SQF Quality Audit Edition 9

Capitol City Produce, LLC

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
US015192 | 30081

DECISION DATE
07/25/23

AUDIT TYPE
RE-CERTIFICATION

RECERTIFICATION DATE
04/21/24

AUDIT DATES
05/31/23 - 06/01/23

EXPIRATION DATE
07/05/24

ISSUE DATE
07/25/23

Facility & Scope

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

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

Products:
Various Fruits & 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

CB#: CB-1-BVC
Accreditation Body: ANSI
Accreditation Number: 747

Lead Auditor: Jim White (122786)
Technical Reviewer: Ariel Rice (210767)
Other Members:
N/A

Hours Spent on Site: 20
Hours of ICT Activites: 0
Hours Spent Writing Report: 8

Non-Conforming

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 1/1/23. 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 (4/12/23 1/10/23). The supplier approval scorecards are not up to date.

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: MINOR

EVIDENCE: The supplier approval scorecard is not up to date.

ROOT CAUSE: Not properly maintained with the respective department.

CORRECTIVE ACTION: Procurement will ensure that all non ProAct suppliers will be reviewed on an annual basis to ensure compliance to our standards.

VERIFICATION OF CLOSEOUT: Approved JW

COMPLETION DATE: 07/07/2023 **CLOSEOUT DATE**: 07/26/2023

2.4.5.3

The facility-maintained SOP 2.4.5 for handling of non-conforming product, equipment and returns is documented (1/24/22). Products and equipment are tagged and 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. There was also a place for returned goods staging that was identified with a sign. The stored items were segregated by allergen type. This area was maintained for assessment of goods on the dock and was segregated from acceptable goods. Minor: There is no documented procedure to accept returned products.

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:** MINOR **EVIDENCE:** There is no documented procedure to accept returned product. The procedure was observed, however there is no documented procedure. **ROOT CAUSE:** Standart Operating Procedure (SOP) for returned product is being followed and was observed. Did not have the SOP readily available for the auditor. **CORRECTIVE ACTION:** The process is being followed. Process is documented. Did not provide adequate documentation at the time of the audit. **VERIFICATION OF CLOSEOUT:** Approved JW **COMPLETION DATE:** 07/07/2023 **CLOSEOUT DATE**: 07/26/2023

Section Responses

Audit Statement	Audit
SQF Practitioner Name	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:** BOB WELLS, SQF PRACTITIONER
SQF Practitioner Email	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:** BWELLS@CCPFRESH.COM
Opening Meeting	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:** TERRECA BATES-WELLS: DIRECTOR OF SPECIAL PROJECTS, BOB WELLS: SQF PRACTITIONER, JIM WHITE: AUDITOR
Facility Description	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: 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 SINCE 1947 YEARS AND AT THE CURRENT LOCATION SINCE 2010 BEING AUDITED FOR SQF 10 YEARS WITH FOOD SAFETY AND 7 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 IS 90,000 SQUARE FEET. THE WAREHOUSE IS DIVIDED INTO A FREEZER ROOM (5,000 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. THERE WERE NO EXEMPTIONS INCLUDED IN THIS AUDIT. THIS WAS A 2.5 DAY ANNOUNCED FOOD SAFETY AND QUALITY AUDIT.
Closing Meeting	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:** TERRECA BATES-WELLS: DIRECTOR OF SPECIAL PROJECTS, BOB WELLS: SQF PRACTITIONER, JIM WHITE: AUDITOR
Auditor Recommendation	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:** RECERTIFICATION ONCE THE NON-CONFORMITIES ARE CORRECTED.
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 4/19/23. 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	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

EVIDENCE:

2.1.1.2 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

EVIDENCE:

2.1.1.3 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

EVIDENCE:

2.1.1.4 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

EVIDENCE:

2.1.1.5 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

EVIDENCE:

2.1.1.6 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

EVIDENCE:

2.1.1.7 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

EVIDENCE:

2.1.1.8 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

EVIDENCE:

2.1.1.9	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 **EVIDENCE:**
2.1.1.10	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 **EVIDENCE:**
2.1.2	**Management Review** The measurement of adherence to quality goals are is tracked through the levels of customer credits (due to problems) 0.40 target YTD is .40, which is broken down into food service and retail. The daily tracking is reported when targets are missed and communicated through the management team. An ongoing log is kept. The logs for 2022 and 2023 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	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 **EVIDENCE:**
2.1.2.2	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 **EVIDENCE:**
2.1.2.3	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 **EVIDENCE:**
2.1.2.4	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

EVIDENCE:

2.1.2.5 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

EVIDENCE:

2.1.2.6 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

EVIDENCE:

2.1.3 Complaint Management

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 food safety and quality. Trending is done annually, 5 complaints for the year all were insects. Corrective actions were reviewed and verified.

