# SQF Quality Audit Edition 9
## Capitol City Produce, LLC - Capitol City Produce, LLC

## Summary

**AUDIT DECISION**
**CERTIFIED**

**CERTIFICATION NUMBER**
**US015192 | 160191**

**DECISION DATE**
**05/27/2022**

**AUDIT TYPE**
**RECERTIFICATION**

**RECERTIFICATION DATE**
**04/21/2023**

**AUDIT DATES**
**04/26/2022 - 04/28/2022**

**EXPIRATION DATE**
**07/05/2023**

**ISSUE DATE**
**06/03/2022**

## 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. Storage and Distribution

**Products:**
Various fruits and vegetables

**Scope of Certification:**
Location: 16550 Commercial Avenue, Baton Rouge, LA 70816
Scope Statement: The operation includes whole case-in-case-out order fulfillment/distribution and a repackaging operation which takes bulk produce cases and repacks into smaller saleable units. Exemptions: There were no exemptions claimed or applied for by the site. The entire operation was subject to audit. All areas were included in the audit.

## Certification Body & Audit Team

**Bureau Veritas Certification NA**

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

**Web Site:** https://www.bvna.com/

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

**Lead Auditor:** McCommons, Joe (204768)
**Technical Reviewer:** Rice, Ariel

**Hours Spent on Site:** 23.5
**Hours of ICT Activities:** 0
**Hours Spent Writing Report:** 7

Non-Conforming

## 2.9.2 Training Program

All training was current (2021 and 2022). The training register was maintained. 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. The English language is used by all in the plant and all instructions / training was in English. In addition to the food safety training, the program covered specific programs that support quality such as procedures around using the refractometer, thermometer and scale. The English language is used by all in the plant and all instructions / training was in English. Yearly training provided for tenured employees. The record of training supports refresher training. A minor was given under 2.9.2.3 as training with regards to general quality program (requirements and checks) was not recorded.

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

**RESPONSE:** MINOR

**EVIDENCE:** Quality Training specific to the quality program and overall program requirements was not recorded although evident in the interviews and observations with employees.

**ROOT CAUSE:** Adequate training (recorded) had not been completed by the SQF Food Safety Team. Quality Training (Add'l) had not been updated or deemed a breakout training from original training plan.

**CORRECTIVE ACTION:** Quality Team needed additional training on the Quality Training Program and Requirements specific to SQF.

2.9.2.1 NC Quality Training 052522.pdf

**VERIFICATION OF CLOSEOUT:** The site's corrective action response CAPA and included training records were reviewed and approved. The NC is closed. JM 5/26/22

**COMPLETION DATE:** 05/17/2022 **CLOSEOUT DATE:** 05/26/2022

## Audit Statements

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| **SQF Practitioner Name** | Name the designated SQF Practitioner<br>**RESPONSE:** Bob Wells, SQF Practitioner |
| **SQF Practitioner Email** | Email of the designated SQF Practitioner<br>**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)<br>**RESPONSE:** Terreca Bates-Wells: Director of Special Projects, 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<br>**RESPONSE:** Capitol City Produce is a wholesale food distribution facility that is located in an I-12 corridor area in Baton Rouge, LA. The company has been in business for 1947 years and at the current location since 2010 being audited for SQF 9 years with food safety and 6 years for quality. The facility operates 7 days a week, 24 hours a day. There are 2 shifts at the facility that run from 7 am to 6 pm, 6 pm to 4 am. There are 220 total employees at the site with 180 employees on the main shift and 40 employees on the second shift. The operation includes whole case-in-case-out order fulfillment/distribution and a repackaging operation which takes bulk produce cases and repacks them into smaller saleable units. The warehouse handles produce and dairy products. There is no processing of foods at the facility. The warehouse is 90,000 square feet. The warehouse is divided into a freezer room (approximately 5000 sq. ft.), large cooler space, two produce aisles that are held at elevated cooler temperatures for specific produce types. The remainder is office and ancillary areas. Products handled at this facility are distributed in the central south region (such as customers in Louisiana, Mississippi, Alabama, port customers – ships and oil rigs). Location: 16550 Commercial Avenue, Baton Rouge, LA 70816 Scope Statement: The operation includes whole case-in-case-out order fulfillment/distribution and a repackaging operation which takes bulk produce cases and repacks into smaller saleable units. Exemptions: There were no exemptions claimed or applied for by the site. The entire operation was subject to audit. All areas were included in the audit. |
| **Closing Meeting** | People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)<br>**RESPONSE:** Terreca Bates-Wells: Director of Special Projects, Bob Wells: SQF Practitioner, Lloyd Antoine: Warehouse Manager, Joe McCommons: Auditor |
| **Auditor Recommendation** | Auditor Recommendation<br>**RESPONSE:** Certification with correction of non-conformances |

