



SQF Food Safety Audit Edition 9

Capital City Produce

Summary

AUDIT DECISION**CERTIFIED****CERTIFICATION NUMBER****US019877 | 270191****AUDIT RATING****Excellent****DECISION DATE****06/18/24****AUDIT TYPE****UNANNOUNCED****RECERTIFICATION DATE****04/21/25****AUDIT DATES****04/30/24 - 05/02/24****EXPIRATION DATE****07/05/25****ISSUE DATE****06/18/24**

Facility & Scope

Capital City Produce

16550 Commercial Ave.
Baton Rouge LA 70816
USA

Food Sector Categories:

25, 26

Products:

Eggs, Dairy Products and Frozen Fruits /
Vegetables.

Scope of Certification:

Location: 16550 Commercial Avenue, Baton
Rouge, LA 70816
Scope Statement: 25. Repackaging of Products
Not Manufactured On Site; 26. Storage and
Distribution - Eggs, Dairy Products and Frozen
Fruits / Vegetables.
Exemptions: None

Certification Body & Audit Team

Bureau Veritas Certification NA

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

CB#: CB-1-BVC**Accreditation Body:** ANSI**Accreditation Number:** 747**Lead Auditor:** Joe McCommons (204768)**Technical Reviewer:** Anissa Abdennouri (451413)**Other Members:**

NA

Hours Spent on Site: 25**Hours of ICT Activities:** 0**Hours Spent Writing Report:** 6

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

The register with dates of review and risk level for each raw ingredient was documented and dated as Document 2.3.4 Raw and Packaging Materials last reviewed 4/19/2023. The bag used for product contact was certified as safe through a letter of guarantee specifying adherence to regulatory standard. The contractor service provider register with the relevant training and description of service/frequency were defined in Form 2.3.3 Contract Service Providers list (1/15/2018, v2). This list was reviewed with the internal audit on 4/9/2024 by the SQF practitioner. A minor was issued in this section under clause 2.3.2.2.

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

RESPONSE: MINOR

EVIDENCE: The site did not have the specification for the repack poly bag.

ROOT CAUSE: Why 1: The specification for the poly bag was not requested from the supplier. The only item requested was the letter of guarantee stating the bags were approved for food contact.

Why 2: This was an oversight by the SQF Practitioner when requesting the documentation.

Why 3: SQF Practitioner was not aware that a specification was also required.

Why 4: This was an oversight due to the fact that the repack poly bags are a very small part of the operation.

CORRECTIVE ACTION: The specifications for the poly bags and the audit were obtained.

The specification was added to the register of raw material and packaging specifications and will be verified on an annual basis and updated if required. Reviewed and confirmed
TBW

VERIFICATION OF CLOSEOUT: The site's corrective action and supporting evidence (amended root cause, supplier approval documents, materials register revised with packaging included and packaging specification obtained) were reviewed and accepted. The NC is closed. JM

COMPLETION DATE: 05/10/2024 **CLOSEOUT DATE:** 06/18/2024

11.1.2 Building Materials

The walls (concrete block, metal paneling and steel frame) were found to be in good condition. The doors used for shipping/receiving were in excellent condition and pest-proofed. All personnel doors were clean and in good condition. Dock levelers were found to be in good condition and seals present to prevent pests and dust. The only drop ceilings were in office areas. These were accessible for inspection. The floors were in good condition with minimal damage and wear. The drains were long trench drains with grated covers running under racks where wet produce may be stored. There was no areas of standing water that presented a hazard to food safety. Drains were found to be clean and drain cleaning was conducted on a regular basis as demonstrated in the cleaning program. Two minors were issued in this section under clauses 11.1.2.5 and 11.1.2.6.

11.1.2.5 Ducting, conduit, and pipes that convey ingredients, products, or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning.

A risk analysis shall be conducted to ensure food contamination risks are mitigated.

RESPONSE: MINOR

EVIDENCE: Risk analysis for ducting, conduit, and pipes that convey ingredients, products, or services was not documented.

ROOT CAUSE: Why 1: The SQF Practitioner did not realize that there was a requirement for a risk analysis regarding this topic.

Why 2: There was some confusion about the specific food sector categories and the required modules that our facility needed to comply with.

Why 3: Due to this requirement not being in Module 12, when we prepared for the Module 11 requirement this clause was missed due to an oversight.

CORRECTIVE ACTION: Risk analysis for ducting, conduit and pipes was reviewed and documented; physical observation of pipes, reviewed installation date and life expectancy, relevant work orders associated with equipment.

Risk assessment will be reviewed annually during the annual SQF review, or when there are any changes to the facility that affect ducting, conduit, or piping. Reviewed and confirmed
TBW

VERIFICATION OF CLOSEOUT: The site's corrective action and supporting evidence (amended root cause, risk analysis was performed) were reviewed and accepted. The NC is closed. JM.

COMPLETION DATE: 05/29/2024 **CLOSEOUT DATE:** 06/18/2024

11.1.2.6 Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces and shall allow ease of cleaning.

A risk analysis shall be conducted to ensure food contamination risks are mitigated.

RESPONSE: MINOR

EVIDENCE: Risk analysis for pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas was not documented.

ROOT CAUSE: Why 1: The SQF Practitioner did not realize that there was a requirement for a risk analysis regarding this topic.

Why 2: There was some confusion about the specific food sector categories and the required modules that our facility needed to comply with.

Why 3: Due to this requirement not being in Module 12, when we prepared for the Module 11 requirement this clause was missed due to an oversight.

CORRECTIVE ACTION: Risk analysis for ducting, conduit and pipes was reviewed and documented; physical observation of pipes, reviewed installation date and life expectancy, relevant work orders associated with equipment.

Risk assessment will be reviewed annually during the annual SQF review, or when there are any changes to the facility that affect ducting, conduit, or piping. Reviewed and confirmed
TBW

VERIFICATION OF CLOSEOUT: The site's corrective action and supporting evidence (amended root cause, risk analysis was performed) were reviewed and accepted. The NC is closed. JM.

COMPLETION DATE: 05/29/2024 **CLOSEOUT DATE:** 06/18/2024

12.6.4.1

The SQF practitioner managed the hazardous chemical register for cleaning chemicals. This was reviewed and dated 4/5/2024. The letters of guaranty and SDS's were on file for the chemicals. There was a designated and locked area for storage of cleaners and cleaning supplies. This was a closet near the dock office. The chemicals were labeled and there was an inventory of chemicals kept to define approval as well as track usage. The storage area was controlled (locked) and access was only by trained sanitation staff. See 12.6.4.1 for non-conformance in the area of chemical handling.

- 12.6.4.1** Hazardous chemicals, toxic substances, and pesticides that are for use on the site with the potential for food contamination shall be:
- i. Used only according to manufacturers' instructions;
 - ii. Controlled to prevent contamination or a food safety hazard to raw material, packaging, work-in-progress, finished product, or product contact surfaces;
 - iii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site;
 - iv. Supplemented with a current Safety Data Sheet (SDS) made available to all staff;
 - v. Controlled to track usage and ensure return to the appropriate storage areas after use;
 - vi. Be compliant with national and local legislation; and
 - vii. Used so that there is no cross-contamination between chemicals.

RESPONSE: MINOR

EVIDENCE: The chemical list did not include Quat Block and specific glass cleaner which are included in the cleaning procedures. The list did not include maintenance or DEF related chemicals. The approval list did not include all site-used/stored chemicals.

ROOT CAUSE: Why 1: When the SQF Practitioner created a list of approved chemicals he only added chemicals that were used for cleaning in the warehouse.

Why 2: The SQF Practitioner was unaware that this chemical list should be expanded to include all chemicals, maintenance, DEF, or otherwise, that were used on site.

Why 3: The SQF Practitioner did not have the proper understanding of this requirement.

CORRECTIVE ACTION: Quad Blocks and the glass cleaner were added to the chemical list. The warehouse was inspected for additional chemicals. Chemicals for the trucks, the compressor, pallet jacks and forklifts were added to the chemical list.

Chemical lists are reviewed annually during the SQF annual review to ensure it was current. Meeting was held with all employees responsible for purchasing chemicals to ensure they understand they must inform the SQF Practitioner prior to purchasing any new chemicals to ensure that the chemical can be reviewed to verify its suitability for the site and added to the approved chemical lists. Reviewed and confirmed
TBW

VERIFICATION OF CLOSEOUT: The site's corrective action and supporting evidence (amended root cause, sanitation/chemical training, chemical list was updated appropriately) were reviewed and accepted. The NC is closed. JM.

COMPLETION DATE: 05/10/2024 **CLOSEOUT DATE:** 06/18/2024

Section Responses

Audit Statement	Audit
SQF Practitioner Name	Name the designated SQF Practitioner RESPONSE: BOB WELLS, SQF PRACTITIONER
SQF Practitioner Email	Email of the designated SQF Practitioner RESPONSE: BWELLS@CCPFRESH.COM
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) RESPONSE: TERRECA BATES-WELLS: DIRECTOR OF SPECIAL PROJECTS, BOB WELLS: SQF PRACTITIONER, ANDY BRYANT: DAY-SHIFT OPERATIONS MANAGER, DARELL EVANS: QA/IC MANAGER, LLOYD ANTOINE: RECEIVING MANAGER, JOE MCCOMMONS: AUDITOR
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details)

RESPONSE: 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 AND AT THE CURRENT LOCATION SINCE 2010 BEING AUDITED FOR SQF 11 YEARS WITH FOOD SAFETY AND 8 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 APPROXIMATELY 220 TOTAL EMPLOYEES AT THE SITE WITH AROUND 180 EMPLOYEES ON THE MAIN SHIFT AND AROUND 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, EGGS, DAIRY PRODUCTS AND FROZEN FRUITS / VEGETABLES. THERE IS NO PROCESSING/CUTTING OF FOODS AT THE FACILITY (WITH EXCEPTION OF PRODUCE INSPECTION WHICH IS DISCARDED). 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. THE SITE IS CURRENTLY UNDERGOING RENOVATION/ADDITION OF A 40,000 SQ. FT. EXPANSION WHICH IS PLANNED TO BE IN OPERATION BY THE END OF THE YEAR. 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: 25. REPACKAGING OF PRODUCTS NOT MANUFACTURED ON SITE; 26. STORAGE AND DISTRIBUTION - EGGS, DAIRY PRODUCTS AND FROZEN FRUITS / VEGETABLES.

EXEMPTIONS: NONE

Closing Meeting

People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)

RESPONSE: CALEB PREJEAN: VP OF OPERATIONS, TERRECA BATES-WELLS: DIRECTOR OF SPECIAL PROJECTS, BOB WELLS: SQF PRACTITIONER, ANDY BRYANT: DAY-SHIFT OPERATIONS MANAGER, DARELL EVANS: QA/IC MANAGER, LLOYD ANTOINE: RECEIVING MANAGER, JOE MCCOMMONS: AUDITOR

Auditor Recommendation

Auditor Recommendation

RESPONSE: CERTIFICATION WITH CORRECTION OF NON-CONFORMANCES.

2.1.1 Management Responsibility

The SOP 2.1 Commitment / 2.1.1 Management Policy (V3, dated 1/24/2022) outlines the company's commitment to food safety and quality and the methods by which food safety/quality will be accomplished. The statement and mission for food safety and quality was signed by the President and dated 1/24/2022. The policy is in English. All persons understand English at the company. The policy is posted at the employee entrance. There was also a 2.1.2 Management Commitment Policy (V3, 1/24/2022). The culture was defined for food safety and quality in the Commitment 2.1.2 Policy. The 2.1.2 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 inventory coordinator 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 organizational chart (dated last reviewed 4/30/2024) is documented with positions responsible for food safety oversight identified. Job descriptions are on file for key individuals and positions within the organization (descriptions reviewed were warehouse ops manager, day shift supervisor, Dir. of Procurement, sanitation, CEO, Director of Ops, order selector Inventory Specialist/Food Safety Practitioner , QA associate and others were among the job descriptions that were reviewed during this audit. The back-ups for key positions were defined in the SOP 2.1.1.3 (v3, 1/24/22) document.

2.1.1.1 Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to:

- i. Supply safe food;
- ii. Establish and maintain a food safety culture within the site;
- iii. Establish and continually improve the site's food safety management system; and
- iv. Comply with customer and regulatory requirements to supply safe food.

The policy statement shall be:

- v. Signed by the senior site manager and displayed in prominent positions; and
- vi. Effectively communicated to all site personnel in the language(s) understood by all site personnel.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.2 Senior site management shall lead and support a food safety culture within the site that ensures at a minimum:

- i. The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures;
- ii. Adequate resources are available to meet food safety objectives;
- iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained;
- iv. Employees are informed and held accountable for their food safety and regulatory responsibilities;
- v. Employees are positively encouraged and required to notify management about actual or potential food safety issues; and
- vi. Employees are empowered to act to resolve food safety issues within their scope of work.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.3 The reporting structure shall identify and describe site personnel with specific responsibilities for tasks within the food safety management system and identify a backup for the absence of key personnel.

Job descriptions for the key personnel shall be documented.

Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.1.1.4** Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to:
- i. Oversee the development, implementation, review, and maintenance of the SQF System;
 - ii. Take appropriate action to ensure the integrity of the SQF System; and
 - iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.1.1.5** The primary and substitute SQF practitioner shall:
- i. Be employed by the site;
 - ii. Hold a position of responsibility related to the management of the site's SQF System;
 - iii. Have completed a HACCP training course;
 - iv. Be competent to implement and maintain HACCP based food safety plans; and
 - v. Have an understanding of the SQF Food Safety Code: Food Manufacturing and the requirements to implement and maintain an SQF System relevant to the site's scope of certification

RESPONSE: COMPLIANT

EVIDENCE:

- 2.1.1.6** Senior site management shall ensure the training needs of the site are resourced, implemented, and meet the requirements outlined in system elements 2.9 and that site personnel meet the required competencies to carry out those functions affecting the legality and safety of food products.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.1.1.7** Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.1.1.8** Senior site management shall designate defined blackout periods that prevent unannounced re-certification audits from occurring out of season or when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed-upon unannounced audit.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.2 Management Review

The 2.1 Commitment / 2.1.3 Management Review (v2, 1/15/2018) was documented defining the site's approach to review of the food safety system and objectives. The full SQF compliance review was held with all management on March 29, 2024 and was signed by the members of senior management on 4/19/2024. The review included the meeting and signature of the VP of Ops, Special Projects Manager and the SQF Practitioner. The yearly review included SQF policies, internal and External Audit Findings, Complaints, corrective actions, hazard and risk management, culture performance for food safety, review of objectives (complaint levels and audit scores), and quality reviews. There was also a monthly meeting between SQF Practitioner and Special Projects manager to review SQF performance through a SQF scorecard. The monthly meeting was confirmed through review of all monthly meeting records. There was a meeting record for each month 2023-2024.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.1.3 Complaint Management

The site had 5 complaints (rocks, insects - produce/commodity-type concerns) within the past year. Investigations were on file. These were not deemed to be originated at Capitol City. The SOP for complaints is 2.1.3 Complaint Management (V3, 1/24/22). The review summary for complaints was documented and showed no significant trends over the past 5 years. The practitioner has the responsibility for overseeing the complaint process. The SOP covers complaints of food safety and quality.

- 2.1.3.1** The methods and responsibility for handling, investigating, and resolving food safety complaints from commercial customers, consumers, and authorities, arising from products manufactured or handled on-site or co-manufactured, shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.1.3.2** Adverse trends of customer complaint data shall be investigated and analyzed and the root cause established by personnel knowledgeable about the incidents.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.1.3.3** Corrective and preventative action shall be implemented based on the seriousness of the incident and the root cause analysis as outlined in 2.5.3. Records of customer complaints, their investigation, and resolution shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.1 Food Safety Management

The SOPs, policies and organizational chart are documented and maintained. The scope of certification is defined in the procedure as FSC 25 and 26. Changes are documented and verified with training to applicable staff.

- 2.2.1.1** The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Food Manufacturing shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include:
- i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard;
 - ii. The food safety policy statement and organization chart;
 - iii. The processes and products included in the scope of certification;
 - iv. Food safety regulations that apply to the manufacturing site and the country(ies) of sale (if known);
 - v. Raw material, ingredient, packaging, and finished product specifications;
 - vi. Food safety procedures, prerequisite programs, food safety plans;
 - vii. Process controls that impact product safety; and
 - viii. Other documentation necessary to support the development, implementation, maintenance, and control of the SQF System.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.2.1.2** Food safety plans, Good Manufacturing Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any changes implemented have an impact on the site's ability to deliver safe food.
- All changes to food safety plans, Good Manufacturing Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the change shall be documented.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.2 Document Control

The SOP 2.2 Document Control and Records (V3, 1/24/2022) and SOP 2.2.2 (v2, 1/15/2018) were documented and defined responsibility of the SQF practitioner as responsible for approving documents and changes. SOP defined responsibility of the document control and how the documents are numbered, versioned and dated. The SOP also defined the methods of storage and retention. A register of all documents was kept current for control of version.

- 2.2.2.1** The methods and responsibility for maintaining document control and ensuring staff have access to current requirements and instructions shall be documented and implemented.
- Current SQF System documents and amendments to documents shall be maintained.

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 document was for a minimum of two years as defined in the procedure. The completion of records (no pencils, no white out, no scratch outs, etc.) and proper 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

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.2.3.3 Records shall be readily accessible, retrievable, and securely stored to prevent unauthorized access, loss, damage, and deterioration. Retention periods shall be in accordance with customer, legal, and regulatory requirements, at minimum the product shelf-life or established by the site if no shelf-life exists.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.1 Specification, Formulation, and Realization

Products are not formulated at this site. This is a produce warehouse operation with a limited repack operation. From a standpoint of product development, the process that would be undertaken at this site is very limited. That being stated, Capitol City did have a 2.3.1 Product Development and Realization procedure. The SQF Practitioner and director of procurement were identified as responsible management members. That covered validation of food safety and quality programs when new products would be introduced. There have been no new or significantly different products added to the portfolio that would warrant an enactment of the new product procedure. Additional SOP 2.3.1 Product Storage Requirements (v2, 1/15/2018) was documented and defined management of product characteristics, storage requirements additionally requirements for packaging, chemicals, and other supplies.
NA: The site does not manufacture.

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

RESPONSE: COMPLIANT

EVIDENCE:

2.3.1.2 New product formulations, manufacturing processes, and the fulfillment of product requirements shall be established, validated, and verified by site trials and product testing as required to ensure product safety.

Product formulations shall be developed by authorized persons to ensure that they meet the intended use. Where necessary, shelf life trials shall be conducted to validate and verify a new product's:

- i. Pre-consumer handling and storage requirements, including the establishment of "use by," "best before dates," or equivalent terminology;
- ii. Microbiological criteria, where applicable; and
- iii. Consumer preparation, where applicable, and storage and handling requirements.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.3.1.6 Records of product design, formulations, label compliance, process flows, shelf life trials, and approvals for all new and existing products shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

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

The register with dates of review and risk level for each raw ingredient was documented and dated as Document 2.3.4 Raw and Packaging Materials last reviewed 4/19/2023. The bag used for product contact was certified as safe through a letter of guarantee specifying adherence to regulatory standard. The contractor service provider register with the relevant training and description of service/frequency were defined in Form 2.3.3 Contract Service Providers list (1/15/2018, v2). This list was reviewed with the internal audit on 4/9/2024 by the SQF practitioner. A minor was issued in this section under clause 2.3.2.2.

2.3.2.1 The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: MINOR

EVIDENCE: The site did not have the specification for the repack poly bag.

ROOT CAUSE: Why 1: The specification for the poly bag was not requested from the supplier. The only item requested was the letter of guarantee stating the bags were approved for food contact.

Why 2: This was an oversight by the SQF Practitioner when requesting the documentation.

Why 3: SQF Practitioner was not aware that a specification was also required.

Why 4: This was an oversight due to the fact that the repack poly bags are a very small part of the operation.

CORRECTIVE ACTION: The specifications for the poly bags and the audit were obtained.

The specification was added to the register of raw material and packaging specifications and will be verified on an annual basis and updated if required. Reviewed and confirmed
TBW

VERIFICATION OF CLOSEOUT: The site's corrective action and supporting evidence (amended root cause, supplier approval documents, materials register revised with packaging included and packaging specification obtained) were reviewed and accepted. The NC is closed. JM

COMPLETION DATE: 05/10/2024 **CLOSEOUT DATE:** 06/18/2024

2.3.2.3 All raw materials, packaging, and ingredients, including those received from other sites under the same corporate ownership, shall comply with specifications and with the relevant legislation in the country of manufacture and country(ies) of destination if known.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.4 Raw materials, packaging, and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.5 Site management shall require approved raw materials suppliers to notify the site of changes in product composition that could have an impact on product formulation (e.g., protein content, moisture, amino acid profiles, contaminant levels, allergens, and/or other parameters that may vary by crop or by season).

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.9 Finished product specifications shall be documented, current, approved by the site and its customer, accessible to relevant staff, and shall include, where applicable:

- i. Microbiological, chemical, and physical limits;
- ii. Composition to meet label claims;
- iii. Labeling and packaging requirements; and
- iv. Storage conditions.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.2.10 Specifications for raw materials and packaging, chemicals, processing aids, contract services, and finished products shall be reviewed as changes occur that impact product safety. Records of reviews shall be maintained. A list of all the above specifications shall be maintained and kept current.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.3 Contract Manufacturers

The site does not contract manufacturing or storage to outside suppliers.

2.3.4 Approved Supplier Program

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 using food safety requirements. The requirements were outlined in the Summary of the Pro*Act Supplier Management Program document dated 1/1/2024. 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). The approved supplier list was documented and dated 4/24/24. 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 (last reviewed 4/9/2024).

2.3.4.1 The responsibility and procedure for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented.
A current record of approved suppliers, receiving inspections, and supplier audits shall be maintained.

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Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4.2 The approved supplier program shall be based on the past performance of a supplier and the risk level of the raw materials, ingredients, processing aids, packaging, and services supplied, and shall contain at a minimum:

- i. Agreed specifications (refer to 2.3.2);
- ii. Reference to the level of risk applied to raw materials, ingredients, packaging, and services from the approved supplier;
- iii. A summary of the food safety controls implemented by the approved supplier;
- iv. Methods for granting approved supplier status;
- v. Methods and frequency of monitoring approved suppliers;
- vi. Details of the certificates of conformance, if required; and
- vii. Methods and frequency of reviewing approved supplier performance and status.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4.3 Verification of raw materials shall include certificates of conformance, certificates of analysis, or sampling, and testing. The verification frequency shall be identified by the site.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4.4 The receipt of raw materials, ingredients, processing aids, and packaging from nonapproved suppliers shall be acceptable only in an emergency situation and provided a receiving inspection or analysis is conducted and recorded before use.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4.5 Raw materials, ingredients, and packaging received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and receiving inspections as all other material providers.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4.6 Supplier audits shall be based on risk (as determined in 2.3.4.2) and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.1 Food Legislation

The SOP 2.4.1 was documented Legislation and Customer Requirements (v2, 1/15/2018). The managers maintain up-to-date standards by association with consultant and maintaining subscription to regulatory websites and publications. Registration the FDA was on file and current (#XXXXXX0652, exp. 12/31/24). The SOP 2.4.1 also detailed the notification of SQFI and the certification body in the event of regulatory warning or action.

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

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.1.2** The methods and responsibility for ensuring the site is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.1.3** SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.2 Good Production Practices

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

- 2.4.2.1** The site shall ensure the applicable Good Manufacturing Practices described in Module 11 of this Food Safety Code are applied or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures that ensure food safety is not compromised.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.2.2** The Good Manufacturing Practices applicable to the scope of certification outlining how food safety is controlled and assured shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3 Food Safety Plan

The food safety plan was documented (2.4.3, v3, 1/24/2022). There was a multi-departmental team consisting of the director of special projects, director of procurement, SQF Practitioner, QA supervisor, director of operations and warehouse management. The product description (1/21/15), the ingredient and packaging assessment (3/15/21), the hazard analysis (8/21/20), allergen assessment containing analysis for all 9 allergens (8/21/21) and flow chart (version date 12/15/14) were last reviewed, signed and dated on 4/1/24. The HACCP team was defined with responsibility defined (dated 4/9/24). Resulting from the hazard analyses there were no CCPs or PCs identified. All were controlled by the prerequisite programs.

- 2.4.3.1** A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. The food safety plan shall be effectively implemented and maintained and shall outline how the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.2** The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant raw materials, packaging, processing aids, products, and associated processes. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.3** The scope of each food safety plan shall be developed and documented including the start and endpoints of the processes under consideration and all relevant inputs and outputs.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.4** Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. The descriptions shall reference the finished product specifications (refer to 2.3.2.9) plus any additional information relevant to product safety, such as pH, water activity, composition, and/or storage conditions.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.5** The intended use of each product shall be determined and documented by the food safety team. This shall include target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative uses of the product.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.6** The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process, all raw materials, packaging, service inputs (e.g., water, steam, gasses as applicable), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.7** The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.8** The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.9** The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.10** Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (i.e., a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.3.11** For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product (critical limits). The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.2.1).

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.12 The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct monitoring, the sampling and test methods, and the test frequency.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.14 The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs, or other changes affecting product safety occur.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.15 Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5).

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.16 Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.17 Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.4 Product Sampling, Inspection, and Analysis

The 2.4.4. Product Sampling, Inspection and Analysis (v3, 1/24/22) was documented and outlined incoming inspection, inspection of storage produce and special circumstances. The site did utilize an outside lab that was ISO 17025 certified. A current certificate was on file. Note the sampling conducted was of the quality nature, not microbial testing (inspection sampling for quality at receiving and inspection of products to customer requirements on shipment). The outside lab was used only for environmental monitoring and water testing. NA: Onsite lab was not present.
NA: Retention samples were not kept.

2.4.4.1 The methods, responsibility, and criteria for sampling, inspecting, and/or analyzing raw materials, work-in-progress, and finished product shall be documented and implemented.

The methods applied shall ensure that inspections and analyses are completed at regular intervals as required and to agreed specifications and legal requirements.

Sampling and testing shall be representative of the process batch and ensure that process controls are maintained to meet specification and formulation.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.4.2 Product analyses shall be conducted to nationally recognized methods or company requirements, or alternative methods that are validated as equivalent to the nationally recognized methods.

Where internal laboratories are used to conduct input, environmental, or product analyses, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses.

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 2.3.2.11).

RESPONSE: COMPLIANT

EVIDENCE:

2.4.4.6 Records of all inspections and analyses shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.5 Non-conforming Materials and Product

2.4.4/2.4.5 Non-conforming product and materials (v3, 1/24/22) defines approach to control of products, equipment, and returns. A log was kept. There were no products on hold at the time of audit. The site's process is inspect and remove from storage on produce items. A hold tag is used if needed. The returns log was kept electronically and specified type of return.

