



# SQF Food Safety Audit Edition 9

## Brewster Heights Packing & Orchards dba Gebbers Farms - Brewster Heights Packing & Orchards DBA Gebbers Farms

### Summary

**AUDIT DECISION**  
**CERTIFIED**

**CERTIFICATION NUMBER**  
**101507 | 162420**

**AUDIT RATING**

**DECISION DATE**  
**09/08/2022**

**AUDIT TYPE**  
**UNANNOUNCED**



**RECERTIFICATION DATE**  
**06/28/2023**

**AUDIT DATES**  
**07/21/2022 - 07/22/2022**

**Excellent**

**EXPIRATION DATE**  
**09/11/2023**

**ISSUE DATE**  
**09/08/2022**

### Facility & Scope

**Brewster Heights Packing & Orchards dba Gebbers Farms  
(45855)**

Brewster Heights Packing & Orchards DBA Gebbers Farms  
25985 Highway 97  
Brewster, WA 98812  
United States

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

**Food Sector Categories:**

4. Fresh Produce, Grain, and Nut Packhouse Operations

**Products:**

Apples & Cherries

**Scope of Certification:**

Fresh Produce and Nuts Packhouse Operations

### Certification Body & Audit Team

**EAGLE Food Registrations, Inc.**



**EAGLE Food Registrations Inc.**  
SERVICE • INTEGRITY • VALUE

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

**Phone #:** 937-293-2000

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

**CB#:** CB-1-Eagle

**Accreditation Body:** ANSI

**Accreditation Number:** 0894

**Lead Auditor:** McNeill, Todd (119528)

**Technical Reviewer:** Stafford, Lindsey (202593)

**Hours Spent on Site:** 16

**Hours of ICT Activities:** 0

**Hours Spent Writing Report:** 8

### Non-Conforming

### 10.1.3 Dust, Insect, and Pest Proofing

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. 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. Minor- Door sweep is missing at the Pre-Sizer far south door

**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:** MINOR

**EVIDENCE:** Door sweep is missing at the Pre Sizer far south door

**ROOT CAUSE:** Facility repairs not made in a timely manner.

**CORRECTIVE ACTION:** Door sweep installed on bottom of door.

**VERIFICATION OF CLOSEOUT:** The sweep was know about but due to constaints for operating cherries and Apples at the same time the door sweep was not replaced prior to the audit. This is now replaced.

**COMPLETION DATE:** 08/22/2022 **CLOSEOUT DATE:** 08/28/2022

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

The staff break rooms were 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. Sinks and Potable water are present. The outside eating area is defined during the Pandemic near the cherry lines. Minor- 3 employees were eating in an unauthorized area near finished packaging

**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:** MINOR

**EVIDENCE:** 3 employees were eating in an unauthorized area near finished packaging

**ROOT CAUSE:** Not enforcing company policies of eating only in designated areas. Supervisor not enforcing company policies.

**CORRECTIVE ACTION:** Supervisor trained on no eating in production area, and enforcing company policies.

**VERIFICATION OF CLOSEOUT:** Seasonal Supervisors for Cherry Packing were not enforcing the policies due to lack of enforcement. Training and enforcement of maintaining company procedures and policies has been completed

**COMPLETION DATE:** 08/23/2022 **CLOSEOUT DATE:** 08/28/2022

### 10.5.4 Receiving and Shipping

Loading and unloading SOP is in place. Trained personnel are documented for loading procedures. 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 are used per customer requirements. All fruit is stored at 33 degrees during transportation. A recorder is added for LTL load and per customer requirement. Minor: Loading dock has exposed insulation.

**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:** MINOR

**EVIDENCE:** Loading dock ceiling is tile has exposed insulation

**ROOT CAUSE:** Insulation was damaged and had not been repaired due to time constraints of shipping and lack of maintenance staff for the seasonal Cherry Season.

**CORRECTIVE ACTION:** Repair of the shipping dock insulation has been completed for the batting material. This was not completed during Cherry packing due to time constraints of shipping and lack of maintenance staff for the seasonal Cherry Season. More maintenance personnel will be available next season.

**VERIFICATION OF CLOSEOUT:** Repair of the shipping dock insulation has been completed for the batting material. This was not completed during Cherry packing due to time constraints of shipping and lack of maintenance staff for the seasonal Cherry Season. More maintenance personnel will be available next season.