## Section Responses

### 2.1.1 Management Responsibility

The SOP 2.1 Commitment (V3, dated 1/24/2022) outlines the company's commitment to food safety and quality and the mechanisms by which this will be achieved. The culture is supported for food safety and quality in the Commitment procedure. The employees were empowered to voice food safety and quality concerns. The document also provides for the SQF Practitioner to have training and program resources to achieve the food safety and quality goals. The SQF practitioner and back up are defined. The SQF practitioner is the Bob Wells (receiving shift supervisor) and is HACCP certified (12/13/2007) and SQF trained in 3/18/2015). The back up Practitioner is the day receiving lead and is HACCP certified (4/23/2022). The SOP for commitment also outlines the food safety and quality responsibility of the CEO / executive teams, practitioner, which includes employee training, reassessment and review. The policy is in English. All persons understand English at the company. The statement and mission for food safety and quality was signed by the President and dated 1/15/2018. The policy is posted at the employee entrance. The organizational chart is documented with positions responsible for SQF oversite specified (practitioner and backup). Job descriptions are on file for key individuals and positions within the organization (CEO, Directory of Ops, Inventory Specialist/Food Safety Practitioner and QA associate were among the job descriptions that were defined. The back ups for key positions were defined in the SOP 2.1 document. The site properly uses the SQF shield on trucks, marketing documents and shipping documents.

**2.1.1.1** Senior site management shall prepare and implement a policy statement that outlines the site's commitment to quality and includes at a minimum: i. Establishment and maintenance of a quality management system; ii. Compliance with customer, regulatory, and company quality requirements; iii. Identification of quality objectives and the methods used to measure them; and iv. Continuous improvement of its quality performance.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

**2.1.1.3** Senior site management shall implement, maintain, and continuously improve the quality culture within the site that ensures at a minimum: i. Quality objectives and key performance indicators are communicated to all staff; ii. Provision of adequate resources to meet the objectives and key performance indicators; iii. Awareness by all staff of their quality responsibilities and their accountability in meeting the requirements of the SQF Quality Code; iv. Responsibility to notify management of actual or pending quality issues and empowerment to resolve quality issues within their scope of work; and v. Education of all staff to understand the importance of quality controls and deviation consequences.

**RESPONSE:** COMPLIANT

**2.1.1.4** Senior site management shall ensure the personnel performing key process steps and responsible for achieving quality objectives and meeting customer, regulatory, and company quality requirements are identified in the reporting structure and have the required competencies to carry out these functions.

**RESPONSE:** COMPLIANT

**2.1.1.5** Job descriptions for personnel performing key process steps and responsible for achieving quality requirements shall be documented and include provisions for coverage in the absence of key personnel.

**RESPONSE:** COMPLIANT

**2.1.1.6** 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 quality system; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the quality system.

**RESPONSE:** COMPLIANT

**2.1.1.7** The SQF quality practitioner shall: i. Be competent to implement and maintain food quality plans using a risk-based methodology such as HACCP; ii. Understand the Quality Code and the requirements to implement and maintain a quality management system; and iii. Be competent, through training or experience, in process control and/or other quality tools to reduce process variation impacting quality and achieve customer requirements.

