SQF Quality Audit Edition 8.1
Capitol City Produce, LLC - Capitol City Produce, LLC

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
US015192 | 133579

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

2.7.1 Food Fraud Vulnerability Assessment

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 assessment included threats to quality. The results of the assessment indicated risk levels were high and adequacy of controls low. As noted as a minor under 2.7.1.2, there was no mitigation plan in place to confront this high risk rating.

2.7.1.2 A food fraud mitigation plan shall be developed and implemented which specifies the methods by which the identified food fraud vulnerabilities that could adversely impact food quality 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. Created a false outcome on the report that stated our facility was high risk.

CORRECTIVE ACTION: There were issues with the Food Fraud Assessment, it did not update outcomes according to our responses which led to a false outcome of our facility being high risk and a mitigation plan was needed.

2.7.1.2 Corrective Ac... Annual Audit 2021.pdf

VERIFICATION OF CLOSEOUT: The CAPA form and food fraud assessment (amended) were supplied by the site as corrective action response. These were reviewed and accepted. The non-conformance is closed. JM 4/30/21

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

Section Responses

2.1.1 Quality Policy

The policy was dated 1/15/2018. Signed by President and posted in employee and reception areas. The statement and mission for food safety and quality was supported by 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 The policy statement prepared and implemented by senior site management to communicate the commitment to food safety shall also include at a minimum: i. The site's commitment to establish quality objectives; ii. The site's commitment to comply with customers' quality requirements; iii. The methods used to measure the site's quality objectives, and iv. The site's commitment to continually improve its quality performance.

RESPONSE: COMPLIANT

2.1.1.2 The site's vision and mission statement shall also be displayed in a prominent position and communicated to all staff. The vision and mission statement may be included in, or separate from, the organization's food safety policy.

RESPONSE: COMPLIANT

2.1.2 Management Responsibility

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 the unannounced audit. The continuous improvement as well as 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. Job descriptions were reviewed. The descriptions on file that were reviewed 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 senior site management shall develop quality objectives and a process by which quality performance is measured.

RESPONSE: COMPLIANT

2.1.2.2 The reporting structure shall identify personnel performing key process steps and responsible for achieving quality objectives.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.1.2.4 Senior site management shall designate an SQF quality practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review and maintenance of the SQF Quality System including quality fundamentals outlined in 2.4.2, and the quality plan outlined in 2.4.3; ii. Take appropriate action to ensure the integrity of the SQF Quality System; iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF Quality System; and iv. Ensure that site personnel have the required competencies to carry out those functions affecting product quality.

RESPONSE: COMPLIANT

2.1.2.5 In addition to the SQF Food Safety Code requirements, the SQF quality practitioner shall: i. Be competent to implement and maintain HACCP-based food quality plans; ii. Understand the SQF Quality Code and the requirements to implement and maintain a quality management system; and iii. Be competent in process control and/or other quality tools (e.g. process control charts, histograms, process capability etc.) to reduce process variation and achieve customer requirements.

RESPONSE: COMPLIANT

2.1.2.6 Senior site management shall ensure site personnel responsible for performing key process steps and meeting customer requirements, and corporate quality requirements where applicable, have the required competencies to carry out those functions.

RESPONSE: COMPLIANT

2.1.2.7 Senior site management shall develop and implement a quality communication program to ensure that all staff are informed of their quality responsibilities, are aware of their role in meeting the requirements of the SQF Quality Code and are informed of the organization's performance against quality objectives. The program shall include: i. the defined vision and mission statement of the site; ii. the site's quality objectives and the process by which quality performance is measured, and iii. The methods by which customer quality requirements, and corporate quality requirements where applicable, are met.

RESPONSE: COMPLIANT

2.1.2.8 Job descriptions for personnel performing key process steps and responsible for achieving quality requirements shall be documented and include provision to cover for the absence of key personnel.

RESPONSE: COMPLIANT

2.1.2.9 Senior site management shall establish a process to trend progress in quality performance against agreed measures and objectives. The performance data including comparisons with external sources (e.g. industry, customers) shall be reviewed at least annually (see also 2.1.3.2) to demonstrate effectiveness of the quality management System and continuous improvement. Results shall be part of communication program to staff (see also 2.1.2.7). Senior site management shall establish a process to trend progress in quality performance against agreed measures. Benchmarking shall be part of this process and the performance data shall be reported at least annually to demonstrate effectiveness of the quality management system and communicated to all staff.