**COMPLETION DATE:** 08/28/2022    **CLOSEOUT DATE:** 08/28/2022

## 10.8.1 Storage of Hazardous Chemicals and Toxic Substances

Chemicals are stored in a caged area in the packing facility on accessible to authorized personnel Chemicals are separate from all other materials on site. Storage area is compliant for storage of chemicals inventoried with inventory and usage logs present. All equipment is designed for chemical application and labeled appropriately for each chemical used. Minor: Chemicals used in the dump tanks are stored outside and not secure

**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:** MINOR

**EVIDENCE:** Chemicals used in the dump tanks are stored outside and not secure

**ROOT CAUSE:** No designated area for indoor chemical storage when product not in use.

**CORRECTIVE ACTION:** Product was moved indoors to chemical cage for storage. A Chemical Usage and Inventory Log has been implemented to track chemicals.

**VERIFICATION OF CLOSEOUT:** Chemicals used for Cherry production were left outside due to lack of area in the packing area during Cherry Packing Season. This has been addressed and fixed. All chemicals are now secure once received.

**COMPLETION DATE:** 08/23/2022    **CLOSEOUT DATE:** 08/23/2022

## Audit Statements

<b>SQF Practitioner Name</b>	Name the designated SQF Practitioner <b>RESPONSE:</b> Brian Thompson
<b>SQF Practitioner Email</b>	Email of the designated SQF Practitioner <b>RESPONSE:</b> Thompsonb@gebbersfarms.com
<b>Opening Meeting</b>	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) <b>RESPONSE:</b> Brian Thompson: SQF Practitioner, Bob Grandy: FS Director, Todd McNeill: Auditor
<b>Facility Description</b>	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details) <b>RESPONSE:</b> Brewster Heights Packing and Orchards dba Gebbers Farms Main is a packer of fresh Apples and Cherries for the retail market. The facility is located in the City of Brewster, WA. There is one pre-size Apple line, 4 dedicated Apple packing lines, and 2 cherry packing lines. At full capacity, the facility employees approximately 450 workers, who work on one of 2 shifts and a separate cleaning crew that works from about 8:30pm until 7:30 am. The day of the audit Apples were being packed on 4 lines as well as Cherries on two lines. The cherry line has 1 main CP, (the dump tank) The apple packing lines use the dump tank as the primary control point with Chlorinated water and a PAA spray bar as the back-up. All area of the facility were viewed.
<b>Closing Meeting</b>	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) <b>RESPONSE:</b> Brian Thompson: SQF Practitioner, Bob Grandy: FS Director, Todd McNeill: Auditor
<b>Auditor Recommendation</b>	Auditor Recommendation <b>RESPONSE:</b> To Approve after NC's are corrected.

## Section Responses

### 2.1.1 Management Responsibility (Mandatory)

A policy statement states The Gebber Farms BHPO commitment to providing Safety for whole Cherries and Apples to the retail market. Gebbers meets this by taking Control measures and precautions to ensure food safety is met for the packing storage and shipping of Cherries and Apples. In order to maintain a healthy food safety culture, this site ensures that shared values and behaviors towards food safety are implemented and communicated. Gebbers Farm BHPO has developed a culture of food safety through training and an open communication system from employees to supervisors to upper management through meetings held weekly with detailed minutes. The commitment is posted in an easily visible location in the front reception area on a bulletin board. An Organizational Chart for this facility shows the key personnel responsible for food safety. Job descriptions for the General Manager, Director of Food Safety, Quality Assurance, Packing Line Managers, Receiving Inspector, and Maintenance Technician was available in the SQF Manual Monthly Food Safety meeting are presented by Bob and Brian to John Gebbers and then presented to staff monthly. The culture for Gebbers Farms BHPO is established through having a robust food safety system which includes management commitment to improving the systems as part of the Chelan Fresh Marketing group requirement. A letter is present stating Gebbers' commitment and signed in January 2022 by Bob Grandy Director of Food Safety. The staff is trained to bring any Food Safety or quality concerns to management. The company management appears to have an open door policy in place which was an event during an inspection by interviewing key line personnel on communication and understanding of Food Safety. Tom Hancock, Tory Wolf, Romero Hadradas The Commitment policy is Form QP-01-05 Signed by Johnny Gebbers and Robert Grandy 3-16-2022.

- 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)**

Management Review is completed annually. HACCP Team of 7 people. George Westling, Bob Grandy, Brian Thompson, Troy Burnett, Tom Hancock's and Doug Fungstan. Jesus Sanchez. Continuous Improvement is met through improving the line equipment. The review includes customer complaints, internal and external audit findings, corrective actions taken, and a review of the entire system and the HACCP Plan. There are steps for reviewing the system and validating any new changes in the past year. Management Review meetings are conducted annually and records for the annual review conducted on 3-16-2022 along with monthly update meetings demonstrated a thorough review of the SQF program. The agenda and minutes reviewed demonstrated that at minimum the Policy manual. The SQF Practitioner, Brian Thompson holds a weekly meeting with Bob Grandy on issues with Food Safety and they are shared with Johnny Gebbers weekly.