**RESPONSE:** COMPLIANT

**2.1.1.8** Senior site management shall develop and implement a quality communication program to ensure all staff: i. Know the site's quality statement, quality objectives, and the process by which quality performance is measured; and ii. Understand the methods by which customer, regulatory, and company quality requirements, where applicable, are met.

**RESPONSE:** COMPLIANT

**2.1.1.9** 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, and communicated to all staff, to demonstrate effectiveness of the quality management system.

**RESPONSE:** COMPLIANT

**2.1.1.10** Sites that are certified to the SQF Quality Code may use the SQF Quality Shield. The use of the quality shield shall follow the requirements outlined in Appendix 4: SQF Quality Shield Rules of Use.

**RESPONSE:** COMPLIANT

## 2.1.2 Management Review

The measurement of adherence to quality goals are is tracked through the levels of customer credits (due to problems) 0.36% which is broken won into 0.21% being customer disapproves and 0.15% being product discarded dure to quality concern. The daily tracking is reported when targets are missed and communicated through the management team. An ongoing log is kept. The logs for 2021 and 2022 were reviewed in the audit. The quality is also communicated through weekly leadership meeting where KPIs and operations weekly meetings with warehouse managers and supervisors to disseminate information to employees. Senior level leadership is communicated on weekly scorecard. Quality included in performance versus target. Quality rates not meeting targets, the specific problems are broken down to employees for monitoring and communicated to suppliers.

**2.1.2.1** Senior site management shall be responsible for reviewing the performance of 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

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

**RESPONSE:** COMPLIANT

**2.1.2.3** 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/or corporate quality requirements where applicable.

**RESPONSE:** COMPLIANT

**2.1.2.4** 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

**2.1.2.5** 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

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

**RESPONSE:** COMPLIANT

## 2.1.3 Complaint Management

Upon an issue being reported by the customer, the issue is coded for tracking and put into the system. These codes are used to trend quality issues. The complaints were recorded, investigated to root cause and corrective action documented. The SOP for complaints is 2.1.3 Complaint Management (V3, 1/24/22). The practitioner has the responsibility for overseeing the complaint process. The SOP covers complaints of quality.

**2.1.3.1** The methods and responsibilities for the complaint management process shall be documented and implemented. They shall include: i. A mechanism to collect and record all quality complaints resulting from activities at the site; and ii. Communication processes for reporting and follow-up with senior management and customers.

**RESPONSE:** COMPLIANT

**2.1.3.2** Trends from quality complaints shall be included in the performance measures established for the quality system.

**RESPONSE:** COMPLIANT

**2.1.3.3** Corrective and preventative action shall be implemented based on the seriousness of the incident and identified trends and shall be completed as outlined in 2.5.3.

**RESPONSE:** COMPLIANT

**2.1.3.4** Records of quality complaints, their investigation and resolution, if applicable, shall be maintained.

**RESPONSE:** COMPLIANT

## 2.2.1 Quality Management System

The SOPs, policies and organizational chart are documented and maintained. The scope of certification is defined in the procedure and included quality in addition to the food safety standards outlined in FSC 25 and 26. Changes are documented and verified with training to applicable staff.

**2.2.1.1** Electronic and/or hard copy documentation that outlines the methods and procedures the site shall use to meet the requirements of the SQF Quality Code shall be current and maintained. It shall 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 SQF Quality Code; ii. The policy statement and site organization chart; iii. A list of the products covered under the scope of certification; iv. Finished product specifications that agree with customers' requirements and/or meet the site's corporate quality requirements, where applicable; and v. 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 be independent of the food safety system manual.

**RESPONSE:** COMPLIANT

## 2.2.2 Document Control

The SOP 2.2 Document Control and Records (V3, 1/24/2022) was documented and defined. SOP defined responsibility of the document control and how the documents are numbers, versioned and dated. The SOP also defined the methods of storage and retention.

**2.2.2.1** The methods and responsibility for maintenance, storage, and distribution of quality documents shall be documented and implemented.

