SQF Food Safety Audit Edition 8.1
Capitol City Produce, LLC - Capitol City Produce, LLC

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
US015192 | 133539

AUDIT RATING
96
Excellent

DECISION DATE
05/03/2021

AUDIT TYPE
UNANNOUNCED

RECERTIFICATION DATE
04/21/2022

AUDIT DATES
04/06/2021 - 04/08/2021

EXPIRATION DATE
07/05/2022

ISSUE DATE
05/03/2021

Facility & Scope

Capitol City Produce, LLC (45240)
Capitol City Produce, LLC
16550 Commercial Avenue
Baton Rouge, LA 70816
United States

Web Site: http://www.capitolcityproduce.com

Food Sector Categories:
25. Repackaging of products not manufactured on site.
26. Food Storage and Distribution

Products:
Various Fruits & Vegetables

Scope of Certification:
FSC 25 & 26: Various Fruits & Vegetables

Certification Body & Audit Team

Bureau Veritas Certification NA

16800 Greenspoint Park Drive,
Suite 300S
Houston, TX 77060
United States

Web Site: https://group.bureauveritas.com

CB#: CB-1-BVC
Accreditation Body: ANSI
Accreditation Number: 0747

Lead Auditor: McCommons, Joe (204768)
Technical Reviewer: Middleton, Kristopher (9690)

Hours Spent on Site: 21
Hours of ICT Activities: 0
Hours Spent Writing Report: 7

Non-Conforming

2.1.3 Management Review (Mandatory)

The procedure for management review was documented (1/15/2018 V2). The review was conducted annually against the SQF code. The procedure also provided for a monthly meeting of the SQF Practitioner and senior management to review matters that impact the SQF system. Records of the monthly meeting were maintained with management attendance. The review of the food safety and quality system was documented 4/1/21 and included completion of the SQF code site self-audit and review of GMPs, Training, Calibration, Pest Control, Maintenance, Sanitation, Water, Control of Foreign Material, Supplier Approval, Transport and Delivery, Waste Management, Food Defense, and Food Fraud. A minor was assessed in this section under 2.1.3.2.

2.1.3.2 The SQF practitioner (s) shall update senior site management on a (minimum) monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented. The SQF System in its entirety shall be reviewed at least annually.

RESPONSE: MINOR

EVIDENCE: The record of monthly meeting and update was missing between the 7/21/2020 meeting and the 1/5/2021 meeting.

ROOT CAUSE: COVID Related Restrictions that prohibited in-person meetings at CCP. Different departments were prohibited from meeting in person to prevent cross team infections. Met with SQF Practitioner via phone but meetings were not recorded.

CORRECTIVE ACTION: Management Review (Mandatory) Meetings were conducted but not recorded due to the lack of in-person meetings due to COVID restrictions.

2.1.3.2 Corrective Action-Manage... Audit

VERIFICATION OF CLOSEOUT: The documented CAPA form with corrective action was presented by the site. The form was completed by Director of Special Projects and reviewed by SQF Practitioner. These are the two persons that are directly responsible for participating in and recording the manager review meetings. The CAPA response was reviewed and accepted. The non-Conformance is closed. JM 4/30/21

COMPLETION DATE: 04/22/2021 **CLOSEOUT DATE:** 04/30/2021

2.4.4 Approved Supplier Program (Mandatory)

The supplier approval program is defined and implemented. There are two types of approved suppliers. These are Pro-Act buying group approved and non-ProAct supplier approval. The SOP 2.4.4 Approved Supplier Program (V2, 1/15/2018) was in place and outlined requirements of Pro-Act approval and for non-Pro-Act supplier which included a supplier questionnaire, food safety and quality, audit/certification, letters of approval, and primary packaging certification of conformance (if applicable). There was a provision for emergency suppliers and contracted services. The register of suppliers was documented and current (3/12/21, V2). The majority of suppliers are Pro-Act suppliers however there are a few local suppliers that are not a member of Pro-Act. These were the suppliers that required in-house approval. The approval documents were not available for the non - ProAct Suppliers. This minor was assessed under clause 2.4.4.8.

2.4.4.8 The approved supplier program shall be based on the prior performance of a supplier and the risk level of the raw materials ingredients, packaging materials, and services supplied, and shall contain as a minimum: i. Agreed specifications (refer to 2.3.2); ii. Reference to the rating of the level of risk applied to a raw material, ingredients, packaging materials and services and the approved supplier; iii. A summary of the food safety controls implemented by the approved supplier; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers; vi. Details of the certificates of conformance if required; and vii. Methods and frequency of reviewing approved supplier performance and status.

RESPONSE: MINOR

EVIDENCE: The 2.4.4 procedure outlines the requirement for specification of the supplied product, letter of guarantee, questionnaire and audit. There were 3 local suppliers that were not ProAct suppliers. The Food Safety Team was not able to produce the specification of the supplied product/packaging, letter of guarantee of the supplied food item, and a completed questionnaire from packaging and product supplier.

ROOT CAUSE: Policy had not been updated to notate CCP requirements which are 1) 3rd party audit or 2) CCP questionnaire. Audits are on file for non-proact suppliers

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CORRECTIVE ACTION: Approved Supplier Program

2.4.4.8 Corrective Action-Appro... Annu

VERIFICATION OF CLOSEOUT: The CAPA form and amended Supplier Approval Program was submitted by the site. The amendment and CAPA form were reviewed and accepted as it satisfied the non-conformance of making sure that non-ProAct suppliers were properly approved and that approval documents were on hand. The non-conformance is closed. JM 4/30/21

COMPLETION DATE: 04/22/2021 **CLOSEOUT DATE:** 04/30/2021

2.7.2 Food Fraud

The 2.7.2 Food Fraud SOP (V2 1/15/2018). The food fraud assessment was last conducted on 4/1/2021. A record of the assessment was maintained. An online tool was used. The results of the assessment indicated risk levels were high and adequacy of controls low. There was no mitigation plan in place to confront this high risk rating.

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.

RESPONSE: MINOR

EVIDENCE: The most recent assessment conducted indicated high risk and no mitigation plan is put into place.

ROOT CAUSE: Error with the Food Fraud Assessment. Did not catch the initial error.

CORRECTIVE ACTION: Food Fraud Assessment There were issues with the Excel Food Fraud Assessment spreadsheet. It was not populated the outcomes properly. I did not notice on our initial submission. Resubmitted our answers. Answers did not change, but the report updated the proper outcomes.

2.7.2.2 Corrective Ac... Annual Audit 2021.pdf

VERIFICATION OF CLOSEOUT: The site submitted the CAPA form and amended fraud assessment. The site is a produce distribution warehouse. The fraud assessment result (amended) was found to be low risk. There was no mitigation steps needed as all were covered by existing prerequisite programs. The CAPA form and new fraud assessment was reviewed and accepted. The non-conformance is closed. JM 4/30/21

COMPLETION DATE: 04/22/2021 **CLOSEOUT DATE:** 04/30/2021

11.2.9 Equipment, Utensils, and Protective Clothing

The tables in use were observed to be clean and in good condition. Gloves were observed to be changed as needed as gloves that were in use at the time of the audit were clean and in good condition. The racks and shelving were in good condition. The cleaning of the repack area was daily and more frequent as needed between products. There was no repack of allergen containing foods, therefore, no allergen or changeover cleaning was needed or performed. A minor was issued under 11.2.9.1.

11.2.9.1 Specifications for equipment, utensils and protective clothing, and procedures for purchasing equipment shall be documented and implemented.

RESPONSE: MINOR

EVIDENCE: Specifications for equipment, utensils and clothing and purchasing procedure for equipment was not documented and clear.

ROOT CAUSE: Specifications/Procedures were not documented at the time of audit.

CORRECTIVE ACTION: Updated/Created SOP for equipment, utensils and protective clothing.

11.2.9.1 Corrective Action-Equipment

VERIFICATION OF CLOSEOUT: The CAPA form and the procedure for purchasing / specification of equipment, utensils and clothing was provided by the site. The CAPA form and procedure were reviewed and accepted. The non-conformance was closed. JM 4/30/21

COMPLETION DATE: 04/22/2021 **CLOSEOUT DATE:** 04/30/2021

Audit Statements

SQF Practitioner Name	Name the designated SQF Practitioner **RESPONSE:** Bob Wells, SQF Practitioner
SQF Practitioner Email	Email of the designated SQF Practitioner **RESPONSE:** bwells@ccpfresh.com
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** Terreca Bates-Wells: Director of Special Projects, Caleb Prejean: VP of Ops, Joe McCommons: Auditor
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details **RESPONSE:** This audit was unannounced. The Capital City Produce warehouse is a 90,000 sq. ft. facility with approximately 200 employees (with 7 QA staff members). The operation is 24 hours, 7 days week. There were no areas of the facility that were considered out of scope for the audit. The operation includes whole case-in-case-out order fulfillment/distribution and a limited repackaging operation which takes bulk produce cases and repacks them into smaller saleable units. The areas of storage were coolers (ranging in temperature dependent upon types of stored goods), a freezer and a dry storage area. The dock area is enclosed and temperature controlled for protected staging for shipping and receiving operations. The audit covered day and night shifts. Employee interviews included managers and supervisors (QA and Operations), QA inspectors, receiver, loaders, selectors, repacker and others. The overall compliance to the code was excellent. There were no majors or criticals.
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** Terreca Bates-Wells: Director of Special Projects, Bob Wells: SQF Practitioner, Loyd Antoine: Warehouse Manager, Thomas Johnson: QA Supervisor, Jimmy Morales: Receiving Manager, John Blanchard: Facility Maintenance and Sanitation Coordinator,
Auditor Recommendation	Auditor Recommendation **RESPONSE:** Continued certification with the correction of non-conformances.

Section Responses

2.1.1 Food Safety Policy (Mandatory)

The statement and mission for food safety and quality was signed by the President and dated 1/15/2018. The SOP 2.1 (V2, dated 1/15/2018) outlines the companies commitment to food safety and quality and the mechanisms by which this will be achieved. The document also provides for the SQF Practitioner to have training and program resources to achieve the food safety and quality goals. The policy is in English. All persons understand English at the company.

2.1.1.1	Senior site management shall prepare and implement a policy statement that outlines as a minimum the: i. The site's commitment to supply safe food; ii. Methods used to comply with its customer and regulatory requirements and continually improve its food safety management system; and iii. The site's commitment to establish and review food safety objectives. **RESPONSE:** COMPLIANT
2.1.1.2	The policy statement shall be: i. Signed by senior site management; ii. Made available in language understood by all staff; iii. Displayed in a prominent position; and iv. Effectively communicated to all staff. **RESPONSE:** COMPLIANT

2.1.2 Management Responsibility (Mandatory)

The site organizational chart was dated as last reviewed and amended on 4/1/21. The positions on the chart included names, titles and responsiblities for quality and product safety. Responsibility matrix was dated 3/29/17 and specified positions and back up in the case of absence. This remained current and reviewed as the roles and positions have not changed. The site had personnel to change therefore that was an amended org chart. This site was aware of the unannounced blackout date policy. This was their unannounced audit. This was the unannounced audit. The continuous improvement as well as food safety and quality targets have been established and discussed with upper management. QA staffing has been increased to fill an anticipated need for additional oversight to meet the goals. There is a continous improvement (CAPEX) program to improve operations. The 2021 plan was on hand and included projects for adding warehouse equipment. There is a monthly meeting with the SQF Practitioner to discuss needs and then those needs are passed up to management. The SQF practitioner is full time and trained through the Implementing SQF course (3/18/2015) and HACCP certified (12/13/2007). Job descriptions were reviewed. The descriptions on file for food safety were QA manager, SQF Practitioner and Warehouse Manager. The descriptions had food safety and quality responsibilities and goals included for each position.

2.1.2.1 The reporting structure describing those who have responsibility for food safety shall be identified and communicated within the site.

RESPONSE: COMPLIANT

2.1.2.2 The senior site management shall make provision to ensure food safety practices and all applicable requirements of the SQF System are adopted and maintained.

RESPONSE: COMPLIANT

2.1.2.3 The senior site management shall ensure adequate resources are available to achieve food safety objectives and support the development, implementation, maintenance and ongoing improvement of the SQF System.

RESPONSE: COMPLIANT

2.1.2.4 Senior site management shall designate an SQF practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review and maintenance of the SQF System, including good manufacturing 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

2.1.2.5 The SQF practitioner shall: i. Be employed by the site as a company employee on a full-time basis; ii. Hold a position of responsibility in relation 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 for Manufacturing and the requirements to implement and maintain an SQF System relevant to the site's scope of certification.

RESPONSE: COMPLIANT

2.1.2.6 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

2.1.2.7 Senior site management shall ensure that all staff are informed of their food safety and regulatory responsibilities, are aware of their role in meeting the requirements of the SQF Food Safety Code for Manufacturing, and are informed of their responsibility to report food safety problems to personnel with authority to initiate action.

RESPONSE: COMPLIANT

2.1.2.8 Job descriptions for those responsible for food safety shall be documented and include a provision to cover for the absence of key personnel.

RESPONSE: COMPLIANT

2.1.2.9 Senior site management shall establish processes to improve the effectiveness of the SQF System to demonstrate continuous improvement.

RESPONSE: COMPLIANT

2.1.2.10 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

2.1.2.11 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

2.1.3 Management Review (Mandatory)

The procedure for management review was documented (1/15/2018 V2). The review was conducted annually against the SQF code. The procedure also provided for a monthly meeting of the SQF Practitioner and senior management to review matters that impact the SQF system. Records of the monthly meeting were maintained with management attendance. The review of the food safety and quality system was documented 4/1/21 and included completion of the SQF code site self-audit and review of GMPs, Training, Calibration, Pest Control, Maintenance, Sanitation, Water, Control of Foreign Material, Supplier Approval, Transport and Delivery, Waste Management, Food Defense, and Food Fraud. A minor was assessed in this section under 2.1.3.2.

2.1.3.1 The senior site management shall be responsible for reviewing the SQF System and documenting the review procedure. Reviews shall include: i. The policy manual; ii. Internal and external audit findings; iii. Corrective actions and their investigations and resolution; iv. Customer complaints and their resolution and investigation; v. Hazard and risk management system; and vi. Follow-up action items from previous management review.

RESPONSE: COMPLIANT

2.1.3.2 The SQF practitioner (s) shall update senior site management on a (minimum) monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented. The SQF System in its entirety shall be reviewed at least annually.

RESPONSE: MINOR

EVIDENCE: The record of monthly meeting and update was missing between the 7/21/2020 meeting and the 1/5/2021 meeting.

ROOT CAUSE: COVID Related Restrictions that prohibited in-person meetings at CCP. Different departments were prohibited from meeting in person to prevent cross team infections. Met with SQF Practitioner via phone but meetings were not recorded.

CORRECTIVE ACTION: Management Review (Mandatory) Meetings were conducted but not recorded due to the lack of in-person meetings due to COVID restrictions.

2.1.3.2 Corrective Action-Manage... Audit

VERIFICATION OF CLOSEOUT: The documented CAPA form with corrective action was presented by the site. The form was completed by Director of Special Projects and reviewed by SQF Practitioner. These are the two persons that are directly responsible for participating in and recording the manager review meetings. The CAPA response was reviewed and accepted. The non-Conformance is closed. JM 4/30/21

COMPLETION DATE: 04/22/2021 **CLOSEOUT DATE:** 04/30/2021

2.1.3.3 Food safety plans, Good Manufacturing Practices and other aspects of the SQF System shall be reviewed and updated as needed when any potential changes implemented have an impact on the site's ability to deliver safe food.

RESPONSE: COMPLIANT

2.1.3.4 Records of all management reviews and updates shall be maintained.

RESPONSE: COMPLIANT

2.1.4 Complaint Management (Mandatory)

The procedure for complaint management was SOP 2.1.4 (V2, 1/15/2018). The trending for complaints is conducted and documented when there are recordable complaints. The auditor was advised that no complaints were received since the last audit. There was a form for the recording of complaints. The form included complaint information, investigation to root cause, corrective action, resolution and response.

2.1.4.1	The methods and responsibility for handling and investigating the cause and resolution of complaints from customers and authorities, arising from products manufactured or handled on site, shall be documented and implemented. **RESPONSE:** COMPLIANT
2.1.4.2	Trends of customer complaint data shall be investigated and analyzed by personnel knowledgeable about the incidents. **RESPONSE:** COMPLIANT
2.1.4.3	Corrective action shall be implemented based on the seriousness of the incident and as outlined in 2.5.3. **RESPONSE:** COMPLIANT
2.1.4.4	Records of customer complaints and their investigations shall be maintained. **RESPONSE:** COMPLIANT

2.1.5 Crisis Management Planning

The procedure for Crisis Management was SOP (V3, 4/22/20). The procedure included all known threats (fire, flooding, hurricane, water leak, equipment failure, electrical power failure, IT disruption, flu/pandemic, terrorism and supply chain disruption). The team is defined to include president, SQF Practitioner, VP of Operations, Director of Procurement, Warehouse Manager, Health, Safety and Loss Prevention Manager and Director of Special Projects. The contact list includes legal counsel, SQF and the certification body. The last test of the crisis plan was conducted on 3/16/2020.

