



# SQF Food Safety Audit Edition 9

## Columbia Valley Fruit, LLC - Columbia Valley Fruit, LLC

### Summary

**AUDIT DECISION**  
**CERTIFIED**

**CERTIFICATION NUMBER**  
**11407 | 152081**

**AUDIT RATING**



**Excellent**

**DECISION DATE**  
**05/04/2022**

**AUDIT TYPE**  
**RECERTIFICATION**

**RECERTIFICATION DATE**  
**03/27/2023**

**AUDIT DATES**  
**03/14/2022 - 03/15/2022**

**EXPIRATION DATE**  
**06/10/2023**

**ISSUE DATE**  
**05/04/2022**

### Facility & Scope

**Columbia Valley Fruit, LLC (43801)**

Columbia Valley Fruit, LLC  
1720 W. Ahtanum Road  
Yakima, WA 98903  
United States

**Food Sector Categories:**

4. Fresh Produce, Grain, and Nut Packhouse Operations

**Products:**

Packing of apples

**Scope of Certification:**

Fresh Produce and Nuts Pack House 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:** McNeill, Todd (119528)

**Technical Reviewer:** Crawford, Lisa (424990)

**Hours Spent on Site:** 16

**Hours of ICT Activities:** 0

**Hours Spent Writing Report:** 8

### Non-Conforming

## 10.5.2 Control of Foreign Matter Contamination Operations

Visual and Electronic inspections are done by sorting Apple on the Packing line, QA of the finished product to ensure no product contamination. Environmental testing is done for listeria, E.coli and Salmonella testing quarterly. Sighted numerous documents for prior 2 weeks of inspections show inspection is done. No temporary repair was seen during the inspection. A glass register is present showing all glass and hard plastics in the facility are in good condition. MINOR: Utility knife blades are stored on a desk next to a finished product not protected or inventoried.

**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:** MINOR

**EVIDENCE:** Utility knife blades are stored on a desk next to a finished product not protected or inventoried.

**ROOT CAUSE:** This was a lack of training. Employees thought that because they had knives there to cut shrink wrap that it was ok to have knife blades in the area.

**CORRECTIVE ACTION:** An inspection was conducted by Ines V. (Food Safety Manager) on 4.28.2022 and no blades or unauthorized knives were found. Knife Procedure Review by Management 3.22.2022 Knife Procedure Training conducted 3.22.2022

**VERIFICATION OF CLOSEOUT:** The utility knife policy has been updated and training for employees was completed. Lack of understanding of the code and training of supervisors and employees was the root cause.

**COMPLETION DATE:** 04/13/2022 **CLOSEOUT DATE:** 04/13/2022

## 10.7.1 Ambient/Dry Storage

Storage racks and pallets were observed constructed of approved materials. Racks were observed clean and well maintained. Vehicles used in the warehouse are electric. Gas forklifts are used in outside and cold storage areas. All were observed well maintained. The FIFO method for stock rotation is used in the inventory control system. No other storages exist off-site The facility also has CA rooms that are present at various locations and are not accessible due to sealed rooms. MINOR: RPC is stored outside without protection or status if to be used or not.

**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:** MINOR

**EVIDENCE:** RPC are stored outside without protection or status if to be used or not.

**ROOT CAUSE:** Miss understanding for delivered and damaged RPC storage.

**CORRECTIVE ACTION:** Miss understanding for delivered and damaged RPC storage.

**VERIFICATION OF CLOSEOUT:** RPC that are not in use are now kept in a designated area so they will not be co-mingled. A lack of training of the packaging crew on how to mark out Non-Conforming products was lacking. This has now been corrected.

**COMPLETION DATE:** 04/04/2022 **CLOSEOUT DATE:** 04/13/2022

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

Multiple Cold Storages are on site. The coolers and dock area are on independent thermometers to verify temperature. The chillers are fitted with a catch basin and drainage. In addition, there is a policy to not store products directly under the chillers. Temperature monitoring records are maintained in a designated binder. The Cold storage temperature is maintained at 33 to 38 degrees, Thermometers are maintained calibrated and temperatures were correct for checking fruit prior to shipment. MINOR: Discharge water is on the floor in a finished product storage room. Maintenance was notified for repair.

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

**RESPONSE:** MINOR

**EVIDENCE:** Discharge water is on the floor in a finished product storage room. Maintenance was notified for repair.

**ROOT CAUSE:** Non-conforming product 3.15.2022

**CORRECTIVE ACTION:** The product was labeled as a "non-conforming product" and inspected by the shipping manager for water contamination. No evidence was found of water contamination and the product was released.