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

### **2.1.3 Complaint Management (Mandatory)**

The customer Complaint Management program states that this site receives complaints. Gebbers farm uses Chelan Fresh marketing for sales of Fruit and they compile complaints from the following: 1. Direct complaints from the customer, and 2. Complaints from the sales department. Complaints are categorized as Urgent High risk, and Non-Urgent Low risk. A complaint log was reviewed. Details of the complaints and corrective actions implemented are documented in a log. Investigations reviewed were observed to detail the issue, describe the product in question, corrective action implemented, the department responsible, and the investigation outcome. All complaints reviewed from January thru June 2022 were for quality issues of the product issued by Chelan Fresh Marketing.

**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)**

The SQF Practitioners are responsible for developing and maintaining the SQF System. Brian Thompson is the SQF Practitioner and ensure that the Food Safety manual is available for all relevant team members. At a minimum, the following are documented in the system manual: Scope of Certification, Food Safety Management System. Any changes made must be justified, and validated by the facility SQF Practitioners. The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code, Food Manufacturing shall be maintained in electronic and hard copy. All documents will be made available to relevant staff and include i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of SQF 9.0 The food safety policy statement and organization chart. All produce complies with FSMA standards including the FSVP.

**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 methods and responsibility for maintaining document control are documented. Editing is accessible only to relevant staff. A register of SQF system documents was presented for review. The register was observed maintained with the latest revision of documents. Master documents are maintained electronically and are password protected. Only authorized personnel from the Food. The safety team has access to documents on the Inhouse Network Server.

**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)**

Methods and responsibilities are documented for records control. Verification activities are conducted by QA/QC personnel and Verified by Food Safety. Records are readily accessible upon request and legible. The following were provided for review, Reviewed documents for Cleaning Incoming and outgoing products. Sighted on control document forms. i.e. Chemical Monitoring Logs. Records are kept on printed forms. Sighted documents for Chemical usage and inventory. Cleaning records, Shipping documents. Records are kept at the office or in the Food Safety Office in Brewster, WA.

**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.

**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)**

Materials Receiving Guidelines detail the requirements for QA and acceptance and receiving procedures for Apples and Cherries. Storage and handling procedures are written. No packing is done at the farm level. Once harvested all fruit is taken to Gebber Farms for storage and packing of both Cherries and Apples. All materials, ingredients, packaging materials, and services that impact finished product safety and quality are supplied by approved suppliers. Non-approved suppliers are not used. Validation activities meet WSDA requirements for packing. A register of approved suppliers and products used post-harvest is kept in the vendor manual, as well as electronically. All Cherries are tested for MRL's to determine where they can be sold too by PAL Matrix in Portland Oregon. This information is passed on to Chelan Fresh Marketing to ensure customer and Country legislation is met.

**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)**

QP -02-04 shows the list of approved suppliers. Reviewed on 3-16-2022. All suppliers are vetted based on quality, capability to delivery products, and meet industry requirements, and customer requirements. Audit certificates for 3rd party audits as well as a letter for manufacturing guarantees are present. A list with documentation on the services provided within the facility. Pace Industries, Sprague, Sims, and 63 others. A register of Contract suppliers is present. A register of Contract suppliers is present.

**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)**

Food Legislation describes the methods for maintaining a register for requirements for storage and shipping of Apples and Sweet Cherries. The methods include the review of information provided by the Produce Management Association (PMA), United Fresh, the FDA, USDA, WSDA . Both SQFI and Eagle Certification Group are listed on the contact list for any food safety event.



**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)**

Good Storage and Distribution Practices are met. The buildings are concrete with a solid roof structure. It is secured and completely closed. The surrounding area is a small town and fallow land and orchards. All clauses of the SQF Edition 9.0 have been implanted and the effectiveness of the pre-requisite programs are verified by monitoring cleanliness, customer complaints, and internal audits and trending.

