not available for review. 2.5.4.3. Minor NC: At the time of the audit, records of regular inspections in the building and equipment were not available for review; this verification activity has not been performed last year, for Good Operating Practices within the facility.

2.5.4.1 The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code: Primary Plant Production are audited per the SQF audit checklist or a similar tool, and objective evidence is recorded to verify compliance and/or non-compliance; ii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken (refer to 2.5.3); iii. Audit results are communicated to relevant management personnel and personnel responsible for implementing and verifying corrective and preventive actions; and iv. Changes implemented from the internal audit that have an impact on the site's ability to deliver safe food result in a review of applicable aspects of the SQF System (refer to 2.3.1.3). Records of internal audits and any corrections and corrective action taken as a result of internal audits are maintained.

RESPONSE: COMPLIANT

2.5.4.2 Personnel conducting internal audits shall be trained and competent in internal audit procedures. Where practical, personnel conducting internal audits shall be independent of the function being audited.

RESPONSE: COMPLIANT

2.5.4.3 Regular inspections during growing and harvesting of products, packing of products, plant production, and/or equipment used shall be planned and carried out to verify Good Agricultural/Operating Practices and building/equipment maintenance are compliant to the applicable SQF Food Safety Code. The site shall: i. Take corrections or corrective and preventative actions; and ii. Maintain records of inspections and any corrective actions taken.

RESPONSE: MINOR

EVIDENCE: 2.5.4.3. Minor NC: At the time of the audit, records of regular inspections in the building and equipment were not available for review; this verification activity has not been performed last year, for Good Operating Practices within the facility.

ROOT CAUSE: Monthly walk through are completed and findings reported to the HACCP Team, however we were not aware of these requirements.

CORRECTIVE ACTION: Monthly Food Safety Inspection form created to be completed each month.

VERIFICATION OF CLOSEOUT: Accepted

COMPLETION DATE: 05/24/2022 **CLOSEOUT DATE:** 06/08/2022

2.6.1 Product Identification (Mandatory)

A policy defining how products are identified from receipt through production and shipping has been documented in QP-06-01 Product ID Traceability. The site's identification system ensures all raw materials, packaging materials, work-in-progress, process inputs and finished goods are clearly identified at all stages of their process. Items are marked at receipt by J.S., Line Supervisor. Product identification records were reviewed during the audit for Crisp Sweet Miniature, Organic Gala Sport B041, Organic Honey Crisp and Sweet Red Cherry Lapin and demonstrated the products were properly identified throughout the process. Product startup/changeover procedures during packing ensure that the correct product goes into the correct package with the correct label. A changeover from Organic Apple to Inorganic Apples was observed on the plant floor and was approved and signed off by J.S., Line Supervisor.

2.6.1.1 The methods and responsibilities for the product identification system shall be documented and implemented to ensure: i. Agricultural inputs, work-in-progress, and finished product are clearly identified during all stages of receipt, operations, storage, shipping, and transportation; ii. Finished product is labeled to the customer specification and/or regulatory requirements; and iii. Product identification records are maintained.

RESPONSE: COMPLIANT

2.6.1.2 The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable to the customer (one up) and provides traceability through the process to the agricultural input supplier and date of receipt of inputs, food contact packaging and materials, and other inputs (one back); ii. Traceability is maintained where product is reworked (refer to 2.4.3); and iii. The effectiveness of the product trace system is reviewed at least annually as part of the product recall and withdrawal review (refer to 2.6.2.1). Records for the receipt and use of agricultural inputs and packaging material and for finished product dispatch and destination are maintained.

RESPONSE: COMPLIANT

2.6.2 Product Withdrawal and Recall (Mandatory)

The site has a Recall Plan defining the methods and responsibilities for withdrawing and recalling product if necessary. A recall team has been designated and is led by J.G., General Manager, C.R., Production Manager and B.G., Food Safety Manager. The withdrawal policy includes the requirement to investigate a recall and determine the root cause of a recall/withdrawal with a corrective action. It also includes a communication plan to notify customers, consumers, regulatory authorities and other essential bodies. This includes SQFI and Eagle Certification Group, the Certification Body, who must be notified within 24 hours in writing of any food safety event requiring public notification. Investigation into the root cause of any product recall, mock recall or product withdrawal, with actions taken, was observed to be documented. Mock trace exercises are completed at least annually, one step forward and one step back, to verify the effectiveness of the system. Records were reviewed of the recall plan and summaries of the trace exercises performed for Organic Granny Smith, on 4/21/22; starting time: 1:18 pm; finish time: 3:23 pm. The mock trace exercise records reviewed showed the Product Withdrawal and Recall procedures were tested back one step and forward one step with acceptable accountability. The auditor chooses randomly a Costco product to conduct a mock exercise during the audit: Honey Crisp; date of production: 11/4/21; Order number 43958; starting time: 11:10 am Finish time: 11:19 am; Total time required: 19 minutes. Traced back to raw material Honey Crisp Apple, supplied by B260, Gold Digger Blue Lake; B370, High-Lo and B375, Eder # 1; traced back to packing material: Boxes; traced forward to finished customer: Costco College Park, GA; Percentage of Recovery: 100%.

- 2.6.2.1** The methods and responsibility to withdraw or recall product shall be documented and implemented. The procedure shall: i. Identify those responsible for initiating, managing, and investigating a product withdrawal or recall; ii. Describe the procedures to be implemented by site management; iii. Outline a communication plan to inform customers, consumers, authorities, and other essential bodies in a timely manner appropriate to the nature of the incident; iv. Describe how the withdrawal and recall system is reviewed, tested, and verified least annually (mock recall); and v. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and are notified in instances of a food safety incident of a public nature or product recall. Records of all product withdrawals, recalls, and mock recalls shall be maintained.

RESPONSE: COMPLIANT

- 2.6.2.2** Investigation shall be undertaken to determine the cause of a withdrawal or recall, and details of investigations and any actions taken shall be documented and recorded.

RESPONSE: COMPLIANT

- 2.6.2.3** SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

2.6.3 Crisis Management Planning

The site's written Crisis Management Plan is found in document QP-06-03 Crisis Management Checklist. The Plan has been implemented and addresses serious disaster threats to the extended interruption of the business. B.G., Food Safety Director, has oversight of the Plan and a Crisis Management team has been identified and trained as evidenced by annual Crisis Management refreshing Training. The Plan includes responses to a business interruption, isolating and identifying affected product and a current crisis alert list. The Crisis Management Plan includes internal/external communications and sources of legal and expert advice. A test of the plan was conducted on 4/22/22 involving a disaster scenario of large amount of water in the floor in the packing area, registered in Business Continuity Plan Crisis Checklist; this situation may affect the food safety of the site's products. Records are maintained in SQF Binder, including follow-up corrective actions of this review and annual test of the Crisis Management Plan.

- 2.6.3.1** The methods and responsibility for execution of a crisis management plan shall be documented and implemented. The plan shall include: i. A list of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather or regional events such as pandemic, warfare, or civil unrest) that can impact the site's ability to deliver safe food; ii. Designated site management responsible for decision making, oversight, communications, and management of the crisis management plan; and iii. Control measures to ensure any affected product is identified, isolated, and dispositioned appropriately.

RESPONSE: COMPLIANT

- 2.6.3.2** The crisis management plan shall be reviewed, tested, and verified at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained.

RESPONSE: COMPLIANT

2.7.1 Food Defense Plan (Mandatory)

The site has a Food Defense Policy QP03-42 Food Defense and Security Policy dated 4/26/22, in which the procedures, responsibilities and criteria for preventing deliberate food adulteration have been documented and implemented. A food defense protocol includes the name of the senior manager responsible for food defense, B.G., Food Safety Director, methods to allow access to the site only for authorized personnel, designated access points, the secured storage of materials and hazardous chemicals and the control of access to contractors and visitors. The Food Defense Plan was last tested and challenged on 4/11/22 with records reviewed. Scenario, Security Inspection: the shipping door was opened, employee entrance was opened, and refrigeration doors 2 and 3 were unlocked.

2.7.1.1 A food defense threat assessment shall be conducted to identify potential threats caused by a deliberate act of sabotage or terrorist-like incident.

RESPONSE: COMPLIANT

2.7.1.2 A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum: i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident; ii. The name of the senior site management person responsible for food defense; iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points; iv. The methods implemented to protect sensitive processing points from intentional adulteration; v. The measures taken to ensure the secure receipt and storage of raw materials, ingredients, packaging, equipment, and hazardous chemicals to protect them from deliberate acts of sabotage or terrorist-like incidents; vi. The measures implemented to ensure raw materials, ingredients, packaging (including labels), work-in-progress, process inputs, and finished products are held under secure storage and transportation conditions; and vii. The methods implemented to record and control access to the premises by personnel, contractors, and visitors.