RESPONSE: COMPLIANT

2.1.2.10 Sites that are certified to the SQF Quality Code may use the SQF quality shield. Use of the SQF quality shield shall follow the requirements outlined in Appendix 5: SQF Quality Shield Rules of Use

RESPONSE: COMPLIANT

2.1.3 Management Review

The review of the food safety and quality system was documented 3/9/21 and included completion of the SQF code site self-audit to the quality code. The results were recorded and included quality related programs Complaints, GMPs, Training, Calibration, Supplier Approval, and Transport and Delivery (other food safety related program reviews were also covered but not listed in this quality audit sectional summary).

2.1.3.1 Senior site management shall be responsible for reviewing the SQF Quality System. Reviews shall include actions required to: i. Monitor compliance to specifications; ii. Measure and reduce process and product variation; iii. Meet customer requirements; iv. Take appropriate corrective action where applicable, and v. Ensure sufficient resources are allocated to maintain and improve the performance of the Quality System.

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 Quality System in its entirety shall be reviewed at least annually.

RESPONSE: COMPLIANT

2.1.3.3 The Quality System, including food quality plans, shall be reviewed when any changes are implemented that have an impact on the site's ability to meet customer requirements and corporate quality requirements where applicable.

RESPONSE: COMPLIANT

2.1.3.4 Senior site management shall ensure the integrity and continued operation of the Quality System in the event of organizational or personnel changes within the company or associated facilities.

RESPONSE: COMPLIANT

2.1.3.5 Senior site management shall document and implement a change management process that details how changes in specifications, materials, equipment or resources are evaluated for their impact on quality, communicated to customers and effectively implemented.

RESPONSE: COMPLIANT

2.1.3.6 Records of all Quality System reviews and reasons for amending documents, and changes to the SQF Quality System shall be maintained. Records shall include decisions for actions related to improvement of the Quality System and process effectiveness.

RESPONSE: COMPLIANT

2.1.4 Complaint Management

Complaints record was kept with investigation and root cause analysis. The log included complaints that were received and processed in 2020. There were no quality related complaints in 2021.

2.1.4.1 The complaint management process shall include a requirement to identify and resolve the cause of all quality complaints resulting from activities at the site.

RESPONSE: COMPLIANT

2.1.4.2 Trends in quality complaints shall be included in the performance measures established for the Quality System.

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 quality complaints, their investigation and resolution (if applicable) 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. The plan included assessment and confirmation of quality in the potentially affected product

2.1.5.1 The crisis management plan prepared by senior site management shall include the methods by which the site shall, in the event of a crisis, maintain continuity of supply that meets the customers' product and service quality requirements.

RESPONSE: COMPLIANT

2.1.5.2 The site shall contact their customers in the event of a crisis that impacts their ability to supply quality product.

RESPONSE: COMPLIANT

2.2.1 Quality Management System

The quality assurance plan was dated 10/12/2020. The product quality plan is manageed electronically and printed in hard copy for staff and auditor reference. The goal, policy and responsibility were defined. The fundamentals were outlined in the plan along with special circumstances, inspection requirements and special product requirements. Section I of the plan details inbound quality elements. Section II of the plan concentrates on product storage aspects of quality. Section III confronts shipment. Section IV is return quality. Section V is repack quality

2.2.1.1 A quality manual shall be documented and maintained in either electronic and/or hard copy form. It shall outline the methods the site uses to meet the requirements of the SQF Quality Code, be made available to staff, and include: i. A summary of the organization's quality policies and the methods it will apply to meet the requirements of the ii. SQF Quality Code; iii. The policy statement and site organization chart; iv. A list of the products covered under the scope of certification; v. Finished product specifications agreed with customers' or corporate quality requirements where applicable; and vi. A description of the applications of process control methods and other quality tools that are used to control and reduce process variation and meet customer specifications The quality system manual may be incorporated into, or independent from the SQF food safety system manual.

RESPONSE: COMPLIANT

2.2.2 Document Control

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 maintenance, storage, and distribution of quality documents shall be the same as those required for SQF Food Safety System documentation.

RESPONSE: COMPLIANT

2.2.3 Records

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 quality documents.

2.2.3.1 The methods and responsibility for authorization, accessibility, retention and storage of quality records shall be the same as those required for SQF Food Safety System records.

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. The site does not manufacture, create nor develop products. Quallity of products are aligned with the USDA standards per product. Storage requirements are defined per storage zone.