**VERIFICATION OF CLOSEOUT:** The leaking water from the drip pans in the cold storage was found and the refrigeration tech did not move the remaining fruit or tag out of the room as he deemed the water was not impacting the packed boxes. This was a mistake by the refrigeration tech as he should have tagged out and notified management. This is now rectified and new SOPs are written to procedures in the event of an issue moving forward. The fruit was removed, tested, and released. The drip pan was unplugged and is now in working order

**COMPLETION DATE:** 03/16/2022 **CLOSEOUT DATE:** 04/30/2022

## Audit Statements

**SQF Practitioner Name** Name the designated SQF Practitioner  
**RESPONSE:** Ines Vazquez

**SQF Practitioner Email** Email of the designated SQF Practitioner  
**RESPONSE:** Ines@columbiaValleyfruit.com

**Opening Meeting** People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas)  
**RESPONSE:** Mark Lundberg Owner, Ines Vazquez practitioner Tony Floyd Operations, John Hall Receiving Manager. Todd McNeill Auditor

**Facility Description** Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details)  
**RESPONSE:** Organic and inorganic apples on one packing line with tray packs and 12 bagging machines. Cold Storages, shipping dock and CA storages are on site. The Operation packs 12 months annually both Organics and Conventional Tree Fruit. The facility is roughly 50 sq ft of packing line with associated Cold and CA storages for raw fruit. Columbia Valley is part of the Chelan Fresh Marketing Group. A total of 150 people total are in the facility for all job functions. 11 growers supply fruit to be packed by Columbia Valley. CP's are in place for Ozone water, Calcium Hypo chlorite, and PAA.

**Closing Meeting** People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)  
**RESPONSE:** Mark Lundberg Owner, Ines Vazquez practitioner Todd McNeill Auditor

**Auditor Recommendation** Auditor Recommendation  
**RESPONSE:** To approve once all CA's are corrected

## Section Responses

## 2.1.1 Management Responsibility (Mandatory)

A food safety policy is signed by Mark Lundberg on 11-9-2021 stating a commitment to SQF and food safety based on HACCP and Codex. A Policy Statement is displayed in the facility in both English and Spanish, posted on the bulletin board at the entrance to the lunchroom. Inez Vasquez is Food Safety Practitioner, a full-time employee of Columbia Valley Fruit and HACCP Trained Inez Vasquez is HACCP trained for the past 5 years with a two-day course. Inez Vasquez is responsible for the training needs of the organization for Food Safety. HR and Supervisors are responsible for training Sorters, line Mechanics, Receiving, Forklift operators, the Shipping department, Line supervisor. CP operators. A Organizational Chart is in place and shows the Management structure and relationships to each other. Mark Lundberg is the Manager for the facility and oversees all area of the company. The culture of the company appears to be a open functional culture. Interviewed numerous people about communication and all said they are informed. Interviews show high level of understanding of each job. Mark Lundberg holds meeting weekly with staff and line employees monthly. A complaint and concern form is present and reviewed immediately. There are 7 people HACCP Certified in the past 5 years A document shows Inez Vasquez is FSMA trained in 2021. Black out periods are recorded.

- 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)**

A food safety manual is in place stating practices and policies for Apple Packing. The system is reviewed each year annually over a period of weeks. Documents show review was completed in February 2022. Inez Vasquez and the food safety team hold monthly meetings and are recorded quarterly with 7 people on the team. An annual review of the SQF code around Code 9.0 for Food Safety issues with Senior Management. Mark Lundberg Production Manager. Management meets monthly to discuss issues. A review of the HACCP plan is in place 1 CP Dump Tank and Chlorine dioxide Spray Bar are identified. Ongoing training programs are in place for all personnel in the facility-based GMP and HACCP criteria. The food safety program includes pre-requisite programs and HACCP plans with Risk assessments. The plan is made available both electronically and in paper form All documents are Held in the food safety office and shared with staff during monthly meetings. Sighted the last one on February 01, 2022. Discussed RPCs and Chelan Fresh requirements for packing. The review document shows the entire system has been reviewed to include areas of internal/external audits, customer complaints, HACCP plans, changes to documents and revisions, Crisis Management plans, product trace, and recall Shipping. Hygiene Training. . Records of reviews are in place. sighted document control numbers for documents showing reviews and amendments made and recorded. The company culture is very strong and Mark Lundberg is active in the development of people and processes. This was evident through interviews, Site inspection, and document review of the system and facility.

**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)**

A complaint log is present but nothing is written in the log for the past year. Records show quality issues are recorded. No food safety issues have occurred in the past year. Sales are done through the Chelan Fresh Marketing group.