RESPONSE: COMPLIANT

2.7.1.3 Instruction shall be provided to all relevant personnel on the effective implementation of the food defense plan (refer to 2.9.2.1).

RESPONSE: COMPLIANT

2.7.1.4 The food defense threat assessment and prevention plan shall be reviewed and tested at least annually or when the threat level as defined in the threat assessment changes. Records of reviews of the food defense plan shall be maintained.

RESPONSE: COMPLIANT

2.7.2 Food Fraud (Mandatory)

The site has conducted a Food Fraud Vulnerability Assessment, found in document QP-03-28 Food Fraud Policy and Risk Assessment which includes the site's susceptibility to fraudulent economic gain, including product substitution, mislabeling, counterfeiting and dilution that could impact food safety. The site has developed a Food Fraud Mitigation Plan, named Food Fraud Policy and risk assessment /Mitigation Plan, to address the control of the identified food fraud vulnerabilities. The Vulnerability Assessment was last reviewed on 4/12/22 and the Mitigation Plan was last reviewed on 4/12/22. The reviews of the Vulnerability Assessment and the Mitigation Plan are on file in SQF Binder.

2.7.2.1 The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud shall be documented, implemented, and maintained. The food fraud vulnerability assessment shall include the site's susceptibility to product substitution, mislabeling, dilution, and counterfeiting or stolen goods that may adversely impact food safety.

RESPONSE: COMPLIANT

2.7.2.2 A food fraud mitigation plan shall be developed and implemented, which specifies the methods by which the identified food fraud vulnerabilities shall be controlled and how the plan is communicated to relevant personnel to ensure effective implementation.

RESPONSE: COMPLIANT

2.7.2.3 The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually with gaps and corrective actions documented. Records of reviews shall be maintained.

RESPONSE: COMPLIANT

2.8.1 Allergen Management (Mandatory)

The site's Allergen Management Policy to control allergens and prevent contamination of other products is found in document QP-03-40 Allergen Management/Raw Material Risk Assessment, dated 4/17/18 and is the responsibility of B.T., SQF Practitioner. No allergens of concern are handled in this operation. Workplace allergens from locations such as lunch rooms, locker rooms and vending machines were found to be part of the allergen program.

2.8.1.1 The methods and responsibility for the control of allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A hazard and risk analysis and control measures of those agricultural inputs and processing aids, including food grade lubricants, that contain food allergens (refer to food safety plan 2.4.3); ii. An assessment of workplace-related food allergens that may originate from change rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of production and the country (ies) of destination if known; iv. A list of allergens that is accessible by relevant personnel; and v. Individual management plans for control of the identified allergens.

RESPONSE: COMPLIANT

2.8.1.2 Product labeling, in accordance with regulatory requirements, shall include allergens where risks from cross-contamination have been documented.

RESPONSE: COMPLIANT

EVIDENCE: 2.8.1.2. Allergens are not handled on site. N/A

2.9.1 Training Requirements

Appropriate training is provided for all plant personnel for all tasks to ensure the effective implementation of the SQF system. Training programs are the assigned responsibility of A.L., Human Resources and M.T., Food Safety Compliance. The effectiveness of the facility's training program was evidenced by interviews with plant employees A.P., Shipping, M.M., Maintenance, H.M., Maintenance and J.S., Line Supervisor.

2.9.1.1 The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented (refer to 2.1.1.6).

RESPONSE: COMPLIANT

2.9.1.2 Appropriate training shall be provided for personnel carrying out the tasks essential to the effective implementation of the SQF System and the maintenance of food safety and regulatory requirements.

RESPONSE: COMPLIANT

2.9.2 Training Program (Mandatory)

The site has implemented a training program, entitled QP-01-03 Training, dated 7/6/09, which covers the necessary competencies for plant personnel. This program requires training to be conducted in HACCP Plan , Clean Up Log, Lube Maintenance PM Check, Tank De-Chlorination, Chemical Usage and Inventory Log , Cleaning and Sanitizing Procedures, HACCP Plan Validation and Summary CCPs, Employee Hygiene Monitoring, Crisis Management and Product Sampling and Inspection, to ensure regulatory, food safety, food quality and all other requirements of the SQF System are met. This training program is administered by A.L., Human Resources. HACCP training for personnel involved in the development and maintaining the food safety plan is administered. The last training occurred on 4/19/22. Work instructions have been written explaining how tasks critical to maintaining food safety are performed. Records of work instruction training were reviewed for J.S., Line Supervisor. Periodic refresher training needs have been identified in the Training Program. From a review of refresher training records covering HACCP Plan, Clean Up Log, Lube Maintenance PM Check, Tank De-Chlorination, Chemical Usage and Inventory Log , Cleaning and Sanitizing Procedures, HACCP Plan Validation and Summary CCPs, Employee Hygiene Monitoring, Crisis Management and Product Sampling and Inspection and interviews with A.P., Shipping, M.M., Maintenance, H.M., Maintenance, and J.S., Line Supervisor, it was evident the proper refresher training has been conducted to ensure food safety, quality and the SQF system are maintained. Specific refresher training topics are covered on an annual frequency. A training skills register, documented on F-01-01 Training Skills, dated 4/26/22, is maintained by the B.T., SQF Practitioner and during the review was found to have a listing of the trainee, trainer, the description of the training, the date of training and verification by supervision that the training was completed. Plant employees interviewed on the production floor, A.P., Shipping, B.X., Sorting Operator, M.D., Janitorial, M.M., Mechanic and S.P., Quality Control were found to have current training records on the register. The training language and materials are in English and Spanish used in the operation and understood by all plant personnel.

2.9.2.1 A training program shall be documented and implemented. It shall outline the necessary competencies for specific duties and the training methods to be applied to relevant personnel upon initial hire and for ongoing refresher training. The training program shall include at a minimum: i. Appropriate HACCP training for personnel involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all personnel engaged in operating critical control points (CCPs); iii. Personal hygiene training for all personnel involved in the handling of food products and food contact surfaces; iv. Good Agricultural/Operating Practices for all personnel engaged in food handling operations; v. Allergen management, food defense and food fraud for all relevant on-site personnel; and vi. Identification and implementation of refresher training.

RESPONSE: COMPLIANT

2.9.2.2 Training materials, the delivery of training, and work instructions on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in language(s) understood by personnel.

RESPONSE: COMPLIANT

2.9.2.3 Training records shall be maintained and include: i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Verification that the trainee is competent to complete the required tasks.

RESPONSE: COMPLIANT

10.1.1 Premise Exterior

The site's buildings, property and surroundings were observed during the audit to not pose a food safety risk to products. Measures have been established to maintain a suitable external environment and the facility performs external inspections as part of their internal audit program. The last external inspection was performed on 11/4/21 and reviewed by management. The site maintains the required approvals by relevant authorities, as evidenced by USDA Good Agricultural Practices, Good Handling Practices Audit Verification Checklist, for their ongoing operations. The grounds and surrounding areas were observed to minimize dust and be free of any waste so pests are not attracted. Paths, roadways and dock areas were seen to be adequately and properly drained and well maintained, so they do not present a hazard. No ponding of water was observed. Walkways from the parking lot and other employee amenities were paved or effectively sealed.

10.1.1.1 The location and construction of the premises and building shall ensure that: i. Adjacent and adjoining buildings, operations, and land use do not interfere with safe and hygienic operations; and ii. Relevant regulatory authority approval has been obtained and is on file.

RESPONSE: COMPLIANT

10.1.1.2 The methods and responsibilities applied to maintain a suitable exterior environment shall be documented and implemented. These include: i. Effective, periodic monitoring and/or inspection of the premises, the surrounding areas, storage facilities, machinery, and equipment; ii. Controls to ensure that the exterior is kept free of waste and/or accumulated debris to prevent the attraction of pests and vermin; iii. Paths, roadways, loading and unloading areas are adequately drained and maintained; and iv. Records of inspections and correction actions are maintained.