2.1.5.1	A crisis management plan that is based on the understanding of known potential dangers (e.g. flood, drought, fire, tsunami, or other severe weather or regional events such as warfare or civil unrest) that can impact the site's ability to deliver safe food, shall be documented by senior management outlining the methods and responsibility the site shall implement to cope with such a business crisis. **RESPONSE:** COMPLIANT
2.1.5.2	The crisis management plan shall include as a minimum: i. A senior manager responsible for decision making, oversight and initiating actions arising from a crisis management incident; ii. The nomination and training of a crisis management team; iii. The controls implemented to ensure a response does not compromise product safety; iv. The measures to isolate and identify product affected by a response to a crisis; v. The measures taken to verify the acceptability of food prior to release; vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers; vii. Sources of legal and expert advice; and viii. The responsibility for internal communications and communicating with authorities, external organizations and media. **RESPONSE:** COMPLIANT
2.1.5.3	The crisis management plan shall be reviewed, tested and verified at least annually. **RESPONSE:** COMPLIANT
2.1.5.4	Records of reviews of the crisis management plan shall be maintained. **RESPONSE:** COMPLIANT

2.2.1 Food Safety Management System (Mandatory)

The manuals for food safety are maintained. There is a summary of programs under SOP 2.2.1 (V2, 1/15/2018). The policy and organizational chart is documented and maintained. The scope of certification is defined in the procedure as FSC 25 and 26. Changes are documented and verified with training to applicable. staff.

2.2.1.1	A food safety management system shall be documented and maintained in either electronic and/or hard copy form. It shall outline the methods the site will use to meet the requirements of the SQF Food Safety Code for Manufacturing, 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 this standard; ii. The food safety policy statement and organization chart; iii. The scope of certification; iv. A list of the products covered under the scope of certification; v. Food safety procedures, pre-requisite programs, food safety plans; and vi. Other documentation necessary to support the development and the implementation, maintenance and control of the SQF System. **RESPONSE:** COMPLIANT
2.2.1.2	All changes made to food safety plans, Good Manufacturing Practices and other aspects of the SQF System shall be validated or justified. **RESPONSE:** COMPLIANT

2.2.2 Document Control (Mandatory)

SOP 2.2.2 Document Control V2 (1/15/2018) is documented and outlines the requirement to monitor and establish current versions of all procedures and forms. Electronic copies of documents are maintained on the company's secure server. The changes to documents are tracked on the document and communicated to relevant staff. The register of documents (2.2.1.2 Document Register, V4, 8/24/2020) specified document number, SQF code reference number, document type, and document name.

2.2.2.1 The methods and responsibility for maintaining document control and ensuring staff have access to current documents shall be documented and implemented.

RESPONSE: COMPLIANT

2.2.2.2 A register of current SQF System documents and amendments to documents shall be maintained.

RESPONSE: COMPLIANT

2.2.2.3 Documents shall be safely stored and readily accessible.

RESPONSE: COMPLIANT

2.2.3 Records (Mandatory)

The procedure for maintaining and completing records is defined in SOP 2.2.3 (V2, Dated 1/15/2018). The rules for legibility, proper correction and storage are established. The retention of records is a minimum of 2 years for food safety documents.

2.2.3.1 The methods and responsibility for undertaking monitoring activities, verifying, maintaining and retaining records shall be documented and implemented.

RESPONSE: COMPLIANT

2.2.3.2 All records shall be legible and suitably authorized by those undertaking monitoring activities that demonstrate inspections, analyses and other essential activities have been completed.

RESPONSE: COMPLIANT

2.2.3.3 Records shall be readily accessible, retrievable, securely stored to prevent damage and deterioration and shall be retained in accordance with periods specified by a customer or regulations.

RESPONSE: COMPLIANT

2.3.1 Product Development and Realization

SOP 2.3.1 Product Development and Realization (V2 / 1/15/2018) was documented and outlined the process of qualification of new product for distribution to fit into the food safety and quality system. This is the responsibility of the SQF Practitioner. By statement of policy in 2.3.1, shelf-life and trials are not applicable at this facility. The site does not manufacture, create nor develop products. Storage requirements/temperature ranges are defined per storage zone.

2.3.1.1 The methods and responsibility for designing, developing and converting product concepts to commercial realization shall be documented and implemented.

RESPONSE: COMPLIANT

2.3.1.2 Product formulation, manufacturing processes and the fulfillment of product requirements shall be validated by site trials, shelf life trials and product testing.

RESPONSE: COMPLIANT

2.3.1.3 Shelf life trials where necessary shall be conducted to establish and validate a product's: i. Handling and storage requirements including the establishment of "use by" or "best before dates"; ii. Microbiological criteria; and iii. Consumer preparation, storage and handling requirements.

RESPONSE: NOT APPLICABLE

EVIDENCE: By statement of policy in 2.3.1, shelf-life and trials are not applicable at this facility. Products are not manufactured or processed at this site.

2.3.1.4 A food safety plan shall be validated and verified for each new product and its associated process through conversion to commercial production and distribution, or where a change to ingredients, process, or packaging occurs that may impact food safety.

RESPONSE: COMPLIANT

2.3.1.5 Records of all product design, process development, shelf life trials and approvals shall be maintained.

RESPONSE: COMPLIANT

2.3.2 Raw and Packaging Materials

The register with dates of review and risk level for each product for repack was documented and dated as Register 2.3.2 Raw and Packaing Materials (V2, 3/29/2016). The bag used for product contact in the repack operation was verified and was found to be certified as safe through a letter of guarantee specifying adherence to regulatory standard and GFSI certification for the manufacturer.

2.3.2.1 Specifications for all raw and packaging materials, including, but not limited to ingredients, additives, hazardous chemicals and processing aids that impact on finished product safety shall be documented and kept current.

RESPONSE: COMPLIANT

2.3.2.2 All raw and packaging materials and ingredients shall comply with the relevant legislation in the country of manufacture and country of destination, if known.

RESPONSE: COMPLIANT

2.3.2.3 The methods and responsibility for developing and approving detailed raw material, ingredient, and packaging specifications shall be documented.

RESPONSE: COMPLIANT

2.3.2.4 Raw and packaging materials and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose. Verification of raw materials and ingredients shall include certificates of conformance, certificate of analysis, or sampling and testing.

RESPONSE: COMPLIANT

2.3.2.5 Verification of packaging materials shall include: i. Certification that all packaging that comes into direct contact with food meets either regulatory acceptance or approval criteria. Documentation shall either be in the form of a declaration of continued guarantee of compliance, a certificate of conformance, or a certificate from the applicable regulatory agency. ii. In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, tests and analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.

RESPONSE: COMPLIANT

2.3.2.6 Finished product labels shall be accurate, comply with the relevant legislation and be approved by qualified company personnel.

RESPONSE: COMPLIANT

2.3.2.7 A register of raw and packaging material specifications and labels shall be maintained and kept current.

RESPONSE: COMPLIANT

2.3.3 Contract Service Providers

The 2.3.3 Contract Service Providers are defined in a register dated 1/15/2018, V2. The register indicated the description of service and requirement for training for each of the firms listed.

2.3.3.1 Specifications for contract services that have an impact on product safety shall be documented, current, include a full description of the service to be provided and detail relevant training requirements of all contract personnel.

RESPONSE: COMPLIANT

2.3.3.2 A register of all contract service specifications shall be maintained.

RESPONSE: COMPLIANT

2.3.4 Contract Manufacturers

There is no contract manufacturing.

2.3.4.1 The methods and responsibility for ensuring all agreements relating to food safety and customer product requirements and its realization and delivery are specified and agreed shall be documented and implemented.

RESPONSE: NOT APPLICABLE

EVIDENCE: There is no contract manufacturing.

2.3.4.2 The site shall: i. Verify compliance with the SQF Food Safety Code for Manufacturing and that all customer requirements are being met at all times. Products and/or processes of co-manufacturers that are considered high risk shall be required to undergo an audit by the site or other third-party agency to confirm compliance to the SQF Food Safety Code for Manufacturing and agreed arrangements; and ii. Ensure changes to contractual agreements are approved by both parties and communicated to relevant personnel.

RESPONSE: NOT APPLICABLE

EVIDENCE: There is no contract manufacturing.

2.3.4.3 Records of all contract reviews and changes to contractual agreements and their approvals shall be maintained.

RESPONSE: NOT APPLICABLE

EVIDENCE: There is no contract manufacturing.

2.3.5 Finished Product Specifications

The specification and register of all products was a comprehensive listing of products. This was a current price list with item numbers that cross-reference to the system (dated 4/10/21). There are also USDA defined grading specification. Specifications included product requirements and characteristics. Customer requirements are managed by entering into the ERP system that is used for all orders.

2.3.5.1 Finished product specifications shall be documented, current, approved by the site and their customer, accessible to relevant staff and may include: i. Microbiological and chemical limits; and ii. Labeling and packaging requirements.

RESPONSE: COMPLIANT

2.3.5.2 A register of finished product specifications shall be maintained.

RESPONSE: COMPLIANT

2.4.1 Food Legislation (Mandatory)

The managers maintain up-to-date standards by association with consultant and maintaining subscription to regulatory websites and publications. Registration the FDA was on file and current. The policy for SOP 2.4.2 detailed the notification of SQFI and the certification body in the event of regulatory warning or action.

2.4.1.1 The site shall ensure that, at the time of delivery to its customer, the food supplied shall comply with the legislation that applies to the food and its production in the country of use or sale. This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, net weights, nutritional, allergen and additive labeling, labeling of identity preserved foods, any other criteria listed under food legislation, and to relevant established industry codes of practice.

RESPONSE: COMPLIANT

2.4.1.2 The methods and responsibility for ensuring the site 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 in the event of a regulatory warning. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

2.4.2 Good Manufacturing Practices (Mandatory)

GMPs and methods for control of food safety at all stages of the warehousing process are defined in the food safety manual. This encompassess all operational standards for safe receiving, storage, repack and shipments of goods. The personnel rules (visitor and employee) and proper storage standards are also defined. Other food safety fundamentals such as pest control and sanitation are documented in procedures and procedures implemented.

2.4.2.1	The site shall ensure the Good Manufacturing Practices described in modules 3, 4, 9, 10 or 11 (as applicable) of this Food Safety Code are applied, 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
2.4.2.2	The Good Manufacturing Practices applicable to the scope of certification that outline how food safety is controlled and assured shall be documented and implemented. **RESPONSE:** COMPLIANT

2.4.3 Food Safety Plan (Mandatory)

The food safety plan was documented. There was a multi-departmental team consisting of the director of procurement, SQF Practitioner, QA supervisor, director of operations and warehouse supervisor. The plan, analysis (9/12/2017) and flow chart (12/15/14) were last reviewed, signed and dated 3/4/2020. The last review over the existing HACCP documents was conducted and recorded on 3/12/21. Each of the team members signed off on the review. The hazard analysis was conducted and identified the following preventive controls: Supplier PC and Allergen PC. The adherence to the supplier preventive control and the allergen preventive control was verified during the audit. The warehouse distributes nut and milk allergen containing products The verification of proper allergen storage and shipment was observed.

2.4.3.1	A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. Feed manufacturers may utilize a HACCP-based reference food safety plan developed by a responsible authority. **RESPONSE:** COMPLIANT
2.4.3.2	The food safety plan shall be effectively implemented, maintained and outline the means by which the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification. **RESPONSE:** COMPLIANT
2.4.3.3	The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant products and associated processes. Where the relevant expertise is not available on site, advice may be obtained from other sources to assist the food safety team. **RESPONSE:** COMPLIANT
2.4.3.4	The scope of each food safety plan shall be developed and documented including the start and end-point of the processes under consideration and all relevant inputs and outputs. **RESPONSE:** COMPLIANT
2.4.3.5	Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. This shall reference the finished product specifications (refer to 2.3.5.1) plus any additional information relevant to product safety, such as pH, water activity, and/or composition. **RESPONSE:** COMPLIANT
2.4.3.6	The intended use of each product shall be determined and documented by the food safety team. This shall include target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative use of the product. **RESPONSE:** COMPLIANT
2.4.3.7	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, all raw material, packaging material, service inputs (e.g. water, steam, gasses as appropriate), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team during all stages and hours of operation. **RESPONSE:** COMPLIANT
2.4.3.8	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 raw materials and other inputs. **RESPONSE:** COMPLIANT

2.4.3.9	The food safety team shall conduct a hazard analysis for every identified hazard to identify which hazards are significant, i.e. their elimination or reduction to an acceptable level is necessary to ensure food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards. **RESPONSE:** COMPLIANT
2.4.3.10	The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure. **RESPONSE:** COMPLIANT
2.4.3.11	Based on the results of the hazard analysis (refer to 2.4.3.9), 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 (i.e. a critical control point, or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure. **RESPONSE:** COMPLIANT
2.4.3.12	For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product. The food safety team shall validate the critical limits to ensure the designated level of control of the identified food safety hazard (s); and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.2.1). **RESPONSE:** COMPLIANT
2.4.3.13	The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.12). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the test frequency. **RESPONSE:** COMPLIANT
2.4.3.14	The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure. **RESPONSE:** COMPLIANT
2.4.3.15	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
2.4.3.16	Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5). **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 Approved Supplier Program (Mandatory)

The supplier approval program is defined and implemented. There are two types of approved suppliers. These are Pro-Act buying group approved and non-ProAct supplier approval. The SOP 2.4.4 Approved Supplier Program (V2, 1/15/2018) was in place and outlined requirements of Pro-Act approval and for non-Pro-Act supplier which included a supplier questionnaire, food safety and quality, audit/certification, letters of approval, and primary packaging certification of conformance (if applicable). There was a provision for emergency suppliers and contracted services. The register of suppliers was documented and current (3/12/21, V2). The majority of suppliers are Pro-Act suppliers however there are a few local suppliers that are not a member of Pro-Act. These were the suppliers that required in-house approval. The approval documents were not available for the non - ProAct Suppliers. This minor was assessed under clause 2.4.4.8.

2.4.4.1	Raw materials, ingredients, packaging materials, and services that impact on finished product safety shall meet the agreed specification (refer to 2.3.2) and be supplied by an approved supplier. **RESPONSE:** COMPLIANT

2.4.4.2	The receipt of raw materials, ingredients, and packaging materials received from non-approved suppliers shall be acceptable only in an emergency situation, and provided they are inspected or analyzed before use. **RESPONSE:** COMPLIANT
2.4.4.3	The responsibility and procedure for selecting, evaluating, approving and monitoring an approved supplier shall be documented and implemented. **RESPONSE:** COMPLIANT
2.4.4.4	The site's food defense plan (refer to 2.7.1.1) shall include measures to secure incoming materials and ingredients and protect them from deliberate act of sabotage or terrorist-like incidents. **RESPONSE:** COMPLIANT
2.4.4.5	The site's food fraud vulnerability assessment (refer to 2.7.2.1) shall include the site's susceptibility to raw material or ingredient substitution, mislabeling, dilution or counterfeiting which may adversely impact food safety. **RESPONSE:** COMPLIANT
2.4.4.6	The food fraud mitigation plan (refer to 2.7.2.2) shall include methods by which the identified food safety vulnerabilities from ingredients and materials shall be controlled. **RESPONSE:** COMPLIANT
2.4.4.7	Raw materials, ingredients, 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) and approved supplier requirements as all other material providers. **RESPONSE:** COMPLIANT

2.4.4.8 The approved supplier program shall be based on the prior performance of a supplier and the risk level of the raw materials ingredients, packaging materials, and services supplied, and shall contain as a minimum: i. Agreed specifications (refer to 2.3.2); ii. Reference to the rating of the level of risk applied to a raw material, ingredients, packaging materials and services and the approved supplier; iii. A summary of the food safety controls implemented by the approved supplier; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers; vi. Details of the certificates of conformance if required; and vii. Methods and frequency of reviewing approved supplier performance and status.

RESPONSE: MINOR

EVIDENCE: The 2.4.4 procedure outlines the requirement for specification of the supplied product, letter of guarantee, questionnaire and audit. There were 3 local suppliers that were not ProAct suppliers. The Food Safety Team was not able to produce the specification of the supplied product/packaging, letter of guarantee of the supplied food item, and a completed questionnaire from packaging and product supplier.