2.3.1.1 The methods for designing, developing and converting product concepts to commercial realization shall include a comparison of process controls with specification limits (process capability analysis) to ensure that processes are able to consistently supply products that meet customer specifications

RESPONSE: COMPLIANT

2.3.1.2 Product formulation, manufacturing processes and the fulfillment of product quality requirements shall be validated by facility trials and product testing.

RESPONSE: COMPLIANT

2.3.1.3 Shelf life trials shall be conducted to establish and validate a product's packaging, handling, storage and customer use requirements through to the end of its commercial life and consumer use.

RESPONSE: NOT APPLICABLE

EVIDENCE: Shelf-life studies are not conducted as products are not developed

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

RESPONSE: COMPLIANT

2.3.1.5 Records of all quality tests, product design, process development, and shelf life trials associated with product changes or new product development shall be maintained.

RESPONSE: COMPLIANT

2.3.2 Raw and Packaging Materials

The components that impact quality are included in the raw material and packaging register. The register contains dates of review and risk level for each product for repack. The register was documented and dated as Document 2.3.2 Raw and Packaging Materials (V2, 3/29/2016). The bag used for product contact was vetted to quality and safety standards. This was documented by certificate of conformance, 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, agricultural inputs (where applicable), hazardous chemicals and processing aids that impact on finished product quality shall be documented and kept current.

RESPONSE: COMPLIANT

2.3.2.2 Raw and packaging materials quality parameters shall be verified upon receipt to ensure they meet specifications (see also 2.5.2 and/or 2.5.4).

RESPONSE: COMPLIANT

2.3.2.3 Product labels that are designed or specified by customers shall be approved by those customers. Records shall be maintained of customer approvals.

RESPONSE: COMPLIANT

2.3.2.4 The register of current raw and packaging material specifications shall include those raw and packaging materials impacting product quality and customer labels.

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 firms that affected quality and food safety. The description of service and requirement for training were specified for each of the firms listed.

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

RESPONSE: COMPLIANT

2.3.3.2 The register of contract service specifications shall include those services impacting product quality.

RESPONSE: COMPLIANT

2.3.4 Contract Manufacturers

Contract manufacturers or storage warehouses are not used.

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

RESPONSE: NOT APPLICABLE

EVIDENCE: Contract manufacturers or storage warehouses are not used.

2.3.4.2 The site shall: i. Ensure that the processes in place at the contract manufacturer are capable of consistently meeting customer requirements, or corporate quality requirements where applicable; ii. iii. Verify compliance with the SQF Quality Code and that all customer requirements are being met at all times; iv. Audit the contract manufacturer annually at a minimum to confirm compliance to the SQF Quality Code and agreed arrangements, or accept the manufacturer's certification to the SQF Quality Code or equivalent; and v. Ensure changes to contractual agreements are approved by both parties, agreed with customers where necessary, and communicated to relevant personnel.

RESPONSE: NOT APPLICABLE

EVIDENCE: Contract manufacturers or storage warehouses are not used.

2.3.4.3 Records of all contract reviews and changes to contractual agreements and their approvals extend to quality records.

RESPONSE: NOT APPLICABLE

EVIDENCE: Contract manufacturers or storage warehouses are not used.

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.

2.3.5.1 Finished product specifications shall be documented, current, approved by the site and their customer, accessible to relevant staff and shall include product quality attributes, service delivery requirements, and labelling and packaging requirements.

RESPONSE: COMPLIANT

2.3.5.2 Customer product specifications and delivery requirements shall be communicated to appropriate departments and staff within the site.

RESPONSE: COMPLIANT

2.4.1 Customer Requirements

Customer requirements are managed by entering into the ERP system that is used for all orders. Specific customer requirements were found to generally deal with quality aspects (e.g. color of products such as bananas). Perfect Order Verification (POV) checks are conducted to verify accuracy to customer special requirements.

2.4.1.1 The requirements and expectations of customers and final consumers shall be continually reviewed to ensure the accuracy of specifications and the ability to supply to customer needs. A full review of customer/consumer expectations for product and delivery shall occur at least annually and shall illustrate how the site is conforming to those expectations and/or requirements that are part of legal contracts or corporate policy. The site shall have a procedure in place to notify essential customers where their ability to supply product that meets customer specifications is temporarily suspended or halted.