**RESPONSE:** COMPLIANT

**2.2.2.2** A register of current SQF Quality System documents and amendments to documents shall be maintained. Documents shall be safely stored and readily accessible.

**RESPONSE:** COMPLIANT

## 2.2.3 Records

The SOP 2.2.3 Records was documented and dated V2, 1/15/2018. The retention of SQF document was for a minimum of two years as defined in the procedure. The completion and error correction were defined. The records were found to be completed properly to the standard as filed records and records in use were reviewed during the audit.

**2.2.3.1** The methods, frequency, and responsibility for verifying, maintaining, and retaining records shall be documented and implemented.

**RESPONSE:** COMPLIANT

**2.2.3.2** All records shall be legible and confirmed 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, and securely stored to prevent unauthorized access, loss, damage, and deterioration. Records shall be retained in accordance with periods specified by customers or regulations or, at a minimum, no less than the product shelf- life.

**RESPONSE:** COMPLIANT

## 2.3.1 Product Formulation and Realization

Products are not formulated. This is a produce warehouse with a limited repack operation.

**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 (i.e., process capability analysis) to ensure that processes can consistently supply products that meet customer specifications.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** Products are not formulated. This is a produce warehouse with a limited repack operation.

**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:** NOT APPLICABLE

**EVIDENCE:** Products are not formulated. This is a produce warehouse with a limited repack operation.

**2.3.1.3** Shelf life trials shall be conducted for new products, or when there are changes in materials, ingredients, or equipment, to establish and validate a product's packaging, handling, storage, and customer-use requirements through the end of its commercial life and consumer use.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** Products are not formulated. This is a produce warehouse with a limited repack operation.

## 2.3.2 Specifications (Raw Material, Packaging, Finished Product, and Services)

Specifications for customer-specific standards are on file and available for reference and POV (perfect order verification) checks. In addition, Capitol City Produce uses USDA-defined produce quality standards to manage baseline quality. The contractor service provider register with the relevant training and description of service defined is documented (1/15/2018, v2). This list was reviewed with the internal audit on 3/8/2022 by the SQF practitioner.

**2.3.2.1** Specifications for all raw materials and packaging, including but not limited to ingredients, additives, agricultural inputs (where applicable), hazardous chemicals, and processing aids that impact finished product quality shall be documented and kept current.

**RESPONSE:** COMPLIANT

**2.3.2.2** Raw and packaging quality parameters shall be verified upon receipt to ensure they meet specifications.

**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 material and packaging specifications shall include those raw material and packaging materials that impact product quality and customer labels.

**RESPONSE:** COMPLIANT

**2.3.2.5** Finished product specifications shall be documented, current, approved by the site and its customers when required, and accessible to relevant staff. The specifications shall include product quality attributes, service delivery requirements, and labeling and packaging requirements.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

**2.3.2.7** 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. The register of contract service specifications shall list those services impacting product quality

**RESPONSE:** COMPLIANT

## 2.3.3 Contract Manufacturers

The site does not utilize contract manufacturing.

**2.3.3.1** The methods and responsibility for ensuring all agreements with contract manufacturers relating to quality, site/customer product requirements, their realization, and delivery shall be specified, documented, agreed upon, and implemented.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** The site does not utilize contract manufacturing.

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

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** The site does not utilize contract manufacturing.

**2.3.3.3** Records of audits, contracts, and changes to contractual agreements and their approvals shall be maintained.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** The site does not utilize contract manufacturing.