RESPONSE: COMPLIANT

10.1.2 Building Interior

Product contact surfaces, surfaces not in contact with food and storage areas are constructed of suitable materials including stainless steel, food grade plastic and aluminum. They were observed during the audit to be properly maintained so that food safety is not compromised. Floors are constructed of smooth and dense impact resistant material and properly graded for effective drainage of overflow or waste water. Waste trap systems are located outside in the drainage system, which is away from food handling areas. Waste water during the audit was observed to be properly discharged. Drains were observed to be located and constructed for ease of cleaning and inspection. Walls, ceilings and doors are of durable construction with smooth and light-colored surfaces. These areas were observed to be clean during the audit tours; however, a non-conformance was raised in this section. Wall to wall and wall to floor junctures were observed to be sealed and free of debris. Ducting, piping and conduit conveying services were observed to be properly designed and installed to prevent contamination and for ease of cleaning. Overhead cleaning was found to be part of the master cleaning schedule. Overhead waste water pipe installations did not pose a hazard of contamination to food, materials or food contact surfaces. Doors, windows and frames in product areas were observed to be properly constructed of materials with the same functional requirements as internal walls and partitions. The ceilings in all food processing and handling areas are constructed of aluminum and concrete, which are easily cleaned and prevent product contamination. Drop ceilings were not observed into the facility. There are no drop ceilings in the food manufacturing areas. N/A Stairs, catwalks and platforms were observed during facility tours to be constructed and designed so that food contamination is avoided, and with no open grates above exposed product surfaces. Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting is either covered or is shatter-proof. Suitable areas are provided for inspection and quality control activities, that are suitable for the examination and testing of the product. The area has easy access to hand washing; appropriate waste handling; and is kept clean. 10.1.2.3. Minor NC: During the plant walk, the auditor observed broken concrete walls, cracks and exposed insulation material in the north wall of the Common warehouse, and west wall of the Packing room. These rough surfaces are not easy to clean and sanitize.

10.1.2.1 Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, easily cleaned, and is impervious to liquid. Floors shall be suitably sloped toward the floor drains at gradients to allow the effective removal of all overflow or wastewater under normal working conditions. Where floor drainage is not possible, plumbed options or other control measures shall be in place to handle overflow or wastewater.

RESPONSE: COMPLIANT

10.1.2.2 Drains and waste/material trap systems shall be constructed and located so that they can be easily cleaned and not present a hazard to products.

RESPONSE: COMPLIANT

10.1.2.3 Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have even, smooth light-colored finishes, be impervious to liquids, and shall be kept clean (refer to 10.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

RESPONSE: MINOR

EVIDENCE: 10.1.2.3. Minor NC: During the plant walk, the auditor observed broken concrete walls, cracks and exposed insulation material in the north wall of the Common warehouse, and west wall of the Packing room. These rough surfaces are not easy to clean and sanitize.

ROOT CAUSE: Damage caused to wall from bins hitting wall. Pieces put in place to protect the wall were damaged allowing for the wall to get damaged.

CORRECTIVE ACTION: A 1 foot thick wall 4 feet up will be poured to protect this area. Cracks will be mortared in with mortar mix. Removed metal that is bent on walls.

VERIFICATION OF CLOSEOUT: Accepted

COMPLETION DATE: 05/25/2022 **CLOSEOUT DATE:** 06/08/2022

10.1.2.4 Ducting, conduit, and pipes that convey products or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning (refer to 10.3.2).

RESPONSE: COMPLIANT

10.1.2.5 Adequate ventilation shall be provided in enclosed product handling and storage areas and meet commodity-specific regulations where applicable. All ventilation equipment and devices shall be adequately cleaned per the cleaning and sanitation program.

RESPONSE: COMPLIANT

10.1.2.6 Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces, and shall allow ease of cleaning.

RESPONSE: COMPLIANT

10.1.2.7 Doors, hatches, and windows and their frames in food handling or storage areas shall be of a material and construction that meets the same functional requirements for internal walls and partitions. Doors and hatches shall be of solid construction, and windows shall be made of shatterproof glass or similar material.

RESPONSE: COMPLIANT

10.1.2.8 Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 10.3.2).

RESPONSE: COMPLIANT

10.1.2.9 The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/packed (refer to 2.4.4 for internal lab requirements). The inspection area shall: i. Have easy access to handwashing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination.

RESPONSE: COMPLIANT

10.1.2.10 Lighting and light fixtures in product handling areas, inspection stations, ingredient/ input and packaging storage areas, and all areas where the product is exposed shall be: i. Of appropriate intensity to enable personnel to carry out tasks efficiently and effectively; and ii. Shatterproof, manufactured with a shatterproof covering, or fitted with protective covers. Where fixtures cannot be recessed, including in warehouses, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program.

RESPONSE: COMPLIANT

10.1.3 Dust, Insect, and Pest Proofing

External windows, doors and other openings were observed during facility tours to be properly sealed to prevent any pest infestation or dust coming into the facility. External personnel doors were observed to be self-closing and sealed to prevent dust and pest ingress. All external doors and dock doors were sealed to prevent infestation. Electric insect devices, and interior and exterior rodent stations are located so the product is not at risk for contamination. Rodenticide bait is only used on the outside of the facility.

10.1.3.1 All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed and proofed against dust, vermin, and other pests. External personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against ingress of dust, vermin, and other pests.

RESPONSE: COMPLIANT

10.1.3.2 External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to prevent pest entry by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas.

RESPONSE: COMPLIANT

10.1.3.3 Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or operating equipment. Poison rodenticide bait shall not be used inside packing rooms, product storage areas, or food handling areas.

RESPONSE: COMPLIANT

10.2.1 Equipment and Utensils

Specifications for the site's equipment, utensils and protective clothing, and purchase procedures for equipment are documented in QP 03-48 Equipment Purchasing Locating and Maintenance, dated 3/26/12 and were seen to be appropriately implemented. Equipment and utensils, including tables, graders, conveyors, tubs, bins and containers are designed, constructed and installed to meet regulatory requirements and prevent risks of contamination of the product. These items were found to be cleaned and stored properly after use to prevent cross contamination. Equipment surfaces were observed to be smooth, impervious and free from cracks and crevices. Containers and bins are made of non-toxic materials and were labeled or color-coded, for appropriate use with either edible or non-edible materials. Waste water from tanks, tubs and other equipment is discharged to the floor drainage system and meets requirements. All equipment and utensils are cleaned at appropriate frequencies and are properly stored to prevent contamination.

10.2.1.1 The methods and responsibility for purchasing and specifications development for equipment and utensils shall be documented and implemented. The methods shall ensure that equipment and utensils: i. Are designed, constructed, installed, and operated so as not to pose a threat to products; and ii. Meet any applicable regulatory requirements.

RESPONSE: COMPLIANT

10.2.1.2 Product contact surfaces and those surfaces not in direct contact with product in product handling areas, raw material storage, packaging material storage, and cold storage areas shall be constructed of materials that will not contribute to a food safety risk.

RESPONSE: COMPLIANT

10.2.1.3 Benches, tables, conveyors, shellers, graders, packers, and other mechanical equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious, and free from cracks or crevices.

RESPONSE: COMPLIANT

10.2.1.4 Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned per the cleaning and sanitation program. Bins used for inedible material shall be clearly identified.

RESPONSE: COMPLIANT

10.2.1.5 All equipment and utensils shall be cleaned after use and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

RESPONSE: COMPLIANT

10.2.1.6 Vehicles and/or other devices used to transport and move products in food contact, handling, or processing zones, or cold storage rooms shall be designed and operated so as not to present a food safety hazard.

RESPONSE: COMPLIANT

10.2.2 Equipment Maintenance and Repair

The site has a program that defines the responsibilities for the maintenance and repair of all plant equipment and buildings. There is a schedule of planned Preventive Maintenance, and PM tasks are documented in QP-03-31 Lube and Maintenance and F-03-18 Monthly Lube and Maintenance-PM Check Apples. Records reviewed and registered in the Lube Maintenance-PM Check, dated on 4/2/22, 3/5/22, 7/5/21 and 3/16/22. Maintenance personnel are trained in good manufacturing practices and food safety. When repairs and maintenance are complete, maintenance personnel remove all tools and debris and notify a supervisor. Appropriate cleaning and pre-operational inspections are carried out before resumption of operations, documented in F-03-17 Mechanics Clean-Up Log. This was reviewed during the audit and found to be complete. Maintenance and engineering contractors on site are trained in the site's food safety and hygiene procedures by means of signing the F-03-06 Contractor Check-In and Check-out List and reading the QP-01-09 Visitor Policies; contractors are escorted to the working area. Periodic inspections are completed to ensure loose parts and other materials are not potential contaminants. Temporary repairs, if required, are appropriate, included in the cleaning program and have a plan for their removal. Machinery, conveyors and other equipment over or near food or food contact surfaces are lubricated with food grade materials. The food grade lubricants were noted to be properly labeled and stored separately in cabinets. Paint is not used on food contact surfaces and any paint in processing areas was noted to be in good condition with no observed flaking.