RESPONSE: COMPLIANT

2.4.1.2 Where customer products, materials or equipment are used within the facility, the site shall have measures in place to safeguard customer property and ensure its correct and proper use.

RESPONSE: COMPLIANT

2.4.2 Quality Fundamentals

The methods for control of quality at all stages of the warehousing process are defined in the food safety manual. This encompasses all operational standards for quality aspects of receiving, storage, repack and shipments of goods. The building, storage areas and repack areas were constructed and established to support quality. The establishment of specifications and customer requirements are documented and managed through the electronic management program (ERP). Other programs that support the quality system are established (calibration, incoming goods inspection, storage and outgoing programs).

2.4.2.1 The buildings and equipment shall be constructed, designed and maintained to facilitate the manufacture, handling, storage and/or delivery of food that meets customer specifications or corporate quality requirements.

RESPONSE: COMPLIANT

2.4.2.2 The methods and responsibility for the calibration of measuring, test and inspection equipment used for quality testing of raw materials, work-in-progress, and finished product, food quality 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

2.4.2.3 Storage and transport of raw materials, work-in progress, and finished product shall be suitable to maintain the integrity of the product without loss, waste or damage.

RESPONSE: COMPLIANT

2.4.3 Food Quality Plan

Quality Assurance plan outlines all fundamentals and checks to support the Quality plan. The plan outlines the quality risks, the analysis of the steps in the warehousing process based on the risk. The QPs and prerequisite programs were identified as controls. There were no critical quality points identified. Non-ciritical quality checks were temperature and quality checks in the process and special customer requirement inspections. These were not critical as the quality checks were covered in the prerequisite programs, culling inspections of stored produce or POV checks on outgoing orders. Measurement of the quality program success was measure is order accuracy measurements and feedback from customers (complaints).

2.4.3.1 A food quality plan shall be developed, effectively implemented, and maintained in accordance with the Codex Alimentarius Commission HACCP method. The food quality plan may be combined with, or independent from, the food safety plan, but must separately identify quality threats and their controls, and critical quality points.

RESPONSE: COMPLIANT

2.4.3.2 The food quality plan shall outline the means by which the site controls and assures the quality attributes of the products or product groups and their associated processes.

RESPONSE: COMPLIANT

2.4.3.3 The food quality plan shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and marketing 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 quality team. The composition of the food quality team may be different from the food safety team.

RESPONSE: COMPLIANT

2.4.3.4 The scope of the food quality plan shall be developed and documented including the start and endpoint of the process 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 quality plan. This shall include information in the finished product specifications (refer to 2.3.5.1) plus any additional quality or service attributes established by agreement with the customers.

RESPONSE: COMPLIANT

2.4.3.6 The intended use of each product shall be determined and documented by the food quality team. This shall include as appropriate target consumer groups, ease of use by consumers, consumer instructions, tamper evidence, and other applicable information affecting product quality.

RESPONSE: COMPLIANT

2.4.3.7 The food quality team shall review the flow diagram developed and confirmed as part of the food safety plan, and ensure process steps, process delays, and inputs that impact product quality are included.

RESPONSE: COMPLIANT

2.4.3.8 The food quality team shall identify and document all quality threats 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 quality team shall conduct a quality threat analysis for every identified quality threat, to identify which threats are significant, i.e. their elimination or reduction to an acceptable level is necessary to ensure or maintain product quality. The methodology for determining threat significance shall be documented and used consistently to assess all potential quality threats.

RESPONSE: COMPLIANT

2.4.3.10 The food quality team shall determine and document the control measures that must be applied to all significant quality threats. More than one control measure may be required to control an identified threat, and more than one significant threat may be controlled by a specific control measure.

RESPONSE: COMPLIANT

2.4.3.11 Based on the results of the threat analysis (refer to 2.4.3.9), the food quality team shall identify the steps in the process where control must be applied to eliminate a significant threat or reduce it to an acceptable level. These steps shall be identified as Critical Quality Points or CQPs.

RESPONSE: COMPLIANT

2.4.3.12 For each identified CQP, the food quality team shall identify and document the quality limits that separate acceptable from unacceptable product. The food quality team shall validate the critical quality limits to ensure the designated level of control of the identified quality threat (s); and that all critical quality limits and control measures individually or in combination effectively provide the level of control required.

RESPONSE: COMPLIANT

2.4.3.13 The food quality team shall develop and document procedures to monitor CQPs 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 quality team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CQP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the quality failure.