2.1.3.1 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

EVIDENCE:

2.1.3.2 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

EVIDENCE:

2.1.3.3 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

EVIDENCE:

2.1.3.4 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

EVIDENCE:

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 26. Changes are documented and verified with training to applicable staff.
2.2.1.1	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 **EVIDENCE:**
2.2.2	**Document Control** The SOP 2.2 Document Control and Records (V2, 1/15/18) 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 retained documents based on the VTE. The SQF team is responsible for the document register.
2.2.2.1	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 **EVIDENCE:**
2.2.2.2	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 **EVIDENCE:**
2.2.3	**Records** The SOP 2.2.3 Records was documented and dated V2, 1/15/2018. The retention of SQF documents 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. VTE records were verified to include receiving documentation for the week 2/14/23.
2.2.3.1	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 **EVIDENCE:**

2.2.3.2 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

EVIDENCE:

2.2.3.3 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

EVIDENCE:

2.3.1 Product Formulation and Realization

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 (3/15/23). This list was reviewed during the food safety audit.

2.3.2.1 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

EVIDENCE:

2.3.2.2 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

EVIDENCE:

2.3.2.3 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

EVIDENCE:

2.3.2.4 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

EVIDENCE:

2.3.2.5 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

EVIDENCE:

2.3.2.6 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

EVIDENCE:

2.3.2.7 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

EVIDENCE:

2.3.3 Contract Manufacturers

No contract manufacturers used.

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 1/1/23. 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 (4/12/23 1/10/23). The supplier approval scorecards are not up to date.

2.3.4.1 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

EVIDENCE:

2.3.4.2	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:** MINOR **EVIDENCE:** The supplier approval scorecard is not up to date. **ROOT CAUSE:** Not properly maintained with the respective department. **CORRECTIVE ACTION:** Procurement will ensure that all non ProAct suppliers will be reviewed on an annual basis to ensure compliance to our standards. **VERIFICATION OF CLOSEOUT:** Approved JW **COMPLETION DATE:** 07/07/2023 **CLOSEOUT DATE**: 07/26/2023
2.3.4.3	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 **EVIDENCE:**
2.3.4.4	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 **EVIDENCE:**
2.3.4.5	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 **EVIDENCE:**
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.). Customer on boarding process and customer set-up SOP was verified.
2.4.1.1	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 **EVIDENCE:**

2.4.1.2 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

EVIDENCE:

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 (V2, 1/24/22) 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 verified in the food safety audit. The directory of calibration activity was defined to the equipment, device ID, frequency, method and responsibility. The calibration certificates for the NIST thermometer (2/7/24) and the scales were verified. 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 using the ice method 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 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

EVIDENCE:

2.4.2.2 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

EVIDENCE:

2.4.2.3 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

EVIDENCE:

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,NA, 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. The quality plan was last reviewed 3/29/23.
2.4.3.1	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 **EVIDENCE:**
2.4.3.2	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 **EVIDENCE:**
2.4.3.3	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 **EVIDENCE:**
2.4.3.4	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 **EVIDENCE:**
2.4.3.5	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 **EVIDENCE:**
2.4.3.6	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

	EVIDENCE:
2.4.3.7	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 **EVIDENCE:**
2.4.3.8	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 **EVIDENCE:**
2.4.3.9	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 **EVIDENCE:**
2.4.3.10	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 **EVIDENCE:**
2.4.3.15	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 **EVIDENCE:**
2.4.3.16	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 **EVIDENCE:**

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. NA: sensory evaluation is not done and process control methods are not used. ISO certification is valid until July 31/2024.
2.4.4.1	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 **EVIDENCE:**
2.4.4.2	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 **EVIDENCE:**
2.4.4.5	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 **EVIDENCE:**
2.4.5	**Non-conforming Materials and Product** The facility-maintained SOP 2.4.5 for handling of non-conforming product, equipment and returns is documented (1/24/22). Products and equipment are tagged and 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. There was also a place for returned goods staging that was identified with a sign. The stored items were segregated by allergen type. This area was maintained for assessment of goods on the dock and was segregated from acceptable goods. Minor: There is no documented procedure to accept returned products.
2.4.5.1	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 **EVIDENCE:**

2.4.5.2 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

EVIDENCE:

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: MINOR

EVIDENCE: There is no documented procedure to accept returned product. The procedure was observed, however there is no documented procedure.