10.2.2.1 The methods and responsibility for the maintenance and repair of equipment and buildings and facilities shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination. The methods shall include procedures to ensure: i. Routine preventive maintenance of facilities and equipment in any food handling or storage area is performed according to a maintenance control schedule; ii. Preventive maintenance and repair of items identified as impacting food safety controls and practices are prioritized for completion according to defined schedules or immediately when they are not properly functioning; and iii. Records are maintained for all preventive maintenance and equipment failure/immediate repair activities and corrective actions. The maintenance schedule shall cover buildings, equipment, and other areas of the premises critical to the maintenance of product safety and quality.

RESPONSE: COMPLIANT

10.2.2.2 The maintenance supervisor and/or site supervisor shall be informed when repairs or maintenance are undertaken in product handling or storage areas and when the activities pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times.

RESPONSE: COMPLIANT

10.2.2.3 Temporary repairs, where required, shall not pose a food safety risk, and shall be included in the cleaning program and/or routine inspections. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions.

RESPONSE: COMPLIANT

10.2.2.4 Equipment located over product or product conveyors shall be lubricated with food-grade lubricants, and their use shall be controlled to minimize the contamination of the product.

RESPONSE: COMPLIANT

10.2.2.5 Paint used in a food handling or contact zone shall be suitable for use, in good condition, and shall not be used on any product contact surface.

RESPONSE: COMPLIANT

10.2.2.6 Compressed air systems, and systems used to store or dispense other gases used in the operational process that come into contact with food or food contact surfaces, shall be maintained and regularly monitored for quality and applicable food safety hazards.

RESPONSE: COMPLIANT

10.2.3 Maintenance Personnel and Contractors

Maintenance personnel are trained in good manufacturing practices and food safety. When repairs and maintenance are complete, maintenance personnel remove all tools and debris and notify a supervisor. Appropriate cleaning and pre-operational inspections are carried out before resumption of operations, documented in F-03-17 Mechanics Clean-Up Log. This was reviewed during the audit and found to be complete. Maintenance and engineering contractors on site are trained in the site's food safety and hygiene procedures by means of reading and signing the visitors Policy and the Contractor Check-In and Check-out List. Control Atmosphere-Coolers general maintenance are conducted once a year and contractors are escorted to the working place. Periodic inspections are completed to ensure loose parts and other materials are not potential contaminants. Coolers maintenance performed by Shiftlett's, Ammonia Detector Calibration report, dated on 2/17/22.

10.2.3.1 Maintenance personnel and contractors shall comply with the site's personnel and operational hygiene requirements (refer to 10.5).

RESPONSE: COMPLIANT

10.2.3.2 All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed.

RESPONSE: COMPLIANT

10.2.3.3 Maintenance personnel and contractors shall remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to the restarting of site operations. Maintenance, operations, and/or sanitation shall sign-off on communications.

RESPONSE: COMPLIANT

10.2.4 Calibration

A policy defines the methods and responsibilities for calibrating measuring, testing and inspection equipment, and has been implemented. The facility has developed a calibration schedule for all devices listed. This documentation is located in QP-04-01 Control of Inspection, Measuring and Test Equipment and F-04-01 Calibration Form. The frequency of calibrations is based on the manufacturer's recommendations or customer requirements. A review of the calibration records were made for: Western Scale Inc., 11 scales were calibrated on 2/9/22; Pace InSite, Service Report for apple line ORP (Oxidation Reduction Potential), calibrated on 3/3/22; Pressure tester Penetrometer, dated 3/15/22; cooler thermometers for Common Storage Room and Cold Room, calibrated on 4/1/21, 6/9/21, 5/4/21, 3/17/21 and 3/29/21. Temperature Probe Calibration Certificate for 23 CA rooms PN1, to PN23, dated 6/9/21. These records confirm the schedule is being followed. The policy includes the procedures to address the disposition of any affected product should inspection equipment be found to be out of calibration, written in F-04-02 Out of Calibration Log. Inspection and testing equipment is protected from damage or unauthorized use by segregation of the device. Equipment is calibrated against national or international standards.

10.2.4.1 The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in Good Operating Practices, food safety plans, and other process controls or to demonstrate compliance with customer specifications shall be documented and implemented. The procedures shall ensure: i. Calibration is performed according to regulatory requirements and/or the equipment manufacturer's recommended schedule; ii. Calibrated measuring, testing, and inspection equipment is protected from damage and unauthorized adjustment; iii. Affected product is handled according to non-conforming product procedures when equipment is found to be out of calibration; iv. Software used for calibration activities is effective and appropriate; and v. Records of calibration activities are maintained.

RESPONSE: COMPLIANT

10.2.4.2 Equipment shall be calibrated against manufacturer, national or international reference standards and methods, or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

RESPONSE: COMPLIANT

10.3.1 Pest Prevention

A policy defines the site's program for pest prevention and the appropriate follow up to pest prevention issues that may occur. The program was observed during the audit to be effectively implemented. The premises were free of waste and debris as observed during the interior and exterior tours. No pest activity was identified or noted during tours, that presented a risk for product contamination and corrective action and record keeping procedures are in place should this occur. No pest activity was found during the audit. A Pest Contractor has been contracted for pest prevention and an updated scope of service dated 3/7/22 defines the methods of pest prevention, the frequency of interior and exterior inspections and targeted pests. A current site map, dated 3/25/22 is accurate showing the location of 29 external and 38 internal devices. A pesticide application log gives details and dates of all chemical usage. Licenses of the Pest Contractor with expiration date 12/31/22 from local authorities are current and indicate employees are trained and competent. Business License issued by the State of Washington expiring 8/31/22. A list of chemicals used by the Pest Contractor is found in SDS and Labels including Contract All Weather Blox, Flatline Soft Bait and Gentrol Point Source, and includes SDS information. Inspection activity reports are signed by a management representative after visits and were reviewed and found to be completed as scheduled. Any observations or issues noted by the Pest Contractor are addressed and documented by the site. The trending of the pest activity frequency is documented in Pest Trending from May 2021 to April 2022. Monthly visits are performed monthly.

10.3.1.1 The methods and responsibility for pest prevention shall be documented and effectively implemented. The pest prevention program shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity so as to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include the identification, location, number, and type of bait stations set on a site map; vii. List the chemicals used. They are required to be approved by the relevant authority, and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make personnel aware of the bait control program and the measures to take when they come into contact with a bait station; ix. Outline the requirements for personnel awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends.

RESPONSE: COMPLIANT

10.3.1.2 Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators, who comply with regulatory requirements; iii. Use only approved chemicals; iv. Maintain a site map indicating the location of bait stations, traps, and other applicable pest control/monitoring devices; and v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments.

RESPONSE: COMPLIANT

10.3.1.3 Inspections for pest activity shall be conducted on a regular basis by trained personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of pest activity inspections and pest control devices shall be maintained.

RESPONSE: COMPLIANT

10.3.1.4 Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation shall be investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

RESPONSE: COMPLIANT

10.3.1.5 No domestic animals shall be permitted on the site in food handling or storage areas

RESPONSE: COMPLIANT

10.3.2 Cleaning and Sanitation

The site has a Cleaning and Sanitation Program that describes the methods and responsibilities for cleaning of processing equipment, the environment, storage areas, bathrooms and break rooms. Sanitation Standard Operating Procedures are written and include what is cleaned, chemical usage (concentrations), cleaning methods and who is responsible. A master sanitation plan includes all areas of the facility with frequencies and responsibilities for deep cleaning. A review of the plan was performed: registered in Cleaning Food Contact Surfaces/F-03-50 Cleaning and Sanitation Food Contact Surfaces/QP-03-33 Sanitation Instructions dated on May 2021 to April 2022 showed cleaning tasks were completed as scheduled. There is a suitable area for cleaning containers, knives, cutting boards and other utensils that does not cause a food product contamination. CIP systems are not used on site. Sanitation tasks and pre-operational inspections by qualified personnel are documented. A verification schedule includes the methods, frequencies and responsibilities for verifying the effectiveness of cleaning methods. Pre-operational inspections are registered in F-03-31 Pre-Operational Inspections Apples, dated 4/18/22, 11/29/21, 5/2/21 and 10/11/21; these records were reviewed and had proper corrective actions documented as required. Cleaning materials are stored securely and properly labeled with SDS information available to all employees. Real Clean, Alpet Quat Free and Lift-OfT were observed to be included on a list of approved chemicals, labeled consistent with regulations and had SDS on hand. Dispensed cleaning chemicals were properly stored and identified. Cleaning chemicals mixed on-site have concentration checks conducted by Wesmar Company, performed at the mixing stations. Sanitation personnel are properly trained in cleaning methods and the safe use of chemicals. The last chemical handling training was conducted 4/18-19/22.