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

RESPONSE: COMPLIANT

EVIDENCE:

- 2.4.5.2** Quarantine records and records of the handling, corrective action, or disposal of nonconforming materials or product shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.6 Product Rework

The product rework/recoup SOP 2.4.5/2.4.6 (v2, 1/15/2028) was documented and defined the produce rework/inspections of returns. An electronic log is used for returns. Quality rework is conducted to remove rot/decay through sorting/inspection. Reworking of produce is simply a culling action to remove any sub-standard products, multiple lots or differing products are not combined.

- 2.4.6.1** The responsibility and methods outlining how ingredients, packaging, or products are reworked shall be documented and implemented. The methods applied shall ensure:
- i. Reworking operations are overseen by qualified personnel;
 - ii. Reworked product is clearly identified and traceable;
 - iii. Reworked product is processed in accordance with the site's food safety plan;
 - iv. Each batch of reworked product is inspected or analyzed as required before release;
 - v. Inspections and analyses conform to the requirements outlined in element 2.4.4.1;
 - vi. Release of reworked product conforms to element 2.4.7; and
 - vii. Reworked product does not affect the safety or integrity of the finished product.
- Records of all reworking operations shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.7 Product Release

SOP 2.4.7 Product Release (v2, 1/15/2018) was documented and defined the product release as it related to the inbound inspection failures, and product in stock/storage holds. Records for release were observed in the receiving documents/inspections and in the hold process for quality issues.

- 2.4.7.1** The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released by authorized personnel, and only after all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met.
- Records of all product releases shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.7.2 Product release shall include a procedure to confirm that product labels comply with the food legislation that applies in the country of manufacture and the country(ies) of use or sale if known (refer to 2.4.1.1). If product is packaged and distributed in bulk or unlabeled, product information shall be made available to inform customers and/or consumers of the requirements for its safe use.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.7.3 In the event that the site uses positive release based on product pathogen or chemical testing, a procedure shall be in place to ensure that product is not released until acceptable results have been received. In the event that off-site or contract warehouses are used, these requirements shall be effectively communicated and verified as being followed.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.8 Environmental Monitoring

The site does conduct environmental monitoring although the repack activity is not high risk and there is no food manufacturing/processing. The program is yearly monitoring for Listeria. The record of tests was on file for 3/20/2024. There were two drain swabs, one truck swab, and two repack table swabs. All tests were negative. The laboratory used had a valid ISO 17025 certification (expiration date 7/31/2024).

2.4.8.1 A risk-based environmental monitoring program shall be in place for all food manufacturing processes and immediate surrounding areas, which impact manufacturing processes. The responsibility and methods for the environmental monitoring program shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.8.2 An environmental sampling and testing schedule shall be prepared. It shall at a minimum:

- i. Detail the applicable pathogens or indicator organisms to test for in that industry;
- ii. List the number of samples to be taken and the frequency of sampling;
- iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and
- iv. Describe the methods to handle elevated or undesirable results.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.8.3 Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) shall be implemented where unsatisfactory results or trends are observed.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.1 Validation and Effectiveness (Mandatory)

The SOP 2.5.1-2 Verification and Validation (v3, 1/24/22) was documented. The validation (Verification of PRP Effectiveness) was conducted on 4/3/24. The review of procedures and records, observations of employee practices, interviews with employees, observances of conditions and other methods were used in the validation of all PRPs (training, cleaning, maintenance, calibration, control of contamination, supplier approval, waste management and others). The Temperatures of storage were justified by validation white paper, "Recommended Storage Temperature and Relative Humidity Compatibility Groups" (Ohio State University with sources: United States Department of Agriculture Handbook #66.and Tropical Products Transport Handbook. USDA OT Agricultural Handbook #688.).

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

RESPONSE: COMPLIANT

EVIDENCE:

2.5.2 Verification Activities (Mandatory)

The SOP 2.5.1-2 Verification and Validation (v3, 1/24/22) was documented and the schedule for verification, Policy 2.5.2 (v4, 1/24/23) was documented. The schedule included the responsibility, frequency and document/action of all monitoring/verification activities.

- 2.5.2.1** The methods, responsibility, and criteria for verifying monitoring of Good Manufacturing Practices, critical control points, and other food safety controls, and the legality of certified products shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.5.2.2** A verification schedule outlining the verification activities, their frequency of completion, and the person responsible for each activity shall be prepared and implemented. Records of verification of activities shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.3 Corrective and Preventative Action

Corrective actions were recorded on a specific form with investigation to root cause as appropriate for all issues noted on the inspections. This was noted for external and internal inspections and audits.

2.5.3.1 The responsibility and methods outlining how corrective and preventative actions are determined, implemented, and verified, including the identification of the root cause and resolution of non-compliance of critical food safety limits and deviations from food safety requirements, shall be documented and implemented. Deviations from food safety requirements may include customer complaints, nonconformances raised at internal or external audits and inspections, non-conforming product and equipment, withdrawals and recalls, as appropriate.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.3.2 Records of all investigation, root cause analysis, and resolution of non-conformities, their corrections, and the implementation of preventative actions shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.4 Internal Audits and Inspections

The internal audit was conducted against the SQF code. A SQF food safety checklist was completed within the past year. The last internal audit was conducted on 3/28-29/2024. The participants conducting the internal audit were the SQF practitioner, consultant and director of special products. The consultant used has experience and training with auditing and conducted the internal audit with the Capitol City staff. The site conducts a GMP audit quarterly and glass/brittle plastic inspection monthly. The dates of the last GMP inspections were 1/19/2024, 12/4/2023, 9/11/2023, and 6/27/2023. All months of the last year 2023 to current 2024 were represented in the glass/brittle plastic inspections. Corrective actions were recorded on a specific form with investigation to root cause as appropriate for all issues noted on the inspections.

2.5.4.1 The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure:

- i. All applicable requirements of the SQF Food Safety Code: Food Manufacturing are audited per the SQF audit checklist or a similar tool;
- ii. Objective evidence is recorded to verify compliance and/or non-compliance;
- iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and
- iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.4.2 Staff conducting internal audits shall be trained and competent in internal audit procedures. Where practical, staff conducting internal audits shall be independent of the function being audited.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.5.4.3** Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and facility and equipment maintenance are compliant to the SQF Food Safety Code: Food Manufacturing. The site shall:
- i. Take corrections or corrective and preventative action; and
 - ii. Maintain records of inspections and any corrective actions taken.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.5.4.4** Records of internal audits and inspections and any corrective and preventative actions taken as a result of internal audits shall be recorded as per 2.5.3.
Changes implemented from internal audits that have an impact on the site's ability to deliver safe food shall require a review of applicable aspects of the SQF System (refer to 2.3.1.3).

RESPONSE: COMPLIANT

EVIDENCE:

2.6.1 Product Identification and Traceability

All products are given a receiving label with lot, item and name identification. Products were identified utilizing manufacturer/supplier labels, receiving pallet labels and re-pack labels. These were applied to products and effectively accomplished labeling and facilitation of trace. Records of product movement through the warehouse were kept electronically. Information on a repack label was applied for products that are repacked into the smaller denominations.

- 2.6.1.1** The methods and responsibility for identifying raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products during all stages of production and storage shall be documented and implemented to ensure:
- i. Raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products are clearly identified during all stages of receipt, production, storage, and dispatch; and
 - ii. Finished product is labeled to the customer specification and/or regulatory requirements.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.6.1.2** Product start-up, product changeover, and packaging changeover (including label changes) procedures shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label and that the changeover is inspected and approved by an authorized person.
Procedures shall be implemented to ensure that label use is reconciled and any inconsistencies investigated and resolved.
Product changeover and label reconciliation records shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.2 Product Trace

The site demonstrated the records generated in the ERP for the trace of item #842 Chopped Romaine Lettuce that was received on 02/17/24 (Lot X0454284) and 174 cases came in on the order. The receiving/auto-pack out screens were demonstrated to show receiving process and acceptance into inventory. The inventory usage screen was demonstrated to detail the trace of the specific lot number to the specific customer. The repacking of a portion of the order (one case) was recorded along with the destination of the resulting smaller units coming from the whole case. The customer receiving, delivery date, lot number, 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.

- 2.6.2.1** The responsibility and methods used to trace product shall be documented and implemented to ensure:
- Finished product is traceable at least one step forward to the customer and at least one step back from the process to the manufacturing supplier;
 - The receipt dates of raw materials, ingredients, food contact packaging and materials, and other inputs are recorded (refer to 2.8.1.8 for traceback of allergen containing food products.);
 - Traceability is maintained where product is reworked (refer to 2.4.6); and
 - The effectiveness of the product trace system is reviewed at least annually, as part of the product recall and withdrawal review (refer to 2.6.3.2).

Records of raw and packaging material receipt and use and finished product dispatch and destination shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.3 Product Withdrawal and Recall (Mandatory)

The 2.6.3 product withdrawal and recall procedure was documented (v 4, 1/24/22). The site performed a mock recall on 3/28/24. This took 60 minutes to trace 100% of the product. 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.

- 2.6.3.1** The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall:
- Identify those responsible for initiating, managing, and investigating a product withdrawal or recall;
 - Describe the management procedures to be implemented, including sources of legal, regulatory, and expert advice, and essential traceability information;
 - Outline a communication plan to inform site personnel, customers, consumers, authorities, and other essential bodies in a timely manner appropriate about the nature of the incident; and
 - Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and notified in instances of a food safety incident of a public nature or product recall for any reason.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.6.3.2** The product withdrawal and recall system shall be reviewed, tested, and verified as effective at least annually. Testing shall include incoming materials (minimum traceability one step back) and finished product (minimum traceability one step forward). Testing shall be carried out on products from different shifts and for materials (including bulk materials) that are used across a range of products and/or products that are shipped to a wide range of customers.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.3.3 Records shall be maintained of withdrawal and recall tests, root cause investigations into actual withdrawals and recalls, and corrective and preventative actions applied.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.3.4 SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.4 Crisis Management Planning

The crisis management plan was documented (2.6.2, v3, 1/24/2022). The crisis team was defined. The SQF Practitioner, COO, Director of Operations and others were responsible for oversight of the program depending on the issue or event. The known threats were fire, flood, weather/hurricane, water leak, power failure, pandemic, terrorism, supply chain disruption, equipment failure, quality issues that prohibit ability to supply customer appropriately and IT disruption. The product assessment for acceptability was defined to be established as events are brought under control. The Disaster Recovery Plan (revised 2023) was documented and provided additional specificity around some of the threats. The test of the BCP was conducted on 4/1/24 and the exercise was recorded. In the scenario, a fire had threatened the facility and product. The product was assessed and the measures to meet customer needs were discussed.

2.6.4.1 A crisis management plan based on the understanding of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather events, warfare or civil unrest, computer outage, pandemic, loss of electricity or refrigeration, ammonia leak, labor strike) that can impact the site's ability to deliver safe food shall be documented by senior management, outlining the methods and responsibility the site shall implement to cope with such a business crisis. The crisis management plan shall include at a minimum:

- i. A senior manager responsible for decision making, oversight, and initiating actions arising from a crisis management incident;
- ii. The nomination and training of a crisis management team;
- iii. The controls implemented to ensure any responses do not compromise product safety;
- iv. The measures to isolate and identify product affected by a response to a crisis;
- v. The measures taken to verify the acceptability of food prior to release;
- vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers;
- vii. Sources of legal and expert advice; and
- viii. The responsibility for internal communications and communicating with authorities, external organizations, and media.

RESPONSE: COMPLIANT

EVIDENCE:

2.6.4.2 The crisis management plan shall be reviewed, tested, and verified at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.7.1 Food Defense Plan

SOP 2.7.1 Food Defense (V4, 1/24/22) documented the site's approach to security of the premises and of the product during all phases of handling and storage. The site's CEO was responsible for overseeing the security program. Challenge conducted and documented on 4/1/2024. This was an visitor procedure test. Food Defense Self-Assessment Checklist Assessment checklist was conducted and recorded on 4/10/2024.

- 2.7.1.1** A food defense threat assessment shall be conducted to identify potential threats that can be caused by a deliberate act of sabotage or terrorist-like incident.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.7.1.2** A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum:
- i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident;
 - ii. The name of the senior site management person responsible for food defense;
 - iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points;
 - iv. The methods implemented to protect sensitive processing points from intentional adulteration;
 - v. The measures taken to ensure the secure receipt and storage of raw materials, ingredients, packaging, equipment, and hazardous chemicals to protect them from deliberate acts of sabotage or terrorist-like incidents;
 - vi. The measures implemented to ensure raw materials, ingredients, packaging (including labels), work-in-progress, process inputs, and finished products are held under secure storage and transportation conditions; and
 - vii. The methods implemented to record and control access to the premises by site personnel, contractors, and visitors.

RESPONSE: COMPLIANT

EVIDENCE:

- 2.7.1.3** Instruction shall be provided to all relevant staff on the effective implementation of the food defense plan (refer to 2.9.2.1).

RESPONSE: COMPLIANT

EVIDENCE:

- 2.7.1.4** The food defense threat assessment and prevention plan shall be reviewed and tested at least annually or when the threat level, as defined in the threat assessment, changes. Records of reviews and tests of the food defense plan shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2 Food Fraud

The 2.7.2 Food Fraud SOP (V2 1/15/2018) was documented. The food fraud assessment was last conducted on 4/9/2024. 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 for substitution, finished product mislabeling, dilution, or counterfeiting.