**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 Management Control System is in place. The scope of the operation and listed product and Food Safety Plan based on Codex is present. The system is complete with the 7 steps of HACCP. All product is packed to WSDA regulations and the supplier comply with all requirements for packing both organic and conventional fruit. All documents are stored in hard copy in the Food Safety office and on computers. The System is reviewed annually by Columbia Valley Fruit in February 2022 over a two-week period. The system was around SQF 9.0

**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 SQF practitioner, Inez Vasquez is responsible for the document control. Documents are maintained both in hard copy and electronically. SOP's are present for document control. Revision dates and dates of control and monitoring docs are in place. Sighted document control number The SQF practitioner is responsible for the document control.

**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)**

Sighted training and monitoring documents for the past year showing the records are maintained and checked off by the food safety practitioner Inez Vasquez Sighted chemical controls and Cleaning documents for daily monitoring of activities. Sighted documents for Monitoring of chemicals, Cleaning, Wash water, Scales, Temperatures, shook, Hold Release, Transportation Etc.

**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**

No product development is done by Columbia Valley

**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)**

Columbia Valley Fruit Company uses USDA and WSDA specifications for packing organic and Inorganic Apples. Specifications are sighted for packaging and raw product. i.e. All Raw product is under Global GAP Certification from WQS and Eagle in 2021. Raw Material specifications are provided. Sighted Bin tags and grower numbers for Apples. Sighted document for NW Wholesaler, HR Spinners, Pace Industries, Sprague Pest Control. Michelson Packing. All apples are Global GAP certified MRL Testing for Raw Product is done by Matrix in Portland Oregon in January 2021 MRL test show results for the US, Mexico Canada. India China Taiwan, Vietnam, Saudi Arabia to meet requirements. Testing done by PAL by Variety packed Certificate AT 1905. Sighted document for Packing, Box materials for contact, and non-contact meet 21 CFR Part 176.170 for food contact. Purchasing is from HR Spinner and Michelson Packing. Product Labels are correct on bags and boxes. Fruit Packers Supply. Michelson Packing

**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)**

A program is in place for monitoring suppliers' programs. Protocols for using approved and unapproved suppliers are in place meeting all requirements i.e. inspection, transporting the product to the facility, and inspection at the facility. Apples packed are GG certified by Columbia Valley-owned orchards and Growers. Packing materials have a letter of guarantee and letter stating audited to compliance for food contact An Approved supplier program is in place and sighted for approving of suppliers based on Prices quality and service, A register of approved suppliers is in place. Sighted 40 suppliers for Columbia Valley with Letters of Guarantee present and or 3rd party audit certificates. All suppliers are evaluated by the supplier agreeing to meet the requirement through a supplier scorecard that includes a Letter of guarantee and or GFSI requirements Audit certificates. All fruit is packed to WSDA standards and inspected by the WSDA daily for inspection. i.e. Sighted Fruit Packers Supply by SQF ( Eagle). Michelson Packing third-party certificate by Eagle in 2021. Cascade Analytica Eurofins for Water Coliforms and IEH for environmental and Matrix labs for MRL testing and water testing

**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)**

A Risk Assessment has been performed by Columbia Valley around HACCP-based methods and Codex requirements. Mark Lundberg is responsible for implementing procedures to comply with the origin of the Country along with Chelan Fresh Marketing. Sighted Documents for USDA and WSDA standards for products grown in Washington State and shipped to Asian, Mid East Europe, and Asian markets. Legislative requirements for Customers are obtained from the professional membership of company staff on committees like SQF. Compliance is reviewed annually to ensure compliance with MRLs and USDA requirements. A letter is in place to Notify SQF and Eagle Certification should a Food Safety Issue or recall become necessary.

**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](mailto:foodsafetycrisis@sqfi.com).

**RESPONSE: COMPLIANT**

## **2.4.2 Good Agricultural/Operating Practices (Mandatory)**

A food safety plan and flow chart are present for receiving, storage, packing. Shipping of Apples complying with good GMP and GAP programs. Prerequisite programs and Food Safety controls are in place that includes CPs and monitoring of activities cleaning and preventing cross-contamination

**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)

A food safety plan and HACCP plan are in place developed by the Food Safety Team of 7 members. Product descriptions are in place for Fresh organic and Inorganic Apples. A flow chart is part of the plan that includes storage repacking grading, shipping of fruit. A risk assessment for food safety is in place and included in the hazard Analysis for Biologic Chemical and Physical controls. A Hazard Analysis report is in place for packing Apples with storage and Shipping. Covering inputs, control measures, Hazard identified Pesticide Residue on apples and water, foreign object control, Pathogens listeria, E.coli, and Salmonella control. Sighted the following HACCP documentation: -HACCP team: Inez Vasquez (Team leader & SQF Practitioner). The food safety plan includes Product Description & intended use for Apples.. -Flow Chart for Apple line. i.e. flow from Receiving to Segregation. -Hazard Analysis for CCP including all inputs, process steps. -Hazard Analysis Report for process steps, ingredients, and materials. CPs are signed off by the HACCP team. Chlorine dioxide Dump tank 5ppm (critical) & Ph 6.5 – PAA Spray Bar 30 PPM Water was sighted at 55 degrees. Temperature range from 34 to 90 degrees. All countries of destination the fruit must meet WSDA and Organic requirements. All Countries product is sold to are held with Chelan Fresh Marketing.