ROOT CAUSE: Policy had not been updated to notate CCP requirements which are 1) 3rd party audit or 2) CCP questionnaire. Audits are on file for non-proact suppliers

0456_001 (1).pdf

0457_001.pdf

CORRECTIVE ACTION: Approved Supplier Program

2.4.4.8 Corrective Action-Appro... Annu

VERIFICATION OF CLOSEOUT: The CAPA form and amended Supplier Approval Program was submitted by the site. The amendment and CAPA form were reviewed and accepted as it satisfied the non-conformance of making sure that non-ProAct suppliers were properly approved and that approval documents were on hand. The non-conformance is closed. JM 4/30/21

COMPLETION DATE: 04/22/2021 **CLOSEOUT DATE:** 04/30/2021

2.4.4.9 Supplier audits shall be based on risk and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques.

RESPONSE: COMPLIANT

2.4.4.10 A register of approved supplier and records of inspections and audits of approved suppliers shall be maintained.

RESPONSE: COMPLIANT

2.4.5 Non-conforming Product or Equipment

SOP 2.4.5 V2 (1/15/2018) for handling of non-conforming product, equipment and returns is documented. Products and equipment are tagged and also put on hold in the management system. A log of hold product was kept with disposition, trained employee that managed release, lot #, product and date of hold. A place for returned goods staging was identified with a sign. This area was maintained for assessment of goods on the dock and was segregated from acceptable goods.

2.4.5.1 The responsibility and methods outlining how non-conforming product, raw material, ingredient, work-in-progress, packaging or equipment detected during receipt, storage, processing, handling or delivery is handled shall be documented and implemented. The methods applied shall ensure: i. Non-conforming product is quarantined, identified, handled and disposed of in a manner that minimizes the risk of inadvertent use, improper use or risk to the integrity of finished product; ii. Non-conforming equipment is effectively repaired or disposed of in a manner that minimizes the risk of inadvertent use, improper use or risk to the integrity of finished product; and iii. All relevant staff are aware of the organization's quarantine and release requirements applicable to equipment or product placed under quarantine status.

RESPONSE: COMPLIANT

2.4.5.2 Quarantine records, and records of the handling, corrective action, or disposal of non-conforming product or equipment shall be maintained.

RESPONSE: COMPLIANT

2.4.6 Product Rework

Rework / Recoup SOP V2 (1/15/2018) is documented. Scope of procedure covers quality and safety inspection and rework or returned product and working of stored product to remove quality deficient product. A log is kept. The log entries noted product, lot, culled amount and initials of employees of employee performing cull.

2.4.6.1 The responsibility and methods outlining how ingredients, packaging materials, or products 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 of reworked product is inspected or analyzed as required before release; iv. Inspections and analyses shall conform to the requirements outlined in element 2.5.4.1; and v. Release of reworked product shall conform to element 2.4.7.

RESPONSE: COMPLIANT

2.4.6.2 Records of all reworking operations shall be maintained.

RESPONSE: COMPLIANT

2.4.7 Product Release (Mandatory)

Hold and release/disposition records were reviewed. The SOP 2.4.7 Product Release V2 1/15/2018 was documented. There were no products on hold at the time of the audit. Quality Assurance department employees are the only personnel that are approved to release product release.

2.4.7.1 The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released: i. By authorized personnel; and ii. Once all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met.

RESPONSE: COMPLIANT

2.4.7.2 Records of all product release shall be maintained.

RESPONSE: COMPLIANT

2.4.8 Environmental Monitoring

There was no pathogen testing conducted. Only ATP testing was conducted to confirm effective cleaning.

2.4.8.1 A risk-based environmental monitoring program shall be in place for all food and pet food manufacturing processes.

RESPONSE: NOT APPLICABLE

EVIDENCE: There was no pathogen testing conducted. Only ATP testing was conducted to confirm effective cleaning.

2.4.8.2 The responsibility and methods for the environmental monitoring program shall be documented and implemented.

RESPONSE: NOT APPLICABLE

EVIDENCE: There was no pathogen testing conducted. Only ATP testing was conducted to confirm effective cleaning.

2.4.8.3 An environmental sampling and testing schedule shall be prepared, detailing the applicable pathogens or indicator organisms to test for that industry, the number of samples to be taken and the frequency of sampling.

RESPONSE: NOT APPLICABLE

EVIDENCE: There was no pathogen testing conducted. Only ATP testing was conducted to confirm effective cleaning.

2.4.8.4 Environmental testing results shall be monitored and corrective actions (refer to 2.5.3.1) implemented where unsatisfactory trends are observed.

RESPONSE: NOT APPLICABLE

EVIDENCE: There was no pathogen testing conducted. Only ATP testing was conducted to confirm effective cleaning.

2.5.1 Validation and Effectiveness (Mandatory)

The Pre-requisite programs were validated in a summary document dated 3/12/2021. This included all fundamental and key support programs. The HACCP validation was conducted on 3/12/2021. The Quality plan was validated on 10/12/2020.

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 Manufacturing Practices are confirmed to ensure they achieve the required result; ii. Critical food safety limits are validated, and re-validated annually; iii. Changes to the processes or procedures are assessed to ensure controls are still effective; and iv. All applicable elements of the SQF Program are implemented and effective.

RESPONSE: COMPLIANT

2.5.1.2 Records of all validation activities shall be maintained.

RESPONSE: COMPLIANT

2.5.2 Verification Activities (Mandatory)

The verification schedule (SOP 2.5.3 V3 4/8/2020) was documented and outlined all verification activities, frequency and responsibility. Verifications observed during the audit included calibrations, pre-op / operational inspections, sanitation schedules, and others.

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

RESPONSE: COMPLIANT

2.5.2.2 The methods, responsibility and criteria for verifying monitoring of Good Manufacturing Practices, critical control points and 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

2.5.2.3 Records of the verification of monitoring activities shall be maintained.

RESPONSE: COMPLIANT

2.5.3 Corrective and Preventative Action (Mandatory)

SOP and Form 2.5.5 Corrective and Preventative Action are completed for complaints, internal inspections, system audits, external inspections, and others as needs are identified. The corrective actions for these programs were verified throughout the audit as programs were reviewed and opportunities were recorded.

2.5.3.1 The responsibility and methods outlining how corrections and corrective actions are determined, implemented and verified, including the identification of the root cause and resolution of non-compliance of critical food safety limits and deviations from food safety requirements, shall be documented and implemented.

RESPONSE: COMPLIANT

2.5.3.2 Records of all investigation and resolution of non-conformities including their corrections and corrective action shall be maintained.

RESPONSE: COMPLIANT

2.5.4 Product Sampling, Inspection and Analysis

The sampling plan for safety and quality were defined in the Quality Plan and incoming goods program. The number of temperatures and quality inspections per load were defined based on the size of the load and number of cases in the lot or PO. This was verified through interview and incoming inspection document review during the audit.

2.5.4.1 The methods, responsibility and criteria for sampling, inspecting and/or analyzing raw materials, finished product and work-in-progress shall be documented and implemented. The methods applied shall ensure: i. Inspections and analyses are completed at regular intervals as required and to agreed specification and legal requirements; ii. Inspections are conducted to ensure raw materials, work in process and finished products comply with the relevant specification, regulatory requirements and are true to label; and iii. All analyses are conducted to nationally recognized methods or alternative methods which are validated as equivalent to the nationally recognized methods.

RESPONSE: COMPLIANT

2.5.4.2 On-site personnel that conduct environmental or product testing shall participate in an applicable proficiency testing program at least annually to ensure accuracy of results.

RESPONSE: COMPLIANT

2.5.4.3 Where external laboratories are utilized to conduct input or product analysis, the laboratories shall be accredited to ISO 17025 or an equivalent national standard and shall be included on the site's contract service specifications register (refer to 2.3.3.1).

RESPONSE: NOT APPLICABLE

2.5.4.4 Records of all inspections and analyses shall be maintained.

RESPONSE: COMPLIANT

2.5.5 Internal Audits and Inspections (Mandatory)

The full internal audit to SQF Food Safety and Quality Code was performed and recorded with CAPA forms completed (4/1/21). The quarterly inspections are conducted and recorded by the SQF Practitioner. These were found to be completed and filed on 1/8/2020, 4/6/2020, 7/3/2020, 10/15/2020 and 3/12/2021. CAPA forms were on file and completion verified.

2.5.5.1 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 at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code for Manufacturing are audited as per the SQF audit checklist or similar tool; ii. Correction and corrective action of deficiencies identified during the internal audits are undertaken; and iii. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective actions.

RESPONSE: COMPLIANT

2.5.5.2 Staff conducting internal audits shall be trained and competent in internal audit procedures.

RESPONSE: COMPLIANT

2.5.5.3 Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and building/equipment maintenance is compliant to the SQF Food Safety Code for Manufacturing. The site shall: i. Take corrections or corrective and preventative action; and ii. Maintain records of inspections and any corrective action taken.

RESPONSE: COMPLIANT

2.5.5.4 Where practical staff conducting internal audits shall be independent of the function being audited.

RESPONSE: COMPLIANT

2.5.5.5 Records of internal audits and inspections and any corrections and corrective action taken as a result of internal audits shall be maintained.

RESPONSE: COMPLIANT

2.6.1 Product Identification (Mandatory)

Products were identified utilizing manufacturere/supplier labels, receiving pallet labels and re-pack labels. These were applied to products and effectively accomplished labeling and facilitated trace. Records of product movement through the warehouse were kept.

2.6.1.1	The methods and responsibility for identifying raw materials, ingredients, packaging materials, work-in -progress, process inputs and finished products during all stages of production and storage shall be documented and implemented. The product identification system shall be implemented to ensure: i. Raw materials, ingredients, packaging materials, work-in progress, process inputs and finished products are clearly identified during all stages of receipt, production, storage and dispatch; and ii. Finished product is labeled to the customer specification and/or regulatory requirements. **RESPONSE:** COMPLIANT
2.6.1.2	Product identification records shall be maintained. **RESPONSE:** COMPLIANT
2.6.1.3	Product start up and changeover procedures during packing shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label, and that the changeover is inspected and approved by an authorized person. **RESPONSE:** COMPLIANT

2.6.2 Product Trace (Mandatory)

The item #1280 Julien Green Peppers, lot # 54199310 was traced for the exercise. These were received on 3/14/21. There were 12 cases received. The PO was 541993. The supplier was specified, the customers were identified and quantities were reconciled. This was accomplished in a short amount of time. The trace procedure was demonstrated to the auditor.

2.6.2.1	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 manufacturing supplier and date of receipt of raw materials, food contact packaging and materials and other inputs (one back); ii. Traceability is maintained where product is reworked; and iii. The effectiveness of the product trace system shall be reviewed at least annually as part of the product recall and withdrawal review (refer to 2.6.3.3). **RESPONSE:** COMPLIANT
2.6.2.2	Records of raw and packaging material receipt and use, and finished product dispatch and destination shall be maintained. **RESPONSE:** COMPLIANT

2.6.3 Product Withdrawal and Recall (Mandatory)

SOP 2.6.3 (V3 1/15/2018) documented the recall plan and outlined responsibilities within the organization. Standard is in place to notify, certifying body, SQFI and legal counsel with specified times. Mock recall was conducted on 4/7/2021 was conducted in 11 minutes for the identification of the trace of the product and was 100% effective. The record of the test was kept with supporting documentation which included a root cause analysis for improvement of the trace.

2.6.3.1	The responsibility and methods used 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 management procedures to be implemented including sources of legal, regulatory and expert advice and essential traceability information; and 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. SQFI, the certification body, and the appropriate regulatory authority shall be listed as an essential body and notified in instances of a food safety incident of a public nature, or product recall for any reason. **RESPONSE:** COMPLIANT
2.6.3.2	Investigation shall be undertaken to determine the root cause of a withdrawal, mock recall or recall and details of investigations and any action taken shall be documented. **RESPONSE:** COMPLIANT
2.6.3.3	The product withdrawal and recall system shall be reviewed, tested and verified as effective at least annually. Testing shall include incoming materials (one back) and finished product (one up). **RESPONSE:** COMPLIANT
2.6.3.4	SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com. **RESPONSE:** COMPLIANT

2.6.3.5 Records of all product withdrawals, recalls and mock recalls shall be maintained.

RESPONSE: COMPLIANT

2.7.1 Food Defense Plan (Mandatory)

SOP 2.7.2 Food Defense (V3, 1/15/2018) documented the site's approach to security of the premises and of the product during all phases of handling and storage. Challenge conducted and documented on 3/24/21. This was an unauthorized intruder exercise. Food Defense Self-Assessment Checklist Assessment checklist was conducted and recorded on 4/1/2021.

2.7.1.1 The methods, responsibility and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident shall be documented, implemented and maintained.

RESPONSE: COMPLIANT

2.7.1.2 A food defense plan shall include: i. The name of the senior site management person responsible for food defense; ii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing and storage areas through designated access points; iii. The methods implemented to protect sensitive processing points from intentional adulteration; iv. The measures taken to ensure the secure receipt and storage of raw materials, packaging, equipment and hazardous chemicals; v. The measures implemented to ensure raw materials, ingredients, packaging materials, work-in progress, process inputs and finished products are held under secure storage and transportation conditions; and vi. The methods implemented to record and control access to the premises by employees, contractors, and visitors.

RESPONSE: COMPLIANT

2.7.1.3 The food defense plan shall be reviewed and challenged at least annually.

RESPONSE: COMPLIANT

2.7.1.4 Records of reviews of the food defense plan shall be maintained.

RESPONSE: COMPLIANT

2.7.2 Food Fraud

The 2.7.2 Food Fraud SOP (V2 1/15/2018). The food fraud assessment was last conducted on 4/1/2021. A record of the assessment was maintained. An online tool was used. The results of the assessment indicated risk levels were high and adequacy of controls low. There was no mitigation plan in place to confront this high risk rating.

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, counterfeiting or stolen goods which may adversely impact food safety.

RESPONSE: COMPLIANT

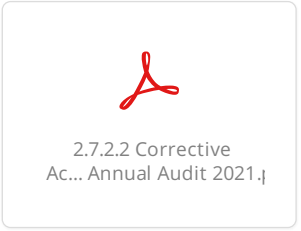
2.7.2.2 A food fraud mitigation plan shall be developed and implemented which specifies the methods by which the identified food fraud vulnerabilities shall be controlled.

RESPONSE: MINOR

EVIDENCE: The most recent assessment conducted indicated high risk and no mitigation plan is put into place.

ROOT CAUSE: Error with the Food Fraud Assessment. Did not catch the initial error.

CORRECTIVE ACTION: Food Fraud Assessment There were issues with the Excel Food Fraud Assessment spreadsheet. It was not populated the outcomes properly. I did not notice on our initial submission. Resubmitted our answers. Answers did not change, but the report updated the proper outcomes.



VERIFICATION OF CLOSEOUT: The site submitted the CAPA form and amended fraud assessment. The site is a produce distribution warehouse. The fraud assessment result (amended) was found to be low risk. There was no mitigation steps needed as all were covered by existing prerequisite programs. The CAPA form and new fraud assessment was reviewed and accepted. The non-conformance is closed. JM 4/30/21

COMPLETION DATE: 04/22/2021 **CLOSEOUT DATE:** 04/30/2021

2.7.2.3 The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually.

RESPONSE: COMPLIANT

2.7.2.4 Records of reviews of the food fraud vulnerability assessment and mitigation plan shall be maintained.

RESPONSE: COMPLIANT

2.8.1 Allergen Management for Food Manufacturing (Mandatory)

Allergen SOP 2.8.1 (V2, 1/1/2018) defines allergens handled or potentially handled. The program is identified as a PC in the food safety plan. The storage of allergen containing foods in the warehouse is controlled by vertical orientation. Only allergens over same allergens or non-allergens over allergen containing is accomplished in all areas possible. There is a spill corrective action plan. Observed storage in the warehouse was found to comply to the program. Training to the SOP was observed. No products containing allergens are repacked. Reworking of produce is simply a culling action to remove any sub-standard products, multiple lots or differing products are not combined.

2.8.1.1 The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A risk analysis of those raw materials, ingredients and processing aids, including food grade lubricants, that contain food allergens; ii. An assessment of workplace-related food allergens from locker rooms, vending machines, lunch-rooms, and visitors; iii. A register of allergens which is applicable in the country of manufacture and the country (ies) of destination if known; iv. A list of allergens which is accessible by relevant staff. v. The hazards associated with allergens and their control incorporated into the food safety plan. vi. A management plan for control of identified allergens. The allergen management program shall include the identification, management, and labelling of products containing gluten, where applicable.