10.3.2.1 The methods and responsibility for cleaning of the product handling equipment and environment shall be documented and implemented. Cleaning procedures and schedules shall include: i. A list of equipment, utensils, and storage areas that require periodic cleaning; ii. Instructions on how cleaning is performed for the various areas and equipment; iii. The frequency of when cleaning is to be completed; iv. Personnel responsible and the methods used to verify the effectiveness of the cleaning and sanitation program (e.g., validation of procedures, concentration of detergents and sanitizers); and v. Records of cleaning activities and effectiveness reviews/inspections are maintained.

RESPONSE: COMPLIANT

10.3.2.2 Detergents and sanitizers shall be suitable for use in a food handling environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i. The site maintains a list of chemicals approved for use; ii. An inventory of all purchased and used chemicals is maintained; iii. Detergents and sanitizers are properly stored as per the storage program; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained personnel handle sanitizers and detergents.

RESPONSE: COMPLIANT

10.3.2.3 Detergents and sanitizers that are mixed for use shall be correctly mixed according to the manufacturer's instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified, and records maintained.

RESPONSE: COMPLIANT

10.3.2.4 Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils. Racks and containers for storing cleaned utensils and protective clothing shall be clearly identified and maintained in a manner that prevents contamination of products, equipment, or storage areas.

RESPONSE: COMPLIANT

10.3.2.5 Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food handling areas, product contact surfaces, equipment, personnel amenities, sanitary facilities, and other essential areas are clean before the start of operations. Pre-operational inspections shall be conducted by qualified personnel and records maintained.

RESPONSE: COMPLIANT

10.3.2.6 Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel at a defined frequency to ensure the areas are clean.

RESPONSE: COMPLIANT

10.3.2.7 The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared. A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

RESPONSE: COMPLIANT

10.4.1 Personnel Practices

Documented on QP-01-07 Personnel Processing Practices, dated 3/21/22. A Good Manufacturing Practice policy for all employees has been documented and implemented. Employees are prohibited from working in food handling or open food storage areas who are suffering from, or who are or were carriers of, an infectious disease that may be passed through food. The site has documented measures to prevent contact of product materials with bodily fluids and respond appropriately to any bodily fluid spillage. The policy includes the prohibition of any food handling activity for persons with exposed cuts, sores or lesions and requires that minor cuts or abrasions be covered with a waterproof, metal detectable, colored bandage or dressing. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements. A policy defining jewelry use has been written in QP-01-07 Personnel Processing Practices, Section 28 Jewelry, dated 3/12/22, and implemented. However, a non-conformance was raised in this section. Jewelry and other loose objects are prohibited in food processing and handling areas. Employees were not observed to comply with the jewelry policy during the audit tours. Plain bands are allowed by the facility's policy. Prescribed Medical Alert bracelets are allowed by policy when approved by management. Food handling procedures for all employees are documented and implemented. Personnel are required to access the processing areas through personnel doors only and doors were observed closed. False fingernails or fingernail polish, long nails, false or extended eyelashes are prohibited and no violations were noted. Hair restraints were observed to be worn where the product is exposed. Ingredients were in appropriate, labeled containers and kept off the floor. Wash down hoses were observed to be properly stored on racks when not in use. The GMP policy prohibits smoking, eating, drinking (except for water under acceptable, controlled conditions) or spitting in the facility. Smoking is permitted only in designated areas. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements. Amendment # 1: the facility has a procedure in place to screen all personnel and contractors in direct contact with food or food contact surfaces. 10.4.1.1. Minor NC: An operator in the sorting area was observed to have a cell phone in the back pocket; an operator in the shipping area wearing a necklace and another employee wearing a bracelet. The GMP jewelry policy for personnel hygiene rules, does not allow employees in the processing areas with jewels or cell phones.

10.4.1.1 A documented and implemented procedure for personal hygiene and personnel practices shall ensure that personnel engaged in the handling of product use appropriate personal hygiene practices. The procedure shall include instructions that: i. Jewelry and other loose objects that pose a threat to the safety of the product are not worn or taken into any product handling or storage operations. ii. Fingernail polish, artificial nails, and long nails are not permitted where product is handled with bare hands; iii. False eyelashes and eyelash extensions are not permitted; iv. Hair restraints are used where product is exposed; and v. Smoking, chewing, eating, drinking (except for water which shall be available to all personnel), or spitting are not permitted in any packing or storage areas. Note: The wearing of plain bands with no stones or jewelry accepted for religious or cultural reasons and prescribed medical alert bracelets can be permitted; however, the site will need to consider its customer requirements and the applicable food legislation. Personnel and visitor practices, including all those listed in 10.4.1, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices. Code Amendment #1 A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

RESPONSE: MINOR

EVIDENCE: 10.4.1.1. Minor NC: An operator in the sorting area was observed to have a cell phone in the back pocket; an operator in the shipping area wearing a necklace and another employee wearing a bracelet. The GMP jewelry policy for personnel hygiene rules, does not allow employees in the processing areas with jewels or cell phones.

ROOT CAUSE: Employees chose not to follow company policies for various reasons. Employee with necklace forgot he was wearing it, and employee with phone in pocket was waiting for a phone call due a sick child. Employees chose not to follow rules for various reasons.

CORRECTIVE ACTION: Training was completed with the Apple House staff on following company policies. Supervisors went over with staff Personnel Processing Practices QP-01-07.

VERIFICATION OF CLOSEOUT: Accepted

COMPLETION DATE: 06/01/2022 **CLOSEOUT DATE:** 06/06/2022

10.4.1.2 Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in packhouse operations.

RESPONSE: COMPLIANT

10.4.1.3 Procedures and responsibilities shall be in place that specify the handling of product and/or product contact surfaces that have been in contact with or exposed to blood or other bodily fluids.

RESPONSE: COMPLIANT

10.4.1.4 Personnel with exposed cuts, sores, or lesions shall not be engaged in handling product or product contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a suitable waterproof and colored dressing.

RESPONSE: COMPLIANT

10.4.2 Sanitary Facilities and Handwashing

A policy covering hand washing requirements has been documented and implemented. Hand wash basins are located at appropriate employee access points to processing areas. Hand wash sinks are made of non-corrosive materials and supplied with tempered potable water. Soap in a fixed dispenser, paper towels and waste containers are available. Hands-free operated taps and hand sanitizers are available in the high-risk areas of the facility. Signs are posted reminding employees to wash their hands before returning to work. Signs are posted at hand wash stations and in bathrooms. Employees are required to wash hands when wearing gloves. Interviews conducted with A.P., Shipping, B.X., Sorting Operator, M.D., Janitorial, M.M., Mechanic and S.P., Quality Control during the audit demonstrated that employees understand the hand washing requirements. Employees were observed to wash their hands properly during the audit and to use proper glove procedures.

10.4.2.1 Toilet and handwashing facilities shall be provided and designed, constructed, and located in a manner that minimizes the potential risk for product contamination. The following shall be considered: i. There shall be sufficient toilet facilities for the maximum number of personnel, and they shall be constructed so they can be easily cleaned and maintained; ii. Handwash basins with clean and potable water, hand soap, disposable towels or effective hand drying devices, waste bins, and a tank that captures used handwash water for disposal (if not connected to drains) shall be provided inside or adjacent to toilet facilities and in accessible locations throughout food handling areas as required; iii. Signage in appropriate languages shall be provided adjacent to handwash basins instructing personnel to wash their hands after each toilet visit; iv. Racks for protective clothing used by personnel and visitors shall be provided; and v. Toilet and wash stations shall be maintained in clean and sanitary conditions. Tools/equipment used for cleaning toilet rooms shall not be used to clean operational areas.

RESPONSE: COMPLIANT

10.4.2.2 Personnel shall have clean hands, and hands shall be washed by all personnel, contractors, and visitors: i. On entering food handling areas, and before putting on gloves; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After handling wash down hoses, cleaning materials, dropped products, or contaminated material.

RESPONSE: COMPLIANT

10.4.2.3 Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system as per regulations.

RESPONSE: COMPLIANT

10.4.3 Protective Clothing

A policy, based on a documented risk assessment, found in QP-01-07 Personnel Processing Practices, Section 24, Clothing, dated 3/21/22, defines the site's clothing requirements and been implemented. Clothing including shoes are required to be clean at the commencement of the shift and changed or replaced if excessively soiled. Disposable gloves and aprons are to be changed when soiled or damaged. Employees were observed to comply with the clothing requirements of the facility. Disposable gloves and aprons were observed to be cleaned and properly stored per site policies.