**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** 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.

**RESPONSE:** COMPLIANT

**2.4.3.6** 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.

**RESPONSE:** COMPLIANT

**2.4.3.7** 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.

**RESPONSE:** COMPLIANT

**2.4.3.8** 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.

**RESPONSE:** COMPLIANT

**2.4.3.9** 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.

**RESPONSE:** COMPLIANT

**2.4.3.10** 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.

**RESPONSE:** COMPLIANT

**2.4.3.11** 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).

**RESPONSE:** COMPLIANT

**2.4.3.12** 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.

**RESPONSE:** COMPLIANT

**2.4.3.13** 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.

**RESPONSE:** COMPLIANT

**2.4.3.14** 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.

**RESPONSE:** COMPLIANT

**2.4.3.15** 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).

**RESPONSE:** COMPLIANT

**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**

Methods for sampling or inspection of Apples both organic and inorganic are in place. visual Inspections are done in-house and by the Washington State Dept of Ag comes periodically as requested by the Customer. Monitoring of water, chemicals are done by Pace, IEH, and Eurofins Cascade Analytics both 17025 company Records are maintained.

**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**

A list of non-conforming products with cross-reference to rework, damage, waste is in place. Sighted documents load rejection, Procedure for inspection of incoming product, Rejected Apples for repacking procedures, None are done for Damaged product policy, Procedures for the expired product, Procedures for non-compliance is monitored. Corrective actions are in place for repacking of products or product rejected at customer's sight. i.e. price adjustment for decay or shrink.

**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**

Apples that are repacked have procedures. Repacking area is done online equipment in a separate building from the packing line. Records or repacking are present including loss amount and new counts on the computer recording system i.e. Repacking of Organic Gala Tray Pack to Tray Pack due to lenticels was being repacked the day of the audit. The loss report is reviewed

**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)**

Sighted the following procedure Product Release Policy Product put on hold procedures in place for issues arising from the condition of the fruit. Records of Release are present. Sales and or Tony Floyd QC is responsible for repacking and release of the product. He verifies all activities.

**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

Eurofins and IEH is an ISO 17025 company test for Listeria Salmonella and E Coli on the line equipment and walls and drains zones 1-4 randomized Testing records show testing is done Quarterly per policy. 4 zones are tested weekly ( swab test) for cleanliness and specific generic pathogens. Sighted recorded for the past 9 months. Test results show testing is negative for listeria Salmonella and Ecoli. Results show no areas positive for E.coli or listeria in non-contact zones. testing is done every quarter on contact surfaces on the line by IEH personnel.

- 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 effectiveness of the pre-requisite programs is verified and Validated through monthly audits, customer complaints, 3rd party audits by key customers, and the Environmental Swab Analysis. A validation of Prerequisites Programs is met. Records for the following validation activities were reviewed: Chemical flume water PPM and MV counts- Calibration of Equipment: Evaluation of procedure, weekly calibration records, and annual calibration schedules. - Internal and external audits, - Cleaning and Sanitation: Hygiene Environmental Swabs and ATP hygiene testing. - Allergen Control: Visual inspecting and observation. Monitoring of incoming water is done annually. validation Schedule (is). December 2021 -Procedures are in place for taking levels of Calcium Hypochlorite at the Dump Tanks. Critical Limit 650 mv or 5.0 ppm free Chlorine for Organic. PAA Spray Bars 60 PPM sighted with a limit range of 40 PPM Water is tested for coliforms by Cascade Analytics quarterly. Validation comes from industry best practices through the WSDA, WSU, Washington Tree Fruit, Washington Hort, United Fresh.

- 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)

Verification activities are sighted. Reviewed documents for Chemicals control, Cleaning, and shipping documents. Also viewed are Cleaning Procedures and chemicals to be used. Pace and CH20 are used for chemical consulting. Training of Personnel is present for each activity by trained personnel on Control Point parameters. Reviewed documents for Cleaning, Chemical Monitoring on the packing line, Maintenance logs. All are filled out and complete.

- 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)

Corrective action procedures are in place for NC should they occur Records are complete for monitoring of processes. Written in the SOPs are how to do a Corrective action and record along with whose responsible for verification of activities

- 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)

Inez Vasquez does the internal audits based on SQF 9.0 A test was done on 2-7-2022 for annual audit and again with Monthly inspections. The test showed all corrective actions were corrected prior to the audit. . HACCP and internal audit trained for Inez Vasquez by Alchemy. Trained through alchemy on February 18, 2019. FSPCA 3-05-2021. the internal audit was based on SQF packing version 9.0. Findings were recorded and completed prior to the SQF recertification audit for Columbia Valley Fruit.