2.7.2.1 The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud, including susceptibility to raw material or ingredient substitution, finished product mislabeling, dilution, or counterfeiting, shall be documented, implemented, and maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2.2 A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled, including identified food safety vulnerabilities of ingredients and materials.

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2.3 Instruction shall be provided to all relevant staff on the effective implementation of the food fraud mitigation plan (refer to 2.9.2.1).

RESPONSE: COMPLIANT

EVIDENCE:

2.7.2.4 The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually with gaps and corrective actions documented. Records of reviews shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1 Allergen Management

The auditor observed the following associated specifically with allergen management in the warehouse: training, signage at storage areas, separate storage with vertical consideration, staging of returns appropriately with respect to allergens, and a selectors were observed during selection of an order (process followed a pick route and dividers, bags and slip sheets were used to keep allergens separate during shipping). The Allergen SOP 2.8.1 (v2, 1/15/2018) defines allergens handled or potentially handled. The storage of allergen containing foods in the warehouse is controlled by vertical orientation. Only allergens over same allergens or non-allergens over allergen containing is accomplished in all areas possible. There is a spill corrective action plan. Observed storage in the warehouse was found to comply to the program. Training to the SOP was observed. No products containing allergens are repacked. The programs were verified as acceptably maintained during the audit. The warehouse distributes dairy, peanut, and egg allergen containing products. All allergen products are contained within packaging (with exception - shell eggs - in boxes/cartons but not 100% enclosed., no damage or spills observed). No exposed allergens were handled. The verification of proper allergen storage and shipment was observed. The loader and selectors that were interviewed were familiar with allergens and proper handling procedures.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.7 The product identification system (refer to 2.6.1.1) shall make provision for clear identification and labeling, in accordance with the regulatory requirements of those products produced on production lines and equipment on which foods containing allergens are manufactured.

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.8 The product trace system (refer to 2.6.2) shall take into consideration the conditions under which allergen-containing foods are manufactured and ensure full traceback of all ingredients and processing aids used.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.8.1.10 Re-working of product (refer to 2.4.6) containing food allergens shall be conducted under conditions that ensure product safety and integrity are maintained. Re-worked product containing allergens shall be clearly identified and traceable.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.9.1 Training Requirements

The training requirements are defined in SOP 2.9.1-7 Training Program. Yearly and upon hire trainings are conducted. The training for all employees covers GMP/SQF, Basic HACCP, food defense (FIRST), and allergens. Chemical safety/SSOP is given to sanitation employees. 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. Additional training was observed around supporting programs such as cleaning/sanitation, swab testing, and USDA / quality program.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.9.2 Training Program

Weekly trainings are given in rotation of existing employees with new hires. The records of the training were recorded in roster/attendance lists and tracked on the SQF Training 2024 electronic document. The training had attendees, training topic, description, delivery method and date. The records specific for a selector, QA inspector and a repack employee were sampled for completeness. All records of training for these individuals were in the file and current within the last year per the training SOP requirement.

2.9.2.1 A training program shall be documented and implemented that at a minimum outlines the necessary competencies for specific duties and the training methods to be applied to personnel carrying out tasks associated with:

- i. Implementing HACCP for staff involved in developing and maintaining food safety plans;
- ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs);
- iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces;
- iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment;
- v. Sampling and test methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products;
- vi. Environmental monitoring for relevant staff;
- vii. Allergen management, food defense, and food fraud for all relevant staff; and
- viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code.

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

RESPONSE: COMPLIANT

EVIDENCE:

2.9.2.2 Training materials, the delivery of training, and procedures on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in language(s) understood by staff.

RESPONSE: COMPLIANT

EVIDENCE:

2.9.2.3 Training records shall be maintained and include:

- i. Participant name;
- ii. Skills description;
- iii. Description of the training provided;
- iv. Date training completed;
- v. Trainer or training provider; and
- vi. Verification that the trainee is competent to complete the required tasks.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.1 Premises Location and Approval

The site is registered with the FDA. The registration is current (exp. 12/31/2024). The City Occupational License certificate was on file with expiry 12/31/2024. The Louisiana Department of Health permit was current (expires 6/30/24). The USDA License No. 20051152 was current and on file (expires 8/10/2024). The risk assessment for the site area was conducted and documented with no high risk activities in the area. It was last reviewed on 4/1/2024.

- 11.1.1.1** The site shall assess local activities and the site environment to identify any risks that may have an adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities.
The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.2 Building Materials

The walls (concrete block, metal paneling and steel frame) were found to be in good condition. The doors used for shipping/receiving were in excellent condition and pest-proofed. All personnel doors were clean and in good condition. Dock levelers were found to be in good condition and seals present to prevent pests and dust. The only drop ceilings were in office areas. These were accessible for inspection. The floors were in good condition with minimal damage and wear. The drains were long trench drains with grated covers running under racks where wet produce may be stored. There was no areas of standing water that presented a hazard to food safety. Drains were found to be clean and drain cleaning was conducted on a regular basis as demonstrated in the cleaning program. Two minors were issued in this section under clauses 11.1.2.5 and 11.1.2.6.

- 11.1.2.1** Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, impervious to liquid, and easily cleaned. Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions.
Where floor drainage is not available, plumbed options to handle overflow or wastewater shall be in place.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.2.3** Waste trap system shall be located away from any food handling areas or entrances to the premises.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.2.4 Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 11.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.2.5 Ducting, conduit, and pipes that convey ingredients, products, or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning.

A risk analysis shall be conducted to ensure food contamination risks are mitigated.

RESPONSE: MINOR

EVIDENCE: Risk analysis for ducting, conduit, and pipes that convey ingredients, products, or services was not documented.

ROOT CAUSE: Why 1: The SQF Practitioner did not realize that there was a requirement for a risk analysis regarding this topic.

Why 2: There was some confusion about the specific food sector categories and the required modules that our facility needed to comply with.

Why 3: Due to this requirement not being in Module 12, when we prepared for the Module 11 requirement this clause was missed due to an oversight.

CORRECTIVE ACTION: Risk analysis for ducting, conduit and pipes was reviewed and documented; physical observation of pipes, reviewed installation date and life expectancy, relevant work orders associated with equipment.

Risk assessment will be reviewed annually during the annual SQF review, or when there are any changes to the facility that affect ducting, conduit, or piping. Reviewed and confirmed
TBW

VERIFICATION OF CLOSEOUT: The site's corrective action and supporting evidence (amended root cause, risk analysis was performed) were reviewed and accepted. The NC is closed. JM.

COMPLETION DATE: 05/29/2024 **CLOSEOUT DATE:** 06/18/2024

11.1.2.6 Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces and shall allow ease of cleaning.

A risk analysis shall be conducted to ensure food contamination risks are mitigated.

RESPONSE: MINOR

EVIDENCE: Risk analysis for pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas was not documented.

ROOT CAUSE: Why 1: The SQF Practitioner did not realize that there was a requirement for a risk analysis regarding this topic.

Why 2: There was some confusion about the specific food sector categories and the required modules that our facility needed to comply with.

Why 3: Due to this requirement not being in Module 12, when we prepared for the Module 11 requirement this clause was missed due to an oversight.

CORRECTIVE ACTION: Risk analysis for ducting, conduit and pipes was reviewed and documented; physical observation of pipes, reviewed installation date and life expectancy, relevant work orders associated with equipment.

Risk assessment will be reviewed annually during the annual SQF review, or when there are any changes to the facility that affect ducting, conduit, or piping. Reviewed and confirmed
TBW

VERIFICATION OF CLOSEOUT: The site's corrective action and supporting evidence (amended root cause, risk analysis was performed) were reviewed and accepted. The NC is closed. JM.

COMPLETION DATE: 05/29/2024 **CLOSEOUT DATE:** 06/18/2024

11.1.2.7 Doors, hatches, and windows and their frames in food processing, handling, or storage areas shall be of a material and construction that meets the same functional requirements as for internal walls and partitions. Doors and hatches shall be of solid construction, and windows shall be made of shatterproof glass or similar material.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.2.8 Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.2.9 Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 11.2.5).

RESPONSE: COMPLIANT

EVIDENCE:

11.1.3 **Lightings and Light Fittings**

The light installation was adequate to supply sufficient brightness to storage and handling areas. All lights were shielded. All lights in receiving, storage, repack and shipping areas were found to be in good condition and shatter proofed. The areas of storage and repack were supplied with adequate lighting for safe working, inspection and cleaning.

11.1.3.1 Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively and shall comply with local light-intensity regulations or industry standards.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.3.2 Light fixtures in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling.

Where fixtures cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.3.3 Light fixtures in the warehouse or other areas where product is covered or otherwise protected shall be designed to prevent breakage and product contamination.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.4 Inspection/ Quality Control Area

The quality inspection areas maintained were on the receiving dock space near the receiving dock office. It was a stainless table. There was proper lighting. All products inspected that were cut for inspection purposes were discarded (destructive sampling) so there was no risk from the sampling process to products that would be distributed. Waste was handled appropriately.

11.1.4.1 If online inspection is required, a suitable area close to the processing line shall be provided for the inspection of product (refer to 2.4.4). The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/processed. The inspection area shall:

- i. Have easy access to handwashing facilities;
- ii. Have appropriate waste handling and removal; and
- iii. Be kept clean to prevent product contamination.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.5 Dust, Insect, and Pest Proofing

All doors were properly maintained. All doors met the above criteria for exterior doors. The pest devices were located around the building in a manner not to be a danger to personnel or products handled and stored.

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

External personnel access doors shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, vermin, and other pests.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.5.3** Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredients or product storage areas or processing areas where ingredients, packaging, and products are handled, processed, or exposed.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.6 Ventilation

Ventilation was adequate for a refrigerated warehouse. There were no hazards or areas of concern on ventilation. No exhaust vents were used regularly as there were no areas of steam or similar. All areas were controlled under refrigeration.

NA: There are no extractor fans or canopies.

- 11.1.6.1** Adequate ventilation shall be provided in enclosed processing and food handling areas. Where appropriate, positive air-pressure systems shall be installed to prevent airborne contamination.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.6.2** All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 11.2.5 to prevent unsanitary conditions.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.6.4** Fans and exhaust vents shall be insect-proofed and located so they do not pose a contamination risk and shall be kept clean.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.7 Equipment and Utensils

The SOP for 11.2.9 Equipment Specification (V3, 1/24/22) was documented and included the specification or description of required properties for utensils, gloves, shelving and equipment. The purchasing procedure was demonstrated through the inspection of equipment once received to make sure it meets standards and the required approval process for new equipment. 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 tables in the repack area were stainless and maintained clean. The scales in the repack area had stainless contact surfaces and were found to be in good condition and clean. The lifts and jacks were maintained in good condition and did not pose a threat to the products during receipt, storage and staging for delivery.

11.1.7.1 Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.1.7.3 Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers. Where possible, food contact equipment shall be segregated from non-food contact equipment.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.1.7.6 Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned as per 11.2.5.1. Bins used for inedible material shall be clearly identified.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.7.7** All equipment and utensils shall be cleaned after use (refer to 11.2.5.1) or at a set and validated frequency to control contamination and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.7.9** Non-conforming equipment shall be identified, tagged, and/or segregated for repair or disposal in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product. Records of the handling, corrective action, and/or disposal of non-conforming equipment shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.8 Grounds and Roadways

The exterior of the warehouse was maintained in an excellent condition. The west side of the warehouse was a construction area for the new addition. This area was not accessible as active construction was occurring. The construction activity was found not to threaten the safety of the warehouse operation. There was complete separation as warehouse walls were intact and were not yet open to construction. The grass at the Interstate 12 side (southside) was maintained cut low with a zone of no growth at the base of the wall. The north side of the building was maintained with landscaped beds and employee/visitor parking (this was the side of the building with the main entrance). The east and south sides of the building were controlled by a security fence that encompassed the truck dock, waste storage and truck parking areas. All areas were maintained very clean. The waste containment was separated into waste foods for transport to farming (covered dumpsters), trash (compactor) and recycling (compactor). There were no areas of standing water on the exterior of the facility. All exterior equipment was stored properly.

- 11.1.8.1** A suitable external environment shall be established, and the effectiveness of the measures shall be monitored and periodically reviewed. The premises, its surrounding areas, storage facilities, machinery, and equipment shall be kept free of waste or accumulated debris, and vegetation shall be controlled so as not to attract pests and vermin or present a food safety hazard to the sanitary operation of the site.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.1.8.2** Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operations of the premises. They shall be adequately drained to prevent the pooling of water. Drains shall be separate from the site drainage system and regularly cleared of debris.

RESPONSE: COMPLIANT

EVIDENCE:

11.1.8.3 Paths from amenities leading to site entrances shall be effectively sealed.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1 Repairs and Maintenance

SOP 12.2.1 Repairs and Maintenance / 12.2.2 Maintenance Staff and Contractors (v3, 1/24/22) was documented. The site relied on contractors for most upkeep (refrigeration servicing, truck refrigeration, truck repair and upkeep, and fork lift service . The contracts, workorders and service reports were on file. Refrigeration - storage, refrigeration-fleet, and truck maintenance documentation were reviewed for the audit. Agreements with contractors were kept on file (The contractors for maintenance that are given access to the warehouse to perform duties have training to the GMPs on file. There is a cabinet on site that is secured in which is stored the tools specifically for the lift maintenance contractor and was locked at the time of the audit. There were no temporary repairs noted during the audit. The racks, doors and dock levelers were observed to be maintained in good condition.