## 2.3.4 Approved Supplier Program

From a quality perspective, the procurement personnel track safety, product quality, performance, order fulfillment, etc. through vendor assessment. Trouble reports are generated for quality issues noted with deliveries and feeds back into overall vendor performance. The SOP 2.3.4 Approved Supplier Program is defined and documented (V2, 1/15/18). The supplier approval for most produce items is managed by purchasing from Pro*Act-approved suppliers. Pro*Act is a procurement organization/buying group that vets suppliers. The requirements were outlined in the Summary of the Pro*Act Supplier Management Program document dated 1/1/2022. Pro*Act requires audits for GAP and compliance with the 21 CFR 112 as well as compliance to FSMA, GAP/food safety questionnaire, letter of guarantee, HACCP / PC food safety plan and others applicable to the type of operation (processor or shipper). Quality standards are also monitored and fed back to the ongoing vendor scorecard. The approved supplier list was documented and dated 3/21/22. The requirement for supplier audits was verified by access the current audits for a dairy item, non-Pro*Act-approved and a Pro*Act approved supplier. The approval program also covers suppliers for packaging materials used for re-pack. The list of packaging suppliers for repack bags and boxes was documented (3/23/21).

**2.3.4.1** Raw materials, ingredients, packaging materials, processing aids, and services, including co-manufactured products, that impact finished product quality shall be supplied by an approved supplier.

**RESPONSE:** COMPLIANT

**2.3.4.2** 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, etc.); iii. Provide evidence that the supplied product meets agreed specifications and metrics; and iv. Have a complaint management system in place that includes corrective actions processes.

**RESPONSE:** COMPLIANT

**2.3.4.3** Materials supplied shall only be accepted by the site based on either a certificate of analysis for each lot received, or inspection of the lot at receipt, to ensure materials comply with specifications. All receipts shall be visually inspected for damage and product integrity.

**RESPONSE:** COMPLIANT

**2.3.4.4** 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

**2.3.4.5** Any supplier audits performed shall be conducted by individuals knowledgeable of applicable regulatory and food quality requirements and trained in auditing techniques.

**RESPONSE:** COMPLIANT

## 2.4.1 Customer Requirements

Customer requirements are monitored through POV (perfect order verification). This is the inspection to specific customer requirements around an order (example - specific sizes, color, ripeness level, etc.).

**2.4.1.1** The methods and responsibilities for managing customer requirements and/or consumer expectations shall be documented and implemented. They shall include at a minimum: i. A review and approval process for all new or updated customer requirements, as they occur; ii. A process for collection and analysis of data for product quality attributes to ensure specifications continue to meet consumer expectations; and iii. A communication process to notify identified customers when the ability to supply compliant products is temporarily 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 building and equipment were in good condition. The SOP for 11.2.9.1 Equipment, Utensils and Protective Clothing (V1, 4/21/21) was documented and included the specification or description of required properties for utensils, gloves, clothing and equipment. A checklist for purchasing of new equipment was on file as a guide to qualify new equipment. Equipment used in the warehouse was in good condition. 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 calibration SOP 12.2.3 was documented V3, 1/24/22. The directory of calibration activity was defined to the equipment, device ID, frequency, method and responsibility. The calibration certificates for the NIST thermometer (exp. 2/23/2023), the scales (performed 9/7/2021), and the weight used for daily scale monitoring (exp. 2/23/23). The daily scale calibrations conducted by in-house employees were recorded. This was accomplished by using a 5 lb. weight. The weekly (receiving and shipping) thermometer calibrations were recorded. These were conducted by in-house personnel. The record of the previous year was reviewed. The site defined and documented the storage conditions needed to maintain the products for quality delivery to the customers.

**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, regulatory requirements, and/or company 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, for 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 and to meet customer requirements for inventory management and transportation, where applicable.

**RESPONSE:** COMPLIANT

## 2.4.3 Food Quality Plan

The quality plan was generated out of the definition of PRPs for quality (programs to measure quality, flow diagram, ingredient and packaging hazard analysis, process hazard analysis, risk assessment, production evaluation and quality plan summary. The analysis does not identify any CQPs but defines in detail the quality points and supporting programs that are closely monitored to result in high quality product and service. These quality points were receiving (temperature, standards), rework inspection / culling, temperature storage, transportation temperatures, and quality parameters to meet customer expectation.

**2.4.3.1** A food quality plan shall be developed, effectively implemented, and maintained in accordance with a risk-based method such as HACCP. The food quality plan may be combined with or independent from the food safety plan, but either way it must identify quality threats and critical quality points and their controls.