**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)**

The Food Safety Plan has been developed and implemented using HACCP and Codex Alimentarius methods. The plan is reviewed at least annually and was last reviewed during the annual review on 3-16-2022 SOP P-03-18. A risk assessment and hazards analysis is in place. No CCPs are determined by the Analysis. There are two control points for Temperature in the coolers and Chemical monitoring in the hydro cooler and flume. The following were reviewed: Risk Assessment, Hazards, Process flow, HACCP Team with meeting records, and Intended use of the product. 7 steps of HACCP are followed. A Multidisciplinary HACCP team has been designated, and their names, position, and contact information is noted in the plan. HACCP verification procedures are outlined. A reassessment of the plan is conducted annually or when changes are made. Verification and validation activities are conducted by HACCP-trained personnel. reviews and changes to the plan are documented. i.e. Hazards identified are controlled by control points and testing. i.e. water, foreign object control, Pathogen listeria, E.coli and Salmonella control. Pre and Post Harvest aids. I.e. FDL, MCP and DPA Sighted the following HACCP documentation: -HACCP food safety Team. -Product Description & intended use for Tree Fruits. -Flow Chart for 4 apple lines and Pre Sizer and 2 Cherry lines with all inputs from receiving to Shipping Hazard Analysis for CP including all inputs, and process steps. -Hazard Analysis Report for process steps, ingredients, and materials. CP's: -Dump tank: ORP 650mv minimum (critical) Ph 7.8 Free Chlorine is 50ppm. PAA Spray bars 60 PPM Peracetic acid 20 ppm is Critical Limit: Cherries. 650 mv for Chlorine in the flume and dump tank. Fruit is testing for MRLs ( Chemical Residue).

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

**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**

Product not meeting specifications or Equipment and Corrective and Preventive Action SOP is defined. The nonconforming product that has been returned is clearly identified and then discarded. The final disposition of the product is authorized by QC and Chelan Fresh Marketing. Equipment such as forklifts and hand jacks are the responsibility of the Maintenance Manager. Scales not operating as required are tagged and removed from service. Calibration records for equipment are current. ( Scales and Refrigeration)

**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**

Procedures are in place for dealing with nonconforming products. Non-conforming product is culled from the line during the packing process and sent to juice producers, peelers, or trashed. A cull analysis report is run for each lot. Reviewed cull analysis report for Honey Crisp Apples being repacked on 7-21-2022 for Bitterpit.

**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**

No Cherries are recouped. Apples are only reworked. Procedures and a dedicated area are present for repacking. Only the site manager is allowed to release any product placed on hold. No records show the product was destined for hold in the past 3 weeks of packing.

**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)**

Only the GM, QA, Chelan Fresh Marketing can release any product placed on hold. Sighted the following procedure Product Release Policy Product put on hold procedures in place for issues arising from Quality. QP-03-68. Records are maintained and verified for release by QA or Chelan Fresh Marketing Kevin Stennis . Records are maintained and verified for release by QA on-site.

**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**

Gebbers Farms Monitoring Program states frequency (Zone 2-4 weekly. Zone 1 daily, trend data quarterly, etc.) Responsibility (Brian Thompson Food Safety Practitioner) Test to be applied (ATP, ) Procedures for collecting samples, documentation, etc. were available for review. COA test results from IEH Laboratories dated 6-17-2022 from reports, process control Testing on equipment and environment with results of 0-4, on zones 2-4. times month clean break for conventional or organic fruit. IEH does the environmental testing prior to Cherry packing and monthly for Apples and Cherries. Checks are for Listeria, Salmonella, and E Coli. 40 locations per month during Cherry and Apple packing. None show any number above 9 is required and re-clean and swab of the area in question. All testing is 0 to 4. All locations pass inspection. The environmental program is a robust system for the detection of pathogens on the line equipment.

**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 through monthly audits, customer complaints, 3rd party audits by key customers, and the Environmental Swab Analysis. A Validation Schedule date was reviewed. 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: Environmental Swabs and ATP testing. - Allergen Control: Visual inspecting and observation. Monitoring of incoming water is done annually.

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

**RESPONSE: COMPLIANT**

## 2.5.2 Verification Activities (Mandatory)

The SQF practitioner is responsible for verification activities. Verification activities are scheduled to be conducted at various frequencies depending on the program or activity. Several documents outline Responsibility, Frequency, and Methods for Gebber Farms BHPO in Brewster WA. Reviewed Verification for cleaning, truck refrigeration, Loading, and Receiving.

**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. i.e. Temperature control of refrigeration falls out of range, corrective actions are in place and recorded to tolerance levels. Less than 650 MV outside of Critical Limits. 2% Chlorine for Cherries and Apples and a range of 30 60ppm for PAA for Apples. Cherries flume water is constantly monitored and pumps maintained greater than 650 mv for Calcium Hypochlorite. Forms are filled out for adding more Chlorine as needed is present and verified on site for all of 2022.

**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)

An internal audits are to be done annually as per SOP QP-04-09. Internal audits are done by Adrienne Rainier SQF Consultant. An annual audit was for the entire facility including lines and storage areas and an internal audit was completed on 6-22-2022. Monthly site audits are also present and completed by Brian Thompson. 8 NCs were found and corrected prior to the audit. Form F-04-04 is a SQF Practitioner and Trained in internal auditing.

**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)

Product Identification is done for all items in the warehouse. The SOP reviewed describes how products are tracked at all stages. The company uses Produce Pro Software, which identifies the product by the product description, date of receipt, PO#, Case quantity, Person Receiving Product. All product comes to the facility in bins with Lot tickets.