10.4.3.1 Protective clothing (e.g., uniforms and smocks) shall not pose a food safety threat or be a risk to product contamination. Protective clothing shall be: i. Manufactured from material that can be effectively maintained, stored, and laundered after use or at a frequency that does not create risks of cross-contact with products. Excessively soiled uniforms shall be changed or replaced where they become a product contamination risk; and ii. Temporarily stored on racks, when personnel leave operating areas or use toilet facilities and the clothing can be easily removed (e.g., smocks and aprons).

RESPONSE: COMPLIANT

10.4.3.2 Where applicable, clothing (i.e., any outer garment), including footwear, shall be in good condition, cleaned, and worn to protect product from the risk of contamination.

RESPONSE: COMPLIANT

10.4.3.3 Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and, when not in use, stored on racks provided in the processing area or designated sealed containers in personnel lockers and not on packaging, ingredients, product, or equipment.

RESPONSE: COMPLIANT

10.4.4 Visitors

A policy defining visitor and contractor requirements found in QP-01-09 Visitor Policies has been documented and implemented. The policy requires that visitors be trained in hygiene and food safety requirements before entering food processing or handling areas, or that they be continually escorted while in those locations. The requirements for visitors in those areas include the proper use of access points, hand wash requirements, suitable protective clothing and footwear, removal of jewelry or other loose objects, and an absence of visible signs of illness.

10.4.4.1 All visitors, including management, shall be required to adhere to site personnel practices and specifically: i. Remove jewelry and other loose objects as per 10.4.1.1; ii. Wash hands as per 10.4.2.2; iii. Wear suitable clothing and footwear when entering any operational or food handling area; and iv. Enter and exit food handling areas through the proper entrance points.

RESPONSE: COMPLIANT

10.4.4.2 Visitors who are exhibiting visible signs of illness or have been in recent direct contact with other sites, animals, or produce shall be prohibited from entering any growing or product handling or harvesting operation.

RESPONSE: COMPLIANT

10.4.5 Personnel Amenities (change rooms, toilets, lunchrooms/breakrooms)

Employee bathrooms and break rooms were observed to be appropriately lit and ventilated and available for all personnel at the facility. There are facilities for employees to change into and out of protective clothing. Provisions have been made for storage of street clothing and personal items and are separate from processing and storage areas. Change rooms are provided for employees working in high risk areas. Provisions have been made for the laundering and storage of clothing for employees working in high risk areas and in operations where staff clothing may become heavily soiled. Restrooms and washrooms were observed to be separate from food processing and handling areas and accessed via a separate room or airlock. An area has been provided for the storage of outer garments and other items while using the facilities. Sanitary facilities were observed to be sufficient in number for all employees and were cleaned and maintained on a scheduled basis. An interview with the Production Manager, combined with onsite observations provided satisfactory evidence that sanitary drainage is separated from plant drainage and that it is disposed of in accordance with regulations. The sanitary facilities have hand wash sinks that comply with the requirements of the SQF Code. Lunch rooms that are properly separated from production are available, well lit, properly ventilated and are appropriately sized for the number of facility employees. Lunch rooms include hot and cold potable water, food storage areas, refrigerators with hand and utensil washing capabilities. Outside eating areas are properly maintained to prevent contamination and pest risks. Signs reminding employees to wash their hands before returning to work were observed at the exit to lunch rooms and in or adjacent to outside eating areas where applicable. Lunch rooms were observed to be clean and well-maintained during the audit tours.

10.4.5.1 Staff facilities shall be supplied with appropriate lighting and ventilation and provided to enable staff and visitors to: i. Change into and out of protective clothing, if applicable; ii. Store street clothing, footwear, and personal items separate from food handling, packing, and storage areas.

RESPONSE: COMPLIANT

10.4.5.2 Separate lunchroom and/or breakroom facilities shall be provided away from product contact/handling zones. Lunchrooms/breakrooms shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to accommodate the maximum number of personnel at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with refrigeration and heating facilities, enabling personnel to store or heat food and prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests.

RESPONSE: COMPLIANT

10.4.5.3 Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential for the introduction of contamination, including pests, to the site.

RESPONSE: COMPLIANT

10.5.1 Product Handling and Packaging Operations

Food handling procedures for all employees are documented and implemented. Personnel are required to access the processing areas through personnel doors only and doors were observed closed. Ingredients were in appropriate, labeled containers and kept off the floor. Sensory evaluations were conducted in designated areas that were well lit and appropriately equipped for that purpose and personnel conducting sensory evaluations are trained and maintain high hygienic standards. Wash down hoses were observed to be properly stored on racks when not in use. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements.

10.5.1.1 All personnel engaged in any food handling operations shall ensure that products and materials are handled and stored to prevent damage or product contamination. They shall comply with the following operational practices: i. No eating or tasting any product in the food handling/contact zone, except as noted in element 10.5.1.2; ii. Entry into operational areas is only through the personnel access doors; iii. All doors are kept closed. Doors are not open for extended periods when access is required for waste removal, or receiving and/or shipping of products, ingredients, or packaging. iv. Packaging, product, and ingredients are kept in appropriate containers as required and off the floor; v. Waste is contained in the bins identified for this purpose, removed from operational areas regularly, and not left to accumulate; and vi. All wash down and compressed air hoses are stored on hose racks after use and not left on the floor.

RESPONSE: COMPLIANT

10.5.1.2 In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone, the site shall implement proper controls and procedures to ensure: i. Food safety is not compromised; ii. Sensory evaluations are conducted by authorized personnel only; iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations; iv. Sensory evaluations are conducted in areas equipped for the purpose; and v. Equipment used for sensory evaluations is sanitized, maintained, and stored separately from operational equipment.

RESPONSE: COMPLIANT

10.5.1.3 The flow of personnel in food handling areas shall be managed so that the potential for contamination is minimized.

RESPONSE: COMPLIANT

10.5.1.4 Personnel practices and activities, including those listed in 10.5, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices.

RESPONSE: COMPLIANT

10.5.2 Control of Foreign Matter Contamination Operations

Policy QP-03-37 Foreign Matter, Glass and Hard Plastic, dated 6/20/09 defines the methods and responsibilities to prevent foreign material contamination. The policy's implementation was demonstrated by pre-operational inspections and regularly scheduled maintenance inspections, that are conducted and documented for the condition of equipment and any potential contaminants. A glass register has been documented with glass, brittle plastic and ceramic sources included in all areas of the plant. The glass register is registered on QP-04-11 Glass and Hard Plastic Register and current as of 3/1/22. Periodic inspections with documentation are made of these areas to ensure breakage has not occurred, and items are not missing or moved. The last inspection conducted on 4/4/22 was reviewed and found to be completed as scheduled. Wood pallets were clean and in good condition, and the facility has a policy controlling wooden pallets in processing/food handling areas; however, this policy was observed not to be completely implemented in the food handling areas; a non-conformance was raised. The site has documented a knife policy, and knives are controlled, cleaned and required to be in good condition. Periodic maintenance inspections include looking for loose objects and potential contaminants from overheads. 10.5.2.1. Minor NC: Broken wood pallets were observed to be in use in the warehouses. These are in bad condition and have splintered wood. A risk of foreign matter contamination in the food handling areas was determined during the plant tour.

10.5.2.1 The methods and responsibility for the prevention of foreign matter and glass contamination shall be documented and implemented. Procedures and resulting records shall ensure: i. Containers, equipment, and other utensils made of glass, porcelain, ceramics, brittle plastic, or similar materials are not permitted where exposed product is handled, unless clearly identified, required for effective operational controls, and regularly inspected; ii. Regular inspections are conducted to ensure food handling/contact zones areas are free of glass and brittle plastic and any items made from the previously identified materials are in good repair; iii. Wooden pallets and other wooden utensils or tools used in food handling/contact zones are dedicated for that purpose. Their condition is subject to regular inspection, and they are cleaned and maintained in good order; iv. Product handling areas are routinely inspected to remove risks from foreign material, such as debris, wood, stones, metal, detached/deteriorated equipment, and other physical hazards; and v. Personnel are to be made aware of their responsibility to adhere to the site's foreign matter and glass controls.

RESPONSE: MINOR

EVIDENCE: 10.5.2.1. Minor NC: Broken wood pallets were observed to be in use in the warehouses. These are in bad condition and have splintered wood. A risk of foreign matter contamination in the food handling areas was determined during the plant tour.

ROOT CAUSE: The house pallets are old, and have been damaged over the years. No attention was given to the condition of the pallets.

CORRECTIVE ACTION: New wood house pallets are being ordered to replace damaged pallets. Attention will be paid to the condition of the pallets in the future and they will be removed if in fragmented poor condition.