**RESPONSE:** COMPLIANT

**2.4.3.2** The food quality plan shall outline how 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 quality 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

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| **2.4.3.4** | The scope of the food quality plan shall be developed and documented, including the start and endpoints of the processes under consideration and all relevant inputs and outputs.<br><br>**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 2.3.2.1) plus any additional quality or service attributes established by agreement with the customers.<br><br>**RESPONSE:** COMPLIANT |
| **2.4.3.6** | The intended use of each product shall be determined and documented. This shall include, as appropriate, target consumer groups, ease of use by consumers, consumer instructions, evidence of tampering , and other applicable information affecting product quality.<br><br>**RESPONSE:** COMPLIANT |
| **2.4.3.7** | The food quality team shall review the flow diagrams developed as part of the food safety plan and confirm and ensure process steps, process delays, and inputs and outputs that impact product quality are included.<br><br>**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.<br><br>**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.<br><br>**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.<br><br>**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 processes 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.<br><br>**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.<br><br>**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.<br><br>**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.<br><br>**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.<br><br>**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 Product Sampling, Inspection, and Analysis

The sampling plan for inspection of loads is 5% of cases from full pallets will be inspected and no fewer than 10% of partial pallets will be inspected. 100% of small loads (5 cases or less) will be inspected. All loads are inspected for temperature front, middle and back. The schedule for quality inspection of product in storage with assignment to specific employee was documented (aisle / slot storage inspection, rework inspection / culling and QA table. A “Trouble Report” is generated for issues found from the inspections. Everything on the warehouse aisles and received is inspected.

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

**RESPONSE:** COMPLIANT

**2.4.4.2** On-site laboratories and inspection stations shall be equipped and resourced to enable testing of in-process and finished products to meet customer, regulatory, and/ or company requirements and meet quality objectives. External laboratories shall be accredited to ISO/IEC 17025 or an equivalent international standard and included on the site’s contract service specifications list (refer to 2.3.2.7).

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

**2.4.4.5** Records of all quality inspections and analyses and statistical analyses shall be maintained.

**RESPONSE:** COMPLIANT

## 2.4.5 Non-conforming Product or Equipment

The facility maintained SOP 2.4.5 for handling of non-conforming product. The primary hold reasons for produce holds are for quality assessment or quality issues. These are caused by customer feedback or inhouse inspection finds. Products and equipment are tagged and also put on hold in the management system. There is an ERP program in place that is used to manage/record receiving inspection, inventory, shipping, repack, order entry, accounting, manage procurement and hold. A log of hold product was kept with disposition, trained employee that managed release, lot #, product and date of hold. The log was generated for the auditor review.

**2.4.5.1** Non-conforming product shall include products that fail to meet in-process or product requirements for quality. Non-conforming product shall be suitably identified, segregated, and appropriately dispositioned with records maintained.

**RESPONSE:** COMPLIANT

**2.4.5.2** Non-conforming equipment shall include equipment that is not suitable for use and/ or is not capable of producing products that meet in-process or product requirements for quality. Non-conforming equipment shall be identified and segregated from production areas, if possible, with appropriate documentation maintained.

**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 identification, handling, and disposition of returned goods to prevent redistribution or contamination of other products.

**RESPONSE:** COMPLIANT

## 2.4.6 Product Rework

Rework / Recoup SOP is documented. Scope of procedure covers quality and safety inspection and rework of stored products or inspection of returned product. This is not a true rework but a working of stored product to remove quality deficient product. A log is kept of the activity. The log entries noted product, lot, culled amount and initials of employees of employee performing cull. The product retains the original lot number and traceability information.

**2.4.6.1** Procedures shall be documented and implemented to ensure product quality or formulation is not compromised by the rework process. Material to be reworked shall be identified and traceable. Rework operations shall be overseen by qualified personnel.

**RESPONSE:** COMPLIANT

## 2.4.7 Product Release

Hold and release/disposition records were reviewed. The SOP 2.4.7 Product Release was documented. Quality Assurance department employees are the only personnel that are approved to release product release.