- 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: COMPLIANT**

## 2.6.1 Product Identification (Mandatory)

Methods for identifying products during all stages of the packing process are provided in Product Trace, and Recall Procedures Written in The SOP and prerequisite programs are listed how the product is identified from receiving to shipping. Receiving Tickets, Grower numbers, lot codes, pallet tags are in place to identify all products at any stage of the packing process and recorded on the Columbia Valley fruit inventory control system.

- 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)

Product trace procedures are in place to be done Annually by Columbia Valley Fruit. written in the SOPs for the responsibility of tracing products from grower to customer. Chelan Fresh is a marketing company and does a mock recall as well annually. A Costco audit was performed at the audit under two hours and was compliant with fruit, packaging, and chemicals. A one-step forward and back system is used. A test is done annually. i.e. As quarterly Mock Recalls a mock recall is done at the annual SQF audit reviewed recall on 1-4-2022 O organic Fuji Apple WA X FCY count 1358 packed mock recall for Dubacano SA DE CV Guadalajara Mexico. 1550 boxes shipped.. order number 60036. 70 left in inventory. The recall is done in 40 minutes Rocky Prairie Orchards received in 2021 All packaging and post-harvest chemicals are recallable. SQFI & Eagles are to be notified in event of recall within 24 hours.

- 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](mailto:foodsafetycrisis@sqfi.com).

**RESPONSE:** COMPLIANT

## 2.6.3 Crisis Management Planning

A Crisis plan is in place along with an annual test as part of the annual review. The Crisis Plan includes all relevant management. phone numbers of state and local agencies, the CB, and SQF. Emergency Preparedness and evacuation routes are sited. Maps and Procedures are in place for Personnel. Columbia Valley ownership is responsible for the decision-making and communication in the event of an incident. An Emergency plan team is sighted for 5 persons Mark Lundberg is available to make decisions on product condition. Columbia Valley management would determine the status of the product. The SQF practitioner, Owner, and QA would determine the condition of staff and the facility and communicate this to management and authorities. Fruit not meeting the criteria would be isolated, tagged or destroyed, or Repacked. A test was done on 10-12-2021 for Covid 19 outbreak. The plan is executed for determining how to continue packing with contingency Plans for the entire organization Chelan Fresh sales and customers were notified and as part of the Chelan Fresh Group, all receiving fruit was transferred to other warehouses.

- 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)

Reviewed Food Security/Food Defense Procedures (SOP). Procedures cover visitor access, investigation of suspicious activities, staff screening, Site Perimeter, physical security, storage of chemicals, security of water and utilities, security Products in the facility and on trucks. and access to the computer system. For entrance to the facility, visitors must enter through the main entrance and provide site contact information and Identification. Shipping dock Camera, locked doors, truck locks, and lighting surrounding the building. A Food Defense plan is tested annually on 9-29-2021 Cyber Security threat shutting down the packing line and inventory control system was tested. Only authorized people have access to the intranet and systems. Security audits are performed annually by a third party

**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)**

Columbia Valley has a food Fraud plan which states, Columbia Valley complies with State and Federal Regulations. No fruit is adulterated misbranded or contains additives that do not meet WSDA and Federal Laws for labeling. All suppliers are vetted Organics are grown and packed. A Washington Organic Certification is present. All Apples are marketed to meet WSDA standards and are inspected daily by State Officials.

**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)**

No allergens are associated with any product stored or produced at Northern Fruit Allergen training is done for all employees on what an allergen is and how cross-contamination could be present through food brought in or purchased in Vending machines

**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

## 2.9.1 Training Requirements

Sighted the Columbia Valley Fruit Policy, for Training of Employees. Sighted training records for CP training for ORP/pH/Cl monitoring with written assessment: CP operators, Trained by Pace and CH20 for CP operators, Sighted records of compliance for recording Levels of Chlorine, Cleaning Crew Sorter, Mechanics Packer, Segregators Forklift operators, and the shipping personnel. Training records are kept in employee records and on a training attendance record which is used to document employee, training or skills description, trainer, date of training A complete training program is in place.