RESPONSE: COMPLIANT

2.4.3.15 The documented and approved food quality plan shall be fully implemented. The effective implementation shall be monitored by the food quality team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, specifications or inputs occur which may affect product quality.

RESPONSE: COMPLIANT

2.4.3.16 Implemented food quality plans shall be verified as part of SQF Quality System verification (refer to 2.5).

RESPONSE: COMPLIANT

2.4.4 Approved Supplier Program

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. In compliance with 2.4.4.4 the procedure and agreements with supplierss for return, refusal and/or disposal of products that are out of specification.

2.4.4.1 Raw materials, ingredients, packaging materials, and services that impact on finished product quality shall be supplied by an approved supplier.

RESPONSE: COMPLIANT

2.4.4.2 Material suppliers shall be selected and approved based on their ability to supply materials that meet quality specifications. The evaluation program shall require suppliers to: i. Maintain controlled and current copies of specifications; ii. Have processes that are capable of consistently supplying materials that meet specification and other defined quality metrics (e.g. delivery. service, adherence to specifications, etc.); iii. Provide evidence that supplied product meets agreed specifications; and iv. Have a complaints and corrective action process in place.

RESPONSE: COMPLIANT

2.4.4.3 Material suppliers shall only be accepted into the facility based on either certificates of analysis for every lot received, or inspection at receipt to ensure materials comply with specification.

RESPONSE: COMPLIANT

2.4.4.4 The approved supplier program shall include an agreement with suppliers for the return or disposal of materials that fail to meet specifications or are damaged or contaminated.

RESPONSE: COMPLIANT

2.4.5 Non-conforming Product or Equipment

SOP 2.4.5 V2 (1/15/2018) for handling of non-conforming product, and returns is documented. Products are tagged and also put on hold in the management system in response to quality issues. 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 Non-conforming product shall include products that fail to meet in-process or product requirements for quality.

RESPONSE: COMPLIANT

2.4.5.2 Non-conforming equipment shall include equipment that is not suitable for use and is not capable of producing products that meet in-process or product requirements for quality.

RESPONSE: COMPLIANT

2.4.5.3 The site shall document and implement a procedure to accept returned product that does not meet finished product specifications. The procedure shall include handling of returned goods to prevent redistribution or contamination of other products.

RESPONSE: COMPLIANT

2.4.6 Product Rework

Product is not reworked in the way that multiple lot numbers are combined. Rework is the inspection of product to remove quality issues. This is an inspection used to cull bad product. Rework / Recoup SOP V2 (1/15/2018) is documented. Scope of procedure covers quality 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 Procedures shall be documented and implemented to ensure product quality or formulation is not compromised by the rework process.

RESPONSE: COMPLIANT

2.4.7 Product Release

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. Hold and release/disposition forms and past records were reviewed.

2.4.7.1 The site shall document and implement a positive product release procedure to ensure that, at the time of delivery to its customer, the food supplied complies with all agreed customer requirements including, but not limited to, product specifications, sensory, packaging and package integrity, labelling, delivery and service requirements.

RESPONSE: COMPLIANT

2.4.7.2 Records of all product release shall be maintained.

RESPONSE: COMPLIANT

2.5.1 Validation and Effectiveness

The Quality Plan assessment was performed 3/9/21 and recorded. Signed by practitioner, Director of Procurement, QA Tech, Dir. of Ops, warehouse supervisor and SQF Consultant. The assessment of the plan included review of KPIs such as performance vs. target, complaints relative to quality, QA testing of product results and orders provided vs. customer requirements.

2.5.1.1 Validation activities shall include those necessary to authenticate critical quality limits, process controls, and other quality tests established to meet customer requirements.

RESPONSE: COMPLIANT

2.5.1.2 Records of validation of quality criteria shall be maintained.

RESPONSE: COMPLIANT

2.5.2 Verification Activities

POV (Perfect Order Verification) checks are conducted to assess overall compliance to customer "specific" requirements. This is a verification safeguard to insure special customer requirements are met and an important part of the quality program. Other verifications are defined in the verification schedule. 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 quality inspections, calibrations, and other food safety/quality programs.

2.5.2.1 The verification schedule shall include activities designed to ensure the effectiveness of process controls and quality tests.

RESPONSE: COMPLIANT

2.5.2.2 The methods, responsibility and criteria for verifying the effectiveness of monitoring critical quality points and other process and quality controls shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each record.