**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)**

All product, packaging and post-harvest waxes and aids are Recallable and traceable as defined in the process and include classes of recalls, the recall team, and corrective actions. Mock recalls are conducted twice per year by Gebbers and once annually by Chelan Fresh Marketing. A mock recall is done 2 times annually for Costco and 2 times for SQF. A Trace and Mock recall were conducted on 7-21-2022 Honey Crisp 9/4 boxes packed on December 18 2021 4018 boxes packed. Form. QP-06-02. Grower Lot is A120. Received over multiple dates in October 2021 Gebbers Main. Shipped 280 master cartons to Costco Aurora Colorado on Order number 47167. All other packs were in inventory and sold over a period of a month to other Costco locations.

**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**

The Crisis management plan is focused on crisis that could effect the facility and operations such as fires, floods, Epidemics and other localized natural or man-made disasters. SOP QP-06-03. The plan is written by a outside consultant. Mike Waldrip. Management and the Company President are responsible for the decision making and communication in the event of an incident. The operations manager is available to make decisions on product condition and quality. Maintenance would determine condition of the facility . The SQF practitioner and QA would determine the condition of staff and the facility and communicate this to management and authorities. Product not meeting criteria would be isolated, tagged and/or destroyed as per SOP. The plan is tested by BHP Main Plant and for the Sales Organization Chelan Fruit. Tested on March 3 2022. Ozone Levels are the Neff Plant effecting all bins stored in the facility 350. All fruit is quarantined and fruit is lost and destroyed. Ozone has been removed from the storage rooms and is only used for when rooms are empty.

**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)**

Preventative Food Defense Procedures site security in place. QP-03-55. Visitor Procedures are in place. Sign in off and agree to SOP's of the facility. Signs are posted exterior Doors are locked Company personnel is trained in sight assessment Master Key list across both sites. Employees are encouraged to watch out for personnel or others not invited into the facility. Bob Grandy is the Food Safety Manager and is responsible for Food Defense of the fruit and Greg Moser is responsible for the site security. Doors are locked from the outside. Security cameras are sighted at the shipping dock. Keys are held with management only. Training is done for employees to watch for unauthorized personnel. A Food Defense Challenge is done annually. July 17, 2022. Test all exterior doors.

**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)**

This site has developed and implemented a Food Fraud Mitigation Plan. A vulnerability assessment will be conducted annually and records of a review conducted in June 2022 for the main plant. At this time produce managed at this site was assessed as low risk Mitigating strategies practiced include: maintaining raw product specifications, supplier relationships, conducting supplier audits, and having a streamlined supply chain in order to improve transparency. A system for proper identification of all fruit is done to ensure organics and inorganics are not cross-mixed or contaminated or labeled.

**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 stored in the facility. A training log for employees on Allergens is performed at hire and annually during the refresher training done by Gebbers Farms BHPO for foods that employees could bring to the facility.

- 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

The SQF Practitioner is responsible for training, which includes both basic training in HACCP, SQF and GMPs, as well as specialized training in job-specific skills required in the warehouse. Training of Personnel is done annually. The training program includes training of all employees on Food Safety, GMPs, Loading, Pallet Jack, HACCP, Allergens, Sanitation, Food Defense, and worker position requirements. Training records for all employee of the facility is sighted i.e. Sorter and Packing line personnel are trained in Hygiene annually. SQF Training is done for Cleaning crew by BHPO. Interviewed Line Chemical injection personal Eduardo Uribe. Trained internal and by Pace. Documents show training has been done by Brian Thompson and HR for all personnel on the SQF system and protocols.

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

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

## 2.9.2 Training Program (Mandatory)

The SQF Practitioner, HR, Specific Supervisors are responsible for training. This includes both basic training in HACCP, SQF and GMPs, as well as specialized training in job-specific skills required in the warehouse. Training of Personnel is done annually and recorded. Alchemy has been used in the past. An inhouse training system and matrix is used for training of all personnel. The training program includes training of all employees on Food Safety, GMPs, Loading, Pallet Jack, HACCP, Allergens, Sanitation, Food Defense, and worker position requirements. Tests are conducted following training for GMPs and Food Safety. Instructions for all job functions are provided in the training manual and are available to relevant workers. Refresher training is performed annually. Refresher training for all employees has been conducted and records are maintained in a binder. Sighted and reviewed multiple date of trainings on Form F-01-02. Training is done for Wesmar for Cleaning crew annually on 6-17-2022 by Pace. Pace also does training for Chemical monitoring. (Jordan Lopez) on 7-12-2022.