RESPONSE: COMPLIANT

2.8.1.2 Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials, work-in progress, rework or finished product on how to identify, handle, store and segregate raw materials containing allergens.

RESPONSE: COMPLIANT

2.8.1.3 Provision shall be made to clearly identify and segregate foods that contain allergens. Segregation procedures shall be implemented and continually monitored.

RESPONSE: COMPLIANT

2.8.1.4 Where allergenic material may be intentionally or unintentionally present, cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces, including aerosols as appropriate, to prevent cross-contact. Separate handling and production equipment shall be provided where satisfactory line hygiene and clean-up or segregation is not possible.

RESPONSE: COMPLIANT

2.8.1.5 Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be effectively implemented.

RESPONSE: COMPLIANT

2.8.1.6 Where allergenic material may be present, product changeover procedures shall be documented and implemented to eliminate the risk of cross-contact.

RESPONSE: COMPLIANT

2.8.1.7 The product identification system shall make provision for clear identification and labeling in accordance with regulatory requirements of those products produced on production lines and equipment on which foods containing allergens were manufactured.

RESPONSE: COMPLIANT

2.8.1.8 The site shall document and implement methods to control the accuracy of finished product labels (or consumer information where applicable) and assure work-in-progress and finished product is true to label with regard to allergens. Such measures may include label approvals at receipt, label reconciliations during production, destruction of obsolete labels, verification of labels on finished product as appropriate, and product change over procedures.

RESPONSE: COMPLIANT

2.8.1.9 The product trace system shall take into consideration the conditions under which allergen containing foods are manufactured and ensure full trace back of all ingredients and processing aids used.

RESPONSE: COMPLIANT

2.8.1.10 Re-working of product containing food allergens shall be conducted under conditions that ensure product safety and integrity is maintained. Re-worked product containing allergens shall be clearly identified and traceable.

RESPONSE: COMPLIANT

2.8.1.11 Sites that do not handle allergenic materials or produce allergenic products shall document, implement and maintain an allergen management program addressing at a minimum the mitigation of introducing unintended allergens through supplier, contract manufacturer, employee and visitor activities.

RESPONSE: COMPLIANT

2.8.2 Allergen Management for Pet Food Manufacturing

Pet Food is not manufactured at this site.

2.8.2.1 The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A risk analysis of those inputs and processing aids, including food grade lubricants, that contain food allergens; ii. An assessment of workplace-related food allergens from locker rooms, vending machines, lunch-rooms, and visitors; iii. A list of allergens which is accessible by relevant staff; and iv. The hazards associated with allergens and their control incorporated into the food safety plan.

RESPONSE: NOT APPLICABLE

EVIDENCE: Pet Food is not manufactured at this site.

2.8.2.2 Product labeling, in accordance with regulatory requirements, shall include allergens where risks from cross-contact have been identified.

RESPONSE: NOT APPLICABLE

EVIDENCE: Pet Food is not manufactured at this site.

2.8.3 Allergen Management for Manufacturers of Animal Feed

Animal Feed is not manufactured at this site.

2.8.3.1 Sites that exclusively manufacture animal feed and do not manufacture, handle or store food or pet food products are not required to implement an allergen management plan unless required by regulation or customer requirement.

RESPONSE: NOT APPLICABLE

EVIDENCE: Animal Feed is not manufactured at this site.

2.8.3.2 Where an allergen management plan is required by regulation or customer specification, the requirements of 2.8.2 shall apply.

RESPONSE: NOT APPLICABLE

EVIDENCE: Animal Feed is not manufactured at this site.

2.9.1 Training Requirements

The training requirements are defined in SOP 2.9.1-7 (V2 date 1/15/18). Yearly and upon hire training is conducted. The training covers SQF, HACCP, food defense, food safety, allergens, GMP and chemical safety. For specialized training employees with certain responsibilities received training in calibration (refractometer, thermometer and scales), pre-op, pre-op swab, pest control, and internal audit. All training was current (last part of 2020 or 2021). The training register was maintained. The English language is used by all in the plant and all instructions / training was in English.

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.

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 training covers SQF, HACCP, food defense, food safety, allergens, GMP and chemical safety. For specialized training employees with certain responsibilities received training in calibration (refractometer, thermometer and scales), pre-op, pre-op swab, pest control, and internal audit.

2.9.2.1 An employee training program shall be documented and implemented. It shall outline the necessary competencies for specific duties and the training methods to be applied for those staff carrying out tasks associated with: i. Developing and applying Good Manufacturing Practices; ii. Applying food regulatory requirements; iii. Steps identified by the hazard analysis and/or other instructions as critical to effective implementation of the food safety plan and the maintenance of food safety; and iv. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF System.

RESPONSE: COMPLIANT

2.9.3 Instructions

The English language is used by all in the plant and all instructions / training was in English.

2.9.3.1 Instructions shall be available in the languages relevant to the staff, explaining how all tasks critical to meeting regulatory compliance, the maintenance of food safety, and process efficiency are to be performed.

RESPONSE: COMPLIANT

2.9.4 HACCP Training Requirements

HACCP and Food Safety Plan is included in the training protocol.

2.9.4.1 HACCP training shall be provided for staff involved in developing and maintaining food safety plans.

RESPONSE: COMPLIANT

2.9.5 Language

English is the primary language and training is conducted in English.

2.9.5.1 Training materials and the delivery of training shall be provided in language understood by staff.

RESPONSE: COMPLIANT

2.9.6 Refresher Training

Yearly training provided for tenured employees. The record of training supports refresher training.

2.9.6.1 The training program shall include provision for identifying and implementing the refresher training needs of the organization.

RESPONSE: COMPLIANT

2.9.7 Training Skills Register

The skills register was current with all personnel trained within the past year and included all information. Supervisor verifications were conducted to measure competency through tests and observation. The date of training on the matrix indicates that they passed the tests and observations and are competent to work at the tasks.

2.9.7.1 A training skills register describing who has been trained in relevant skills shall be maintained. The register shall indicate the: i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Supervisor's verification that the training was completed, and that the trainee is competent to complete the required tasks.

RESPONSE: COMPLIANT

11.1.1 Premises Location and Approval

The license for operation from the state of Louisiana was current, on display, on file and expires on 6/30/2021. The City of Baton Rouge - Parish of East Baton Rouge, Occupational License Tax certificate was on file and dated expiration 12/31/2021. The operation was a stand alone facility with Interstate Highway-12 bordering the rear of the facility and with no business immediately adjacent. The FDA registration was on file and current (expiration 12/31/2021).

11.1.1.1 The location of the premises shall be such that adjacent and adjoining buildings, operations and land use do not interfere with safe and hygienic operations.

RESPONSE: COMPLIANT

11.1.1.2 The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

RESPONSE: COMPLIANT

11.2.1 Materials and Surfaces

The repack tables being used were stainless steel tables that were maintained clean. There were food-contact gloves being used as evidenced by labeling on the glove boxes. The gloves were nitrile or latex. All were powder-free and all were approved for food contact. The bags were food-contact approved as evidenced by certificate of conformance on file from the supplier.

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

RESPONSE: COMPLIANT

11.2.2 Floors, Drains, and Waste Traps

The floors were in good condition with minimal damage and wear. The drains were long trench drains with grated covers running under racks where wet produce may be stored. There were no areas of standing water. Drains were found to be clean and drain cleaning was conducted on a monthly basis.

11.2.2.1 Floors shall be constructed of smooth, dense impact resistant material that can be effectively graded, drained, impervious to liquid and easily cleaned.

RESPONSE: COMPLIANT

11.2.2.2 Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions.

RESPONSE: COMPLIANT

11.2.2.3 Drains shall be constructed and located so they can be easily cleaned and not present a hazard.

RESPONSE: COMPLIANT

11.2.2.4 Waste trap system shall be located away from any food handling area or entrance to the premises.

RESPONSE: COMPLIANT

11.2.3 Walls, Partitions, Doors and Ceilings

The walls (concrete block, metal paneling and steal frame) were found to be in good condition. The doors used for shipping/receiving were in excellent condition and pest-proofed. All personnel doors were clean and in good condition. Dock levelers were found to be in good condition and seals present to prevent pests and dust. The only drop ceilings were in office areas. These were accessible for inspection.

11.2.3.1 Walls, partitions, ceilings and doors shall be of durable construction. Internal surfaces shall be smooth and impervious with a light-colored finish and shall be kept clean (refer to 11.2.13.1).

RESPONSE: COMPLIANT

11.2.3.2 Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

RESPONSE: COMPLIANT

11.2.3.3 Ducting, conduit and pipes that convey 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.

RESPONSE: COMPLIANT

11.2.3.4 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

11.2.3.5 Doors, hatches and windows and their frames in food processing, handing or storage areas shall be of a material and construction which meets the same functional requirements as 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

11.2.3.6 Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products.

RESPONSE: COMPLIANT

11.2.3.7 Drop ceilings shall be constructed to enable monitoring for pest activity, facilitate cleaning and provide access to utilities.

RESPONSE: COMPLIANT

11.2.4 Stairs, Catwalks and Platforms

There were no catwalks, platforms or stairs in food storage and repack areas.

11.2.4.1 Stairs, catwalks and platforms in food processing and handling areas shall be designed and constructed so as not to present a product contamination risk, and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 11.2.13.1).

RESPONSE: NOT APPLICABLE

EVIDENCE: There were no catwalks, platforms or stairs in food storage and repack areas.

11.2.5 Lightings and Light Fittings

All lights in receiving, storage, repack and shipping areas were found to be in good condition and shatterproofed. The areas of storage and repack were supplied with adequate lighting for safe working, inspection and cleaning.

11.2.5.1 Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.

RESPONSE: COMPLIANT

11.2.5.2 Light fittings in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers and recessed into or fitted flush with the ceiling. Where fittings cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials and addressed in the cleaning and sanitation program.

RESPONSE: COMPLIANT

11.2.5.3 Light fittings in warehouses and other areas where the product is protected shall be designed such as to prevent breakage and product contamination.

RESPONSE: COMPLIANT

11.2.6 Inspection / Quality Control Area

All inspected produce that is sampled for quality purposes is discarded if destructive inspection is used. The inspection areas (receiving and repack) were found to clean, clear of extraneous debris, supplied with hand washing sink or have reasonable access to a hand washing sink. The areas were supplied with adequate lighting. Employees working with the products in the inspection areas followed GMPs.

11.2.6.1 A suitable area shall be provided for the inspection of the product if required.

RESPONSE: COMPLIANT

11.2.6.2 The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/processed. The inspection area shall: i. Have easy access to hand washing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination.

RESPONSE: COMPLIANT

11.2.7 Dust, Insect, and Pest Proofing

All doors (overhead and personnel) had a required pest-proofing method and were protected against pest entry and airborne debris. Pest devices were located in areas that did not threaten food safety.

11.2.7.1 All external windows, ventilation openings, doors and other openings shall be effectively sealed when closed and proofed against dust, vermin and other pests.

RESPONSE: COMPLIANT

11.2.7.2 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

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

RESPONSE: COMPLIANT

11.2.7.4 Electric insect control devices, pheromone or other traps and baits shall be located so as not to present a contamination risk to the product, packaging, containers or processing equipment. Poison rodenticide bait shall not be used inside ingredient or product storage areas or processing areas.

RESPONSE: COMPLIANT

11.2.8 Ventilation

The repack area was in a cooler space in the warehouse. There was no ventilation needed for this process.

11.2.8.1 Adequate ventilation shall be provided in enclosed processing and food handling areas.

RESPONSE: NOT APPLICABLE

EVIDENCE: The repack area was in a cooler space in the warehouse. There was no ventilation needed for this process.

11.2.8.2 All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 11.2.12, to prevent unsanitary conditions.

RESPONSE: NOT APPLICABLE

EVIDENCE: The repack area was in a cooler space in the warehouse. There was no ventilation needed for this process.

11.2.8.3 Extractor fans and canopies shall be provided in areas where cooking operations are carried out or a large amount of steam is generated and shall have the following features: i. Capture velocities shall be sufficient to prevent condensation build up and to evacuate all heat, fumes and other aerosols to the exterior via an exhaust hood positioned over the cooker(s); ii. Fans and exhaust vents shall be insect-proofed and located so as not to pose a contamination risk; and iii. Where appropriate, positive air-pressure system shall be installed to prevent airborne contamination.

RESPONSE: NOT APPLICABLE

EVIDENCE: The repack area was in a cooler space in the warehouse. There was no ventilation needed for this process.

11.2.9 Equipment, Utensils, and Protective Clothing

The tables in use were observed to be clean and in good condition. Gloves were observed to be changed as needed as gloves that were in use at the time of the audit were clean and in good condition. The racks and shelving were in good condition. The cleaning of the repack area was daily and more frequent as needed between products. There was no repack of allergen containing foods, therefore, no allergen or changeover cleaning was needed or performed. A minor was issued under 11.2.9.1.

11.2.9.1 Specifications for equipment, utensils and protective clothing, and procedures for purchasing equipment shall be documented and implemented.

RESPONSE: MINOR

EVIDENCE: Specifications for equipment, utensils and clothing and purchasing procedure for equipment was not documented and clear.

ROOT CAUSE: Specifications/Procedures were not documented at the time of audit.

CORRECTIVE ACTION: Updated/Created SOP for equipment, utensils and protective clothing.

11.2.9.1 Corrective Action-Equipment

VERIFICATION OF CLOSEOUT: The CAPA form and the procedure for purchasing / specification of equipment, utensils and clothing was provided by the site. The CAPA form and procedure were reviewed and accepted. The non-conformance was closed. JM 4/30/21

COMPLETION DATE: 04/22/2021 **CLOSEOUT DATE:** 04/30/2021

11.2.9.2 Equipment and utensils shall be designed, constructed, installed, operated and maintained to meet any applicable regulatory requirements and not to pose a contamination threat to products.

RESPONSE: COMPLIANT

11.2.9.3 Benches, tables, conveyors, mixers, mincers, graders and other mechanical processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious and free from cracks or crevices.

RESPONSE: COMPLIANT

11.2.9.4 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 as per 11.2.13. Bins used for inedible material shall be clearly identified.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.2.9.6 Protective clothing shall be manufactured from material that will not contaminate food and is easily cleaned.

RESPONSE: COMPLIANT

11.2.9.7 Racks shall be provided for the temporary storage of protective clothing when staff leave the processing area and shall be provided in close proximity or adjacent to the personnel access doorways and hand washing facilities.

RESPONSE: COMPLIANT

11.2.9.8 All equipment, utensils and protective clothing shall be cleaned after use or at a frequency to control contamination and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

RESPONSE: COMPLIANT

11.2.10 Premises and Equipment Maintenance

Maintenance of the building, refrigeration, fork lifts, dock - levelers and transportation is contracted out to outside service providers. The contracts, workorders and service reports were on file. Refrigeration - storage, refrigeration-fleet, and truck maintenance documentation were reviewed for the audit. Current agreements were observed and were dated as follows: Refrigeration - 4/3/2018 (continuing), Fleet/vehicle-9/20/2019 (continuing), and refrigeration - fleet (The contractors for maintenance that are given access to the warehouse to perform duties have training to the GMPs on file. There is a cabinet on site that is secured in which is stored the tools specifically for the lift maintenance contractor and was locked at the time of the audit. There were no temporary repairs noted during the audit. The racks were obseved to be maintained in good condition.

11.2.10.1 The methods and responsibility for the maintenance and repair of plant, equipment and buildings shall be documented, planned and implemented in a manner that minimizes the risk of product, packaging or equipment contamination.

RESPONSE: COMPLIANT

11.2.10.2 Routine maintenance of plant and equipment in any food processing, handling or storage area shall be performed according to a maintenance-control schedule and recorded. The maintenance schedule shall be prepared to cover building, equipment and other areas of the premises critical to the maintenance of product safety and quality.

RESPONSE: COMPLIANT

11.2.10.3 Failures of plant and equipment in any food processing, handling or storage area shall be documented, reviewed and their repair incorporated into the maintenance control schedule.

RESPONSE: COMPLIANT

11.2.10.4 Maintenance staff and contractors shall comply with the site’s personnel and process hygiene requirements (refer to 11.3.1, 11.3.2, 11.3.3, 11.3.4).

RESPONSE: COMPLIANT

11.2.10.5 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

11.2.10.6 Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling or storage area.