- 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)

Annually training of all employees is done and recorded in binders. Sighted multiple training for system operators. Pace Osequere for Bertha Velazquez 5-1-2021 training done by CH20 Jorge Ramirez 12-1-2021 HACCP training and food safety. is done by Inez Vazquez and supervisors annually. Inventory Control. All employees receive hygiene and food safety training. Dates, names, and types of training are logged

- 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 facility has is in an industrial area on Union GAP Washington with business surrounding the business and a major city road on one side. The location is appropriate for packing of Apple A business License if in place Wash State Lic The facility is under the FSMA Preventative Controls

- 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

The packing house consists of one building for packing and one for Cold Storage and Shipping. All floors are sealed concrete is observed to be smooth, impact-resistant, and sloped towards the floor drains. The area by the dump tank for Leaves placed in a bin was leaking water out and not directed towards a drain. Drains were constructed in a manner that allows for ease of cleaning. Drains were observed very clean and well maintained. Walls, partitions, ceilings, and doors were observed constructed of materials suitable for food manufacturing. Wall to floor and wall to wall junctions were properly sealed and no accumulation of debris was observed. There are no windows in the product handling areas and all doors are solid. Stairs and catwalks are protected with Stainless Steel plates and 3-inch lips. Repacking is done in a separate building on site. Repacking was sighted and compliant.

- 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:** COMPLIANT

- 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

All buildings are pest resistant. External doors and other openings were observed to be properly sealed to prevent entry to pests or dust. The doors, including personnel access doors, are self-closing and were observed closed when not in use. Speed doors and roll doors seal to the bottom. Adequate provision is made for sealing around trucks in docking areas. Insect light traps are not present. Interior traps are tin cats and are properly located along the perimeter wall with a numbering system. Pest chemicals are not stored on-site. No Chemicals for pests are on site.

- 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

The line equipment is designed by Aweta for Apple Packing. All areas are cleanable and have cleanable and accessible contact surfaces. There are electric forklifts in the facility. Produce storage racks and calibrated equipment were observed well maintained. Protective clothing (gloves and hairnets) are provided. Racks for clothing are provided near the break and restroom. All cleaning aids are identified and stored in a lockers closet on site.

- 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

There is a Maintenance schedule that includes all areas of the facility on a daily, weekly, and Monthly Schedule. Mike Noy is the maintenance manager lead. Maintenance work activity is recorded. i.e.\ replacement of on tubs. A lead mechanic with 2 others does all repairs. The maintenance has a separate mechanics shop off the production floor for the storage of tools etc. are to be cleaned after use per policy. Maintenance and the cleaning crew both clean areas after maintenance or repairs are done. No paint on contact zones. Lubricants are stored and labeled. Training records for training on GMPs and Food Safety are present and ongoing training is sighted throughout the year.

**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

A list of contractors is written for work in the facility. Trucks maintained by Columbia Valley Mechanics, Pacific CA Refrigeration is used for Refrigeration, Sprague Pest control, Pace, and CH20 for Chemical all are in the facility for contracted work. All work is done after the line is down per policy. Pre-op is done daily by the Operations Manager Jim Bryant and signed off on. Pace is used for injection pumps and PAA monitoring and calibration. Mechanics ensure all machinery is in a good safe condition for packing of fruit. Records are online and in a logbook for 2021 and January 2022. Other Contractors are Sprague, Paterson Electrical Western scales and Aweta

**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 calibration system is written to ensure all instruments used in the facility are calibrated annually. Pace OPR calibrations are done weekly on Feb 23 2022 were reviewed. Western Scale on 5-7-2021 annually for truck scales and bagging scales. Decco Calibrates for Wax machine monthly. CH2O does chemical cleaning calibration monthly. Penetrometers are calibrated daily

**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 pest control program is sighted and Sprague Pest Control is contracted to help with the Pest Program. Bait stations are used outside the buildings and tin cats inside. Weaver is a licensed Pest Control Company in Yakima Washington and insured to 2,000,000. Monitoring records on file, externals once per month. with trending reports presented. Pest Control procedures sighted: -Site maps for Exterior and Interior Rodent traps are present. Lawrence Trelevan owner has been trained in pest control and all technicians are licensed Exp Dec 2021. Sprague employee was interviewed during the audit on trending. No issues were brought up from pest activity. Bait stations are used outside the buildings and tin cats inside. no Bait is stored at the packing site and SDS is present. Monitoring records on file, externals once per month. Gary Mitchell is the technician and WSDA Licensed 75049. Pest Control procedures sighted: -Site maps for Exterior and Interior Rodent traps. Pest chemical used is Bromadiolone Trending is sighted monthly for activity.