- 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 is in good condition and is well maintained. The outside area is maintained and monitored and by internal staff. The surrounding are mostly orchard and fallow land. The location and surrounding property do not pose a contamination risk. The facility is approved by The City of Brewster, Washington for packing for fruit. Business Lic for of Brewster raw 16-79768 Valid through 2022. Gebbers BHPO falls under the Produce Rule for FSMA.

**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 two main buildings on site are maintained. Floors are observed to be smooth, impact-resistant, and sloped towards the floor drains. Floors are sloped to floor drains; no standing water was observed. 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 Packing. Wall to floor, and wall to wall junctions were properly sealed and no accumulation of debris was observed. There are no windows in the produce handling areas and all doors are solid. Stairs and catwalks are protected with stainless Steel plates and 3-inch lip. Repacking for apples is done in building 2 by shipping. Pre-op inspections are done and all employees have appropriate amenities near the packing areas. Glass in the facility is protected for shattering.

**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**

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. 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. Minor- Door sweep is missing at the Pre-Sizer far south door

**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:** MINOR

**EVIDENCE:** Door sweep is missing at the Pre Sizer far south door

**ROOT CAUSE:** Facility repairs not made in a timely manner.

**CORRECTIVE ACTION:** Door sweep installed on bottom of door.

**VERIFICATION OF CLOSEOUT:** The sweep was know about but due to constaints for operating cherries and Apples at the same time the door sweep was not replaced prior to the audit. This is now replaced.

**COMPLETION DATE:** 08/22/2022 **CLOSEOUT DATE:** 08/28/2022

**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 Unitec Fruit f and designed for packing of cherries. Apple packing lines (4) are all designed for packing of Apples exclusively. All area is cleanable. There are 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 locks closet on site. All containers are well marked for intended purpose. Fork lift are propane and electric. Propane is used mostly outdoors and transferring fruit from rooms to the packing facility.

- 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

SOP F-03-36 is reviewed There are the Three mechanics on site at all times. There is a Maintenance schedule written down. Maintenance work activity is recorded. i.e. Belts replace and Cup sizers replaced. Sighted training records maintenance staff. The maintenance team have a caged area on 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. No temporary repairs are seen. Lubricants are stored and well repair log June 25 2020 chain replace on sizer belt. Training records for training on GMPs and Food Safety are present and ongoing training is sighted throughout the year. Compressed air is used for Cherry sorting and for Apple Bagging. Hepa filter is replaced annually in October of each year. 12cfu/100l Eurofins air test. Apple and Cherry Compressor air.

- 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 Team of 3 personnel handle all maintenance during production. A list of contractors is written for work in the facility. Trucks maintained by Gebbers Farm Mechanics, Double Kold and Shifflet refrigeration is used for maintaining the refrigeration systems. Sprague Pest control, Pace for Chemical all are in the facility for contracted work. All work is done after the line is down per policy for maintenance. Pace monitors pumps weekly. Sprague Pest control inspect monthly.

**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**

Sighted the following procedures: Work Procedure Packing Line Equipment Calibration Instructions, refrigeration, Thermometers, Scales, ORP injection pumps and PAA spray bars Sighted in the external calibration records were verification activities. Washington State Weights and Measures and Western Scales are used for scale calibration. ORP calibration by Pace Instrumentation week and daily calibration is done by BHPO Brewster for Scales. 5-23-2022 Refrigeration is done on 6-10-2022 for probe calibration by Double Kold.

**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

Sprague pest control designed a pest control program for the facility and interior and exterior. Sprague Pest Control is used to help with the pest control program. Bait station are used outside the buildings and tin cats inside. Monitoring records on file, externals twice per month, internal weekly. Pest Control procedures sighted: -Packing line Quarantine). -Pest Control Work Procedure). Paul Bennett is a licensed pesticide operator in Washington state Lic # 94864. Records are held in the Pesticide binder from Sprague and Service Reports. reviewed pest control reports for each month in 2022. June 28 2202 Report 4821880 is reviewed with trending done for the facility. Reports show minor activity and the plant is well controlled.