RESPONSE: COMPLIANT

2.5.2.3 Verification activities shall include a comparison of process control limit with specification limits to ensure alignment and appropriate process control corrections.

RESPONSE: COMPLIANT

2.5.2.4 Records of the verification of quality activities shall be maintained.

RESPONSE: COMPLIANT

2.5.3 Corrective and Preventative Action

The form 2.5.5 Corrective Action form was completed and kept on file for all issues that were generated out of internal audit, external audit and other assessments. These were completed to root cause.

2.5.3.1 Corrective and preventative action methods shall include the identification of the root cause and resolution of non-compliance of critical quality limits and deviations from quality requirements.

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 Processing parameters or in-process measurements shall be established, validated, and verified at a determined frequency to meet all customer requirements.

RESPONSE: COMPLIANT

2.5.4.2 On-site laboratories and inspection stations shall be equipped and resourced to enable testing of in-process and finished products to meet customer expectations and meet quality objectives.

RESPONSE: COMPLIANT

2.5.4.3 Process control methods shall be used to effectively control and optimize production processes to improve process efficiency and product quality and reduce waste. Control charts and/or other quality tools shall be in use for control of key processes.

RESPONSE: COMPLIANT

2.5.4.4 A sensory evaluation program shall be in place to ensure alignment with agreed customer requirements. Sensory evaluation results shall be communicated with relevant staff and with customers where appropriate

RESPONSE: COMPLIANT

2.5.4.5 Records of all quality inspections and analyses, and statistical analyses, shall be maintained.

RESPONSE: COMPLIANT

2.5.5 Internal Audits

The audit to the quality code was conducted and recorded on 3/9/21. Staff conducting internal audits are trained internally through observation during inspection by trained personnel, accompanying the consultant through assessments and experience. The practitioner, director of projects and other quality personnel

2.5.5.1 Internal audit plans and methods shall include food quality plans, process controls, quality tests, and other activities implemented to meet finished product specifications and customer requirements.

RESPONSE: COMPLIANT

2.5.5.2 Staff conducting the quality internal audits shall be trained and assessed in internal audit procedures and have knowledge and experience in the quality process and process control methods as they relate to the scope of certification.

RESPONSE: COMPLIANT

2.6.1 Product Identification

Repack lot numbers transferred to subdivided product. This was also recorded on use documents in the repack area. Products were identified utilizing manufacturer/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 Finished product shall be labeled to the agreed customer, company or corporate requirements.

RESPONSE: COMPLIANT

2.6.1.2 Product changeover procedures shall include quality attributes required to meet finished product specifications and customer requirements.

RESPONSE: COMPLIANT

2.6.2 Product Trace

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 Finished product shall be traceable forward to the final customer, such as the retailer, distributor, or manufacturer.

RESPONSE: COMPLIANT

2.6.2.2 All raw materials, ingredients, and packaging materials used in manufacturing a finished product, and processing aids associated with the product, shall be identified with the finished product lot number and traceable back to the supplier (one back).

RESPONSE: COMPLIANT

2.6.3 Product Withdrawal and Recall

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 site's recall and withdrawal procedures shall apply to product recalled or withdrawn due to failure to meet customer specifications or corporate quality requirements.

RESPONSE: COMPLIANT

2.7.1 Food Fraud Vulnerability Assessment

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 assessment included threats to quality. The results of the assessment indicated risk levels were high and adequacy of controls low. As noted as a minor under 2.7.1.2, there was no mitigation plan in place to confront this high risk rating.

2.7.1.1 2.7.1.1 The food fraud vulnerability assessment shall include the site's susceptibility to ingredient or product substitution, mislabeling, dilution and counterfeiting that could adversely impact food quality.

RESPONSE: COMPLIANT

2.7.1.2 A food fraud mitigation plan shall be developed and implemented which specifies the methods by which the identified food fraud vulnerabilities that could adversely impact food quality 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. Created a false outcome on the report that stated our facility was high risk.

CORRECTIVE ACTION: There were issues with the Food Fraud Assessment, it did not update outcomes according to our responses which led to a false outcome of our facility being high risk and a mitigation plan was needed.

2.7.1.2 Corrective Ac... Annual Audit 2021.pdf

VERIFICATION OF CLOSEOUT: The CAPA form and food fraud assessment (amended) were supplied by the site as corrective action response. These were reviewed and accepted. The non-conformance is closed. JM 4/30/21

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

2.8.1 General Requirements for Identity Preserved Foods

There are no identity preserved foods distributed.