**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, regulatory, and/or company requirements, including but not limited to product specifications, sensory attributes, packaging and package integrity, labeling, delivery, and service requirements.

**RESPONSE:** COMPLIANT

**2.4.7.2** Records of all product release or disposition shall be maintained

**RESPONSE:** COMPLIANT

## 2.5.1 Validation and Effectiveness

The Quality Validation summary was documented. The four QPs status were validated against targets. This was recorded on 3/8/2022. The management team (VP of Ops, SQF Practitioner, Dir. Of Procurement, QA, Warehouse Supervisor and SQF Consultant) were participatory and signed the validation document. The Quality Targets (returns and shipments), complaints, QA testing (inspections of incoming products to quality specification), and 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

The schedule for quality inspection with assignment to specific employee was documented (aisle / slot storage inspection, rework inspection / culling and QA table. A “Trouble Report” is generated for issues found from the inspections. Everything on the aisle and received is inspected.

**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 between process control limits and 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

SOP and Form 2.5.5 Corrective and Preventative Action are completed for quality 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** Corrective and preventative action methods shall include the identification of the root cause(s) and the resolution of non-compliance of critical quality limits and deviations from quality requirements.

**RESPONSE:** COMPLIANT

## 2.5.4 Internal Audits

The internal audit was conducted 3/7-8/22 and the corrective actions are documented for non-conformances. The modules 2 and 12 are completed. The quality and food safety edition 9 internal audits were completed.

**2.5.4.1** Internal audit plans and methods shall include assessments of food quality plans, process controls, quality tests, and other activities implemented to meet finished product specifications as well as customer and company requirements.

**RESPONSE:** COMPLIANT

**2.5.4.2** Staff conducting the quality internal audits shall be trained and competent in internal audit procedures and have knowledge and experience in quality processes and process control methods as they relate to the scope of certification. Where practical, staff conducting internal audits shall be independent of the function being audited.

**RESPONSE:** COMPLIANT

## 2.6.1 Product Identification and Traceability

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. The site demonstrated the records generated in the ERP for the trace of item #1096 Green Pencil Onion (iceless) that was packed on 02/02/22 (Lot X0301101). From the inventory screen on the repack record the item was selected. The inventory usage screen was access to detail the trace of the specific lot number. The repacking employee was recorded as well as the destination customers for the lot number. The customer receiving, delivery date, reference number (invoice number) and quantity were recorded. The customers receiving the lot were listed. The contact information for each customer was available. The vendor (Field Fresh Farms). The product contact packaging tracing was confirmed during the exercise. The lot numbers for product contact bags were recorded on a usage log.

**2.6.1.1** Finished product shall be labeled to the agreed customer, regulatory, and/or company requirements.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** COMPLIANT

**2.6.1.3** Finished product shall be traceable forward to the customer, such as the retailer, distributor, or manufacturer (one forward).

**RESPONSE:** COMPLIANT

**2.6.1.4** 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

## 2.6.2 Product Withdrawal and Recall

The product withdrawal and Recall was documented (v 4, 1/24/22). It included issues of quality as well as safety as potential reasons for conducting recall or withdrawal. The site performed a mock recall on 4/24/22. This took 35 minutes to trace 100% of item 316 (1/2-inch coin carrots) with lot number 56013403. The site also participated in the real recall of a supplier (premade salads). The records were kept on time, inventory, shipments, customers and proficiency for the test and the actual recall. The procedure does provide for notification of SQFI and the CB in the event of an actual recall that is initiated by the site.

**2.6.2.1** 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. Records shall be maintained and meet customer, regulatory, and company requirements, as applicable.

**RESPONSE:** COMPLIANT

## 2.6.3 Crisis Management

The crisis management/ business continuity plan (BCP) was documented (Sept. 2016) for fire, weather/hurricane and active shooter. The test of the BCP was conducted on 3/1/2022 and the exercise was recorded. In the scenario discussed, a fire had threatened the facility and product (safety and quality). The product was assessed and the measures to meet customer needs were discussed.