**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 program is in place for the entire facility. P-03-15 shows Lead Sanitation and Cleaner overseeing all lines and 10 cleaners. Brian Thompson oversees all cleaning. Wesmar Chemicals is hired to help with the cleaning program. Cleaning of packing equipment is effective and in clean condition. ATP testing and environmental testing is done daily ATP swabbing is done nightly to verify effectiveness. Sighted records for: Daily Shed Cleaning Log for each line & cool room: Pre-operational inspections are done and cleaning verification is present for each shift. Records show Form P-03-15-line cleaning is done daily during operations. Sighted procedures for: - Main production Room Lines 1 and Apples 4 lines. SSOP covering all equipment with photos. ATP and Environmental Sampling Protocol in place. Sighted MSDS for: -Pac Chlor 12.5%. -Natures Shield 440-BF. -Shield-Brite FDL. -Result degreaser. -Accutab. -D Brite Plus. -Orange Citrus Clean. -Sodium Thiosulfate (is 5-22). - Clor Cling 525. Form P-03-15 Cleaning jugs and barrels are taken back to the supplier for proper disposal. Agri Plas in Pasco WA picks up the plastic containers. Sighted records for: -lab results for swabs (listeria, salmonella, E. coli) of belts, debris table, rollers brushes, Belts. ATP Testing is done daily us hygiena Snap tester. Records show counts and corrective actions for recleaning if positive counts. All areas of the facility are cleaned at a rate frequency and effectiveness for all contact and non-contact areas. I.e. cups and tubs are clean and no stickers are sighted. Protective clothing for cleaning is sighted and well maintained. Racks in break rooms are present for personnel belongs. All smocks etc. are on hooks inside the facility. Mixing tubs are well marked for intended use and equipment is properly stored Pre-operational inspection are done by daily prior to start up and walks are made in the facility throughout the day Form F-03-30. ATP testing is done after each cleaning to verify cleaning effectiveness. Chemicals are stored in a locked closet and appropriate for cleaning amenities. All containers are properly disposed of in an onsite dumpster Brian Thompson oversees all cleaning operations for all lines in the facility.

**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**

An SOP is present for inspection of Personnel daily prior to start up A policy is in place in the SOPs and training is sighted on for all employees. Interviews of supervisors (Jesus Sanchez) on startup and employee inspection was done and meet SOP's as written. Supervisor ensure hand washing protocols were observed compliant with written policy. No observation of food or packaging materials on the floor. Waste containers were properly identified and hoses securely stored off the floor. Supervisors are present managing all personnel.

**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**

35 stalls and 4 restroom areas are sighted for all packing areas. All are plumbed with hot water liquid Soap and paper towels. 350 personnel at the Apple and Cherry lines. Hand washing basins are in the restroom and outside on the production floor. Drains are connected to the City Sewer system. Hand washing basins made of Stainless steel or temporary handwashing is plastics. The restrooms on site are well-supplied 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 and in the breakroom. Personnel entering the warehouse were observed washing their hands as trained at permanent and portable hand wash stations.

**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**

Uniforms are not required. Clothing worn by personnel was observed clean and in good condition. Disposable gloves, hairnets, sleeves and beard nets were observed worn and changed as required. The only jewelry that can be worn is a single plain wedding band and medic alert bracelet. Jewelry was not observed worn during the audit. PPE is stored in controlled areas of the facility and is stored in a dry and secure manner for cleaning purposes.

**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

Visitors must sign and agree to follow GMPs prior to entry into the facility. Visitors exhibiting signs of illnesses are not allowed to enter the facility. Covid protocols are present for temp checks and assessment. Visitors enter and exit the facility through a designated door.

**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 rooms were 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. Sinks and Potable water are present. The outside eating area is defined during the Pandemic near the cherry lines. Minor- 3 employees were eating in an unauthorized area near finished packaging

**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:** MINOR

**EVIDENCE:** 3 employees were eating in an unauthorized area near finished packaging

**ROOT CAUSE:** Not enforcing company policies of eating only in designated areas. Supervisor not enforcing company policies.

**CORRECTIVE ACTION:** Supervisor trained on no eating in production area, and enforcing company policies.

**VERIFICATION OF CLOSEOUT:** Seasonal Supervisors for Cherry Packing were not enforcing the policies due to lack of enforcement. Training and enforcement of maintaining company procedures and policies has been completed

**COMPLETION DATE:** 08/23/2022 **CLOSEOUT DATE:** 08/28/2022

#### 10.5.1 Product Handling and Packaging Operations

Personnel observed were following the GMPs for packing Apples and Cherries. All product is QC at arrival. Cherries are sent through a hydro cooler with Sodium Hypochlorite. Apples are drenched and QC determines for short- or long-term storage. All Apples and Cherries are inspected for quality, fruit fly, and condition. Supervisors inspect the employees at the beginning of each shift. Cherries are inspected at various locations on the packing line and are following procedures. All Apple cherries are brought to the facility on straddle carriers or refrigerated vans. Truck inspection logs are present for each incoming load. All finished product is separate from raw product and Packing materials.