RESPONSE: COMPLIANT

11.2.10.7 The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance pose a potential threat to product safety (i.e. pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside processing times.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.2.10.9 Maintenance staff 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 completed and a pre-operational inspection conducted prior to the commencement of site operations.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.2.10.11 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

11.2.11 Calibration

Scale and thermometer calibration is defined in a monitoring and verification schedule that is imbedded into the SOP 12.2.9 (V2, 1/15/2018). The scale certificate from LA Dept of Ag was on file and dated 3/18/2021). Daily scale calibrations are conducted and recorded by employees in the repack area and verified by the SQF Practitioner on a weekly basis. The record of the in-house calibration was verified for 2020 and year to date 2021). Employee training and observation is documented to verify correct performance of the scale calibration check (March of 2021). Thermometers are calibrated weekly with record. Training on thermometer calibration was conducted during yearly training (the staff was trained during sessions in February 2021 with record). The certificate for a reference NIST thermometer was on file with expiration of 2/20/2021. Calibration of the refractometer (used in the measure of melon sweetness) is conducted weekly with record. Training on the refractometer calibration was recorded for the staff in February of 2021). The verification of all calibration records is conducted monthly by the SQF practitioner and evident by sign off on the forms. The 2020 and 2021 records were reviewed for the audit.

11.2.11.1 The methods and responsibility for the calibration and re-calibration of measuring, test and inspection equipment used for monitoring activities outlined in pre-requisite programs and food safety plans, or to demonstrate compliance with customer specifications shall be documented and implemented. Software used for such activities shall be validated as appropriate.

RESPONSE: COMPLIANT

11.2.11.2 Procedures shall be documented and implemented to address the disposition of potentially affected products should measuring, test and inspection equipment be found to be out of calibration state.

RESPONSE: COMPLIANT

11.2.11.3 Calibrated measuring, test and inspected equipment shall be protected from damage and unauthorized adjustment.

RESPONSE: COMPLIANT

11.2.11.4 Equipment shall be calibrated against national or international reference standards and methods or to 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

11.2.11.5 Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers recommended schedule.

RESPONSE: COMPLIANT

11.2.11.6 Calibration records shall be maintained.

RESPONSE: COMPLIANT

11.2.12 Pest Prevention

The pest control policy was defined in SOP 12.2.9. The policy was dated V1 - 12/15/14. There were no evidences of pest infestation observed during the audit. Pest control contracted out to a licensed service. The manual was kept up to date with all required documents and records. Service reports and trend summaries were kept up-to-date and showed no active pest issues. No pest activities were noted during the audit. A map was on file and dated as verified 2/22/21. The site utilized interior traps placed on both sides of all doors and around the perimeter. Locked and secured bait stations were used on the exterior. There was no bait poison used on the interior of the building. There were insect light traps (ILT) utilized in the dock areas. The ILTs were inspected on each service and were equipped with shatterproof bulbs with sticky pads as the mechanism for insect retention so as not to scatter insect fragments into the dock space. Service reports were issued on each biweekly service and these reported any usage of pest control chemicals, the inspection of all devices, recommendations for improvement of site pest-proofing and the presence of any signs of activity. Licenses and insurance were on hand and up-to-date. The SQF practitioner also inspected the pest system for proper maintenance.

11.2.12.1 The methods and responsibility for pest prevention shall be documented and effectively implemented. The premises, its surrounding areas, storage facilities, machinery and equipment shall be kept free of waste or accumulated debris so as not to attract pests and vermin.

RESPONSE: COMPLIANT

11.2.12.2 Identified pest activity shall not present a risk of contamination to food products, raw materials or packaging.

RESPONSE: COMPLIANT

11.2.12.3 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 investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

RESPONSE: COMPLIANT

11.2.12.4 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 to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods; v. Outline the frequency with which pest status is to be checked; vi. Include on a site map the identification, location, number and type of bait stations set; 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 staff 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 staff 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.

RESPONSE: COMPLIANT

11.2.12.5 Inspections for pest activity shall be undertaken on a regular basis by trained personnel and the appropriate action taken if pests are present.

RESPONSE: COMPLIANT

11.2.12.6 Records of all pest control applications shall be maintained.

RESPONSE: COMPLIANT

11.2.12.7 Pesticides and other toxic chemicals shall be clearly labeled and stored as described in element 11.6.4 and handled and applied by properly trained personnel. They 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

11.2.12.8 Pest contractors shall be: i. 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. Provide a pest prevention plan (refer to 2.3.3) which will include and maintain a site map indicating the location of bait stations traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; and vi. Provide a written report of their findings and the inspections and treatments applied.

RESPONSE: COMPLIANT

11.2.12.9 The site shall dispose of unused pest control 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 waiting authorized disposal by an approved vendor.

RESPONSE: COMPLIANT

11.2.13 Cleaning and Sanitation

The cleaning schedule was maintained with daily, weekly, quarterly, yearly and bi-annual (twice per year) tasks. The employees performing the task reported completion and the supervisor or SQF Practitioner verified the completion of the work. A verification signature was evident on all completed schedules. Schedules for the past year were reviewed. There were thorough procedures on file for cleaning (chemicals, tools and cleaning steps defined). Schedules completed had a final review by the SQF practitioner sign-off. Sanitation training was on file conducted by the SQF Practitioner. (2/3/2021 with verification of effectiveness). SDSs confirmed on file were for the chemicals in use. San-T 10 Plus (sanitizer) and Inspector's Choice (cleaner). Cleaner and sanitizer mix and concentration verifications of metering devices were conducted and recorded monthly. Pre-op swabbing is conducted on totes and tables with a protein swab. This is conducted in the repacking operation (2020 and 2021 ongoing results logs were reviewed). Training in the sanitation of the repack area was conducted and documented on through the yearly training program (verification of the training was documented and dated in February of 2021). The pre-op visual inspection is conducted daily with record (all 2021 and last of 2020 was verified). The verification of removal of trash and waste is included on the pre-op/operational inspection. Chemical usage was logged. All chemicals in use were properly labeled when in spray bottles and dispensing containers. The staff amenities (restrooms and breakrooms) were cleaned and inspected daily.

11.2.13.1 The methods and responsibility for the cleaning of the food handling and processing equipment and environment, storage areas, staff amenities and toilet facilities shall be documented and implemented. Consideration shall be given to: i. What is to be cleaned; ii. How it is to be cleaned; iii. When it is to be cleaned; iv. Who is responsible for the cleaning; v. Methods used to confirm the correct concentrations of detergents and sanitizers, and vi. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

RESPONSE: COMPLIANT

11.2.13.2 Provision shall be made for the effective cleaning of processing equipment, utensils and protective clothing.

RESPONSE: COMPLIANT

11.2.13.3 Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards and other utensils and for cleaning of protective clothing used by staff. These cleaning operations shall be controlled so as not to interfere with manufacturing operations, equipment or product. Racks and containers for storing cleaned utensils shall be provided as required.

RESPONSE: COMPLIANT

11.2.13.4 Cleaning in place (CIP) systems where used shall not pose a chemical contamination risk to raw materials, ingredients or product. CIP parameters critical to assuring effective cleaning shall be defined, monitored and recorded (e.g., chemical and concentration used, contact time and temperature). CIP equipment including spray balls shall be maintained and modifications to CIP equipment shall be validated. Personnel engaged in CIP activities shall be effectively trained.

RESPONSE: NOT APPLICABLE

EVIDENCE: CIP not performed.

11.2.13.5 Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food processing areas, product contact surfaces, equipment, staff amenities and sanitary facilities and other essential areas are clean before the commencement of production. Pre-operational inspections shall be conducted by qualified personnel.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.2.13.7 The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared.

RESPONSE: COMPLIANT

11.2.13.8 Detergents and sanitizers shall be suitable for use in a food manufacturing 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 chemicals purchased and used shall be maintained; iii. Detergents and sanitizers are stored as outlined in element 11.6.4; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained staff handles sanitizers and detergents.

RESPONSE: COMPLIANT

11.2.13.9 Detergents and sanitizers that have been mixed for use shall be correctly mixed according to manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.

RESPONSE: COMPLIANT

11.2.13.10 The site shall dispose of unused detergents and sanitizers and empty containers in accordance with regulatory requirements and ensure that: i. Empty detergent and sanitizer containers are appropriately cleaned, treated and labeled before use; ii. Empty detergent and sanitizer containers are labeled, isolated and securely stored while awaiting collection; and iii. Unused and obsolete detergents and sanitizers are stored under secure conditions while waiting authorized disposal by an approved vendor.

RESPONSE: COMPLIANT

11.2.13.11 A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

RESPONSE: COMPLIANT

11.3.1 Personnel

The GMP documented policy for staff and visitors defined health requirements which excluded those persons suffering from or with symptoms of illness. The employees observed in the warehouse were observed to be healthy with no appearance of illness. Activities of smoking, chewing and eating were prohibited in the warehouse. All employees were following the standard at the time of audit. First aid kits were in place with colored bandages for visibility.

11.3.1.1 Personnel who are carriers or are known to have been carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in the processing or packing of food or enter storage areas where food is exposed.

RESPONSE: COMPLIANT

11.3.1.2 The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids from open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury which causes spillage of bodily fluid, a properly trained employee shall ensure that all affected areas including handling and processing areas have been adequately cleaned and that all materials and products have been quarantined and disposed of.

RESPONSE: COMPLIANT

11.3.1.3 Personnel with exposed cuts, sores or lesions shall not engage in handling or processing products or handling primary packaging materials or food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored bandage containing a metal strip or an alternative suitable waterproof and colored dressing.

RESPONSE: COMPLIANT

11.3.1.4 Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed. Drinking of water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers in production and storage areas shall be stored in clear, covered containers, and in designated areas away from raw materials, packaging or equipment.

RESPONSE: COMPLIANT

11.3.2 Hand Washing

The sink for handwashing was supplied to the employees in the repack area. The sink was supplied with tempered water, towels in dispenser, soap and a trash receptacle. There was a sign designating the sink as a hand wash and the sink was not observed to be used for other purposes. The employees were observed to use the sink at appropriate times (entry and when hands were soiled). Gloves were changed as needed (when dirty or damaged). Employees washed hands prior to applying gloves.

11.3.2.1 Hand wash basins shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.

RESPONSE: COMPLIANT

11.3.2.2 Hand wash basins shall be constructed of stainless steel or similar non-corrosive material and as a minimum supplied with: i. A potable water supply at an appropriate temperature; ii. Liquid soap contained within a fixed dispenser; iii. Paper towels in a hands-free cleanable dispenser; and iv. A means of containing used paper towels.

RESPONSE: COMPLIANT

11.3.2.3 The following additional facilities shall be provided in high risk areas: i. Hands free operated taps; and ii. Hand sanitizers.

RESPONSE: NOT APPLICABLE

EVIDENCE: The process is not high risk.

11.3.2.4 A sign instructing people to wash their hands, and in appropriate languages, shall be provided in a prominent position.

RESPONSE: COMPLIANT

11.3.2.5 Personnel shall have clean hands and hands shall be washed by all personnel, including staff, contractors and visitors: i. On entering food handling or processing areas; 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, dropped product or contaminated material.

RESPONSE: COMPLIANT

11.3.2.6 When gloves are used, personnel shall maintain the hand washing practices outlined above.

RESPONSE: COMPLIANT

11.3.3 Clothing

The risk analysis for clothing and hair policy was on file and dated 8/21/2020. Personal clothing is worn however there is assessment at the start to make sure that the clothing is clean and that jewelry, hair coverage and glove use is being followed. The employees were observed during the audit to wear clean clothes in good repair. The product being divided into the smaller bagged portions was only contacted by gloved hands.

11.3.3.1 The site shall undertake a risk analysis to ensure that the clothing and hair policy protects materials, food and food contact surfaces from unintentional microbiological or physical contamination.

RESPONSE: COMPLIANT

11.3.3.2 Clothing worn by staff engaged in handling food shall be maintained, stored, laundered and worn so as not to present a contamination risk to products.

RESPONSE: COMPLIANT

11.3.3.3 Clothing, including shoes, shall be clean at the commencement of each shift and maintained in a serviceable condition.

RESPONSE: COMPLIANT

11.3.3.4 Excessively soiled uniforms shall be changed or replaced where they present a product contamination risk.

RESPONSE: COMPLIANT

11.3.3.5 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

11.3.4 Jewelry and Personal Effects

Jewelry was prohibited in the repack area, inspection station and in the general warehouse. Employees were observed to comply to the GMP requirement.

11.3.4.1 Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or any area where food is exposed. The wearing of plain bands with no stones and prescribed medical alert bracelets can be permitted, however the site will need to consider their customer requirements and the applicable food legislation.

RESPONSE: COMPLIANT

11.3.5 Visitors

At sign in upon arrival, visitors going into the storage areas are asked to review the GMP and Hygiene Policy. A policy was signed by the visitors and kept on file. The auditor was presented with the policy and asked to review and sign by the reception employee prior to being greeted by management. The policy was again reviewed at the time of walking into the warehouse area. There were limited number of entry points used into the warehouse area. These were through the main office and through the dock office. These entries were controlled by card/fob access and monitored by personnel and cameras.

11.3.5.1 All visitors, including management and maintenance staff, shall wear suitable clothing and footwear when entering any food processing or handling area.

RESPONSE: COMPLIANT

11.3.5.2 All visitors shall be required to remove jewelry and other loose objects.

RESPONSE: COMPLIANT

11.3.5.3 Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled or processed.

RESPONSE: COMPLIANT

11.3.5.4 Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all hand washing and personnel practice requirements.

RESPONSE: COMPLIANT

11.3.5.5 All visitors shall be trained in the site's food safety and hygiene procedures before entering any food processing or handling areas or shall be escorted at all times in food processing, handling and storage areas.

RESPONSE: COMPLIANT

11.3.6 Staff Amenities

Restrooms and break areas were sufficiently lighted and exhaust vents were installed in the restrooms. These were found to be operational.

11.3.6.1 Staff amenities supplied with appropriate lighting and ventilation shall be made available for the use of all persons engaged in the handling and processing of product.

RESPONSE: COMPLIANT

11.3.7 Change Rooms

Changing rooms were not present as employees were not required to change into uniforms for work purposes.

11.3.7.1 Facilities shall be provided to enable staff and visitors to change into and out of protective clothing as required.

RESPONSE: NOT APPLICABLE

EVIDENCE: Changing rooms were not present as employees were not required to change into uniforms for work purposes.

11.3.7.2 Change rooms shall be provided for staff engaged in the processing of high risk foods or processing operations in which clothing can be soiled.

RESPONSE: NOT APPLICABLE

EVIDENCE: Changing rooms were not present as employees were not required to change into uniforms for work purposes.

11.3.7.3 Provision shall be made for staff to store their street clothing and personal items separate from food contact zones and food and packaging storage areas.

RESPONSE: NOT APPLICABLE

EVIDENCE: Changing rooms were not present as employees were not required to change into uniforms for work purposes.

11.3.7.4 Where required, a sufficient number of showers shall be provided for use by staff.

RESPONSE: NOT APPLICABLE

EVIDENCE: Changing rooms were not present as employees were not required to change into uniforms for work purposes.

11.3.8 Laundry

The site does not process and the site is not a high risk operation. There is no processing performed.

11.3.8.1 Provision shall be made for the laundering and storage of clothing worn by staff engaged in high risk processes and for staff engaged in processing operations in which clothing can be heavily soiled.

RESPONSE: NOT APPLICABLE

EVIDENCE: The site does not process and the site is not a high risk operation. There is no processing performed.

11.3.9 Sanitary Facilities

The restrooms for the site were inspected and found to be clean, supplied with hot water, soap, towels and dryers, and proper trash receptacles. All restrooms had signage to encourage proper hand washing. The restrooms and toilets installed were located near break areas and offices convenient for warehouse staff and sufficient in number for the number of employees on site. There were sufficient number of sinks inside each restroom.

11.3.9.1 Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations; ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; v. Include an area inside or nearby, for storing protective clothing, outer garments and other items while using the facilities; and vi. Kept clean and tidy.

RESPONSE: COMPLIANT

11.3.9.2 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 in accordance in regulations.

RESPONSE: COMPLIANT

11.3.9.3 Hand wash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.2.

RESPONSE: COMPLIANT

11.3.10 Lunch Rooms

The break rooms were found to be clean and in good condition. There was a room designated for drivers and one for warehouse personnel. Breakrooms were supplied with sinks for washing of wares and utensils. There was also a refrigerator for storage of personal foods. Microwaves for heating of foods were present and clean. Signs encouraging hand washing were present.

11.3.10.1 Separate lunch-room facilities shall be provided away from a food contact/handling zone.

RESPONSE: COMPLIANT

11.3.10.2 Lunch-room facilities shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to cater for the maximum number of staff 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 them to store or heat food and to prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests.