ROOT CAUSE: Standart Operating Procedure (SOP) for returned product is being followed and was observed. Did not have the SOP readily available for the auditor.

CORRECTIVE ACTION: The process is being followed. Process is documented. Did not provide adequate documentation at the time of the audit.

VERIFICATION OF CLOSEOUT: Approved JW

COMPLETION DATE: 07/07/2023 **CLOSEOUT DATE**: 07/26/2023

2.4.6 Product Rework

Rework / Recoup SOP is documented (1/15/18) 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 employee performing cull. The product retains the original lot number and traceability information. Verification of truck returns from the rework log were verified to have included truck inspection using the VTE dates.

2.4.6.1 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

EVIDENCE:

2.4.7 Product Release

The documented program dated 1/15/18 includes: inbound inspections, product in storage inspections and release of product. Any product that passes its quality inspection can be released. There are no critical quality limits included in the program.

2.4.7.1 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

EVIDENCE:

2.4.7.2 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

EVIDENCE:

2.5.1 Validation and Effectiveness

The Quality Validation summary was documented. The four QPs status were validated during the annual review on 3/29/23. 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 included 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 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

EVIDENCE:

2.5.1.2 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

EVIDENCE:

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. NA: process control limits and specifications are not compared.

2.5.2.1 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

EVIDENCE:

2.5.2.2 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

EVIDENCE:

2.5.2.4 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

EVIDENCE:

2.5.3 Corrective and Preventative Action

SOP and Form 2.5.5 Corrective and Preventative Action are completed for complaints, internal inspections, system audits, external inspections. The corrective actions for these programs were verified throughout the audit as programs were reviewed and opportunities were recorded. There were no open past due CAPAs.

2.5.3.1 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

EVIDENCE:

2.5.4 Internal Audits

The internal audit was conducted 3/28-29/23, 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. The internal audit was conducted by a consultant that is contracted by the site. The SQF practitioner is responsible for conducting quarterly GMP self- inspections. The dates of audits conducted were 3/14/23, 12/8/22 and 8/22/22. Corrective actions were recorded on all non- conformances that were identified in the quarterly self-inspections

2.5.4.1 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

EVIDENCE:

2.5.4.2 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

EVIDENCE:

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. A vertical trace exercise was completed during this audit. 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 product contact packaging tracing was confirmed during the exercise. The lot numbers for product contact bags were recorded on a usage log. NAL no changeovers, and no materials used in finished products.
2.6.1.1	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 **EVIDENCE:**
2.6.1.3	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 **EVIDENCE:**
2.6.2	**Product Withdrawal and Recall** The product withdrawal and Recall was documented (v 4, 1/24/22). The program includes a recall team and methods to do a recall. The site performed a mock recall on 5/31/23. This took 20 minutes to trace 100% of item 364 celery. 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 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 **EVIDENCE:**
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 3/22/23 and the exercise was recorded. In the scenario discussed, a fire had threatened the facility and product because of a flood. The product was assessed and the measures to meet customer needs were discussed.
2.6.3.1	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 **EVIDENCE:**

2.6.3.2	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 **EVIDENCE:**
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 3/28/23. 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.
2.7.1.1	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 **EVIDENCE:**
2.7.1.2	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 **EVIDENCE:**
2.8.1	**General Requirements for Identity Preserved Foods** No identity preserved foods.
2.9.1	**Training Requirements** The training requirements are defined in SOP 2.9. Yearly and upon hire training is conducted. The training covers SQF, HACCP, food defense, food safety, allergens, GMP and chemical safety. For specialized training employees with certain responsibilities received training in calibration (refractometer, thermometer and scales), pre-op, pre-op swab, pest control, and internal audit.
2.9.1.1	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 **EVIDENCE:**
2.9.1.2	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 **EVIDENCE:**

2.9.2	**Training Program** All training was current (2022 and 2023). 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. The training covers SQF, HACCP, food defense, food safety, allergens, GMP and chemical safety. For specialized training employees with certain responsibilities received training in calibration (refractometer, thermometer and scales), pre-op, pre-op swab, pest control, and internal audit. The English language is used by all in the plant and all instructions / training was in English. HACCP and Food Safety Plan is included in the training protocol. Yearly training provided for tenured employees. The record of training supports refresher training
2.9.2.1	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 **EVIDENCE:**
2.9.2.2	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 **EVIDENCE:**
2.9.2.3	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 **EVIDENCE:**