**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 Apples and Cherry Packing, QA of finished product to ensure no product contamination. Environmental testing is done listeria weekly and E. coli and Salmonella testing monthly. Sighted numerous documents for prior 2 weeks of inspections show inspection are done. No temporary repair seen during the inspection. A glass register is present form F -04-15 showing all glass and hard plastics

**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:** COMPLIANT

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

**RESPONSE:** COMPLIANT

## **10.5.3 Detection of Foreign Objects Operations**

An SOP is in place for products not meeting legislation 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 sighted 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:** NOT APPLICABLE

**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:** NOT APPLICABLE

**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:** NOT APPLICABLE

## **10.5.4 Receiving and Shipping**

Loading and unloading SOP is in place. Trained personnel are documented for loading procedures. 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 are used per customer requirements. All fruit is stored at 33 degrees during transportation. A recorder is added for LTL load and per customer requirement. Minor: Loading dock has exposed insulation.

**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:** MINOR

**EVIDENCE:** Loading dock ceiling is tile has exposed insulation

**ROOT CAUSE:** Insulation was damaged and had not been repaired due to time constraints of shipping and lack of maintenance staff for the seasonal Cherry Season.

**CORRECTIVE ACTION:** Repair of the shipping dock insulation has been completed for the batting material. This was not completed during Cherry packing due to time constraints of shipping and lack of maintenance staff for the seasonal Cherry Season. More maintenance personnel will be available next season.

**VERIFICATION OF CLOSEOUT:** Repair of the shipping dock insulation has been completed for the batting material. This was not completed during Cherry packing due to time constraints of shipping and lack of maintenance staff for the seasonal Cherry Season. More maintenance personnel will be available next season.

**COMPLETION DATE:** 08/28/2022 **CLOSEOUT DATE:** 08/28/2022

### 10.6.1 Water Supply

Water samples are taken from the site and analyzed for microbes at Eurofins on June 1 2022 Negative coliforms at incoming water accredited laboratory (Cert exp. 4/20/23 Samples were obtained from the warehouse handwash sink. Water is provided by a pressurized underground piping system in the City of Brewster WA. A water hold pond is on-site for temporary use should the municipal water become not available.

**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

Water is treated at the Hydro Cooler dump tanks and water Flumes. Minimum 650 mv. Is to be met. Calcium Hypo Chlorite is used in the Water Flume and records of testing is present. Test of water for potability was completed on 6-1- 2022 by Cascade Analytics (Euro Fins) and ISO 17025 LAB. Results are negative for Coliform

**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 Brewster WA. Hot and cold water is present. Backflow devices are inspected and maintained in good condition annually by The City of Brewster WA. Only potable water is delivered and used. Water samples are analyzed by Eurofins an ISO17025:2005 accredited laboratory (Cert exp. 5/7/23) annually. Test results dated 6/1/22 were reviewed. Samples were taken at the incoming water valve.

**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

**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**

An air test is done for the cherry and Apple Lines. Cherries used compressed air to blow cherries for sizing. Apples use compressed air for bagging. Eurofins does the testing annually. A test is sighted for October 26 2022 26cfu/100ml which is deemed passing.

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

## **10.7.1 Ambient/Dry Storage**

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. No other storages exist. The facility also has CA rooms for Apple Storage which are packed in Brewster WA.

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

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

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

Multiple Cold Storages are on site. The coolers and dock area are on independent thermometers to verify temperature. The Refrigerators 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 are maintained at 33 to 38 degrees Tunnel cooling is used for cherries as well to get temperature down to 33 degrees. Thermometers are maintained calibrated and temperatures were correct.

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

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

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

**RESPONSE: COMPLIANT**

## **10.8.1 Storage of Hazardous Chemicals and Toxic Substances**

Chemicals are stored in a caged area in the packing facility on accessible to authorized personnel Chemicals are separate from all other materials on site. Storage area is compliant for storage of chemicals inventoried with inventory and usage logs present. All equipment is designed for chemical application and labeled appropriately for each chemical used. Minor: Chemicals used in the dump tanks are stored outside and not secure

**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:** MINOR

**EVIDENCE:** Chemicals used in the dump tanks are stored outside and not secure

**ROOT CAUSE:** No designated area for indoor chemical storage when product not in use.

**CORRECTIVE ACTION:** Product was moved indoors to chemical cage for storage. A Chemical Usage and Inventory Log has been implemented to track chemicals.

**VERIFICATION OF CLOSEOUT:** Chemicals used for Cherry production were left outside due to lack of area in the packing area during Cherry Packing Season. This has been addressed and fixed. All chemicals are now secure once received.

**COMPLETION DATE:** 08/23/2022 **CLOSEOUT DATE:** 08/23/2022

**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 collection areas were observed clean and well maintained. Waste was not overflowing and trash compactors were not leaking. Waste bins were maintained in a serviceable condition and were not overflowing. Inedible waste is clearly identified and properly stored the effectiveness of waste removal is verified during daily inspections. Yakima Waste disposal

**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