RESPONSE: COMPLIANT

11.3.10.3 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 introduction of contamination including pests to the site.

RESPONSE: COMPLIANT

11.3.10.4 Signage in appropriate languages instructing people to wash their hands before entering the food processing areas shall be provided in a prominent position in lunch-rooms, at lunch-room exits and in outside eating areas if applicable.

RESPONSE: COMPLIANT

11.4.1 Staff Engaged in Food Handling and Processing Operations

The area for repacking was a segregated portion of warehouse. Sensory evaluations (tasting of foods) is not performed. Visual inspection for quality occurs and is documented daily in storage areas. Employees in repack are trained to visually look for product quality and safety issues while repacking. All employees in the warehouse are required to wear hair and beard restraints. GMPs are clean clothes, no eating/drinking in storage/handling areas, hand washing and gloves for direct fruit contact.

11.4.1.1 All personnel engaged in any food handling, preparation or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices: i. Personnel entry to processing areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be left open for extended periods when access for waste removal or receiving of product/ingredient/packaging is required; iii. Packaging material, product, and ingredients shall be kept in appropriate containers as required and off the floor; iv. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; v. Staff shall not eat or taste any product being processed in the food handling/contact zone, except as noted in element 11.4.1.2; vi. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails or fingernail polish is not permitted when handling exposed food; and vii. Hair restraints are used where product is exposed.

RESPONSE: COMPLIANT

11.4.1.2 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 separate from processing equipment.

RESPONSE: NOT APPLICABLE

EVIDENCE: Sensory evaluations (tasting of foods) is not performed. Visual inspection for quality occurs and is documented daily in storage areas. Employees in repack are trained to visually look for food quality and safety issues while repacking.

11.4.1.3 All wash down hoses shall be stored on hose racks after use and not left on the floor.

RESPONSE: COMPLIANT

11.5.1 Water Supply

The warehouse is supplied with potable water. Water is not stored for use. Hot and cold water was supplied at adequate amounts for hygiene of employees in restrooms, break areas and hand washing in the repack area. No cross connections were noted. Backflow prevention was observed at sinks, mop sinks, hose bibs, etc.. Only municipally-sourced water is used.

11.5.1.1 Adequate supplies of potable water drawn from a known clean source shall be provided for use during processing operations, as an ingredient and for cleaning the premises and equipment.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.5.1.3 The delivery of water within the premises shall ensure potable water is not contaminated.

RESPONSE: COMPLIANT

11.5.1.4 The use of non-potable water shall be controlled such that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; and iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent back flow or back siphonage.

RESPONSE: COMPLIANT

11.5.1.5 Where water is stored on site, storage facilities shall be adequately designed, constructed and maintained to prevent contamination.

RESPONSE: NOT APPLICABLE

EVIDENCE: Water is not stored on site.

11.5.2 Water Treatment

Water is not treated.

11.5.2.1 Water treatment methods, equipment and materials, if required, shall be designed, installed and operated to ensure water receives an effective treatment.

RESPONSE: NOT APPLICABLE

EVIDENCE: Water is not treated.

11.5.2.2 Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

RESPONSE: NOT APPLICABLE

EVIDENCE: Water is not treated.

11.5.2.3 Treated water shall be regularly monitored to ensure it meets the indicators specified.

RESPONSE: NOT APPLICABLE

EVIDENCE: Water is not treated.

11.5.2.4 Water used in as an ingredient in processing, or in cleaning and sanitizing equipment, shall be tested, and if required, treated to maintain potability (refer to 11.5.2.1).

RESPONSE: NOT APPLICABLE

EVIDENCE: Water is not treated.

11.5.3 Ice Supply

Ice is not made for use in contact with product.

11.5.3.1 Ice provided for use during processing operations or as a processing aid or an ingredient shall comply with 11.5.4.1.

RESPONSE: NOT APPLICABLE

EVIDENCE: Ice is not made for use in contact with product.

11.5.3.2 Ice rooms and receptacles shall be constructed of materials as outlined in elements 11.2.1, 11.2.2 and 11.2.3 and designed to minimize contamination of the ice during storage and distribution.

RESPONSE: NOT APPLICABLE

EVIDENCE: Ice is not made for use in contact with product.

11.5.4 Water Quality

The last water test was conducted on 3/17/2021. This was a test for total coliform and E. Coli. The results were negative for E. coli.

11.5.4.1 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. to convey food; iv. as an ingredient or food processing 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 used to heat water that will come in contact with food.

RESPONSE: COMPLIANT

11.5.4.2 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 or cleaning, or from within the site. The frequency of analysis shall be risk-based, and at a minimum annually.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.5.5 The Quality of Air and Other Gasses

Compressed air and other gasses are not used.

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

RESPONSE: NOT APPLICABLE

EVIDENCE: Compressed air and other gasses are not used.

11.5.5.2 Compressed air systems, and systems used to store or dispense other gases used in the manufacturing 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: NOT APPLICABLE

EVIDENCE: Compressed air and other gasses are not used.

11.6.1 Storage and Handling of Goods

The site defined and documented the storage conditions needed to maintain the products safely for selection and delivery to the customers. This included rotation of goods in a FIFO manner but also with respect to inspected quality (produce condition) was closely monitored and recorded through daily inspection. Products are disposed of or inspected more closely and culled dependent upon the quality inspection report. The proper storage of goods is also defined in the allergen managment plan which requires vertical separation of foods with respect to allergen content (eggs, milk and nut containing foods are received stored and shipped).

11.6.1.1 The site shall document and implement an effective storage plan that allows for the safe, hygienic storage of raw materials (i.e. frozen, chilled, and ambient), ingredients, packaging materials, equipment, and chemicals.

RESPONSE: COMPLIANT

11.6.1.2 The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented.

RESPONSE: COMPLIANT

11.6.1.3 Procedures shall be in place to ensure that all ingredients, materials, work-in-progress, rework, and finished product are utilized within their designated shelf-life.

RESPONSE: COMPLIANT

11.6.1.4 Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers.

RESPONSE: COMPLIANT

11.6.1.5 Where goods described in 11.6.2 to 11.6.4 are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there is no risk to the integrity of those goods or contamination or adverse effect on food safety.

RESPONSE: NOT APPLICABLE

EVIDENCE: Goods were not held in temporary or overflow conditions. Temporary storage was not utilized.

11.6.1.6 Records shall be available to validate alternate or temporary control measures for the storage of raw materials, ingredients, packaging materials, equipment, chemicals, or finished products.

RESPONSE: NOT APPLICABLE

EVIDENCE: Goods were not held in temporary or overflow conditions. Temporary storage was not utilized.

11.6.2 Cold Storage, Freezing and Chilling of Foods

The freezer, cooler and dry storage spaces were all inspected. The temperatures were found to be within safe ranges for the types of products stored within each space. The coolers were all at 40 F or below or between 40 and 55 F for produce required to be stored at temperatures for quality. The records were kept electronically. There is an alarm for notification when temperatures were found above established limits. The electronically records were reviewed for the audit. Random days were selected over the last year and temperature levels confirmed to be consistent.

11.6.2.1 The site shall provide confirmation of the effective operational performance of freezing, chilling and cold storage facilities. Chillers, blast freezers and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient refrigeration of food and easily accessible for inspection and cleaning.

RESPONSE: COMPLIANT

11.6.2.2 Sufficient refrigeration capacity shall be available to chill, freeze, store chilled or store frozen the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.

RESPONSE: COMPLIANT

11.6.2.3 Discharge from defrost and condensate lines shall be controlled and discharged to the drainage system.

RESPONSE: COMPLIANT

11.6.2.4 Freezing, chilling and cold storage rooms shall be fitted with temperature monitoring equipment and located to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible.

RESPONSE: COMPLIANT

11.6.2.5 Loading and unloading docks shall be designed to protect the product during loading and unloading.

RESPONSE: COMPLIANT

11.6.3 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods

The storage of shelf stable foods and packaging were observed in areas of storage away from wet conditions in a non-refrigerated area so as not to compromise quality of the dry good and packaging. The racks in this area were found to be in good condition and areas were found to be clean. The lifts and jacks used in the warehouse were found to be in good condition and clean. The battery area was kept away from food and food-related storage. The battery area was clean and free of debris.

11.6.3.1 Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration.

RESPONSE: COMPLIANT

11.6.3.2 Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room. Storage areas shall be constructed to prevent packaging from becoming a harborage for pests or vermin.

RESPONSE: COMPLIANT

11.6.3.3 Vehicles used in food contact, handling or processing zones or in cold storage rooms shall be designed and operated so as not to present a food safety hazard.

RESPONSE: COMPLIANT

11.6.4 Storage of Hazardous Chemicals and Toxic Substances

There was a designated and locked area for storage of cleaners and cleaning supplies. This was a closet near the dock office. The chemicals were labeled and there was an inventory of chemicals kepts to define approval as well as track usage. The storage area was controlled (locked) and access was only by trained sanitation staff.

11.6.4.1 Hazardous chemicals and toxic substances with the potential for food contamination shall be stored so as not to present a hazard to staff, product, packaging, product handling equipment or areas in which the product is handled, stored or transported.

RESPONSE: COMPLIANT

11.6.4.2 Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.6.4.4 Pesticides, rodenticides, fumigants and insecticides shall be stored separate from sanitizers and detergents. All chemicals shall be stored in their original containers, or in clearly labelled and suitable secondary containers if allowed by applicable legislation.

RESPONSE: COMPLIANT

11.6.4.5 Hazardous chemical and toxic substance storage facilities shall: i. Be compliant with national and local legislation and designed such that 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 those personnel with formal training in the handling and use of hazardous chemicals and toxic substances; v. Have instructions on the safe handling of hazardous chemicals and toxic substances readily accessible to staff; 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

11.6.5 Loading, Transport, and Unloading Practices

12.7.2 SOP Receiving V2, 1/15/2018. Assessment of truck compartment includes the following: cleanliness, condition, evidence of tampering, temperature precooled, off odors, locks or seals present and product temperatures acceptable. During the audit, a receiver was interviewed and documents/software in use were demonstrated.

11.6.5.1 The practices applied during loading, transport and unloading of food shall be documented, implemented and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported and unloaded under conditions suitable to prevent cross-contamination.

RESPONSE: COMPLIANT

11.6.6 Loading

Form 12.6.7 Loading checklist is completed during loading for shipment. The Transportation Temperature Check Form is completed by drivers at loading and at each stop in the route. The receiving form is completed electronically on everly load. During the audit, a loader was interviewed and documents in use were demonstrated.

11.6.6.1 Vehicles (e.g. trucks/vans/containers) used for transporting food shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose and free from odors or other conditions that may impact negatively on the product.

RESPONSE: COMPLIANT

11.6.6.2 Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining the product and package integrity during loading and transport.

RESPONSE: COMPLIANT

11.6.6.3 Vehicles (e.g. trucks/vans/containers) shall be secured from tampering using a seal or other agreed upon and acceptable device or system.

RESPONSE: COMPLIANT

11.6.7 Transport

Trucks were observed to be in good condition and clean. All trucks for delivery were temperature controlled at the appropriate temperature for the type of product (refrigerated vs. frozen).

11.6.7.1 Refrigerated units shall maintain the food at required temperatures and the unit's temperature settings shall be set, checked and recorded before loading and product temperatures recorded at regular intervals during loading as appropriate.

RESPONSE: COMPLIANT

11.6.7.2 The refrigeration unit shall be operational at all times and checks completed of the unit's operation, the door seals and the storage temperature at regular intervals during transit.

RESPONSE: COMPLIANT

11.6.8 Unloading

The temperatures of goods were confirmed throughout the load receiving. Settings and unit temperatures were confirmed prior to opening of doors. Unloading was performed on a enclosed and temperature controlled dock. Priority for frozen items is given when putting goods into storage. This limits time products are out of temperature required ranges.

11.6.8.1 Prior to opening the doors, the refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently and product temperatures shall be recorded at the commencement of unloading and at regular intervals during unloading.

RESPONSE: COMPLIANT

11.6.8.2 Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining the product and package integrity.

RESPONSE: COMPLIANT

11.7.1 Process Flow

Personnel entering the facility are routed through offices and reception areas to allow only authorized persons (e.g. driver lounge and check-in). No persons are allowed onto the dock without hair/beard covering and face masks. The area for repackaging is maintained for only support staff for that activity. All restrooms and break areas are outside for product handling/storage zones.

11.7.1.1 The process flow shall be designed to prevent cross-contamination and organized so there is a continuous flow of product through the process. The flow of personnel shall be managed such that the potential for contamination is minimized.

RESPONSE: COMPLIANT

11.7.2 Receipt of Raw and Packaging Materials and Ingredients

There is a dry goods area that is maintained clean and in good condition. Packaging and other products were stored in this area with minimal to no damage observed.

11.7.2.1 Dry ingredients and packaging shall be received and stored separately from frozen and chilled raw materials to ensure there is no cross-contamination. Unprocessed raw materials shall be received and segregated to ensure there is no cross-contamination.

RESPONSE: COMPLIANT

11.7.3 Thawing of Food

No thawing is performed.

11.7.3.1 Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose.

RESPONSE: NOT APPLICABLE

EVIDENCE: No thawing is performed.

11.7.3.2 Equipment for water thawing shall be continuous flow to ensure the water exchange rate and temperature do not contribute to product deterioration or contamination. Water overflow shall be directed into the floor drainage system and not onto the floor.

RESPONSE: NOT APPLICABLE

EVIDENCE: No thawing is performed.

11.7.3.3 Air thawing facilities shall be designed to thaw food under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination.

RESPONSE: NOT APPLICABLE

EVIDENCE: No thawing is performed.

11.7.3.4 Provision is to be made for the containment and regular disposal of used cartons and packaging from thawed product so that there is no risk to the product.

RESPONSE: NOT APPLICABLE

EVIDENCE: No thawing is performed.

11.7.4 High Risk Processes

The process is not high risk

11.7.4.1 The processing of high risk food shall be conducted under controlled conditions such that sensitive areas in which high risk food has undergone a “kill” step, a “food safety intervention” or is subject to post process handling, are protected/segregated from other processes, raw materials or staff who handle raw materials to ensure cross-contamination is minimized.

RESPONSE: NOT APPLICABLE

EVIDENCE: The process is not high risk

11.7.4.2 Areas in which high risk processes are conducted shall only be serviced by staff dedicated to that function.

RESPONSE: NOT APPLICABLE

EVIDENCE: The process is not high risk

11.7.4.3 Staff access points shall be located, designed and equipped to enable staff to don distinctive protective clothing and to practice a high standard of personal hygiene to prevent product contamination.

RESPONSE: NOT APPLICABLE

EVIDENCE: The process is not high risk

11.7.4.4 Staff engaged in high risk areas shall change into clean clothing or temporary protective outerwear when entering high risk areas.

RESPONSE: NOT APPLICABLE

EVIDENCE: The process is not high risk

11.7.4.5 Product transfer points shall be located and designed so as not to compromise high risk segregation and to minimize the risk of cross-contamination.

RESPONSE: NOT APPLICABLE

EVIDENCE: The process is not high risk

11.7.5 Control of Foreign Matter Contamination

The 12.7.3-4 SOP Foreign Matter was documented as V2, 2/15/2018. This called for control of glass, wood, etc. There storage area checks which included pallet condition. This is conducted daily with record. The glass and brittle plastic inspection is conducted and recorded monthly. Monthly inspections were verified as completed and recorded. The 2020 and year-to-date 2021 records were reviewed.

11.7.5.1 The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented and communicated to all staff.

RESPONSE: COMPLIANT

11.7.5.2 Inspections shall be performed to ensure plant and equipment remain in good condition, equipment has not become detached or deteriorated and is free from potential contaminants.

RESPONSE: COMPLIANT

11.7.5.3 All glass objects or similar material in food handling/contact zones shall be listed in a glass register including details of their location.

RESPONSE: COMPLIANT

11.7.5.4 Containers, equipment and other utensils made of glass, porcelain, ceramics, laboratory glassware or other like material (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers or MIG thermometers required under regulation) shall not be permitted in food processing /contact zones.

RESPONSE: COMPLIANT

11.7.5.5 Regular inspections of food handling/contact zones shall be conducted to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass register.

RESPONSE: COMPLIANT

11.7.5.6 Glass instrument dial covers on processing equipment and MIG thermometers shall be inspected at the start of each shift to confirm they have not been damaged.

RESPONSE: NOT APPLICABLE

EVIDENCE: Processing is not performed.

11.7.5.7 Wooden pallets and other wooden utensils used in food handling/contact zones shall be dedicated for that purpose, clean, maintained in good order. Their condition shall be subject to regular inspection.11.7.5.8 Loose metal objects on equipment, equipment covers and overhead structures shall be removed or tightly fixed so as not to present a hazard.