**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**

A Cleaning and sanitization program is written and reviewed. The entire facility is covered under the plan. Zone 1 -4 are identified by risk. Zone one is the wet areas and 2 -3 are line equipment and floor-ceiling walls. Zone 4 are storage area. ATP testing is beginning in 2020 and is in the calibration phase at audit time. An environmental program is done every month for Listeria Salmonella and E Coli on contact and non-contact surfaces reviewed records of testing with data showing testing within limits for December and January to date. A crew of 4 people cleans the facility nightly and a clean break is done weekly prior to organics being packed. . SOPs and cleaning procedures are present. Reviewed SDS for Chemicals along with training provided. A review of the Cleaning records is present and verified by Inez. A pre-operation Inspection is done daily by Management and verified prior to the start of every shift Miguel Sanchez lead cleaner for a crew of 5-10 people. Trained by Kelly Clausen of CH2O. Chlor Cling 937 is used on contact and non-contact surfaces. ISO alcohol for organic and Shield brite is used on direct contact equipment and organic fruit.

**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

Policies are in place for controlling all workers health. Daily supervision is in place for monitoring the health and condition of workers. A policy is in place for not eating smoking or drinking outside of approved areas. No NC was sighted during inspections.

**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:** COMPLIANT

**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

The restrooms on site are well supplied with sinks and plumbed toilets. A hands-free operated hand wash sink was observed at the entrance of the storage and repack area. Hand wash signs were observed posted next to all hand wash sinks written in both Spanish and English. Signs are also posted in the breakroom. Personnel entering the warehouse were observed washing their hands as trained. No issues not meeting the GMPs were sighted.

**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

Clothing is compliant for the packing of apples. No special attire is required. No high-risk areas are present. All gloves are single-use nitrile gloves or atlas gloves. All gloves are controlled inspected and have a storage area inside of the facility for each person to place gloves. Aprons if worn is placed on hook in the facility. None are a sight in restroom or break rooms.

- 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 Visitor GMP policy is sighted and all visitors must read and sign before entry. Badges and escorts are provided at all times as recorded in the SOP. A review of the visitor log shows some Contracted suppliers are not required to check-in or are checking in without knowledge of Columbia Valley Fruit.

- 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)

The staff break room was observed adequately lit and well ventilated. No changing rooms are needed. The break room is located in a designated location away from processing or packaging areas. Refrigerators, microwaves, tables, and chairs are available. The outside eating area is defined during the Pandemic as acceptable.

- 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

Personnel observed were following the GMPs for packing of Apples. All product is QC at arrival for Apple. Apples are assessed as short or long-term storage and if any post-harvest application is required. . Some fruit may have mildew control for customer requirements. All fruit is inspected at arrival and again during packing and prior to shipping. Supervisors inspect the employees at the beginning of each shift Apples are inspected at various locations on the packing line and are following procedures. All fruit is brought to the facility in cold Vans or on Flatbed trucks. Truck inspection logs are present for each incoming load. All finished product is separate from the raw product.

- 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

Visual and Electronic inspections are done by sorting Apple on the Packing line, QA of the finished product to ensure no product contamination. Environmental testing is done for listeria. E.coli and Salmonella testing quarterly. Sighted numerous documents for prior 2 weeks of inspections show inspection is done. No temporary repair was seen during the inspection. A glass register is present showing all glass and hard plastics in the facility are in good condition. MINOR: Utility knife blades are stored on a desk next to a finished product not protected or inventoried.

- 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:** COMPLIANT

**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:** MINOR

**EVIDENCE:** Utility knife blades are stored on a desk next to a finished product not protected or inventoried.

**ROOT CAUSE:** This was a lack of training. Employees thought that because they had knives there to cut shrink wrap that it was ok to have knife blades in the area.

**CORRECTIVE ACTION:** An inspection was conducted by Ines V. (Food Safety Manager) on 4.28.2022 and no blades or unauthorized knives were found. Knife Procedure Review by Management 3.22.2022 Knife Procedure Training conducted 3.22.2022

**VERIFICATION OF CLOSEOUT:** The utility knife policy has been updated and training for employees was completed. Lack of understanding of the code and training of supervisors and employees was the root cause.

**COMPLETION DATE:** 04/13/2022 **CLOSEOUT DATE:** 04/13/2022

**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

An SOP is in place for products not meeting WSDA, USDA, FDA, or customer requirements to be placed on hold with a red card and placed in storage for rework or disposal. A glass clean-up and chemical spill procedure is signed in the SOP. No metal detection or other devices are used.

**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

**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

**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:** COMPLIANT

**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

Loading and unloading SOP is in place. Trained personnel are documented for loading procedures. All truck vans are inspected for condition prior to loading and verified by personnel. All incoming fruit is separate from the finished product. Truck inspection sheets are provided and recorded for each load of the incoming and outgoing trailer. Seals and a recorder are used per customer requirements. All fruit is stored at 33 to 34 degrees during transportation. A recorder is added for LTL load and per customer requirements.

**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**

incoming water is tested by Eurofins quarterly for Coliforms. All test negative in 2021 and to date 2022. The water is sourced by the City of Union Gap. The system is an underground piped system. Discharge water is sent to the City of Yakima wastewater treatment.