VERIFICATION OF CLOSEOUT: Accepted

COMPLETION DATE: 06/01/2022 **CLOSEOUT DATE:** 06/08/2022

10.5.2.2 Knives and cutting instruments used in product handling and packaging operations shall be controlled, kept clean, and well maintained. Snap-off blades shall not be used in manufacturing or storage areas.

RESPONSE: COMPLIANT

10.5.2.3 Gaskets and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency (refer to 2.5.4.3).

RESPONSE: COMPLIANT

10.5.3 Detection of Foreign Objects Operations

The site's policy requires that any product affected by foreign material contamination be isolated, inspected, reworked or disposed of. The glass policy requires that a thorough cleanup and inspection (including of cleaning equipment and footwear) occur if a glass breakage were to occur. A responsible person, J.S., Line Supervisor, is required to inspect the affected area before the restarting of production. The site does not use devices for metal or physical contamination detection. N/A

10.5.3.1 The responsibility, methods, and frequency for monitoring, maintaining, calibrating, and using screens, sieves, filters, or other technologies to remove or detect foreign matter shall be documented and implemented.

RESPONSE: NOT APPLICABLE

EVIDENCE: 10.5.3.1.-10.5.3.3. The site does not use devices for metal or physical contamination detection. N/A

10.5.3.2 Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.

RESPONSE: NOT APPLICABLE

EVIDENCE: 10.5.3.1.-10.5.3.3. The site does not use devices for metal or physical contamination detection. N/A

10.5.3.3 Records shall be maintained of the inspection of foreign object detection devices and any products rejected or removed by them. Records shall include any corrective and preventative actions resulting from the inspections.

RESPONSE: NOT APPLICABLE

EVIDENCE: 10.5.3.1.-10.5.3.3. The site does not use devices for metal or physical contamination detection. N/A

10.5.3.4 In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition.

RESPONSE: COMPLIANT

10.5.3.5 In circumstances where glass or similar material breakage occurs, the affected area shall be isolated, cleaned, and thoroughly inspected (including cleaning equipment and footwear), and the completed actions approved by a suitably responsible person before restarting operations.

RESPONSE: COMPLIANT

10.5.4 Receiving and Shipping

A policy defining the practices for loading, unloading and storage of food products has been documented and implemented in QP-03-47 Incoming Materials, Inspection Log F-02-02/QP-03-49 Shipping and Trailer, Inspection Log/Trailer Seal Log F-03-38. It was observed during the audit tours that food is unloaded, stored and loaded under conditions that prevent cross contamination. The site's policy requires that all trailers be inspected for cleanliness, infestation, odors and damage before loading and that vehicles be secured from tampering. Documentation was reviewed for 3/21/22, 10/18/21 and 5/5/21. It was observed during the audit tours that loading practices do not expose products to detrimental conditions. Trailers and vehicles used for transport were observed to be properly secured from tampering by a seal, for outgoing finished products only.

10.5.4.1 Personnel conducting receiving activities shall ensure agricultural inputs, packaging materials, and product are not contaminated during the unloading process. Work instructions and training shall include the following practices: i. Vehicles are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the agricultural input, packaging, or product; ii. Vehicles (e.g., trucks/vans/containers) are secured from tampering using a seal or other agreed-upon and acceptable device or system; iii. Unloading docks are designed to protect the product and in good operating condition (refer to 10.1.2.7); and iv. Where temperature control is required, the refrigeration unit's storage temperature settings and operating temperature are checked and recorded before opening the doors. Unloading is completed efficiently, and product temperatures are recorded at the start of unloading and at regular intervals during unloading. Recording documents for vehicle inspection, identification of approved suppliers, and temperature checks shall be maintained.

RESPONSE: COMPLIANT

10.5.4.2 Personnel conducting loading and transporting of harvested and/or packaged product shall ensure that product integrity is maintained. Work instructions and training shall include the following practices: i. Inspections for ensuring vehicles are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on products; ii. Securing vehicles (e.g., trucks/vans/containers) from tampering using a seal or other agreed upon and acceptable device or system; iii. Loading docks are designed to protect the product and in good operating condition (refer to 10.1.2.7); iv. Verification that appropriate storage conditions are maintained during transportation to final destinations; v. Prevention of cross-contamination with other hazards and potential spoilage; vi. Use of appropriate stock rotation practices; and vii. Recording and maintaining documents for vehicle inspection, transport conditions, and stock rotation.

RESPONSE: COMPLIANT

10.6.1 Water Supply

Potable water is sourced for use in the facility for processing and cleaning the premises and equipment. Potable water is supplied from City of Pateros and own well. It was determined that there was adequate hot and cold water for cleaning and processing. Non-potable water systems are not used on site. One Back flow devices is installed on water lines. Back flow devices are tested annually, and the last test was conducted on 3/14/22. Hose stations, taps and other water sources are designed to prevent back flow or back siphonage. Water is not stored on site. Non-potable water is not used at this site. N/A

10.6.1.1 A water supply plan shall be prepared that describes the water sources and the operational areas they serve and shall include the location of water sources, permanent fixtures, and the flow of the water system. The plan shall be kept current and revised when changes occur. Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

RESPONSE: COMPLIANT

10.6.1.2 Adequate supplies of potable water drawn from a known clean source shall be provided for use during operations, cleaning the premises and equipment, and handwashing.

RESPONSE: COMPLIANT

10.6.1.3 Supplies of hot and cold water shall be provided, as required, to enable the effective cleaning of the premises and equipment.

RESPONSE: COMPLIANT

10.6.1.4 The use of non-potable water shall be controlled so that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent backflow or back siphonage; and iv. Testing of the backflow system, where possible, is conducted at least annually and records are maintained.

RESPONSE: NOT APPLICABLE

EVIDENCE: 10.6.1.4 Non-potable water is not used at this site. N/A

10.6.1.5 Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.

RESPONSE: NOT APPLICABLE

EVIDENCE: 10.6.1.5. Water is not stored on site. N/A

10.6.2 Water Treatment

10.6.2.1-10.6.2.3 Water is not required to be treated at the facility. N/A

10.6.2.1 Water treatment methods, equipment, and materials if required, shall be designed, installed, and operated to ensure water receives effective treatment. Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

RESPONSE: NOT APPLICABLE

10.6.2.2 Water used as an aid to operations (e.g., fluming, final product spray) or for cleaning and sanitizing equipment, shall be tested and, if required, treated to maintain potability (refer to 10.6.2.1).

RESPONSE: NOT APPLICABLE

10.6.2.3 Treated water shall be regularly monitored to ensure it meets the specified indicators. Water treatment chemical usage shall be monitored to ensure chemical residues are within acceptable limits. Records of testing results shall be kept.

RESPONSE: NOT APPLICABLE

10.6.3 Water Quality

Water used in processing, thawing, treating or conveying of food, cleaning or handwashing is monitored periodically for potability by the site. The manufacture of ice and steam with the potable water complies with potable water microbiological and quality standards. Samples from inside the facility are sent to an outside lab for analysis. Based on risk, the site's testing frequency is set at a minimum frequency of annually. The last potability test was conducted on 3/23/22, testing E Coli and Total Coliforms: results <1 CFU/100 ml.

10.6.3.1 Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required, when used for: i. Washing, thawing, and treating food; ii. Handwashing; iii. Conveying food; iv. An ingredient or operational aid; v. Cleaning food contact surfaces and equipment; vi. The manufacture of ice; or vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.

RESPONSE: COMPLIANT

10.6.3.2 Microbiological analysis of the water and ice supply shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Samples for analysis shall be taken at sources supplying water for the process, cleaning, or from within the site. The frequency of analysis shall be risk-based, and at a minimum annually.

RESPONSE: COMPLIANT

10.6.3.3 Water and ice shall be analyzed using reference standards and methods.

RESPONSE: COMPLIANT

10.6.4 Ice Supply

10.6.4.1 - 10.6.4.3. Ice is not used at the facility. N/A

10.6.4.1 Ice provided for use during operations, as a processing aid, or an ingredient shall comply with 10.5.3.1.

RESPONSE: NOT APPLICABLE

10.6.4.2 Ice that is purchased shall be from an approved supplier and included in the site's food safety risk assessment. Ice shall be supplied in containers that are appropriate for use, cleanable if reused, and be tested as appropriate (refer to 2.3.3).

RESPONSE: NOT APPLICABLE

10.6.4.3 Ice rooms and receptacles shall be constructed of materials as outlined in 10.1 and designed to minimize contamination of the ice during storage, retrieval, and distribution.