RESPONSE: COMPLIANT

11.7.5.8 Loose metal objects on equipment, equipment covers and overhead structures shall be removed or tightly fixed so as not to present a hazard.

RESPONSE: COMPLIANT

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

RESPONSE: NOT APPLICABLE

EVIDENCE: Knives and cutting equipment are not used.

11.7.6 Detection of Foreign Objects

Detection devices are not utilized.

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

RESPONSE: NOT APPLICABLE

EVIDENCE: Detection devices are not utilized.

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

RESPONSE: NOT APPLICABLE

EVIDENCE: Detection devices are not utilized.

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

RESPONSE: NOT APPLICABLE

EVIDENCE: Detection devices are not utilized.

11.7.7 Managing Foreign Matter Contamination Incidents

The SOP 12.7.3-4 had provision for isolation, inspection and corrective action management around incidents.

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

RESPONSE: COMPLIANT

11.7.7.2 In circumstances where glass or similar material breakage occurs, the affected area is to be isolated, cleaned and thoroughly inspected (including cleaning equipment and footwear) and cleared by a suitably responsible person prior to the commencement of operations.

RESPONSE: COMPLIANT

11.8.1 Location

No on site laboratory is present.

11.8.1.1 On site laboratories conducting chemical and microbiological analysis that may pose a risk to product safety, shall be located separate from any food processing or handling activity and designed to limit access only to authorized personnel.

RESPONSE: NOT APPLICABLE

EVIDENCE: No on site laboratory is present.

11.8.1.2 Provisions shall be made to isolate and contain all laboratory waste held on the premises and manage it separately from food waste. Laboratory wastewater outlet shall as a minimum be down stream of drains that service food processing and handling areas.

RESPONSE: NOT APPLICABLE

EVIDENCE: No on site laboratory is present.

11.8.1.3 Signage shall be displayed identifying the laboratory area as a restricted area accessible only by authorized personnel.

RESPONSE: NOT APPLICABLE

EVIDENCE: No on site laboratory is present.

11.9.1 Dry and Liquid Waste Disposal

The dumpsters exterior were kept closed and areas was clean. Interior waste handling was managed through verification of removal of trash and waste and verified on the pre-op inspection. Trash on the interior was not allowed to accumulate. There was removal to the exterior waste containers as needed. The waste containment on the exterior was separated into waste foods for transport to farming (covered dumpsters), trash (compactor) and recycling (compactor).

11.9.1.1 The responsibility and methods used to collect and handle dry, wet and liquid waste and store prior to removal from the premises shall be documented and implemented.

RESPONSE: COMPLIANT

11.9.1.2 Waste shall be removed on a regular basis and not build up in food handling or processing areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until external waste collection is undertaken.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.9.1.4 Adequate provision shall be made for the disposal of all solid processing waste including trimmings, inedible material and used packaging.

RESPONSE: COMPLIANT

11.9.1.5 Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

RESPONSE: COMPLIANT

11.9.1.6 Inedible waste designated for animal feed shall be stored and handled so as to not cause a risk to the animal or to further processing.

RESPONSE: COMPLIANT

11.9.1.7 Waste held on site prior to disposal shall be stored in a separate storage facility and suitably insect proofed and contained so as not to present a hazard.

RESPONSE: COMPLIANT

11.9.1.8 Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall be either removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal so as not to present a hazard.

RESPONSE: COMPLIANT

11.9.1.9 Reviews of the effectiveness of waste management will form part of daily hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports.

RESPONSE: COMPLIANT

11.10.1 Grounds and Roadways

The exterior of the warehouse was maintained in an excellent condition. The west side of the warehouse was all grass area. The grass was maintained cut low with a zone of no growth at the base of the wall. The north side of the building was maintained with landscaped beds and employee/visitor parking (this was the side of the building with the main entrance). The east and south sides of the building were controlled by a security fence that encompassed the truck dock, waste storage and truck parking areas. All areas were maintained very clean. The waste containment was separated into waste foods for transport to farming (covered dumpsters), trash (compactor) and recycling (compactor). All waste was contained to prevent pest attraction and area around containers were clean. There were no areas of standing water on the exterior of the facility. All exterior equipment was stored properly.

11.10.1.1 Measures shall be established to maintain a suitable external environment, and the effectiveness of the established measures shall be monitored and periodically reviewed.

RESPONSE: COMPLIANT

11.10.1.2 The grounds and area surrounding the premises shall be maintained to minimize dust and kept free of waste, accumulated debris or standing water so as not to attract pests and vermin.

RESPONSE: COMPLIANT

11.10.1.3 Paths, roadways and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operation of the premises.

RESPONSE: COMPLIANT

11.10.1.4 Paths, roadways, loading and unloading areas shall be adequately drained to prevent ponding of water. Drains shall be separate from the site drainage system and regularly cleared of debris.

RESPONSE: COMPLIANT

11.10.1.5 Surroundings shall be kept neat and tidy and not present a hazard to the hygienic and sanitary operation of the premises.

RESPONSE: COMPLIANT

11.10.1.6 Paths from amenities leading to site entrances are required to be effectively sealed.

RESPONSE: COMPLIANT

12.1.1 Premises Location and Approval

See comments for section 11.1.1.

12.1.1.1 The location of the premises shall be such that adjacent and adjoining buildings, operations and land use do not interfere with safe and hygienic operations.

RESPONSE: COMPLIANT

12.1.1.2 The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

RESPONSE: COMPLIANT

12.2.1 Materials and Surfaces

Refer to comments under 11.2.1.

12.2.1.1 In warehouses where food products are recouped or exposed, product contact surfaces shall be constructed of materials that will not contribute a food safety risk.

RESPONSE: COMPLIANT

12.2.2 Floors, Drains and Waste Traps

Refer to comments under 11.2.2.

12.2.2.1 Floors shall be constructed of smooth, dense impact resistant material that can be effectively graded, drained, impervious to liquid and easily cleaned.

RESPONSE: COMPLIANT

12.2.2.2 Drains shall be constructed and located so they can be easily cleaned and not present a hazard. Drains if located in storage and handling areas, shall be maintained in a clean manner.

RESPONSE: COMPLIANT

12.2.2.3 Waste trap system shall be located away from any food handling or storage area or entrance to the premises.

RESPONSE: COMPLIANT

12.2.3 Walls, Partitions, Doors and Ceilings

Refer to comments under 11.2.3.

12.2.3.1 Walls, partitions, ceilings and doors shall be of durable construction. Internal surfaces shall be smooth and impervious, and shall be kept clean (refer to 12.2.11.1).

RESPONSE: COMPLIANT

12.2.3.2 Wall to wall and wall to floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

RESPONSE: COMPLIANT

12.2.3.3 Doors shall be of solid construction; and windows shall be made of shatterproof glass or similar material.

RESPONSE: COMPLIANT

12.2.3.4 Drop ceilings shall be additionally constructed to enable monitoring for pest activity, facilitate cleaning and provide access to utilities.

RESPONSE: COMPLIANT

12.2.4 Lighting and Light Fittings

Refer to comments under 11.2.5

12.2.4.1 Lighting in warehouses where food product is recouped or exposed shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.

RESPONSE: COMPLIANT

12.2.4.2 Light fittings in areas where food product is recouped or exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers and recessed into or fitted flush with the ceiling.

RESPONSE: COMPLIANT

12.2.4.3 Light fittings in other areas where product is protected shall be designed such as to prevent breakage and product contamination.

RESPONSE: COMPLIANT

12.2.5 Dust, Insect and Pest Proofing

Refer to comments under 11.2.7.

12.2.5.1 All external windows, ventilation openings, doors and other openings shall be effectively sealed when closed and proofed against dust, vermin and other pests.

RESPONSE: COMPLIANT

12.2.5.2 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 entry of dust, vermin and other pests.

RESPONSE: COMPLIANT

12.2.5.3 Inspections for pest activity shall be undertaken on a regular basis by trained personnel and the appropriate action taken if pests are present.

RESPONSE: COMPLIANT

12.2.5.4 Electric insect control devices, pheromone or other traps and baits shall be located so as not to present a contamination risk to product, packaging, containers or equipment. Poison rodenticide bait shall not be used inside food storage areas.

RESPONSE: COMPLIANT

12.2.6 Ventilation

Repack area was in a cooler space. No ventilation was needed. Refer to comments under 11.2.10

12.2.6.1 Adequate ventilation shall be provided in enclosed storage and food handling areas.

RESPONSE: NOT APPLICABLE

EVIDENCE: Repack area was in a cooler space. No ventilation was needed. Refer to comments under 11.2.8

12.2.6.2 All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 12.2.11.

RESPONSE: NOT APPLICABLE

EVIDENCE: Repack area was in a cooler space. No ventilation was needed. Refer to comments under 11.2.9

12.2.7 Equipment, Utensils and Protective Clothing

Refer to comments under 11.2.9

12.2.7.1 Equipment and utensils shall be designed, constructed, installed, operated and maintained so as not to pose a contamination threat to products.

RESPONSE: COMPLIANT

12.2.7.2 Protective clothing in areas where food product is recouped or exposed shall be manufactured from material that is not liable to contaminate food and easily cleaned.

RESPONSE: COMPLIANT

12.2.7.3 In areas where food product is recouped or exposed, racks shall be provided for the temporary storage of protective clothing when staff leaves the processing area and shall be provided in close proximity or adjacent to the personnel access doorways and hand washing facilities.

RESPONSE: COMPLIANT

12.2.8 Premises and Equipment Maintenance

Refer to comments under 11.2.10.

12.2.8.1 The methods and responsibility for the maintenance and repair of plant, equipment and buildings shall be documented, planned and implemented in a manner that minimizes the risk of product, packaging or equipment contamination.

RESPONSE: COMPLIANT

12.2.8.2 Routine maintenance of site and equipment in any food storage area shall be performed according to a maintenance-control schedule and recorded. The maintenance schedule shall be prepared to cover building, equipment and other areas of the premises critical to the maintenance of product safety.

RESPONSE: COMPLIANT

12.2.8.3 Failures of site and equipment in any storage area shall be documented, reviewed and their repair incorporated into the maintenance control schedule.

RESPONSE: COMPLIANT

12.2.8.4 Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 12.3.1, 12.3.2, 12.3.3, 12.3.4).

RESPONSE: COMPLIANT

12.2.8.5	All maintenance and other engineering contractors required to work on site shall be trained in the site's food safety and hygiene procedures and shall be assessed in their understanding before entering into any food storage areas. **RESPONSE:** COMPLIANT
12.2.8.6	Facility supervisors shall be notified when maintenance or repairs are to be undertaken in any food processing, handling or storage area. **RESPONSE:** COMPLIANT
12.2.8.7	The maintenance supervisor and the facility supervisor shall be informed if any repairs or maintenance pose a potential threat to product safety (i.e. pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times. **RESPONSE:** COMPLIANT
12.2.8.8	Temporary repairs, where required shall not pose a food safety risk. They shall exclude the use of fasteners such are wire or tape, are clearly identified and dated and included on cleaning programs. There shall be a plan in place to address final completion of temporary repairs in order to ensure temporary repairs do not become permanent solutions. **RESPONSE:** COMPLIANT
12.2.8.9	Maintenance staff 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 completed prior to the commencement of site operations. **RESPONSE:** COMPLIANT
12.2.8.10	Paint used in a food handling or contact zone shall be suitable for use and in good condition and shall not be used on any product contact surface **RESPONSE:** COMPLIANT
12.2.9	**Calibration** Refer to comments under 11.2.11.
12.2.9.1	The methods and responsibility for the calibration and re-calibration of measuring, test and inspection equipment used for monitoring activities outlined in pre-requisite program, food safety plans and other process controls, or to demonstrate compliance with customer specifications shall be documented and implemented. Software used for such activities shall be validated as appropriate. **RESPONSE:** COMPLIANT
12.2.9.2	Procedures shall be documented and implemented to address the disposition of potentially affected products should measuring, test and inspection equipment be found to be out of calibration state. **RESPONSE:** COMPLIANT
12.2.9.3	Calibrated measuring, test and inspected equipment shall be protected from damage and unauthorized adjustment. **RESPONSE:** COMPLIANT
12.2.9.4	Equipment shall be calibrated against national or international reference standards and methods or to accuracy appropriate to its use. In cases where standards are not available, the supplier shall provide evidence to support the calibration reference method applied. **RESPONSE:** COMPLIANT
12.2.9.5	Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers recommended schedule. **RESPONSE:** COMPLIANT
12.2.9.6	Calibration records shall be maintained. **RESPONSE:** COMPLIANT
12.2.10	**Pest Prevention** Refer to comments under 11.2.12

12.2.10.1	The methods and responsibility for pest prevention shall be documented and effectively implemented. The premises, its surrounding areas, storage facilities, machinery and equipment shall be kept free of waste or accumulated debris so as not to attract pests and vermin. **RESPONSE:** COMPLIANT
12.2.10.2	Any identified pest activity shall not present a risk of contamination to food products or packaging. **RESPONSE:** COMPLIANT
12.2.10.3	Food products or packaging that is found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation investigated and resolved. **RESPONSE:** COMPLIANT
12.2.10.4	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 to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods; v. Outline the frequency with which pest status is to be checked; vi. Include on a site map the identification, location, number and type of bait stations set; 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 staff 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 staff 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. **RESPONSE:** COMPLIANT
12.2.10.5	Inspections for pest activity shall be undertaken on a regular basis by trained personnel and the appropriate action taken if pests are present. **RESPONSE:** COMPLIANT
12.2.10.6	Records of all pest control applications shall be maintained. **RESPONSE:** COMPLIANT
12.2.10.7	Pesticides and other toxic chemicals shall be clearly labeled and stored as described in element 12.6.5 and handled and applied by properly trained personnel. They 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
12.2.10.8	Pest control contractors shall be: i. 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. Provide a pest control management plan (refer to 2.3.3) which will include and maintain a site map indicating the location of bait stations and traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; and vi. Provide a written report of their findings and the inspections and treatments applied. **RESPONSE:** COMPLIANT
12.2.10.9	The site shall dispose of unused pest control 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 waiting authorized disposal by an approved vendor. **RESPONSE:** COMPLIANT
12.2.11	**Cleaning and Sanitation** Refer to comments under 11.2.13.
12.2.11.1	The methods and responsibility for the cleaning of the food handling and storage areas, staff amenities and toilet facilities shall be documented and implemented. Consideration shall be given to: i. What is to be cleaned; ii. How it is to be cleaned; iii. When it is to be cleaned; iv. Who is responsible for the cleaning; and v. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program. **RESPONSE:** COMPLIANT

12.2.11.2 Provision shall be made for the effective cleaning of processing equipment, utensils and protective clothing.

RESPONSE: COMPLIANT

12.2.11.3 The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared.

RESPONSE: COMPLIANT

12.2.11.4 Detergents and sanitizers that are used to clean, sanitize and maintain the facility shall be purchased in accordance with applicable legislation. The organization shall ensure: i. The site maintains a list of chemicals approved for use within the site; ii. An inventory of all chemicals purchased and used for cleaning and sanitation purposes shall be maintained; iii. Detergents and chemicals are stored as outlined in 12.6.5; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; v. Only trained staff handles sanitizers and detergents;

RESPONSE: COMPLIANT

12.2.11.5 Detergents and sanitizers that have been mixed for use shall be correctly mixed according to manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.

RESPONSE: COMPLIANT

12.2.11.6 The site; shall dispose of unused detergents and sanitizers and empty containers in accordance with regulatory requirements and ensure that: i. Empty detergent and sanitizer containers are appropriately cleaned, treated and labeled before use; ii. Empty detergent and sanitizer containers are labeled, isolated and securely stored while awaiting collection; and iii. Unused and obsolete detergents and sanitizers are stored under secure conditions while waiting authorized disposal by an approved vendor.

RESPONSE: COMPLIANT

12.2.11.7 A record of hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

RESPONSE: COMPLIANT

12.3.1 Personnel

Refer to comments under 11.3.1.

12.3.1.1 Personnel suffering from infectious diseases or are carriers of, any infectious disease are not permitted to work in the distribution center or in the transportation of food, and shall not engage in food handling operations, or be permitted access to storage areas where the product is exposed.

RESPONSE: COMPLIANT

12.3.1.2 The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids from open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury which causes spillage of bodily fluid, properly trained employee shall ensure that all affected areas including handling and processing areas have been adequately cleaned and that all materials and products have been quarantined and disposed of.

RESPONSE: COMPLIANT

12.3.1.3 Personnel with exposed cuts, sores or lesions shall not be engaged in handling exposed product or food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with protective bandage, or an alternative suitable dressing.