**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:** COMPLIANT

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

**RESPONSE:** COMPLIANT

## **10.6.2 Water Treatment**

No water treatment is needed from the incoming water source. Testing show water is potable with no Heavy metals or needs for further treatment tested by Cascade Analytics Eurofins. The City of Union Gap Wa supplies the water. Negative for Coliforms. Water is treated only for dump tanks for apples to prevent cross-contamination. sighted Calcium Hypochlorite in flume water measure free chlorine and ORP. 887 MV and 10 PPM PH is 6.85 Calcium Hypo Chlorite and PAA is used in the water. Spray bar water is Ozone treated water as well.

**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:** COMPLIANT

**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:** COMPLIANT

**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:** COMPLIANT

### **10.6.3 Water Quality**

Water is supplied by the City of Union GAP Washington. Hot and cold water is present. Backflow devices are inspected and maintained in good condition. Only potable water is delivered and used. Water samples are analyzed by Eurofins an ISO17025:2005 accredited laboratory annually. Testing is done quarterly and findings were reviewed. Samples were taken at the incoming water for the dump tanks. All water tested quarterly shows all water is potable with 0 Coliforms. Reviewed water test records over the past 5 years and all tests quarterly show water was coliform free.

**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**

No ice is used in the facility

**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**

No compressed air is used in the facility.

**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:** NOT APPLICABLE

**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:** NOT APPLICABLE

**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:** NOT APPLICABLE

## 10.7.1 Ambient/Dry Storage

Storage racks and pallets were observed constructed of approved materials. Racks were observed clean and well maintained. Vehicles used in the warehouse are electric. Gas forklifts are used in outside and cold storage areas. All were observed well maintained. The FIFO method for stock rotation is used in the inventory control system. No other storages exist off-site. The facility also has CA rooms that are present at various locations and are not accessible due to sealed rooms. MINOR: RPC is stored outside without protection or status if to be used or not.

**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:** MINOR

**EVIDENCE:** RPC are stored outside without protection or status if to be used or not.

**ROOT CAUSE:** Miss understanding for delivered and damaged RPC storage.

**CORRECTIVE ACTION:** Miss understanding for delivered and damaged RPC storage.

**VERIFICATION OF CLOSEOUT:** RPC that are not in use are now kept in a designated area so they will not be co-mingled. A lack of training of the packaging crew on how to mark out Non-Conforming products was lacking. This has now been corrected.

**COMPLETION DATE:** 04/04/2022    **CLOSEOUT DATE:** 04/13/2022

**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

Multiple Cold Storages are on site. The coolers and dock area are on independent thermometers to verify temperature. The chillers are fitted with a catch basin and drainage. In addition, there is a policy to not store products directly under the chillers. Temperature monitoring records are maintained in a designated binder. The Cold storage temperature is maintained at 33 to 38 degrees, Thermometers are maintained calibrated and temperatures were correct for checking fruit prior to shipment. MINOR: Discharge water is on the floor in a finished product storage room. Maintenance was notified for repair.

**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:** MINOR

**EVIDENCE:** Discharge water is on the floor in a finished product storage room. Maintenance was notified for repair.

**ROOT CAUSE:** Non-conforming product 3.15.2022

**CORRECTIVE ACTION:** The product was labeled as a "non-conforming product" and inspected by the shipping manager for water contamination. No evidence was found of water contamination and the product was released.

**VERIFICATION OF CLOSEOUT:** The leaking water from the drip pans in the cold storage was found and the refrigeration tech did not move the remaining fruit or tag out of the room as he deemed the water was not impacting the packed boxes. This was a mistake by the refrigeration tech as he should have tagged out and notified management. This is now rectified and new SOPs are written to procedures in the event of an issue moving forward. The fruit was removed, tested, and released. The drip pan was unplugged and is now in working order

**COMPLETION DATE:** 03/16/2022 **CLOSEOUT DATE:** 04/30/2022

**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

Chemicals are stored in a cage in the packing rooms. Protected from unauthorized entry. Chemicals are located away From Fruit or packing materials. All chemicals are Protected from unauthorized entry and located away From Fruit or packing materials. Chemicals used on the line for the wash flume and stored next to the line with protective containment under them. Chemicals are inventoried with SDS sheets. US Syntec and Fruit Packers supply most cleaning chemicals used for environmental cleaning. Signs are posted and all containers have original labels chemicals are stored in well-ventilated areas. PPE is stored nearby and clean and maintained.

**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

Waste is controlled and hauled away by Waste Management of Yakima. The invoice and schedule for pick-up are in place. Liquid Waster is sent to the City of Union GAP Sewer System. Exterior areas are inspected and checked daily during the packing season Basin Waster Disposal includes garbage and culls.

**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