RESPONSE: NOT APPLICABLE

10.6.5 Air and Other Gasses

Compressed air or other gases coming in contact with food or food contact surfaces is checked periodically for cleanliness and food safety hazards. Compressed air or other gas systems are regularly maintained and monitored. Filters are located at the point of use and are of the appropriate micron size to effectively filter the air or gas before contacting food or food contact surfaces. Filter inspections and changes are conducted by H.M, Maintenance Manager. The compressed air (food contact gas) checked on 10/25/21, was reviewed during the audit. Compressed air or gas samples are periodically sent to an outside laboratory for analysis. No adverse results were observed.

10.6.5.1 Compressed air or other gases (e.g., nitrogen or carbon dioxide) that contact food or food contact surfaces shall be clean and present no risk to food safety.

RESPONSE: COMPLIANT

10.6.5.2 Compressed air systems and systems used to store or dispense other gases used in the operational process that come into contact with food or food contact surfaces shall be maintained and regularly monitored for quality and applicable food safety hazards. The frequency of analysis shall be risk-based and at a minimum annually.

RESPONSE: COMPLIANT

10.6.5.3 Ambient air shall be tested at least annually to confirm that it does not pose a risk to food safety.

RESPONSE: COMPLIANT

10.7.1 Ambient/Dry Storage

The site has implemented effective documented storage plan for the storage of raw materials, packaging, equipment and chemicals. For example, the QP-02-04 Stock Rotation and QP-03-47 Packaging, was reviewed during the audit and found to be acceptable. Stock rotation, based on "On Demand Shook as Needed" has been implemented by the site to ensure that all materials, including rework, are used within their designated shelf-life. Temporary or overflow storage is not used on site.

10.7.1.1 The responsibility and methods for ensuring proper storage of inputs, packaging, and finished product shall be documented and implemented. The methods shall ensure: i. Effective stock rotation; ii. Utilization of inputs, work-in-progress, and finished product within their shelf life; iii. Risks to temporarily stored materials and/or products are analyzed, and controls are applied if necessary; iv. Rooms used for the storage of product ingredients, packaging, and other dry goods are located away from wet areas (refer to 10.1.2); and v. Records are maintained to control storage and stock rotation.

RESPONSE: COMPLIANT

10.7.1.2 Dry ingredients and packaging shall be received and stored separately from field product or chilled materials to ensure there is no cross-contamination. Unprocessed field products shall be received and segregated to ensure there is no cross-contamination.

RESPONSE: COMPLIANT

10.7.1.3 Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and areas behind the racks. Storage areas shall be cleaned at a predetermined frequency (refer to 10.2.5.1) and designed and constructed to prevent packaging from becoming a harborage for pests or vermin.

RESPONSE: COMPLIANT

10.7.2 Cold Storage, Controlled Atmosphere Storage, and Chilling of Foods

23 Controlled Atmosphere Rooms and cold storage areas are designed and constructed to allow for hygienic and efficient refrigeration. There appeared to be sufficient capacity for the facilities requirements and sufficient space for periodic cleaning. The condensate lines were connected directly to the plant drainage system. Temperature monitoring devices are located at the warmest part of the refrigerators and temperatures are periodically monitored and recorded. Temperature monitoring for NP1 to NP23, dated 4/27/22 was reviewed and met required targets. Refrigeration equipment is maintained on the plant's preventive maintenance schedule, and work was last completed: Coolers maintenance performed by Shiftlett's, Ammonia Detector Calibration report, dated on 2/17/22. An outside contractor maintains the refrigeration equipment.

10.7.2.1 The site shall provide confirmation of the effective operational performance of coolers, controlled atmosphere facilities, and cool rooms. They shall be designed and constructed to allow for the hygienic and efficient refrigeration and storage of food and be easily accessible for inspection and cleaning.

RESPONSE: COMPLIANT

10.7.2.2 Sufficient refrigeration and controlled atmosphere capacity shall be available to chill or store the maximum anticipated throughput of products with allowance for periodic cleaning of storage rooms.

RESPONSE: COMPLIANT

10.7.2.3 Discharge from defrost and condensate lines shall be controlled and discharged into the drainage system.

RESPONSE: COMPLIANT

10.7.2.4 Cool and controlled atmosphere rooms shall be fitted with temperature and atmosphere monitoring equipment and located to monitor the warmest part of the room and fitted with measurement devices that are easily read and accessible.

RESPONSE: COMPLIANT

10.8.1 Storage of Hazardous Chemicals and Toxic Substances

Any hazardous chemicals were observed to be properly stored and labeled and did not appear to present a hazard to personnel or food products. No processing utensils or packaging were stored next to chemicals. Pesticides are not stored on site. Chemical storage areas were observed to be locked and had instructions on handling hazardous chemicals, an up-to-date inventory of all chemicals, available first aid and spill containment equipment. Daily supplies of chemicals were properly stored. All stored chemicals have current SDS information on file at the facility. SDS and the label declaration and documented approval for the chemical's intended use were reviewed for Acidex Max, Pac Rite, Chlor Out, Real Clean and Nature's Shield 440 BF.

10.8.1.1 Hazardous chemicals and toxic substances with the potential for food contamination shall be stored so as not to present a hazard to personnel, product, packaging, product handling equipment, or areas in which product is handled, stored, or transported. Specifically, they shall not be stored inside food handling areas and product and packaging storage rooms.

RESPONSE: COMPLIANT

10.8.1.2 Daily supplies of chemicals used for continuous sanitizing of water, as a processing aid, or for emergency cleaning of food handling equipment and surfaces in food contact zones may be stored within or in close proximity to a food handling area, provided that access to the chemical storage facility is restricted to authorized personnel.

RESPONSE: COMPLIANT

10.8.1.3 Hazardous chemical and toxic substance storage facilities shall: i. Be compliant with national and local legislation and designed so there is no cross-contamination between chemicals; ii. Be adequately ventilated; iii. Be provided with appropriate signage indicating the area is a hazardous storage area; iv. Be secure and lockable to restrict access only to personnel with formal training in handling and use of hazardous chemicals and toxic substances; v. Have instructions, including up-to-date Safety Data Sheets (SDS), on the safe handling of hazardous chemicals and toxic substances, readily accessible to personnel; vi. Be equipped with a detailed and up-to-date inventory of all chemicals contained in the storage facility; vii. Have suitable first aid equipment and protective clothing available close to the storage area; viii. In the event of a hazardous spill, be designed such that spillage and drainage from the area is contained; and ix. Be equipped with spillage kits and cleaning equipment.

RESPONSE: COMPLIANT

10.8.1.4 Hazardous chemical and toxic substances shall be handled and applied by properly trained personnel. These materials shall be used by, or under the direct supervision of, trained personnel with a thorough understanding of the hazards involved, including the potential for the contamination of food and food contact surfaces.

RESPONSE: COMPLIANT

10.8.1.5 The site shall dispose of unused chemicals and empty containers in accordance with regulatory requirements and ensure that: i. Empty chemical containers are not reused; ii. Empty containers are labeled, isolated, and securely stored while awaiting collection; and iii. Unused and obsolete chemicals are stored under secure conditions while awaiting authorized disposal by an approved vendor.

RESPONSE: COMPLIANT

10.9.1 Waste Management

A policy defining the methods and responsibilities for handling dry, wet and liquid waste has been documented and implemented, is found in QP 03-39 Waste Management and Disposal. Waste was observed to be removed on a scheduled basis and is documented on pre-operational inspections and internal audits conducted by the plant. Waste containers, hoppers, bins and storage areas on the interior and exterior of the facility were observed to be well-maintained and clean. Solid waste from processing was observed to be properly disposed of. Waste water is discharged to plant drains and collected for disposal to the municipality's waste water system. Trademarked materials are not used in the facility. Inedible waste designated for animal feed is handled and stored so as not to pose a risk to the animal or to further processing. Controlled disposal of trademarked materials is not required at the site.

10.9.1.1 The methods and responsibilities that describe the effective and efficient disposal of dry, wet, liquid, and solid waste, including inedible material, unusable packaging, and trademarked materials, from the premises shall be documented and implemented. Reviews of the effectiveness of waste management will be part of the site's daily inspections, and the results of these inspections shall be included in the relevant reports.

RESPONSE: COMPLIANT

10.9.1.2 Waste shall be regularly removed from food handling or processing areas so it does not create food safety risks for finished product and packing operations. Designated waste accumulation areas shall be maintained in a clean, tidy conditions until external waste collection occurs.

RESPONSE: COMPLIANT

10.9.1.3 Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system and meet local regulatory requirements.

RESPONSE: COMPLIANT

10.9.1.4 Trolleys, vehicles waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so they do not attract pests and other vermin.

RESPONSE: COMPLIANT

10.9.1.5 Inedible waste designated for animal feed shall be stored and handled so it does not cause a risk to the animals or to further processing.

RESPONSE: COMPLIANT