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

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1.2 Routine maintenance of plant and equipment in any food processing, handling, or storage areas shall be performed according to a maintenance control schedule and recorded. The maintenance schedule shall be prepared to include buildings, equipment, and other areas of the premises critical to the maintenance of product safety.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.1.3 Failures of plant and equipment in any food processing, handling, or storage areas shall be documented and reviewed, and their repair(s) incorporated into the maintenance control schedule.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.1.6** Temporary repairs, where required, shall not pose a food safety risk and shall be included in routine inspections (refer to 2.5.4.3) and the cleaning program. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.1.7** Food contact equipment and equipment located over food contact equipment shall be lubricated with food-grade lubricant, and its use shall be controlled to minimize the contamination of the product.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.1.8** Paint used in a food handling or processing area shall be suitable for use, in good condition, and not be used on any product contact surfaces.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.2 Maintenance Staff and Contractors

All non-employees were required to check in and were issued security badges. Contractors were handled as any visitor with regards to compliance to the food safety policy. There were signed trainings for contractors reviewed and on file. The maintenance staff were trained just as all other employees with record. Maintenance staff were observed to follow GMPs.

- 11.2.2.1** Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 11.3).

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.2.2** All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.2.3** Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed, and inform the area supervisor and maintenance supervisor, so appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to the restarting of site operations.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.3 Calibration

The calibration SOP 12.2.3 was documented V3, 1/24/22. In the procedure, the directory of calibration activity was defined to the equipment, device ID, frequency, method and responsibility. The calibration certificates for the NIST thermometer (exp. 3/7/2025), the scales (performed 4/2/2024), and the weight used for daily scale monitoring (exp. 3/26/25). 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 procedure also included corrective measures for thermometers found out of calibration.

- 11.2.3.1** The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, shall be documented and implemented. Software used for such activities shall be validated as appropriate.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.3.2** Equipment shall be calibrated against national or international reference standards and methods or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.3.3** Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.3.4** Procedures shall be documented and implemented to address the resolution of potentially affected products when measuring, testing, or inspection equipment is found to be out of calibration.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.3.5** Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.3.6** A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.4 Pest Prevention

The SOP for Management of Pests and Vermin (12.2.4 (v3, 1/24/2024) and last reviewed by Capital City staff and PCO on 3/25/2024. The contracted service is monthly. There are traps placed on the floor/wall junction around exterior walls and on both sides of doors. The exterior bait stations are positioned around the entire facility, are secured and locked. The training of employees with inspection and knowledge on bait poison and pest control was recorded. The SDS for the rodenticide was on file and the usage for the rodenticides was recorded. The insurance certificate was current (exp. 6/15/24). The current license was on file (PCO and business - 12/31/24 expiration). The site map was current and accurate (last review date was 3/25/24). The record of pest activity and trends was documented and current. There was no interior activity or catches over the past year. There was no significant outside activity trends for feeding in the bait stations. There were no signs of activity or infestation observed on the interior during the audit. Past months service reports for in-house and contracted checks were documented and reviewed for compliance. The GMP form for the pest technician was signed and on file for 3/25/2024.

11.2.4.1

A documented pest prevention program shall be effectively implemented. It shall:

- i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program;
- ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications;
- iii. Outline the methods used to prevent pest problems;
- iv. Outline the pest elimination methods and the appropriate documentation for each inspection;
- v. Outline the frequency with which pest status is to be checked;
- vi. Include the identification, location, number, and type of applied pest control/monitoring devices on a site map;
- vii. List the chemicals used. The chemicals are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available;
- viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station;
- ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and
- x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.4.2

Pest contractors and/or internal pest controllers shall:

- i. Be licensed and approved by the local relevant authority;
- ii. Use only trained and qualified operators, who comply with regulatory requirements;
- iii. Use only approved chemicals;
- iv. Provide a pest prevention plan (refer to 2.3.2.8), which includes a site map, indicating the location of bait stations traps and other applicable pest control/monitoring devices;
- v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments;
- vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and
- vii. Provide a written report of their findings and the inspections and treatments applied.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.4.3 Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be conducted on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of all pest control inspections and applications shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.4.4 Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation shall be investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.4.5 Pesticides shall be clearly labeled and stored per 11.6.4 if kept on-site.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.4.6 No animals shall be permitted on-site in food handling and storage areas.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5 Cleaning and Sanitation

The cleaning schedule was documented on a multi-sheet record that had weekly, daily, monthly, quarterly and bi-annual cleaning activities defined (Form 12.2.11, v1, 1/1/2018). The employees performing the task reported completion and the supervisor or SQF Practitioner verified the completion of the work. These were as follows. Weekly-Exterior schedule including overall cleanliness and waste containment (each week's entry was verified as effective by management). There is a daily cleaning schedule for interior areas (aisle and room specific) in addition to the restrooms/break area. that is kept with notation of completion and supervisor/management verification initials. The monthly schedule was completed for exterior and specialty cleaning activities such as dock doors, drains, dock plates (space underneath), mechanical rooms and others. The monthly schedule had management verification. The quarterly cleaning schedule included cleaning the refrigeration units and associated pipes, walls and associated structures. The bi-annual schedule included ceiling/rafters and light covers with verification by managers. The 2023 and up-to-current 2024 records were observed to be completed. The Cleaning and Sanitation SOP 12.2.5 (v3, 1/24/22) was documented. There were thorough procedures on file for cleaning (chemicals, tools and cleaning steps defined). SDSs confirmed on file were for the chemicals in use. Zep FS Formulate 940, San-T 10 Plus (sanitizer) and Inspector's Choice (cleaner). Cleaner and sanitizer mix and concentration verifications of metering devices were conducted and recorded monthly. The record for verification of concentration was complete for 2023 and current to date, 2024. Daily records were confirmed for the pre-op swabbing is conducted on totes and tables with ATP protein swabs. The training was conducted for those with sanitation and chemical usage responsibilities on 4/2/2024 with verification of competency. The pre-op visual inspection is conducted daily with record (all records 2023 year to current 2024 were verified). The verification of removal of trash and waste is included on the pre-op/operational inspection. The storage areas and the staff amenities (restrooms and breakrooms) were found to be satisfactorily cleaned.

- 11.2.5.1** The methods and responsibility for the effective cleaning of the food handling and processing equipment and environment and storage areas shall be documented and implemented. Consideration shall be given to:
- i. What is to be cleaned;
 - ii. How it is to be cleaned;
 - iii. When it is to be cleaned;
 - iv. Who is responsible for the cleaning;
 - v. Validation of the cleaning procedures for food contact surfaces (including CIP);
 - vi. Methods used to confirm the correct concentrations of detergents and sanitizers; and
 - vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.5.2** Detergents and sanitizers shall be suitable for use in a food manufacturing environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure:
- i. The site maintains a list of chemicals approved for use;
 - ii. An inventory of all purchased and used chemicals is maintained;
 - iii. Detergents and sanitizers are stored as outlined in element 11.6.4;
 - iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and
 - v. Only trained staff handle sanitizers and detergents.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.2.5.5** Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing areas, product handling equipment, and storage areas as well as the tools themselves.

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5.6 Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils used by staff. The areas for these cleaning operations shall be controlled so they do not interfere with manufacturing operations, equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.2.5.9 The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared. A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.1 Personnel Welfare

The GMP documented policy for staff and visitors was verified to define health requirements which excluded those persons suffering from or with symptoms of illness. The employees observed in the warehouse were observed to be healthy with no appearance of illness or injury that could threaten workplace or product safety.

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

Code Amendment #1

A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.2 Handwashing

The sink for handwashing was provided in the repack area. The sink was supplied with tempered water, towels in dispenser and a trash receptacle. There was a sign designating the sink as a hand wash and the sink was not observed to be used for other purposes. Gloves were changed as needed (when dirty or damaged). Training of employees encouraged them to wash hands prior to applying gloves. Hand sinks were also available in all restrooms and in the break area. These were supplied appropriately for effective handwashing.

11.3.2.1 All personnel shall have clean hands, and hands shall be washed by all staff, contractors, and visitors:

- i. On entering food handling or processing areas;
- ii. After each visit to a toilet;
- iii. After using a handkerchief;
- iv. After smoking, eating, or drinking; and
- v. After handling wash down hoses, cleaning materials, dropped product, or contaminated material.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.2.2 Handwashing stations shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.2.3 Handwashing stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with:

- i. A potable water supply at an appropriate temperature;
- ii. Liquid soap contained within a fixed dispenser;
- iii. Paper towels in a hands-free cleanable dispenser; and
- iv. A means of containing used paper towels.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.3.2.6** When gloves are used, personnel shall maintain the handwashing practices outlined above.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3 Clothing and Personal Effects

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3.5 Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged.
Non-disposable aprons and gloves shall be cleaned and sanitized as required and when not in use stored on racks provided in the processing area or in designated sealed containers in personnel lockers. They should not be placed or stored on packaging, ingredients, product, or equipment.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3.6 Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned.
All protective clothing shall be cleaned after use, or at a frequency to control contamination, and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3.7 Racks shall be provided for the temporary storage of protective clothing when staff leave the processing area and shall be provided nearby or adjacent to the personnel access doorways and handwashing facilities.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.3.8 Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or into any area where food is exposed. Wearing plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided these items are properly covered and do not pose a food safety risk.
All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.4 Visitors

Visitors were required to comply to rules for Good Warehousing Practices just as employees were required while in warehousing areas. The rules were reviewed prior to entry to the warehouse. At sign in upon arrival, visitors going into the storage areas are asked to review the GMP and Hygiene Policy. A policy was signed by the visitors and kept on file. The auditor was presented with the policy and asked to review and sign by the reception employee prior to being greeted by management. The policy was again reviewed at the time of walking into the warehouse area. The drivers were controlled so that they could not wonder into the warehouse. If a driver was given access, they are required to follow GMPs.

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.4.2 All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 11.3.3.8. All visitors shall wear suitable clothing and footwear when entering any food processing and handling area.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.3.5 Staff Amenities (change rooms, toilet, break rooms)

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

NA: There were no high risk areas.

11.3.5.1 Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for use by all persons engaged in the handling and processing of product.

RESPONSE: COMPLIANT

EVIDENCE:

11.3.5.2 Change rooms shall be provided to enable staff and visitors to change into and out of protective clothing as required. Change rooms shall be kept clean.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.3.5.6** Toilet rooms shall be:
- i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations;
 - ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room;
 - iii. Sufficient in number for the maximum number of staff;
 - iv. Constructed so that they can be easily cleaned and maintained;
 - v. Located inside or nearby areas for storing protective clothing, outer garments, and other items while using the facilities; and
 - vi. Kept clean and tidy.
- Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.3.5.7** Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system in accordance with regulations.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.3.5.8** Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.3.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.3.5.9** Separate break rooms shall be provided away from food contact/handling zones.
- Break rooms shall be:
- i. Ventilated and well lit;
 - ii. Provided with adequate tables and seating to cater for the maximum number of staff at one sitting;
 - iii. Equipped with a sink serviced with hot and cold potable water for washing utensils;
 - iv. Equipped with refrigeration and heating facilities, enabling staff to store or heat food and to prepare non-alcoholic beverages if required; and
 - v. Kept clean and free from waste materials and pests.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.3.5.10** Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential for the introduction of contamination, including pests to the site.

RESPONSE: COMPLIANT

EVIDENCE:

11.4.1 Staff Engaged in Food Handling and Processing Operations

There is no processing of foods the area for repacking was a segregated portion of warehouse. Sensory evaluations (tasting of foods) are not performed. Visual inspection for quality occurs and is documented daily in storage areas. All employees in the warehouse are required to wear hair and beard restraints (caps, hair nets, beard nets, facial coverings or other were accepted). GMPs are defined and established as clean clothes, no eating/drinking in storage/handling areas, hand washing and gloves for direct fruit contact. Activities of smoking, chewing and eating were prohibited in the repack area and warehouse. All employees were following the standard at the time of audit. First aid kits were in place with colored bandages for visibility.

- 11.4.1.1** All personnel engaged in any food handling, preparation, or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices:
- i. Personnel entry to processing areas shall be through the personnel access doors only;
 - ii. All doors are to be kept closed. Doors shall not be open for extended periods when access is required for waste removal or receiving of product/ingredient/packaging;
 - iii. Packaging, product, and ingredients shall be kept in appropriate containers as required and off the floor;
 - iv. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; and
 - v. All wash down and compressed air hoses shall be stored on hose racks after use and not left on the floor.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.4.1.2** Personnel working in or visiting food handling or processing operations shall ensure that:
- i. Staff shall not eat or taste any product being processed in the food handling/contact zones, except as noted in element 11.4.1.4;
 - ii. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails, or fingernail polish is not permitted when handling exposed food;
 - iii. Hair restraints and beard covers, where applicable, shall be used in areas where product is exposed.
 - iv. Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed.
 - v. Drinking water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers in production and storage areas shall be stored in clear, covered containers, and in designated areas away from raw materials, packaging, tools, or equipment storage.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.4.1.3** The flow of personnel in food processing and handling areas shall be managed such that the potential for contamination is minimized.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.1 Water Supply

The water is municipally-sourced. The last water test for potability was conducted on 4/5/2024. This was performed by the ETR Laboratories on a sample taken at the Capitol City Warehouse location. The backflow tests for the site were conducted last on 2/23/2024. The SOP 12.5 Water (v3, 1/24/2022) includes the policy for yearly test, backflow tests, supply of adequate hot / cold water and contingency in the event water becomes contaminated.