2.8.1.1 The methods and responsibility for the identification and processing of food and other products requiring the preservation of their identity preserved status (e.g. Kosher, HALAL, organic, GMO-free, regional provenance, free from, free trade etc.) shall be documented and implemented.

RESPONSE: NOT APPLICABLE

EVIDENCE: There are no identity preserved foods distributed.

2.8.1.2 Identification shall include a statement of the product's identity preserved status of all ingredients, including additives, preservatives, processing aids and flavorings.

RESPONSE: NOT APPLICABLE

EVIDENCE: There are no identity preserved foods distributed.

2.8.1.3 Raw material and ingredient specifications to identity preserved foods shall include requirements for their handling, transport, storage and delivery prior to use.

RESPONSE: NOT APPLICABLE

EVIDENCE: There are no identity preserved foods distributed.

2.8.1.4 Assurances concerning the raw material or ingredient's identity preserved status shall be by agreement with the supplier of the material.

RESPONSE: NOT APPLICABLE

EVIDENCE: There are no identity preserved foods distributed.

2.8.1.5 The process description shall allow for a product's identity preserved status to be maintained during manufacturing.

RESPONSE: NOT APPLICABLE

EVIDENCE: There are no identity preserved foods distributed.

2.8.1.6 The processing of identity preserved foods shall be conducted under controlled conditions such that: i. Ingredients are physically separated from ingredients identified as incompatible with the identity preserved food; ii. Processing is completed in separate rooms; or scheduled as the first production run; or carried out after the completion of a thorough sanitation of the area and equipment; and iii. Finished product is stored and transported in separate units or isolated by a physical barrier from non- specialty product.

RESPONSE: NOT APPLICABLE

EVIDENCE: There are no identity preserved foods distributed.

2.8.1.7 The identity preserved status shall be declared in accordance with regulatory requirements.

RESPONSE: NOT APPLICABLE

EVIDENCE: There are no identity preserved foods distributed.

2.8.1.8 Additional customer-specific requirements concerning identity preserved foods shall be included in the finished product specification described in 2.3.5, or label register, and implemented by the site.

RESPONSE: NOT APPLICABLE

EVIDENCE: There are no identity preserved foods distributed.

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 all elements of quality and food safety.

2.9.1.1 Appropriate training shall be provided for personnel carrying out the tasks critical to the effective implementation of the SQF Quality System and the maintenance and improvement of quality requirements.

RESPONSE: COMPLIANT

2.9.2 Training Program

For quality there was specialized training of employees with certain responsibilities such as calibration (refractometer, thermometer and scales), and USDA produce and fruit quality training. All training was documented and current.

2.9.2.1 The employee training program shall include the necessary competencies for specific duties and the training methods to be applied for those staff carrying out tasks associated with: i. Process control and monitoring of critical quality points (CQPs); ii. Steps identified as critical to effective implementation of the food quality plan and the maintenance of food quality, and iii. Product inspection and testing.

RESPONSE: COMPLIANT

2.9.2.2 The employee training program shall include applicable process control and quality tools training for line operators, quality inspectors and supervisory staff responsible for operating and inspecting key manufacturing processes.

RESPONSE: COMPLIANT

2.9.2.3 The training program shall include training, calibration and proficiency testing of internal laboratory personnel.

RESPONSE: COMPLIANT

2.9.3 Quality Instructions

There were direct observation training records for those employees doing activity critical to quality such as calibration and quality inspection.

2.9.3.1 Instructions shall be available explaining how all tasks critical to meeting customer specifications, and quality and process efficiency are to be performed.

RESPONSE: COMPLIANT

2.9.4 HACCP for Quality Training Requirements

HACCP and the qualiyt plan are included in the training protocol. The SQF practitioner has HACCP certification and is responsible for overseeing maintenance of the quality plan.

2.9.4.1 Training in the application of HACCP principles for the identification and control of quality threats shall be provided to staff involved in development and maintenance of the food quality plan.

RESPONSE: COMPLIANT

2.9.5 Language

The English language is used by all in the warehouse and all instructions / trainings were 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 site personnel.

RESPONSE: COMPLIANT

2.9.7 Training Skills Register

The training register was maintained and specified all elements required under clause 2.9.7.

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 the training was completed, and that the trainee is competent to complete the required tasks.

RESPONSE: COMPLIANT