**2.6.3.1** 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 customer, regulatory, and/or company product and service quality requirements.

**RESPONSE:** COMPLIANT

**2.6.3.2** The site shall contact its customers in the event of a crisis that impacts its ability to supply quality product.

**RESPONSE:** COMPLIANT

## 2.7.1 Food Fraud

The 2.7.2 Food Fraud SOP (V2 1/15/2018) was documented. The food fraud assessment was last conducted on 4/21/2022. A record of the assessment was maintained. An online tool was used. The results of the assessment indicated risk levels were low and there were no high-risk mitigations needed. This included those types of frauds that have impact on product quality.

**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. This assessment may address both food safety and quality.

**RESPONSE:** COMPLIANT

**2.7.1.2** A food fraud mitigation plan shall be developed and implemented that specifies the methods to be used for controlling identified food fraud vulnerability that could adversely impact food quality.

**RESPONSE:** COMPLIANT

## 2.8.1 General Requirements for Identity Preserved Foods

Identity preserved status is not maintained as the site does not handle any products with claims.

**2.8.1.1** The methods and responsibility for the identification, label approval, 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:** The site does not handle identity preserved foods.

**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:** The site does not handle identity preserved foods.

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

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** The site does not handle identity preserved foods.

**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:** The site does not handle identity preserved foods.

**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:** The site does not handle identity preserved foods.

**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, scheduled as the first production run, or carried out after completion of thorough sanitation of the processing area and equipment; and iii. Finished product is stored and transported in separate units or isolated by a physical barrier from the non-specialty product.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** The site does not handle identity preserved foods.

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

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** The site does not handle identity preserved foods.

**2.8.1.8** Additional customer-specific requirements for identity preserved foods shall be included in the finished product specification, as described in 2.3.2.5, or the label register and implemented by the site.

**RESPONSE:** NOT APPLICABLE

**EVIDENCE:** The site does not handle identity preserved foods.

## 2.9.1 Training Requirements

The training program was defined and quality was included in the program. The tasks such as refractometer, calibrations for scales, etc. that support quality were carried out and recorded.

**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

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

**RESPONSE:** COMPLIANT

## 2.9.2 Training Program

All training was current (2021 and 2022). The training register was maintained. 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. The English language is used by all in the plant and all instructions / training was in English. In addition to the food safety training, the program covered specific programs that support quality such as procedures around using the refractometer, thermometer and scale. The English language is used by all in the plant and all instructions / training was in English. Yearly training provided for tenured employees. The record of training supports refresher training. A minor was given under 2.9.2.3 as training with regards to general quality program (requirements and checks) was not recorded.

**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: i. Applicable process control and quality tools training for those responsible for operating, inspecting, and overseeing key manufacturing processes; ii. Training, calibration, and proficiency testing of internal laboratory personnel; iii. Training of personnel responsible for sensory evaluations; iv. Training in the application of risk-based principles, such as HACCP, used for the identification and control of quality threats for staff involved in developing and maintaining the food quality plan; and v. Provision for identifying and implementing the refresher training needs of site personnel.

**RESPONSE:** COMPLIANT

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

**RESPONSE:** MINOR

**EVIDENCE:** Quality Training specific to the quality program and overall program requirements was not recorded although evident in the interviews and observations with employees.

**ROOT CAUSE:** Adequate training (recorded) had not been completed by the SQF Food Safety Team. Quality Training (Add'l) had not been updated or deemed a breakout training from original training plan.

**CORRECTIVE ACTION:** Quality Team needed additional training on the Quality Training Program and Requirements specific to SQF.

2.9.2.1 NC Quality Training 052522.pdf

**VERIFICATION OF CLOSEOUT:** The site's corrective action response CAPA and included training records were reviewed and approved. The NC is closed. JM 5/26/22

**COMPLETION DATE:** 05/17/2022 **CLOSEOUT DATE:** 05/26/2022