11.5.1.1 Adequate supplies of potable water drawn from a known clean source shall be provided for water used as an ingredient during processing operations and for cleaning the premises and equipment. The source of potable water shall be identified as well as on-site storage (if applicable) and reticulation within the facility.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.1.2 Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.5.1.4 The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.2 Water Treatment

The water is not treated at this site prior to use.

11.5.3 Water Quality

The water is municipally-sourced. The last water test for potability was conducted on 4/5/2024. This was performed by the ETR Laboratories on a sample taken at the Capitol City Warehouse location. With this test, there was a full mineral analysis conducted.

11.5.3.1 Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required when used for:

- i. Washing, thawing, and treating food;
- ii. Handwashing;
- iii. Conveying food;
- iv. An ingredient or food processing aid;
- v. Cleaning food contact surfaces and equipment;
- vi. The manufacture of ice; or
- vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.

RESPONSE: COMPLIANT

EVIDENCE:

11.5.3.2 Microbiological analysis of the water and ice supply shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Samples for analysis shall be taken at sources supplying water for the process or cleaning or from within the site. The frequency of analysis shall be risk-based and at a minimum annually.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.5.4 Ice Supply

The site does not produce ice or purchase ice for product contact use.

11.5.5 Air and Other Gasses

Air or other gasses are not used in this manner.

11.6.1 Receipt, Storage and Handling of Goods

The site defined and documented the receiving and storage conditions needed to maintain the products safely for selection and delivery to the customers. This was documented in the following SOPs 12.6.1-6 Storage Program (v3, 1/24/22) and 12.7.2 Receiving (v2, 1/15/2018). The receiving of products included the inspection of product for quality / temperature as well as the assessment for carrier condition. This included rotation of goods in a FIFO manner but also with respect to inspected quality (produce condition) was closely monitored and recorded through daily inspection. Products are disposed of or inspected more closely and culled dependent upon the quality inspection report. The proper storage of allergen-containing goods was included in the allergen management plan which requires vertical separation of foods with respect to allergen content. The interview of incoming quality personnel was conducted (two inspectors). They were knowledgeable and familiar with the responsibilities of their position.

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

RESPONSE: COMPLIANT

EVIDENCE:

11.6.1.2 Controls shall be in place to ensure all ingredients, raw materials, processing aids, and packaging are received and stored properly to prevent cross-contamination risks. Unprocessed raw materials shall be received and stored separately from processed raw materials to avoid cross-contamination risk.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.1.3 The responsibility and methods for ensuring effective stock rotation principles shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.6.1.5 Where raw materials, ingredients, packaging, equipment, and chemicals are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there are no risks to the integrity of those goods, no potential for contamination or adverse effect on food safety.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.6.2 Cold Storage, Freezing and Chilling of Foods

The freezer was found to be at -2 F. The main cooler was found to be at 35 to 37 F average temperature. The aisle 10 was a tempered room to product requirements at 45 F (potatoes room). The aisle 11 another tempered space to product requirements was around 56 F (onions and bananas room). The shipping / receiving dock was at 36 F. The tomato room was kept high for product quality (this was around 60 F). The site was electronically monitoring the temperatures. Graphs were used to illustrate history of the temperatures. The site had records for the entire year. The freezer, cooler and dry storage spaces were all inspected. The temperatures were found to be within safe ranges for the types of products stored within each space. The records were kept electronically. There is an alarm for notification when temperatures were found above established limits. The records were reviewed for the audit. Random days were selected over the last year and temperature levels confirmed to be consistent. The discharge of refrigeration was conveyed to the exterior and away from storage.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.2.3** The site shall have a written procedure for monitoring temperatures, including the frequency of checks, and corrective actions, if the temperature is out of specification. Freezing, chilling, and cold storage rooms shall be fitted with temperature monitoring equipment that is located to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

There were no shelf stable foods stored or handled. The racks were found to be in good condition and areas were found to be clean. The lifts and jacks used in the warehouse were found to be in good condition and clean. The battery charging area was kept away from food and food-related storage. The battery area was clean and free of debris

- 11.6.3.1** Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration and prevent packaging from becoming a harborage for pests or vermin.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.3.2** Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and behind the racks. Storage areas shall be cleaned at a pre-determined frequency.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.4 Storage of Hazardous Chemicals and Toxic Substances

- 11.6.4.1** Hazardous chemicals and toxic substances with the potential for food contamination shall be:
- i. Clearly labeled, identifying and matching the contents of their containers;
 - ii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; and
 - iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.4.2** Storage of hazardous chemicals and toxic substances shall be:
- i. Located in an area with appropriate signage indicating that the area is for hazardous storage;
 - ii. Controlled, lockable, and accessible only by personnel trained in the storage and use of chemicals;
 - iii. Adequately ventilated;
 - iv. Stored where intended and not comingled (e.g., food versus non-food grade);
 - v. Designed such that pesticides, rodenticides, fumigants, and insecticides are stored separately from sanitizers and detergents; and
 - vi. Stored in a manner that prevents a hazard to finished product or product contact surfaces.
- Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.4.3** Hazardous chemicals and toxic substances shall be correctly labeled and:
- i. Used only according to manufacturers' instructions;
 - ii. Controlled to prevent contamination or a hazard to raw and packaging material, work-in progress, finished product, or product contact surfaces;
 - iii. Returned to the appropriate storage areas after use; and
 - iv. Be compliant with national and local legislation.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.4.5** Personnel who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals,:
- i. Shall be fully trained in the purpose of the hazardous chemicals and toxic substances, their storage, handling, and use;
 - ii. Be provided first aid equipment and personnel protective equipment (PPE); and
 - iii. Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.4.6

The SQF practitioner managed the hazardous chemical register for cleaning chemicals. This was reviewed and dated 4/5/2024. The letters of guaranty and SDS's were on file for the chemicals. There was a designated and locked area for storage of cleaners and cleaning supplies. This was a closet near the dock office. The chemicals were labeled and there was an inventory of chemicals kept to define approval as well as track usage. The storage area was controlled (locked) and access was only by trained sanitation staff. See 12.6.4.1 for non-conformance in the area of chemical handling.

- 11.6.4.7** The site shall dispose of empty, obsolete, and unused chemicals, pesticides, toxic substances, and containers in accordance with requirements and ensure that primary containers are:
- i. Not reused;
 - ii. Segregated and securely stored prior to collection; and
 - iii. Disposed through an approved vendor.

RESPONSE: COMPLIANT

EVIDENCE:

11.6.5 Loading, Transport, and Unloading Practices

The loading checklist is completed during loading for shipment. The receiving form is completed electronically on every load. This was demonstrated in an interview with receiver. During the audit, the loading of trucks was witnessed. A truck moving employee and product loader were interviewed. The employees were very knowledgeable on their food safety responsibilities, temperatures and handling product. The precooling of the trucks was observed. The staging of frozen items was not performed for lengths of time to allow thawing. The staging of products was acceptable as it was performed in a cold dock. Records of inspections (incoming and outgoing) were verified.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.5.3** Vehicles (e.g., trucks/vans/containers) shall be secured from tampering using seals or other agreed-upon and acceptable devices or systems.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.5.4** Loading and unloading docks shall be designed to protect the product during loading and unloading. Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity during loading and transport.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.6.5.5** Refrigerated units shall maintain the product at the required temperature. The unit's temperature settings shall be set, checked, and recorded before loading, and the product temperature shall be recorded at regular intervals during loading, as applicable.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.6.5.7 On arrival, prior to opening the doors, the food transport vehicle's refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently, and product temperatures shall be recorded at the start of unloading and regular intervals during unloading.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.7.1 High-Risk Processes

The site does not engage in high risk processing or handling.

11.7.2 Thawing of Food

The site does not thaw foods.

11.7.3 Control of Foreign Matter Contamination

The 12.7.2-4 SOP Foreign Matter was documented as V2, 1/15/2018. This called for control of glass, wood, other foreign materials and contingency procedure for glass breakage. There storage area checks which included pallet condition. The glass and brittle plastic inspection is conducted and recorded monthly based on a glass and plastic register. The inspections were verified as completed and recorded. The 2023 and year-to-date 2024 records were reviewed.

NA: There was no cutting of products in the repack area.

NA: Such equipment was not used.

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

Inspections shall be performed (refer to 2.5.4.3) to ensure plant and equipment remain in good condition and equipment has not become detached or deteriorated and is free from potential contaminants.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.3.2 Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or other similar materials shall not be permitted in food processing /contact zones (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers are used, or MIG thermometers are required under regulation).
Where glass objects or similar material are required in food handling/contact zones, they shall be listed in a glass inventory, including details of their location and condition.

RESPONSE: COMPLIANT

EVIDENCE:

11.7.3.3 Regular inspections of food handling/contact zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass inventory.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.7.3.6 Wooden pallets and other wooden utensils used in food processing and handling areas shall be dedicated for that purpose, clean, and maintained in good order. Their condition shall be subject to regular inspection.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.7.4 **Detection of Foreign Objects**

The site product storage and repack operation does not require a metal detector as they do not cut, slice or otherwise process products.

11.8.1 Waste Disposal

The 12.8.1 SOP Dry and Liquid Waste Disposal (v3, 1/24/2022) was documented. The dumpsters on the exterior were kept closed and areas around the units were found to be clean. Interior waste handling was managed through verification of removal of trash and waste and verified on the pre-op inspection. Trash on the interior was not allowed to accumulate. There was removal to the exterior waste containers as needed. The waste containment on the exterior was separated into waste foods for transport to farming (covered dumpsters), trash (compactor) and recycling (compactor).

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.3 Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system or by an alternative method that meets local regulatory requirements.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.4 Trolleys, vehicle waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition, cleaned, and sanitized regularly to prevent the attraction of pests and other vermin.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.6 Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials waste considered high-risk for handling or other reasons. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

RESPONSE: COMPLIANT

EVIDENCE:

11.8.1.7 Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.8.1.8** Waste held on-site prior to disposal shall be stored in a separate storage facility that is suitably insect proofed and located where it does not present any hazards.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.8.1.9** Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall either be removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal where it does not present any hazards.

RESPONSE: COMPLIANT

EVIDENCE:

- 11.8.1.10** Reviews of the effectiveness of waste management shall form part of regular site inspections (refer to 2.5.4.3), and the results of these inspections shall be included in the relevant inspection reports.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.1 Premises Location and Approval

The site is registered with the FDA. The registration is current (exp. 12/31/2024). The City Occupational License certificate was on file with expiry 12/31/2024. The Louisiana Department of Health permit was current (expires 6/30/24). The USDA License No. 20051152 was current and on file (expires 8/10/2024). The risk assessment for the site area was conducted and documented with no high risk activities in the area. It was last reviewed on 4/1/2024.

- 12.1.1.1** The site shall assess local activities and the site environment to identify any risks that may have an adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities.

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

RESPONSE: COMPLIANT

EVIDENCE:

12.1.2 Building Materials

The walls (concrete block, metal paneling and steel frame) were found to be in good condition. The doors used for shipping/receiving were in excellent condition and pest-proofed. All personnel doors were clean and in good condition. Dock levelers were found to be in good condition and seals present to prevent pests and dust. The only drop ceilings were in office areas. These were accessible for inspection. The floors were in good condition with minimal damage and wear. The drains were long trench drains with grated covers running under racks where wet produce may be stored. There was no areas of standing water that presented a hazard to food safety. Drains were found to be clean and drain cleaning was conducted on a regular basis as demonstrated in the cleaning program.

12.1.2.1 Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, is impervious to liquid, and easily cleaned. When drains are present in the warehouse, floors shall be sloped at gradients suitable to allow for the effective removal of all overflow or wastewater under normal working conditions.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.2.2 Drains shall be constructed and located so they can be easily cleaned and do not present a hazard. Drains if located in storage and handling areas, shall be kept clean.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.1.2.4 Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 12.2.5).

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

RESPONSE: COMPLIANT

EVIDENCE:

12.1.2.5 Doors shall be of solid construction. Windows shall be made of shatterproof glass or similar material, or otherwise protected.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.2.6 Drop ceilings (where applicable) shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.1.3 Lightings and Light Fittings

The light installation was adequate to supply sufficient brightness to storage and handling areas. All lights were shielded. All lights in receiving, storage, repack and shipping areas were found to be in good condition and shatter proofed. The areas of storage and repack were supplied with adequate lighting for safe working, inspection and cleaning.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.1.3.3 Light fittings in other areas of the warehouse where product is covered or otherwise protected shall be designed to prevent breakage and product contamination.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.4 Dust, Insect, and Pest Proofing

All doors were properly maintained. All doors met the above criteria for exterior doors. The pest devices were located around the building in a manner not to be a danger to personnel or products handled and stored.

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

External personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, birds, and other pests.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.4.2 Electric insect control devices, pheromone, or other traps and baits shall be located and operate so as not to present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredient of product storage areas where ingredients, packaging, and product are handled, processed, or exposed.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.5 Ventilation

Ventilation was adequate for a refrigerated warehouse. There were no hazards or areas of concern on ventilation. No exhaust vents were used regularly as there were no areas of steam or similar. All areas were controlled under refrigeration.