RESPONSE: COMPLIANT

12.3.1.4 Smoking, chewing, eating, or spitting is not permitted in any food handling or storage areas where the product is exposed. Drinking is permissible under conditions that prevent contamination or other food safety risks from occurring.

RESPONSE: COMPLIANT

12.3.2 Hand Washing

Refer to comments under 11.3.2.

12.3.2.1 Hand wash basins shall be available and accessible as required.

RESPONSE: COMPLIANT

12.3.2.2 Hand wash basins shall be constructed of stainless steel or similar non-corrosive material and as a minimum supplied with a potable water supply at an appropriate temperature, supplied with liquid soap contained within a fixed dispenser, with paper towels with a means of containing used paper towels. An effective hand dryer may be used in instances where there is no direct hand contact of food or food contact surfaces.

RESPONSE: COMPLIANT

12.3.2.3 A sign instructing people to wash their hands, and in appropriate languages, shall be provided in a prominent position.

RESPONSE: COMPLIANT

12.3.2.4 When gloves are used, personnel shall maintain the hand washing practices outlined above.

RESPONSE: COMPLIANT

12.3.3 Clothing

Refer to comments under 11.3.3.

12.3.3.1 Clothing worn by staff shall be maintained, stored, laundered and worn so as not to present a contamination risk to product.

RESPONSE: COMPLIANT

12.3.3.2 Clothing worn by staff engaged in handling food shall be maintained, stored, laundered and worn so as not to present a contamination risk to products.

RESPONSE: COMPLIANT

12.3.4 Jewelry and Personal Effects

Refer to comments under 11.3.4.

12.3.4.1 Jewelry and other loose objects shall not be worn or taken into any area where exposed food is recouped. The wearing of wedding rings and medical alert bracelets (plain bands with no stones) that cannot be removed can be permitted, however the site will need to consider their customer requirements and the applicable food legislation.

RESPONSE: COMPLIANT

12.3.5 Visitors

Refer to comments under 11.3.5.

12.3.5.1 All visitors, including management and maintenance staff, shall wear suitable clothing and footwear when entering any food handling area.

RESPONSE: COMPLIANT

12.3.5.2 All visitors shall be required to follow the GDPs outlined by the site.

RESPONSE: COMPLIANT

12.3.5.3 Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled or exposed.

RESPONSE: COMPLIANT

12.3.5.4 Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all hand washing and personal practice requirements.

RESPONSE: COMPLIANT

12.3.5.5 Facility shall have a policy for how drivers are managed and designated driver areas are maintained to prevent contamination or other food safety risks.

RESPONSE: COMPLIANT

12.3.6 Staff Amenities

Refer to comments under 11.3.6.

12.3.6.1 Staff amenities supplied with appropriate lighting and ventilation shall be made available for the use of all persons engaged in the handling of product.

RESPONSE: COMPLIANT

12.3.7 Change Rooms

Refer to comments under 11.3.7.

12.3.7.1 Facilities shall be provided to enable staff and visitors to change into and out of protective clothing as required.

RESPONSE: COMPLIANT

12.3.7.2 Provisions shall be made for staff to store their personal items separate from food contact zones and food and packaging storage areas.

RESPONSE: COMPLIANT

12.3.8 Sanitary Facilities

Refer to comments under 11.3.9.

12.3.8.1 Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any food handling operations; ii. Accessed from the warehouse or product handling area via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; and v. Kept clean and tidy.

RESPONSE: COMPLIANT

12.3.8.2 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. Procedure shall be documented and implemented to properly manage sewage back-ups in order to minimize the potential for contamination.

RESPONSE: COMPLIANT

12.3.8.3 Hand wash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 12.3.2.2.

RESPONSE: COMPLIANT

12.3.9 Lunch Rooms

Refer to comments under 11.3.10.

12.3.9.1 Separate lunch room facilities shall be provided away from a food handling or storage areas. Lunch rooms shall be kept clean and tidy and free from waste materials and pests.

RESPONSE: COMPLIANT

12.3.9.2 Signage in appropriate languages advising people to wash their hands before entering the food storage areas shall be provided in a prominent position in lunch rooms and at lunch room exits.

RESPONSE: COMPLIANT

12.4.1 Staff Engaged in Food Handling and Repack/Recoup Operations

The personnel were observed to be wearing gloves and hairnets when handling produce directly. Also refer to comments under 11.4.1.

12.4.1.1 All personnel engaged in the direct handling of exposed food shall comply with the following practices: i. Personnel entry to food handling areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be left open for extended periods when access for waste removal or stock transfer; iii. The wearing of false fingernails or fingernail polish is not permitted when handling food; iv. Materials and products shall be kept in appropriate containers as required and off the floor; v. Waste shall be contained in the bins identified for this purpose and removed from the operational area on a regular basis and not left to accumulate; vi. Staff shall not eat or taste any product in the food storage or handling area.

RESPONSE: COMPLIANT

12.4.1.2 All personnel engaged in storage, transport and handling of packaged products and materials shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination.

RESPONSE: COMPLIANT

12.5.1 Water Supply

Refer to comments under 11.5.1.

12.5.1.1 Adequate supplies of water drawn from a known clean source shall be provided for use during holding or storage and for cleaning the premises and equipment.

RESPONSE: COMPLIANT

12.5.1.2 Supply of hot and cold water shall be provided as required to enable the effective cleaning of the premises and equipment.

RESPONSE: COMPLIANT

12.5.2 Water Quality

Refer to comments under 11.5.2.

12.5.2.1 Microbiological analysis of the water and ice supply that is in contact with food or food contact surfaces shall be conducted to verify the cleanliness of the supply, the monitoring activities and the effectiveness of the treatment measures implemented.

RESPONSE: COMPLIANT

12.5.2.2 Water and ice, that contacts food or food contact surfaces, shall be analyzed using reference standards and methods.

RESPONSE: COMPLIANT

12.5.3 Water Delivery

Refer to comments under 11.5.1. There were provisions such as backflow prevention in place to prevent contamination of water lines. There were no non-potable water lines or non-potable water usage.

12.5.3.1 The delivery of water within the premises shall ensure potable water is not contaminated.

RESPONSE: COMPLIANT

12.5.3.2 The use of non-potable water shall be controlled such that: i. There is no cross contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified.

RESPONSE: COMPLIANT

12.5.4 Ice Supply

Ice is not used for produce contact.

12.5.4.1 Ice rooms and receptacles shall be constructed of materials as outlined in elements 12.2.1, 12.2.2 and 12.2.3 and designed to minimize contamination of the ice during storage and distribution.

RESPONSE: NOT APPLICABLE

EVIDENCE: Ice is not used for produce contact.

12.5.5 Analysis

Water and ice do not come into contact with produce.

12.5.5.1 Microbiological analysis of the water and ice supply that is in contact with food or food contact surfaces shall be conducted to verify the cleanliness of the supply, the monitoring activities and the effectiveness of the treatment measures implemented.

RESPONSE: NOT APPLICABLE

EVIDENCE: Water and ice do not come into contact with produce.

12.5.5.2 Water and ice, that is contact with food or food contact surfaces, shall be analyzed using reference standards and methods.

RESPONSE: NOT APPLICABLE

EVIDENCE: Water and ice do not come into contact with produce.

12.5.6 The Quality of Air and Other Gases

Air and gases are not used in direct produce contact during repack/recoup.

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

RESPONSE: NOT APPLICABLE

EVIDENCE: Air and gases are not used in direct produce contact during repack/recoup.

12.5.6.2 Compressed air systems, and systems used to store or dispense other gasses used in the storage and distribution process shall be maintained and regularly monitored for quality and microbiological purity.

RESPONSE: NOT APPLICABLE

EVIDENCE: Air and gases are not used in direct produce contact during repack/recoup.

12.6.1 Storage and Handling of Goods

Refer to comments under 11.6.1.

12.6.1.1 The site shall implement an effective storage plan that allows for the safe, hygienic storage of ice, food products (frozen, chilled, and ambient), packaging materials, equipment, and chemicals.

RESPONSE: COMPLIANT

12.6.1.2 The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented.

RESPONSE: COMPLIANT

12.6.1.3 Procedures are in place to ensure that all food products, and recouped product, are utilized within their designated shelf-life.

RESPONSE: COMPLIANT

12.6.2 Cold Storage, Freezing and Chilling of Foods

Refer to comments under 11.6.2.

12.6.2.1 The site shall provide confirmation of the effective operational performance of freezing, chilling and cold storage facilities. Chillers, blast freezers and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient cold/frozen storage of food, easily accessible for inspection and cleaning.

RESPONSE: COMPLIANT

12.6.2.2 Sufficient refrigeration capacity shall be available to store chilled or frozen food at the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.

RESPONSE: COMPLIANT

12.6.2.3 Discharge from defrost and condensate lines shall be controlled and discharged to the drainage system.

RESPONSE: COMPLIANT

12.6.2.4 Cold and chilled storage rooms shall be fitted with temperature monitoring equipment and located so as to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible.

RESPONSE: COMPLIANT

12.6.2.5 Loading and unloading docks shall be designed to protect product during loading and unloading.

RESPONSE: COMPLIANT

12.6.3 Storage of Shelf Stable Packaged Goods

Refer to comments under 11.6.3. Fork lifts and jacks were in good condition.

12.6.3.1 Rooms used for the storage of dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration.

RESPONSE: COMPLIANT

12.6.3.2 Racks provided for the storage of food products shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room. Storage areas shall be constructed in a way to prevent food products from becoming a harborage for pests or vermin.

RESPONSE: COMPLIANT

12.6.3.3 Vehicles used in storage rooms shall be designed and operated so as not to present a food safety hazard.

RESPONSE: COMPLIANT

12.6.4 Storage of Equipment and Containers

The areas for storage of lifts, tools, cleaning equipment and packaging were kept in good condition and clean.

12.6.4.1 Storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers.

RESPONSE: COMPLIANT

12.6.5 Storage of Hazardous Chemicals and Toxic Substances

See comments under 11.6.4. All chemicals were kept stored in secured areas, properly labeled and away from stored foods.

12.6.5.1 Hazardous chemicals and toxic substances that are for use in the site with the potential for food contamination shall be stored separate from the distribution storage area so as not to present a hazard to staff, product, packaging, product handling equipment. Hazardous chemicals shall be stored in their original containers, or in clearly labeled secondary containers if allowed by applicable legislation.

RESPONSE: COMPLIANT

12.6.6 Alternative Storage and Handling of Goods

Alternative storage is not used.

12.6.6.1 Where goods described in 12.6.1 to 12.6.4 are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there is no risk to the integrity of those goods or contamination or adverse effect on food safety and quality.

RESPONSE: NOT APPLICABLE

EVIDENCE: Alternative storage is not used.

12.6.7 Loading, Transport and Receiving Practices

See comments in sections 11.6.5, 11.6.6. 11.6.7, and 11.6.8.

12.6.7.1 The practices applied during loading, transport and unloading of food shall be documented, implemented and designed to maintain appropriate storage conditions and product integrity.

RESPONSE: COMPLIANT

12.6.7.2 Trailers shall be washed in a segregated area away from the distribution site in a manner so as to not pose a risk to the products.

RESPONSE: COMPLIANT

12.6.7.3 Practices shall be in place for loading, transport and unloading receiving to protect against the contamination from biological, chemical and physical risks.

RESPONSE: COMPLIANT

12.6.7.4 Records of compliance activities shall be accessible.

RESPONSE: COMPLIANT

12.6.7.5 Sites shall have a procedure in place that is documented and implemented to ensure trailers are inspected prior to receiving shipments or loading to ensure that the trailer is in good repair, clean, secured and at required environmental conditions and temperatures.

RESPONSE: COMPLIANT

12.6.8 Staging and Loading

Refer to comments under 11.6.6.

12.6.8.1 Vehicles (e.g. trucks/vans/containers) used for transporting food shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose and free from odors or other conditions that may impact negatively on the product.

RESPONSE: COMPLIANT

12.6.8.2 Staging and loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product integrity.

RESPONSE: COMPLIANT

12.6.8.3 Food transport vehicle's refrigeration unit shall maintain the food at required temperatures and the unit's temperature settings shall be set, checked and recorded before loading and product temperatures monitored at regular intervals during loading as appropriate.

RESPONSE: COMPLIANT

12.6.9 Transport

Refer to comments under 11.6.7.

12.6.9.1 The refrigeration unit shall be operational at all times and checks completed of the unit's operation, the door seals and the storage temperature checked at regular intervals during transit.

RESPONSE: COMPLIANT

12.7.1 Process Flow

Refer to comments under 11.7.1.

12.7.1.1 The process flow shall be designed to prevent cross contamination and organized so there is a continuous flow of product through the process. The flow of personnel shall be managed such that the potential for contamination is minimized.

RESPONSE: COMPLIANT

12.7.2 Receiving

The receivers verify security and temperature prior to opening doors for receipt of goods. See comments under 11.6.5 and 11.6.8.

12.7.2.1 Prior to opening the doors the food transport vehicle's refrigeration unit storage temperature settings and operating temperature shall be checked and recorded. Receiving shall be completed efficiently and product temperatures shall be recorded at the commencement of unloading and at regular intervals during unloading.

RESPONSE: COMPLIANT

12.7.2.2 Receiving practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity.

RESPONSE: COMPLIANT

12.7.3 Control of Foreign Matter

Refer to comments under 11.7.5.

12.7.3.1 The responsibility and methods used to prevent foreign matter contamination of food product shall be documented, implemented and communicated to all staff.

RESPONSE: COMPLIANT

12.7.3.2 Inspections shall be performed to ensure plant and equipment remains in good condition and potential contaminants have not detached or become damaged or deteriorated.

RESPONSE: COMPLIANT

12.7.3.3 The following preventative measures shall be implemented where applicable to prevent glass contamination: i. All glass objects or similar material used by the site in storage and handling areas shall be listed in a glass register including details of their location. ii. Containers, equipment and other utensils made of glass, porcelain, ceramics, laboratory glassware or other like material (except where product is contained in packaging made from these materials, or measurement instruments with glass dial covers or MIG thermometers required under regulation) shall not be permitted in food processing/contact zones. iii. Product that is in glass or similar material that is for distribution purposes shall be stored in a manner that prevents contamination. iv. Conduct regular inspections of storage and handling areas to ensure they are free of glass or other like material and to establish no changes to the condition of the objects listed in the glass register. v. Glass instrument dial covers on equipment and MIG thermometers shall be inspected at regular intervals.

RESPONSE: COMPLIANT

12.7.3.4 Wooden pallets used in food storage shall be dedicated for that purpose, clean, maintained in good order and their condition subject to regular inspection.

RESPONSE: COMPLIANT

12.7.3.5 Loose metal objects on equipment, equipment covers and overhead structures shall be removed or tightly affixed so as not to present a hazard.

RESPONSE: COMPLIANT

12.7.4 Managing Foreign Matter Contamination Incidents

Refer to comments under 11.7.7.

12.7.4.1 In all cases of foreign matter contamination the affected food product shall be isolated, inspected, reworked or disposed of.

RESPONSE: COMPLIANT

12.7.4.2 In circumstances where glass or similar material breakage occurs, the affected area is to be isolated, cleaned and thoroughly inspected (including cleaning equipment and footwear) and cleared by a suitably responsible person.

RESPONSE: COMPLIANT

12.8.1 Dry and Liquid Waste Disposal

Refer to comments under 11.8.1.

12.8.1.1 The responsibility and methods used to collect and handle dry, wet and liquid waste and store prior to removal from the premises shall be documented and implemented.

RESPONSE: COMPLIANT

12.8.1.2 Waste shall be removed on a regular basis and not build up in food handling or storage areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until such time as external waste collection is undertaken.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

12.8.1.4 Reviews of the effectiveness of waste management will form part of regular hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports.

RESPONSE: COMPLIANT

12.8.1.5	Inedible waste designated for animal feed shall be stored and handled so as to not cause a risk to the animal or risk to other food designated for further processing for human consumption. **RESPONSE:** COMPLIANT
12.9.1	**Grounds and Roadways** Refer to comments under 11.9.1.
12.9.1.1	The grounds and area surrounding the premises shall be maintained to minimize dust and be kept free of waste or accumulated debris so as not to attract pests and vermin. **RESPONSE:** COMPLIANT
12.9.1.2	Paths, roadways and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operation of the premises. **RESPONSE:** COMPLIANT
12.9.1.3	Surroundings shall be kept neat and tidy and not present a hazard to the hygienic and sanitary operation of the premises, or harborage for pests. **RESPONSE:** COMPLIANT