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

RESPONSE: COMPLIANT

EVIDENCE:

12.1.5.2 All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 12.2.5 and effectively sealed against dust, insects, and other pests as per 12.1.4.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.6 Equipment and Utensils

The SOP for 11.2.9 Equipment Specification (V3, 1/24/22) was documented and included the specification or description of required properties for utensils, gloves, shelving and equipment. The purchasing procedure was demonstrated through the inspection of equipment once received to make sure it meets standards and the required approval process for new equipment. 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 tables in the repack area were stainless and maintained clean. The scales in the repack area had stainless contact surfaces and were found to be in good condition and clean. The lifts and jacks were maintained in good condition and did not pose a threat to the products during receipt, storage and staging for delivery.

12.1.6.1 Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.1.6.3 Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers. Where possible, food contact equipment shall be segregated from non-food contact equipment.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.6.4 All equipment and utensils shall be cleaned (refer to 12.2.5.1) at a frequency to control contamination and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.6.5 Vehicles used in handling areas or in cold storage rooms shall be designed, cleaned, and operated so as not to present a food safety hazard.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.6.6 In addition to the above, locations handling exposed products and recouping products on-site shall have:
i. Product contact equipment and utensils constructed of materials that are non-toxic, smooth, impervious and readily cleaned as per 12.2.5;
ii. Clearly identified equipment and utensils that are used for inedible material; and
iii. Clearly identified waste and overflow handling equipment and utensils. The waste material is discharged hygienically and according to local regulatory requirements.

RESPONSE: COMPLIANT

EVIDENCE:

12.1.7 Grounds and Roadways

The exterior of the warehouse was maintained in an excellent condition. The west side of the warehouse was a construction area for the new addition. This area was not accessible as active construction was occurring. The construction activity was found not to threaten the safety of the warehouse operation. There was complete separation as warehouse walls were intact and were not yet open to construction. The grass at the Interstate 12 side (southside) was maintained cut low with a zone of no growth at the base of the wall. The north side of the building was maintained with landscaped beds and employee/visitor parking (this was the side of the building with the main entrance). The east and south sides of the building were controlled by a security fence that encompassed the truck dock, waste storage and truck parking areas. All areas were maintained very clean. The waste containment was separated into waste foods for transport to farming (covered dumpsters), trash (compactor) and recycling (compactor). There were no areas of standing water on the exterior of the facility. All exterior equipment was stored properly.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.1.7.3 Surroundings shall be kept neat and tidy and shall not present a hazard to the hygienic and sanitary operation of the premises or provide harborage for pests.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.1 Repairs and Maintenance

SOP 12.2.1 Repairs and Maintenance / 12.2.2 Maintenance Staff and Contractors (v3, 1/24/22) was documented. The site relied on contractors for most upkeep (refrigeration servicing, truck refrigeration, truck repair and upkeep, and fork list service . The contracts, workorders and service reports were on file. Refrigeration - storage, refrigeration-fleet, and truck maintenance documentation were reviewed for the audit. Agreements with contractors were kept on file (The contractors for maintenance that are given access to the warehouse to perform duties have training to the GMPs on file. There is a cabinet on site that is secured in which is stored the tools specifically for the lift maintenance contractor and was locked at the time of the audit. There were no temporary repairs noted during the audit. The racks, doors and dock levelers were observed to be maintained in good condition.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.2.1.3 Failures of facility and equipment in any food storage and handling area shall be documented, reviewed, and necessary repair incorporated into the maintenance control schedule.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.1.4 Site supervisors shall be notified when maintenance or repairs are to be undertaken in any food handling or storage area.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.2.1.8 Paint used in a food handling or contact zone shall be suitable for use, in good condition (i.e., no chips), and shall not be used on any product contact surface.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.2 Maintenance Staff and Contractors

All non-employees were required to check in and were issued security badges. Contractors were handled as any visitor with regards to compliance to the food safety policy. There were signed trainings for contractors reviewed and on file. The maintenance staff were trained just as all other employees with record. Maintenance staff were observed to follow GMPs.

12.2.2.1 Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 12.3).

RESPONSE: COMPLIANT

EVIDENCE:

12.2.2.2 All maintenance staff and contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed. Records of training shall be documented and retrievable.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.2.3 Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so that appropriate hygiene and sanitation can be completed and an inspection conducted prior to restarting site operations. The inspections shall be documented.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.3 Calibration

The calibration SOP 12.2.3 was documented V3, 1/24/22. In the procedure, the directory of calibration activity was defined to the equipment, device ID, frequency, method and responsibility. The calibration certificates for the NIST thermometer (exp. 3/7/2025), the scales (performed 4/2/2024), and the weight used for daily scale monitoring (exp. 3/26/25). 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 procedure also included corrective measures for thermometers found out of calibration.

- 12.2.3.1** The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, shall be documented and implemented. Software used for such activities shall be validated and secured as appropriate.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.3.2** Equipment shall be calibrated against national or international reference standards and methods or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied. A list of measuring, testing, and inspection equipment requiring calibration shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.3.3** Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.3.5** A directory of measuring, testing, and inspection equipment requiring calibration and records of calibration tests shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.4 Pest Prevention

The SOP for Management of Pests and Vermin (12.2.4 (v3, 1/24/2024) and last reviewed by Capital City staff and PCO on 3/25/2024. The contracted service is monthly. There are traps placed on the floor/wall junction around exterior walls and on both sides of doors. The exterior bait stations are positioned around the entire facility, are secured and locked. The training of employees with inspection and knowledge on bait poison and pest control was recorded. The SDS for the rodenticide was on file and the usage for the rodenticides was recorded. The insurance certificate was current (exp. 6/15/24). The current license was on file (PCO and business - 12/31/24 expiration). The site map was current and accurate (last review date was 3/25/24). The record of pest activity and trends was documented and current. There was no interior activity or catches over the past year. There was no significant outside activity trends for feeding in the bait stations. There were no signs of activity or infestation observed on the interior during the audit. Past months service reports for in-house and contracted checks were documented and reviewed for compliance. The GMP form for the pest technician was signed and on file for 3/25/2024.

12.2.4.1

A documented pest prevention program shall be effectively implemented. It shall:

- i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program;
- ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications;
- iii. Outline the methods used to prevent pest problems;
- iv. Outline the pest elimination methods and the appropriate documentation for each inspection;
- v. Outline the frequency with which pest status is to be checked;
- vi. Include on a site map the identification, location, number, and type of applied pest control/ monitoring devices;
- vii. List the chemicals used. They are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available;
- viii. Outline the methods used to make staff aware of the bait control program and the measures required when they come into contact with a bait station;
- ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and
- x. Measure the effectiveness of the program to verify the elimination of applicable pests and identify trends.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.4.2

Pest contractors and/or internal pest controllers shall:

- i. Be licensed and approved by the local relevant authority;
- ii. Use only trained and qualified operators who comply with regulatory requirements;
- iii. Use only approved chemicals;
- iv. Provide a pest prevention plan (refer to 12.2.4.1), which includes a site map indicating the location of bait stations traps and other applicable pest control/monitoring devices;
- v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments;
- vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and
- vii. Provide a written report of their findings and the inspections and treatments applied.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.4.3 Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be undertaken on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging.

Records of all pest control inspections and applications shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.4.4 Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of and the source of pest infestation investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.4.5 Pesticides shall be clearly labeled and stored per 12.6.4 if kept on-site.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.4.6 No animals shall be permitted on-site in food handling or storage areas.

RESPONSE: COMPLIANT

EVIDENCE:

12.2.5 Cleaning and Sanitation

The cleaning schedule was documented on a multi-sheet record that had weekly, daily, monthly, quarterly and bi-annual cleaning activities defined (Form 12.2.11, v1, 1/1/2018). The employees performing the task reported completion and the supervisor or SQF Practitioner verified the completion of the work. These were as follows. Weekly-Exterior schedule including overall cleanliness and waste containment (each week's entry was verified as effective by management). There is a daily cleaning schedule for interior areas (aisle and room specific) in addition to the restrooms/break area. that is kept with notation of completion and supervisor/management verification initials. The monthly schedule was completed for exterior and specialty cleaning activities such as dock doors, drains, dock plates (space underneath), mechanical rooms and others. The monthly schedule had management verification. The quarterly cleaning schedule included cleaning the refrigeration units and associated pipes, walls and associated structures. The bi-annual schedule included ceiling/rafters and light covers with verification by managers. The 2023 and up-to-current 2024 records were observed to be completed. The Cleaning and Sanitation SOP 12.2.5 (v3, 1/24/22) was documented. There were thorough procedures on file for cleaning (chemicals, tools and cleaning steps defined). SDSs confirmed on file were for the chemicals in use. Zep FS Formulate 940, San-T 10 Plus (sanitizer) and Inspector's Choice (cleaner). Cleaner and sanitizer mix and concentration verifications of metering devices were conducted and recorded monthly. The record for verification of concentration was complete for 2023 and current to date, 2024. Daily records were confirmed for the pre-op swabbing is conducted on totes and tables with ATP protein swabs. The training was conducted for those with sanitation and chemical usage responsibilities on 4/2/2024 with verification of competency. The pre-op visual inspection is conducted daily with record (all records 2023 year to current 2024 were verified). The verification of removal of trash and waste is included on the pre-op/operational inspection. The storage areas and the staff amenities (restrooms and breakrooms) were found to be satisfactorily cleaned.

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

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.5.2** Detergents and sanitizers shall be suitable for use in a food and storage and handling environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure:
- i. The site maintains a list of chemicals approved for use;
 - ii. An inventory of all chemicals purchased and used is maintained;
 - iii. Detergents and sanitizers are stored as outlined in element 12.6.4;
 - iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and
 - v. Only trained staff handle sanitizers and detergents.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.5.4** Provision shall be made for the effective cleaning of equipment, utensils, and protective clothing.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.2.5.5** Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing, product handling equipment, and storage areas as well as the tools themselves.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.2.5.7 Records of cleaning and sanitation activities, verification, and inspections shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.3.1 Personnel Welfare

The GMP documented policy for staff and visitors was verified to define health requirements which excluded those persons suffering from or with symptoms of illness. The employees observed in the warehouse were observed to be healthy with no appearance of illness or injury that could threaten workplace or product safety.

12.3.1.1 Personnel suffering from infectious diseases or who are carriers of any infectious disease shall be restricted from working on the site or in the transportation of food and shall not engage in food handling operations or be permitted access to storage areas where the product is exposed or there is a risk of contamination of food.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.1.2 The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids from open wounds, coughing, sneezing, spitting, or any other means.

In the event of an injury that causes spillage of bodily fluid, a properly trained staff member shall ensure that all affected areas, including handling and storage areas, have been adequately cleaned and that all materials and products have been quarantined and/or disposed of.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.1.3 Personnel with exposed cuts, sores, or lesions shall not engage in handling exposed products, recoup, repack or processing products, or handling primary packaging or food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a protective bandage or alternative suitable dressing. A colored bandage or alternative suitable waterproof and colored dressing is recommended for handling exposed products, recoup, or repack processes.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.2 Handwashing

The sink for handwashing was provided in the repack area. The sink was supplied with tempered water, towels in dispenser and a trash receptacle. There was a sign designating the sink as a hand wash and the sink was not observed to be used for other purposes. Gloves were changed as needed (when dirty or damaged). Training of employees encouraged them to wash hands prior to applying gloves. Hand sinks were also available in all restrooms and in the break area. These were supplied appropriately for effective handwashing.

- 12.3.2.1** All personnel shall have clean hands and hands shall be washed by all staff, contractors, and visitors:
- i. On entering food handling, storage, and processing areas;
 - ii. After each visit to a toilet;
 - iii. After using a handkerchief;
 - iv. After smoking, eating, or drinking; and
 - v. After sneezing or coughing.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.3.2.2** Handwash stations shall be available and accessible as required.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.3.2.3** Handwash stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with:
- i. A potable water supply at an appropriate temperature;
 - ii. Liquid soap;
 - iii. Paper towels; and
 - iv. A means of containing used paper towels.

An effective hand dryer may be used in instances where there is no direct hand contact of food or food contact surfaces.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.3.2.4** Signage in appropriate languages instructing people to wash their hands shall be provided in a prominent position.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.3.2.5** When gloves are used, personnel shall maintain the handwashing practices outlined above.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.3 Clothing and Personal Effects

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

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.3.3.3 Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.3.4 Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or any area where food is exposed. The wearing of plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided it is properly covered and does not pose a food safety risk.

All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.4 Visitors

Visitors were required to comply to rules for Good Warehousing Practices just as employees were required while in warehousing areas. The rules were reviewed prior to entry to the warehouse. At sign in upon arrival, visitors going into the storage areas are asked to review the GMP and Hygiene Policy. A policy was signed by the visitors and kept on file. The auditor was presented with the policy and asked to review and sign by the reception employee prior to being greeted by management. The policy was again reviewed at the time of walking into the warehouse area. The drivers were controlled so that they could not wonder into the warehouse. If a driver was given access, they are required to follow GMPs.

12.3.4.1 All visitors shall be required to comply with all Good Storage and Distribution Practices and hygiene standards required by the site, including those applying to clothing and personal effects, hand-washing, and illness (refer to 12.3.1, 12.3.2 and 12.3.3).

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.3.4.3 Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled or processed (refer to 12.3.1).

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.3.4.6 The site shall have a documented procedure for how driver access is managed to minimize food safety risk and designated driver areas are maintained to prevent food contamination or other food safety risks.

RESPONSE: COMPLIANT

EVIDENCE:

12.3.5 Staff Amenities (change rooms, toilets, break rooms)

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

12.3.5.1 Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for the use of all persons engaged in the handling and processing of product.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 12.3.5.4** Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system. Procedure shall be documented and implemented to properly manage sewage back-ups to minimize the potential for contamination.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.3.5.5** Handwash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 12.3.2.2.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.3.5.6** Separate break room facilities shall be provided away from a food handling or storage areas. Break rooms shall be kept clean and tidy and free from waste materials and pests.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.3.5.7** Where outside eating areas are provided, they shall be kept clean and free from waste materials and maintained in a manner that minimizes the potential for introduction of contamination including pests to the site.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.3.5.8** Signage in languages understood by staff advising people to wash their hands before entering the food storage areas shall be provided in a prominent position in break rooms and break room exits.

RESPONSE: COMPLIANT

EVIDENCE:

12.4.1 Personnel Processing Practices

There is no processing of foods the area for repacking was a segregated portion of warehouse. Sensory evaluations (tasting of foods) are not performed. Visual inspection for quality occurs and is documented daily in storage areas. Activities of smoking, chewing and eating were prohibited in the warehouse. All employees were following the standard at the time of audit. First aid kits were in place with colored bandages for visibility.

12.4.1.1 All personnel shall comply with the following practices:

- i. Personnel entry to food handling areas shall be through the personnel access doors only;
- ii. All doors are to be kept closed. Doors shall not be left open for extended periods when access is required for waste removal or stock transfer;
- iii. The wearing of false fingernails or fingernail polish is not permitted when handling exposed food;
- iv. Materials and products shall be kept in appropriate containers as required and off the floor;
- v. Waste shall be contained in the bins identified for this purpose and removed from the operational area on a regular basis and not left to accumulate;
- vi. Staff shall not eat or taste any product in the food storage or handling area;
- vii. Smoking, chewing, eating, or spitting is not permitted in any food handling or storage areas; and
- viii. Drinking of water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers shall be stored in clear, covered containers, and used in designated areas only.

Code Amendment #1

A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.5.1 Water Supply

The water is municipally-sourced. The last water test for potability was conducted on 4/5/2024. This was performed by the ETR Laboratories on a sample taken at the Capitol City Warehouse location. The backflow tests for the site were conducted last on 2/23/2024. The SOP 12.5 Water (v3, 1/24/2022) includes the policy for yearly test, backflow tests, supply of adequate hot / cold water and contingency in the event water becomes contaminated.

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

RESPONSE: COMPLIANT

EVIDENCE:

12.5.1.2 Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.5.1.4 The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

12.5.2 Water and Ice Quality

The last water test for potability was conducted on 4/5/2024. This was performed by the ETR Laboratories on a sample taken at the Capitol City Warehouse location.

12.5.2.1 Microbiological analysis of the water and ice supply that comes into contact with food or food contact surfaces shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Verification, at minimum, shall be made annually.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.5.3 Air and Other Gases

Air and other gasses are not used in product contact application.

12.6.1 Receipt, Storage and Handling of Goods

The receiving form is completed electronically on every load. This was demonstrated in an interview with receiver. The storage conditions needed to maintain the products safely for selection and delivery to the customers were defined in SOP. This included rotation of goods in a FIFO manner but also with respect to inspected quality (produce condition) was closely monitored and recorded through daily inspection. Products inspected and culled dependent upon the quality inspection report. The proper storage of allergen-containing goods was included in the allergen management plan which requires vertical separation of foods with respect to allergen content. All products were stored off the floor in appropriate temperature zones for the type of product. Employees were interviewed and found to be knowledgeable on separation of allergens and raw goods (shell eggs).

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

RESPONSE: COMPLIANT

EVIDENCE:

12.6.1.2 Dry food products shall be received and stored in a way to prevent cross-contamination with frozen and chilled products.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.6.1.4 Procedures shall be in place to ensure that all food products and recouped products are utilized within their designated shelf life.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.6.1.7 Racks provided for the storage of food products shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room. Storage areas shall be cleaned at a predetermined frequency.

RESPONSE: COMPLIANT

EVIDENCE:

12.6.2 Cold Storage, Freezing and Chilling of Foods

The site was electronically monitoring the temperatures. The records were reviewed for the audit. Random days were selected over the last year and temperature levels confirmed to be consistent. Graphs were used to illustrate history of the temperatures. The site had records for the entire year. The freezer was found to be at -4 F. The main cooler was found to be at 36 F. The aisle 10 tempered room was at 55 F (potato room). The shipping / receiving dock was at 38 F. The freezer, cooler and dry storage spaces were all inspected. The temperatures were found to be within safe ranges for the types of products stored within each space. The records were kept electronically. There is an alarm for notification when temperatures were found above established limits.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.6.2.4 The site shall have a written procedure for monitoring temperatures of storage rooms, including the frequency of checks, and corrective actions if the temperature is out of specification. Cold and chilled storage rooms shall be fitted with temperature monitoring equipment, located to monitor the warmest part of the room, and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures.

RESPONSE: COMPLIANT

EVIDENCE:

12.6.2.5 Procedures shall be in place to identify the methods and responsibilities used to ensure that processes applied to materials prior to distribution (e.g. thawing, slacking, labeling) do not pose a risk to product safety or loss of traceability.

RESPONSE: COMPLIANT

EVIDENCE:

12.6.3 Storage of Dry Goods

The site does not carry much shelf stable foods and packaging however these were found to be kept in areas of storage away from wet conditions. The racks were found to be in good condition and areas were found to be clean. The lifts and jacks used in the warehouse were found to be in good condition and clean. The battery charging area was kept away from food and food-related storage. The battery area was clean and free of debris

12.6.3.1 Dry goods shall be located away from wet areas to protect the product from contamination and deterioration and to prevent packaging from becoming a harborage for pests or vermin.

RESPONSE: COMPLIANT

EVIDENCE:

12.6.4 Storage of Hazardous Chemicals and Toxic Substances Used On-site

The SQF practitioner managed the hazardous chemical register for cleaning chemicals. This was reviewed and dated 4/5/2024. The letters of guaranty and SDS's were on file for the chemicals. There was a designated and locked area for storage of cleaners and cleaning supplies. This was a closet near the dock office. The chemicals were labeled and there was an inventory of chemicals kept to define approval as well as track usage. The storage area was controlled (locked) and access was only by trained sanitation staff. See 12.6.4.1 for non-conformance in the area of chemical handling.

12.6.4.1 Hazardous chemicals, toxic substances, and pesticides that are for use on the site with the potential for food contamination shall be:

- i. Used only according to manufacturers' instructions;
- ii. Controlled to prevent contamination or a food safety hazard to raw material, packaging, work-in-progress, finished product, or product contact surfaces;
- iii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site;
- iv. Supplemented with a current Safety Data Sheet (SDS) made available to all staff;
- v. Controlled to track usage and ensure return to the appropriate storage areas after use;
- vi. Be compliant with national and local legislation; and
- vii. Used so that there is no cross-contamination between chemicals.

RESPONSE: MINOR

EVIDENCE: The chemical list did not include Quat Block and specific glass cleaner which are included in the cleaning procedures. The list did not include maintenance or DEF related chemicals. The approval list did not include all site-used/stored chemicals.

ROOT CAUSE: Why 1: When the SQF Practitioner created a list of approved chemicals he only added chemicals that were used for cleaning in the warehouse.

Why 2: The SQF Practitioner was unaware that this chemical list should be expanded to include all chemicals, maintenance, DEF, or otherwise, that were used on site.

Why 3: The SQF Practitioner did not have the proper understanding of this requirement.

CORRECTIVE ACTION: Quad Blocks and the glass cleaner were added to the chemical list. The warehouse was inspected for additional chemicals. Chemicals for the trucks, the compressor, pallet jacks and forklifts were added to the chemical list.

Chemical lists are reviewed annually during the SQF annual review to ensure it was current. Meeting was held with all employees responsible for purchasing chemicals to ensure they understand they must inform the SQF Practitioner prior to purchasing any new chemicals to ensure that the chemical can be reviewed to verify its suitability for the site and added to the approved chemical lists. Reviewed and confirmed
TBW

VERIFICATION OF CLOSEOUT: The site's corrective action and supporting evidence (amended root cause, sanitation/chemical training, chemical list was updated appropriately) were reviewed and accepted. The NC is closed. JM.

COMPLETION DATE: 05/10/2024 **CLOSEOUT DATE:** 06/18/2024

- 12.6.4.2** Hazardous chemicals and toxic substances shall be stored:
- i. In an area with appropriate signage;
 - ii. Accessible only by personnel trained in the storage and use of chemicals;
 - iii. Separated from the distribution storage area so as not to present a hazard to staff, product, packaging, or product handling equipment;
 - iv. In their original containers, or in clearly labeled secondary containers if allowed by applicable legislation; and
 - v. Stored so that there is no cross-contamination between chemicals.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.6.4.3** Personnel who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals:
- i. Shall be fully trained in their purpose, storage, handling, and use;
 - ii. Be provided first aid equipment and personnel protective equipment; and
 - iii. Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.6.4.4** The site shall dispose of unused chemicals and empty containers in accordance with regulatory requirements and ensure that:
- i. Empty chemical containers are not reused;
 - ii. Empty containers are labeled, isolated, and securely stored while awaiting collection; and
 - iii. Unused and obsolete chemicals are stored under secure conditions while waiting authorized disposal by an approved vendor.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.6.4.5** In the event of a hazardous spill, the site shall:
- i. Have spillage clean-up instructions to ensure that the spill is properly contained; and
 - ii. Be equipped with spillage kits and cleaning equipment.

RESPONSE: COMPLIANT

EVIDENCE:

12.6.5 Loading, Transport, and Staging Practices

The loading checklist is completed during loading for shipment. During the audit, the loading of trucks was witnessed. A truck moving employee and product loader were interviewed. The employees were very knowledgeable on their food safety responsibilities, temperatures and handling product. The precooling of the trucks was observed. The staging of frozen items was not performed for lengths of time to allow thawing. The staging of products was acceptable as it was performed in a cold dock. Records of inspections (incoming and outgoing) were verified.

- 12.6.5.1** The practices applied during loading, transport, and unloading of food products and materials shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Practices shall protect against contamination from biological, chemical, and physical hazards, and under conditions that prevent cross-contamination.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 12.6.5.4** Receiving, staging, loading, and unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product integrity.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.6.5.5** Where applicable, food transport vehicles' refrigeration units shall maintain the food at the required temperatures and the units' temperature settings shall be set, checked, and recorded before loading and product temperatures monitored at regular intervals during loading as appropriate.

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

RESPONSE: COMPLIANT

EVIDENCE:

- 12.6.5.6** Upon arrival and prior to opening the doors, the food transport vehicles' refrigeration unit storage temperature settings and operating temperature shall be checked and recorded. Receiving shall be completed efficiently and product temperatures shall be recorded at the commencement of unloading and at regular intervals during unloading.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.7.1 High-Risk Processes**
This is not a high risk process.

12.7.2 Control of Foreign Matter Contamination

The 12.7.2-4 SOP Foreign Matter was documented as V2, 1/15/2018. This called for control of glass, wood, other foreign materials and contingency for glass breakage. There storage area checks which included pallet condition. The glass and brittle plastic inspection is conducted and recorded monthly based on a glass and plastic register. The inspections were verified as completed and recorded. The 2023 and year-to-date 2024 records were reviewed.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.4 Where glass objects or similar material are required to be used by the site in storage and handling areas, they shall be listed in a glass inventory including details of their location.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.5 Product that is in glass or similar material that is for distribution purposes shall be stored and handled in a manner that prevents contamination.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.6 Regular inspections of storage and handling zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass inventory.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.7 Glass instrument dial covers on equipment and MIG thermometers shall be inspected at regular intervals.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.8 Pallets used in food storage shall be made of a suitable material, dedicated for that purpose, clean, maintained in good order, and their condition subject to regular inspection.

RESPONSE: COMPLIANT

EVIDENCE:

12.7.2.9 Wooden pallets and other wooden utensils used in food handling areas shall be dedicated for that purpose, clean, and maintained in good order. Their condition shall be subject to regular inspection.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.7.3 Managing Foreign Matter Contamination Incidents

The 12.7.2-4 SOP Foreign Matter was documented as V2, 1/15/2018. This called for control of glass, wood, other foreign materials and contingency for glass breakage. The incident management called for a thorough inspection of the area of concern prior to resuming operations.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

12.8.1 Waste Disposal

The 12.8.1 SOP Dry and Liquid Waste Disposal (v3, 1/24/2022) was documented. The dumpsters on the exterior were kept closed and areas around the units were found to be clean. Interior waste handling was managed through verification of removal of trash and waste and verified on the pre-op inspection. Trash on the interior was not allowed to accumulate. There was removal to the exterior waste containers as needed. The waste containment on the exterior was separated into waste foods for transport to farming (covered dumpsters), trash (compactor) and recycling (compactor).

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

- 12.8.1.5** Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health.

RESPONSE: COMPLIANT

EVIDENCE:

- 12.8.1.6** Reviews of the effectiveness of waste management will form part of regular hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports (refer to 2.5.4.3).

RESPONSE: COMPLIANT

EVIDENCE:

- 12.8.1.7** A procedure shall be in place to ensure drainage wastewater is effectively removed from the storage areas (refer to 12.1.2.2). If stored and/or treated on the premises, it shall be stored in a separate storage facility and suitably contained. Inspections of the drainage system and wastewater storage shall be included in the regular site inspections (refer to 2.5.4.3).

RESPONSE: COMPLIANT

EVIDENCE: