



SQF Food Safety Audit Edition 9

BHPO LP, Gebbers Farms North - 17435

Summary

Audit Decision

Certified

Certificate Number

17435

Audit Rating**Decision Date**

June 4, 2025

Audit Type

Unannounced

Recertification Date

March 28, 2026

On-Site Audit Dates

April 3, 2025 - April 4, 2025

Expiration Date

June 11, 2026

ICT Dates

-

Good

Issue Date

June 4, 2025

Facility and Scope

BHPO LP, Gebbers Farms North - 17435

1110 Jennings Loop Road
Oroville, 98844 United States

Products

Apples, Cherries, Pears

Food Sector Categories

04. Fresh Produce, Grain, and Nut Packhouse
Operations

Scope of Certification

Fresh Produce, Grain, and Nut Packhouse Operations

Certification Body and Audit Team

EAGLE Food Registrations, Inc.

40 N Main St
1880
Dayton, OH 45423 United States

CB#: 40756

Accreditation Body: ANAB

Accreditation Number: 894

Lead Auditor: Courtney Moyers (C-436897)

Technical Reviewer: Jeffrey Pry (C-366244)

Hours Spent on Site: 16

Hours of ICT Activities:

Hours Spent Writing Report: 8

Section Responses

Audit Statement - Audit

SQF Practitioner Name - Name the designated SQF Practitioner

Response: Brian Thompson

SQF Practitioner Email - Email of the designated SQF Practitioner

Response: Thompsonb@gebbbersfarms.com

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

Response: Brian Thompson: SQFP, Courtney Moyers: Lead SQF Auditor, Bob Grandy: Director of Food Safety

Facility Description - Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details)

Response: Brewster Heights Packing and Orchards LP- Gebbers Farms Oroville. Apple, Pear, and Cherry packing house and CA storage in Oroville, WA which employs approximately 65-80 employees people during the peak season. Main shift operates from 6:00AM to 4:00PM Monday-Thursday with some Fridays. Site has been assessed to SQF designated customer specific requirements where noted.

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

Response: Brian Thompson: SQFP, Courtney Moyers: Lead SQF Auditor, Bob Grandy: Director of Food Safety

Auditor Recommendation - Auditor Recommendation

Response: Approve pending closure of NC

2.1.1 - Management Responsibility (Mandatory)

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 site personnel in language(s) understood by all site personnel.

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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, including Good Agricultural/Operating Practices outlined in 2.4.2, and the food safety plan outlined in 2.4.3. ii. Take appropriate action to ensure the integrity of the SQF System; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System

Response: Compliant

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

Response: Compliant

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 have met the required competencies to carry out those functions affecting the legality and safety of food products.

Response: Compliant

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

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

Summary -

Response: Policy statement has been developed (signed 3/24/25) that outlines the sites commitment to providing safe food, developing and maintaining a food safety culture, continuous improvement, achieving customer and regulatory requirements, and providing adequate resources to employees via training, supplies, and support. Policy is posted in break areas and at the main office and is available in primary languages spoken, English and Spanish. Observed food safety culture via employee interviews, meeting notes, training records, and observations. Food safety policies are communicated via trainings and regular department meetings. Employees are trained and encouraged to identify and report food safety concerns and are held accountable for relevant decisions. Organizational chart has been developed (ver 3) and identifies key personnel and their backup, including primary and backup SQF practitioners, farm managers, maintenance, sanitation, production, and QC. Job descriptions for key personnel provided for review. Emergency Personnel

coverage for Key Roles is provided. Staffing needs are met as outlined in the food safety policy. Primary and backup practioners have been identified, have received relevant training, and display competency in SQF and HACCP based programs. Both are staff members who share responsibility for implementation of SQF programs. *Primary SQFP: Brian Thompson HACCP Training: 2/23/21 *Backup SQFP: Bob Grandy HACCP Training: 1/6-7/11 Additional Training: BT- PSA 1/17/18, SQF 10/24/2011. Internal Auditor 3/21/12, Training needs are determined, resourced, and documented as outlined in 2.9. Backup team members are identified to ensure responsibilities are covered in the event of personnel or organizational changes. Blackout periods have been determined by the site based on the operations scheduled and communicated with the CB. Site is compliant with customer requirements.

2.1.2 - Management Review (Mandatory)

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. The hazard and risk management system; and vi. Follow-up action items from previous management review. Records of all management reviews and updates shall be maintained.

Response: Compliant

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

Summary -

Response: The SQF system is reviewed annually, most recently on 5/1/24 Review includes: Changes to FSMS, Food Safety Culture Performance, Food Safety Objectives, CAPA, Trends, Complaints, Verification/Validation. Attendees: BT, RG. Daily production meeting is recorded and includes SQF practitioner and production team members where they discuss production changes, customer complaints, updates to food safety programs.

2.1.3 - Complaint Management (Mandatory)

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

Response: Compliant

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

Response: Compliant

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

Summary -

Response: Procedure for handling complaints has been developed, implemented, and is the responsibility of the SQFP and the Marketing Company. Records of complaints are maintained in emailed "Trouble Reports" sent by marketing company. Trouble report reviewed related to product defect. Quality reports, follow up, and CAPA reviewed. Complaint trends are compiled and analyzed during the annual SQF Review. Trend Report: Provided by Chelan Fresh Complaints are handled by SQFP and Quality Manager. Root cause analysis is required for all complaints related to food safety and quality. CAPA's provided for review.

2.2.1 - Food Safety Management System (Mandatory)

2.2.1.1 - The methods the site uses to meet the requirements of the SQF Food Safety Code: Primary Plant Production shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include: i. Food safety policies and organization chart; ii. Products covered under the scope of certification; iii. Food safety regulations that apply to the site and to the country of sale if known; iv. Agricultural inputs/materials, packaging materials, and finished product specifications; and v. Written procedures and programs (Good Agricultural Practices and/or Good Operational Practices) and other documentation necessary to support the development, implementation, maintenance, and control of the SQF System (e.g., food safety plans, validation, and verification).

Response: Compliant

2.2.1.2 - Food safety plans, Good Agricultural/Operating Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any potential changes implemented have an impact on the site's ability to deliver safe food. The reason for the change shall be documented.

Response: Compliant

Summary -

Response: Food Safety Management System is developed and available electronically for SQFP and paper versions are available in binders at the food safety office. All employees have access to paper versions. Various policies are posted on the info board, including food safety policy and hygiene policies. Other required documents are available within binders. Pre-Req Programs are implemented and include GMP's, HACCP, Training, Sanitation, Maintenance, Calibration, etc. Changes/updates are communicated to employees via annual training sessions. Changes are justified using industry best practices, training programs, and industry updates. Program register identifies all current and obsolete food safety policies and procedures.

2.2.2 - Document Control (Mandatory)

2.2.2.1 - The methods and responsibility for maintaining document control, including records, shall be documented and implemented. They shall ensure that documents and records are i. Controlled; ii. Current; iii. Safely stored to prevent unauthorized access, loss, damage, and deterioration; iv. Organized in a registry or listing form; and v. Readily accessible in a manner that ensures employees use up-to-date and current policies, procedures (work instructions/task lists), and forms when documenting food safety related activities.

Response: Compliant

Summary -

Response: Procedure for document control has been developed, implemented, and Is the responsibility of the SQFP. Document register is available that includes title, version number and reason for change when

necessary. Food Safety Manual is on site at the facility that includes all current policies and procedures. Version number is changed when important changes are made and is used to identify current version. Current version of documents is made available to employees. Program register identifies all current and obsolete food safety policies and procedures.

2.2.3 - Records (Mandatory)

2.2.3.1 - All manual or electronic/digital records shall be legible, suitably authorized, and/or signed by those undertaking activities to demonstrate that inspections, supervisory reviews, testing, and other essential activities have been completed.

Response: Compliant

2.2.3.2 - Records shall be retained in accordance with periods specified by a customer or regulations or at a minimum no less than product shelf life.

Response: Compliant

Summary -

Response: Procedure for record management (Document and Data Control QP-05-01) has been developed, implemented, and is the responsibility of the SQFP. Records are retained for a minimum of two years at the orchard, but specific document retention is dependent on customer and regulatory requirements and is outlined. Records are securely stored on-site and accessible.

2.3.1 - Plant Variety/Hybrid or Product Development

2.3.1.1 - The methods and responsibility for designing, developing, and converting product concepts (e.g. new varieties, hybridization, crops, species) to commercial realization shall be documented and implemented and comply with regulatory and customer requirements. Records for new products testing, shelf life, and final approvals shall be maintained.

Response: Compliant

2.3.1.2 - The food safety plan shall be reviewed and revised accordingly for each new product and its associated process through conversion to commercial production and distribution, or where a change to inputs, process, or packaging occurs that may impact food safety.

Response: Compliant

2.3.1.3 - New products shall be tested and inspected to ensure they meet stated shelf life, maximum residue limits (MRLs), and other regulatory and customer requirements (e.g., potency, strength, purity).

Response: Compliant

2.3.1.4 - The process flows for all new and existing processes shall be designed to ensure that products meet specifications and to prevent cross-contamination.

Response: Compliant

Summary -

Response: Procedure for product/variety development has been developed, implemented, and is the responsibility of the SQFP. Procedure outlines team member responsibilities for each type of approval. Ex.Varieties, and chemicals. In the event that a new product/variety is developed or approved, the food safety

plan is to be reviewed and updated, and product testing will be done, per written procedure. Packaging Material is approved by the SQFP and plant managers. There have been no new developments.

2.3.2 - Specifications (Agricultural Inputs, Packaging, Harvested Product, and Contract Services)

2.3.2.1 - Specifications and/or descriptions for seeds, agricultural inputs, packaging, and contract services that impact finished product safety shall be documented, approved, comply with relevant legislation, and kept current through a review process.

Response: Compliant

2.3.2.2 - Food contact packaging, seeds, and agricultural inputs shall be verified to ensure product safety is not compromised and the material is fit for its intended purpose. Verification shall include certificates of conformance, certificate of analysis, or sampling and testing (refer to 2.4.4.1).

Response: Compliant

2.3.2.3 - Finished product specifications shall be documented, approved by the site and its customer where applicable, accessible to relevant staff, and kept current through a review process. Specifications shall include, where applicable: i. Microbiological, purity, strength, composition, and agricultural chemical limits; ii. Maximum residue limits (MRLs) for pesticides; and iii. Labeling and packaging regulatory and customer requirements.

Response: Compliant

2.3.2.4 - The methods and responsibilities for managing contract farms, services (e.g., spraying), packers, or storage and distribution facilities shall be documented and implemented to ensure the following are being met: i. Contract farms and services shall comply with the SQF Food Safety Code: Primary Plant Production and relevant regulatory and customer requirements; ii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel; and iii. Records of all contract reviews and changes to contractual agreements and their approvals are maintained.

Response: Compliant

2.3.2.5 - A register or listing of all specifications and/or descriptions for seeds, agricultural inputs, packaging, and labels, finished products, and contract services shall be maintained and kept current.

Response: Compliant

Summary -

Response: The development and management of specifications, including raw material, work in progress, finished product, chemicals, and packaging is the responsibility of the SQFP, as outlined in QP-01-01. Specifications were reviewed for various raw materials, packaging items, chemicals, and finished products. Raw materials require a LoG or CoA. Packaging material is approved by Chelan Fresh and must be FDA approved for food use. Chemicals are required to meet chemical composition specifications and be approved for the intended use. Specifications are maintained and available for review. Finished product labels are reviewed and approved. Examples of specifications reviewed: Raw Materials: Apples, Pears, and Cherry's from company growers. Packaging: Corrugated boxes, bags, pads, labels. Finished Product: USDA Grades and Standards used for all finished product. Reviewed standards for Apples, Pears, Cherries. Chemicals: SDS, Food Grade Approval status. Contract services include: Laboratories, Pest Control. All are included in Approved supplier program and have been fully vetted and approved for use.

2.3.3 - Approved Supplier/Input Purchasing Program (Mandatory)

2.3.3.1 - Seeds, agricultural inputs, harvested product, market-ready product, and packaging materials that impact finished product food safety shall be supplied by an approved supplier. The methods and responsibility for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented. The approved supplier program shall contain at a minimum: i. A risk level assigned to each supplier that is based on the past performance of the supplier, criticality to the site, food safety risk, and other relevant factors determined by the site; ii. Agreed specifications; iii. A summary of the food safety controls implemented by the approved supplier, including regulatory compliance and licensing where applicable; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers, which may include testing, receiving inspection, and/or supplier audits; vi. Methods and frequency of reviewing approved supplier performance and status. Where supplier audits are used as a monitoring tool, they shall be based on risk and conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques. A register or list of approved suppliers and records of monitoring activities shall be maintained. Code Amendment #2 Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered.

Response: Minor

Evidence: • MINOR: Some suppliers included on the approved supplier list don't have evaluation forms and some state they are no longer in use, but remain on the list of approved suppliers. Written procedure states that "a supplier evaluation form should be reviewed and completed for all suppliers appearing on QP-02-02 (Approved Supplier List" and "Food safety guarantees must be reviewed at least annually and verified to be sure they are still valid. Guarantees should be dated and tracked to be sure none are missed", but LoG's provided for review are outdated. Ex. Packaging Corporation of America: 3/19/21, Pacon, Inc. 1/1/13, Polycell Packaging Corp 1/4/12. Fruit Packers Supply 1/7/21. An employee in the purchasing department is responsible for updating the approved supplier list and completing the supplier evaluation forms.

Root Cause: The Letters of Guarantees were out of date as the system to keep them up to date was not being implemented. They are often times not all provided by the distributors when requested.

Corrective Action: New Supplier Approvals were completed. The Approved Supplier List has been updated to include any missing vendors, and Letters of Guarantee have been provided by vendors. Requests were made with the vendors to provide a Letter of Guarantee.

Verification Of Closeout: Approved per HS.

Completion Date: April 14, 2025

Closeout Date: May 27, 2025

2.3.3.2 - The receipt of seeds, agricultural inputs, harvested product, market-ready product, and packaging materials from non-approved suppliers shall be acceptable in an emergency situation, provided they are inspected or analyzed before use.

Response: Compliant

2.3.3.3 - Agricultural inputs, harvested product, market-ready product, and packaging materials received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and receiving inspections as all other material providers.

Response: Compliant

Summary -

Response: Supplier program has been developed (QP-02-02), implemented, and is the responsibility of the SQFP. List of approved suppliers is available that includes contact information and approved materials.

Supplier approval is based on risk status and includes packaging, cleaning supplies, chemicals, utensils, and contractors. Procedure outlines emergency supplier approval. Suppliers are evaluated annually and are required to maintain current documentation dependent on type of item supplied and risk level. All incoming deliveries are inspected and approved prior to receiving. No supplier audits are conducted. Examples of approval criteria- Raw Materials: 3rd party audit. Packaging: FDA Approval, LoG, 3rd Party Audit Chemicals: EPA/FDA Approval, SDS. Services: Contractor agreement, CoI, Licenses List of approved suppliers: Dated 3/20/24. Includes Packaging for cherries, pears, apples- boxes, bags, pads, wrap, liners, shells. Chemicals-cleaning chemicals, fruit wash and wax materials. MINOR: Some suppliers included on the approved supplier list don't have evaluation forms and some state they are no longer in use, but remain on the list of approved suppliers. Written procedure states that "a supplier evaluation form should be reviewed and completed for all suppliers appearing on QP-02-02 (Approved Supplier List" and "Food safety guarantees must be reviewed at least annually and verified to be sure they are still valid. Guarantees should be dated and tracked to be sure none are missed", but LoG's provided for review are outdated. Ex. Packaging Corporation of America: 3/19/21, Pacon, Inc. 1/1/13, Polycell Packaging Corp 1/4/12. Fruit Packers Supply 1/7/21. An employee in the purchasing department is responsible for updating the approved supplier list and completing the supplier evaluation forms

2.4.1 - Food Legislation (Mandatory)

2.4.1.1 - The owner/senior site manager shall ensure that, at the time of delivery to its customer, the food supplied shall comply with food safety and production legislation applicable in the country of use and sale, if known. Any specific licensing requirements or commodity-specific regulations shall be maintained and kept current.

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Quality Policy Manual outlines the site's commitment to providing products that meet local, state, and federal requirements. The SQFP is responsible for ensuring the site stays up to date and in compliance. The site is compliant with cGMP's, FDA/USDA and customer requirements. Site management stays informed via FDA news, industry groups and publications. Procedure requires that SQFI and CB is notified within 24 hours of any regulatory event. Verified contact information. During the assessment the site was verified to comply with customer specific requirements.

2.4.2 - Good Agricultural/Operating Practices (Mandatory)

2.4.2.1 - The site shall ensure the applicable Good Agricultural Practices described in modules 7, 8, or 18 and the Good Operating Practices described in module 10 of this Food Safety Code are documented and implemented (refer to 2.2.1.1), or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised.

Response: Compliant

Summary -

Response: Good Manufacturing Practices have been developed and implemented as outlined in module 10. observed employees and managers following the implemented GMP's.

2.4.3 - Food Safety Plan (Mandatory)

2.4.3.1 - A HACCP-based referenced food safety plan, developed by a responsible authority, shall be implemented in the absence of a specifically developed food safety plan for the site. The site shall: i. Maintain current records indicating that the food safety plan has been reviewed and its scope of hazard analysis, risk assessments, and control measures, such as Good Agricultural or Operational Practices, cover all products produced and sold by the site and are within the scope of certification; and ii. Document when changes in the food safety plan have impacted their Good Agricultural or Operational Practices. Note: Sites shall choose either 2.4.3.1 or 2.4.3.2 with the subsequent 2.4.3 requirements as the mandatory element.

Response: Minor

Evidence: • MINOR: Documents provided for review provide conflicting information regarding the designation of CCP's. HACCP Plan Validation and Summary (CCP's) Rev 14 states "We determined that we had two hazards that met the above criteria and would be considered a Critical control point" These CCP's are Water/Chemicals in dump tank, and PAA spray bar. QP-03-72 shows the same two CCP's but QP-03-73 shows those two steps as Control Points, not Critical Control Points. SQFP states that there are currently no CCP's in either process, but the plan does not reflect this. For Cherries, there are two CCP's: Hydrocooler and Dump tank, per the "Cherry Line #1 New GP Line Flow Chart" and the "Hazard Analysis Worksheet Process."

Root Cause: We do not have a kill step in apple or cherry packing, but rather we have control points. I updated the HACCP Plan to show this, and have been in the process of updating the HACCP Plan Validation and Summary. I was not aware at the time of my audit this had not been completed, as I believed I had completed it earlier.

Corrective Action: The flow charts for apples and cherries have been updated to show no CCP's The HACCP Plan Validation and Summary (CCP's) has been updated to show we have no CCP's, but are CP's.

Verification Of Closeout: Please provide QP-03-72 and QP-03-73 for review, as these documents were reviewed during the audit and provided conflicting information regarding CCP's. Flow chart and Hazard analysis for cherries provided for review and is acceptable. Flow chart and hazard analysis for Apples and Pears provided for review and is acceptable. CCP's have been removed from the plan and changed to CP's.

Completion Date: May 5, 2025

Closeout Date: May 14, 2025

2.4.3.2 - Where a site has developed its own food safety plan, either by choice or due to product(s) not included within the scope of a HACCP-based model as per 2.4.3.1, it shall be implemented and maintained and outline how the organization controls and assures food safety of the products or product groups and their associated processes that are included in the scope of the SQF certification. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

Response: Compliant

2.4.3.3 - The food safety plan(s) shall be developed and maintained by a team that includes the SQF practitioner and those site personnel with agricultural, technical, and/or machinery knowledge relevant to the commodities and products. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.

Response: Compliant

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

Response: Compliant

2.4.3.5 - Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. These shall reference and/or include: i. The finished product specifications; ii. Information relevant to product safety, such as it is ready-to-eat, requires further processing, and/or storage conditions; and iii. The intended use of each product, which includes target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative use of the product.

Response: Compliant

2.4.3.6 - 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 of primary production, all agricultural inputs, packaging material, service inputs (e.g., water, steam, gasses as appropriate), process delays, and all process outputs, including feed, waste, and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation.

Response: Compliant

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 agricultural inputs.

Response: Compliant

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

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

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 (a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.

Response: Compliant

2.4.3.11 - For each identified CCP, the food safety team shall identify and document the critical limits that separate safe from unsafe product. 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

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 testing, the sampling and test methods, and the test frequency.

Response: Compliant

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

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

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

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Food Safety Plan has been developed and is the responsibility of the SQFP. Revision Date: 3/11/24
BT Document Names/Versions: Hazard Analysis Worksheet Process Steps QP-03-12 Rev. 10. Food Plans Summary and Validation QP-03-01 Rev. 10. Multidisciplinary team includes: BT, TB, DB, GW, TH, JS, DF Scope of plans: Fruit-Apples, Cherry, Pears Product description: Tree Fruit- Ready to Eat Apples, Pears, and Cherries Intended Use: RTE fruit for general population. Flow Diagram has been developed and includes each process step, packaging, inputs, and outputs. MINOR: Documents provided for review provide conflicting information regarding the designation of CCP's. HACCP Plan Validation and Summary (CCP's) Rev 14 states "We determined that we had two hazards that met the above criteria and would be considered a Critical control point" These CCP's are Water/Chemicals in dump tank, and PAA spray bar. QP-03-72 shows the same two CCP's but QP-03-73 shows those two steps as Control Points, not Critical Control Points. SQFP states that there are currently no CCP's in either process, but the plan does not reflect this. For Cherries, there are two CCP's: Hydrocooler and Dump tank, per the "Cherry Line #1 New GP Line Flow Chart" and the "Hazard Analysis Worksheet Process."

2.4.4 - Product Sampling, Inspection and Analysis

2.4.4.1 - The sampling, inspecting, and/or analyzing of agricultural inputs and finished product shall be documented and implemented. The procedures applied shall ensure: i. Inspections and analyses are completed at regular intervals as required and to agreed specifications (e.g., MRLs, purity, strength, composition as per 2.3.2) and regulatory and labeling requirements; ii. Records of all inspections and analyses are maintained; and iii. All analyses are conducted to nationally recognized methods or alternative methods which are validated as equivalent to the nationally recognized methods. Where external laboratories are used to conduct input or product analyses, the laboratories shall be accredited to ISO 17025 or an equivalent national standard, licensed or recognized by a regulatory authority if required, and shall be included on the site's contract service specifications register (refer to 2.3.2.1). Where internal laboratories are used to conduct input or product analyses, sampling and testing methods shall be used in accordance with the applicable requirements of ISO/IEC 17025 or an equivalent national standard, including annual proficiency testing for personnel conducting analyses.

Response: Compliant

2.4.4.2 - On-site laboratories conducting chemical and microbiological analyses that may pose a risk to product safety shall ensure the following: i. Be located separate from any food handling or packaging activity and designed to limit access only to authorized personnel; ii. Provisions shall be made to isolate and contain all laboratory waste and to manage laboratory waste separately from food waste; iii. Laboratory wastewater outlets shall at a minimum be downstream of drains that service food processing and handling areas; and iv. Signage is displayed that identifies the laboratory area as a restricted area, accessible only by authorized personnel.

Response: Compliant

Summary -

Response: QP-04-13 has been developed for Apple Inspections of In-process, packed storage and final. has been developed, implemented and is the responsibility of the SQFP. QP-04-32, QP-04-33 were provided for cherry inspections for receiving, in progress and finished product. Records provided for review and capture product inspections. Fruit is tested by the grower for residue analysis and random samples are taken as a verification for residues. Quality checks are conducted throughout the receiving and packing process. Chelan Fresh, WSDA, and Gebbers Farms have QC checks in place at various steps. Raw Material testing: None
WIP/Finished Product: Pre-size grading, Weights, Pressure test, Water Core, Starch test, Solids. Internal Laboratory: None- QC "Lab" used for grading and inspection. No testing done. External Laboratory: Used for water samples and EMP Retention Samples: None

2.4.5 - Non-conforming Agricultural Inputs and Products

2.4.5.1 - The methods and responsibility for how to control non-conforming products, agricultural inputs, and packaging shall be documented and implemented. The procedures shall ensure: i. Items are quarantined (held), identified, handled, re-worked, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; ii. All relevant personnel are aware of the site's hold and release instructions and approvals; and iii. Records of non-conforming product holds, release, and dispositions are maintained.

Response: Compliant

Summary -

Response: Procedure for identification, handling, and disposition of non-conforming product has been developed, implemented, and is the responsibility of the SQFP and Plant Manager. Products identified as

non-conforming for any reason are placed on hold until disposition is determined. SQFP and Food safety manager are the only people approved to remove product from hold status. On-hold product is quarantined and labeled. Employees are trained in hold and quarantine procedures. Non-Conforming product log show no instances of non-conforming product due to food safety concerns. Re-pack log includes all product placed on hold for re-pack or further processing due to lower quality.

2.4.6 - Product Rework

2.4.6.1 - The responsibility and methods outlining how harvested or packaged product or packaging are reworked shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are supervised by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Each batch/lot of reworked product is inspected or analyzed as required before release; iv. Inspections and analyses conform to the requirements outlined in element 2.4.4.1; and v. Records of all reworking operations are maintained.

Response: Compliant

Summary -

Response: Corrective and Preventive Action QP-03-03 Rev 6. outlines the procedure for product rework. Fruit that does not meet quality expectations may be used for a lower grade product or sold for processing. Re-pack log is maintained to identify all product that has been placed on hold and its disposition. Traceability is verified by retaining original labels and new labels which identify crop and product information as well as new pack date.

2.4.7 - Product Release (Mandatory)

2.4.7.1 - The methods and responsibility for releasing finished products shall be documented and implemented. The methods applied shall ensure: i. The product is released by authorized personnel; ii. The product is released only after all inspections and analyses have been successfully completed, reviewed, and documented; and iii. The product meets regulatory and other established food safety controls. Records of all product releases shall be maintained.

Response: Compliant

Summary -

Response: Product inspection is done by QC throughout the day and provides the product release. If no issues are observed during QC checks, the product is released. Otherwise, product will be placed on hold pending disposition. QC checks are provided for review.

2.4.8 - Environmental Monitoring

2.4.8.1 - A risk-based environmental monitoring program shall be in place for all products grown indoors and packhouse operations and include all processes and immediate surrounding areas. The methods and responsibility for the environmental monitoring program shall be documented and implemented.

Response: Compliant

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

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

Response: Compliant

Summary -

Response: A risk based EMP has been developed (Environmental Monitoring Program QP-06-04) and is the responsibility of the SQFP. PCT testing is conducted on zones 2,3, and 4. ATP on Zone 1. Cherry lines are sampled prior to season start. Apple lines are tested monthly using the Process Control Testing process by IEH Laboratories. Reviewed results for the 2024-2025 growing season to current date. Most recent samples taken 3/21/25 which show acceptable results for all 13 samples below the determined threshold for corrective action.

2.5.1 - Validation and Effectiveness (Mandatory)

2.5.1.1 - The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall ensure that: i. Good Agricultural/Operating 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

Summary -

Response: The SQFP is responsible for validation activities. PRP's are validated as outlined the validation schedule. Validation activities: 2/13/25 BT. For Personnel practices, calibration, cleaning and sanitation, premises and equipment maintenance, Water and chemical quality, stock rotation, pest control, foreign matter and glass protocol, allergen control protocol, and food defense, training, transport, product ID and trace.

2.5.2 - Verification Activities (Mandatory)

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

Response: Compliant

2.5.2.2 - 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 the verification of monitoring activities shall be maintained.

Response: Compliant

Summary -

Response: The SQFP is responsible for verification activities. PRP's are verified as outlined in the verification schedule. Verification activities: Raw material receipt/verification, Foreign Material controls, Allergen Verification, Calibration. Frequency: Annual

2.5.3 - Corrective and Preventative Action (Mandatory)

2.5.3.1 - The methods and responsibility for outlining how corrective and preventative actions are determined, implemented, and verified shall be documented and implemented. The procedures shall include: i. The identification of the root cause, and ii. Resolution of non-compliances of critical food safety limits and deviations from food safety requirements that are deemed significant. Records of all investigation and resolution of non-conformities, including their corrections and preventative actions, shall be maintained.

Response: Compliant

Summary -

Response: CAPA's are the responsibility of the SQFP and relevant department management. CAPA records were provided for review. CAPA form is completed for each non-conformance, Food safety deviations, and employee violations. Reviewed CAPA for NC identified during Internal audit.

2.5.4 - Internal Audits and Inspections (Mandatory)

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: Primary Plant Production are audited per the SQF audit checklist or a similar tool, and objective evidence is recorded to verify compliance and/or non-compliance; ii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken (refer to 2.5.3); iii. Audit results are communicated to relevant management personnel and personnel responsible for implementing and verifying corrective and preventive actions; and iv. Changes implemented from the internal audit that have an impact on the site's ability to deliver safe food result in a review of applicable aspects of the SQF System (refer to 2.3.1.3). Records of internal audits and any corrections and corrective action taken as a result of internal audits are maintained.

Response: Compliant

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

Response: Compliant

2.5.4.3 - Regular inspections during growing and harvesting of products, packing of products, plant production, and/or equipment used shall be planned and carried out to verify Good Agricultural/Operating Practices and building/equipment maintenance are compliant to the applicable SQF Food Safety Code. The site shall: i. Take corrections or corrective and preventative actions; and ii. Maintain records of inspections and any corrective actions taken.

Response: Compliant

Summary -

Response: Procedure for conducting internal audits has been developed, implemented, and is the responsibility of the SQFP. Frequency: Annual Date Sampled: March 5th, 2025. Conducted by: BG- Training reviewed NC's: 1 CA's: Completed for 1 NC issued.

2.6.1 - Product Identification (Mandatory)

2.6.1.1 - The methods and responsibilities for the product identification system shall be documented and

implemented to ensure: i. Agricultural inputs, work-in-progress, and finished product are clearly identified during all stages of receipt, operations, storage, shipping, and transportation; ii. Finished product is labeled to the customer specification and/or regulatory requirements; and iii. Product identification records are maintained.

Response: Compliant

2.6.1.2 - The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable to the customer (one up) and provides traceability through the process to the agricultural input supplier and date of receipt of inputs, food contact packaging and materials, and other inputs (one back); ii. Traceability is maintained where product is reworked (refer to 2.4.3); and iii. The effectiveness of the product trace system is reviewed at least annually as part of the product recall and withdrawal review (refer to 2.6.2.1). Records for the receipt and use of agricultural inputs and packaging material and for finished product dispatch and destination are maintained.

Response: Compliant

Summary -

Response: Product Identification and Traceability QP-06-01 Rev 1. Product has bin ticket from the orchard, bins may be stored or packed right away, packaged product is identified with the variety, grade, lot number, packaging date, identification marking and customer name where appropriate. Incident Traceability for Recall QP-06-02 outlines recall procedure and guidelines. Product is identifiable at each step in the process and is traceable. Trace exercise is conducted at least twice per year, and records were reviewed. Trace exercise conducted during audit was successful as 100% of product was accounted for in less than two hours.

2.6.2 - Product Withdrawal and Recall (Mandatory)

2.6.2.1 - The methods and responsibility to withdraw or recall product shall be documented and implemented. The procedure shall: i. Identify those responsible for initiating, managing, and investigating a product withdrawal or recall; ii. Describe the procedures to be implemented by site management; iii. Outline a communication plan to inform customers, consumers, authorities, and other essential bodies in a timely manner appropriate to the nature of the incident; iv. Describe how the withdrawal and recall system is reviewed, tested, and verified least annually (mock recall); and v. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and are notified in instances of a food safety incident of a public nature or product recall. Records of all product withdrawals, recalls, and mock recalls shall be maintained.

Response: Compliant

2.6.2.2 - Investigation shall be undertaken to determine the cause of a withdrawal or recall, and details of investigations and any actions taken shall be documented and recorded.

Response: Compliant

2.6.2.3 - 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

Summary -

Response: Incident Traceability for Recall QP 06-02 Rev 9. implemented, and is the responsibility of the SQFP. Procedure outlines team member responsibilities, including communication and notification of the CB and SQFI, investigation, and corrective actions. Finished product is traceable, as detailed in the mock recall. Raw materials, packaging, and process inputs are received and documented on receiving logs, which provide

traceability. Reworked product is traceable using rework logs. Mock Recall conducted at time of audit. Packed: 3/11/25, WXPR 113 GSM. Harvested on 10/13/24. Lot #: B257, B220, B225, B228. Storage room: HP05 1,314 boxes packed. Mock recall was successful as 100% of product was accounted for within 2 hours.

2.6.3 - Crisis Management Planning

2.6.3.1 - The methods and responsibility for execution of a crisis management plan shall be documented and implemented. The plan shall include: i. A list of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather or regional events such as pandemic, warfare, or civil unrest) that can impact the site's ability to deliver safe food; ii. Designated site management responsible for decision making, oversight, communications, and management of the crisis management plan; and iii. Control measures to ensure any affected product is identified, isolated, and dispositioned appropriately.

Response: Compliant

2.6.3.2 - 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

Summary -

Response: Crisis Management procedure has been developed (RM-04), implemented and is the responsibility of the SQFP. Crisis Management Plan was tested on 3/25/25. Plan identifies responsible people for communication, initiation, product protection and employee protection. Includes Crisis Decision Making Process, levels of crisis, corrective action, and follow up activities. Scenario for this test was a flood in the facility.

2.7.1 - Food Defense Plan (Mandatory)

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

Response: Compliant

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 personnel, contractors, and visitors.

Response: Compliant

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

Response: Compliant

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 of the food defense plan shall be maintained.

Response: Compliant

Summary -

Response: Comprehensive food defense plan has been developed (7/12/24) and includes food defense threat assessment, mitigation strategies, responsibilities, and reporting and verification responsibilities. PH's are inspected daily. General Manager is identified as the senior site manager responsible for food defense. All incoming materials are inspected and verified to be from approved suppliers as outlined in receiving procedures. Employees receive food defense training at least annually. The food defense plan is tested at least annually. Most recent: 3/13/25

2.7.2 - Food Fraud (Mandatory)

2.7.2.1 - The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud shall be documented, implemented, and maintained. The food fraud vulnerability assessment shall include the site's susceptibility to product substitution, mislabeling, dilution, and counterfeiting or stolen goods that may adversely impact food safety.

Response: Compliant

2.7.2.2 - A food fraud mitigation plan shall be developed and implemented, which specifies the methods by which the identified food fraud vulnerabilities shall be controlled and how the plan is communicated to relevant personnel to ensure effective implementation.

Response: Compliant

2.7.2.3 - 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

Summary -

Response: A comprehensive food fraud program has been developed that addresses food fraud vulnerabilities, mitigation strategies, and verification. SQFP is responsible for implementation and monitoring. Vulnerability to food fraud is determined to be low due to the type of products grown and access. Employees receive food fraud training at least annually. Food Fraud program is reviewed at least annually. Most recent: 7/12/24

2.8.1 - Allergen Management (Mandatory)

2.8.1.1 - The methods and responsibility for the control of allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A hazard and risk analysis and control measures of those agricultural inputs and processing aids, including food grade lubricants, that contain food allergens (refer to food safety plan 2.4.3); ii. An assessment of workplace-related food allergens that may originate from change rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of production and the country (ies) of destination if

known; iv. A list of allergens that is accessible by relevant personnel; and v. Individual management plans for control of the identified allergens.

Response: Compliant

2.8.1.2 - Product labeling, in accordance with regulatory requirements, shall include allergens where risks from cross-contamination have been documented.

Response: Compliant

Summary -

Response: The site has developed (7/12/24) and implemented an allergen control plan that is the responsibility of the SQFP. Control plan includes the following: Workplace related allergens- no allergens handled, stored, or grown. Allergens of concern: US Big 9 Accessible Allergens: None on site. Potential for employee lunches to contain allergens. Potential for oil or lubricants to contain allergens. Allergen controls: Hand Washing, no food allowed outside of designated areas, Maintenance program to prevent equipment/oil from being a source of contamination. Employees were observed to be following handling procedures and proper handwashing requirements. Product changeover: Not Necessary, no allergens handled. Segregation/Labeling: Not Necessary, no allergens handled. Validation/Verification: Not Necessary, no allergens handled. Label verification: Not Necessary, no allergens handled.

2.9.1 - Training Requirements

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

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

Summary -

Response: Training program has been developed and is the responsibility of the SQFP and HR. Program outlines required training topics, frequency, and competency verification. All employees are trained upon hire and at least annually for refresher training.

2.9.2 - Training Program (Mandatory)

2.9.2.1 - A training program shall be documented and implemented. It shall outline the necessary competencies for specific duties and the training methods to be applied to relevant personnel upon initial hire and for ongoing refresher training. The training program shall include at a minimum: i. Appropriate HACCP training for personnel involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all personnel engaged in operating critical control points (CCPs); iii. Personal hygiene training for all personnel involved in the handling of food products and food contact surfaces; iv. Good Agricultural/Operating Practices for all personnel engaged in food handling operations; v. Allergen management, food defense and food fraud for all relevant on-site personnel; and vi. Identification and implementation of refresher training.

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Comprehensive training program has been developed and is the responsibility of the SQFP. Training is provided at least annually or more as procedures change. Training topics include: HACCP, Hygiene, GMP's, Quality inspections, food defense and food fraud. Additional trainings are provided for specific employees based on their positions and tasks. Ex.: cleaning/sanitation, equipment safety, internal auditor, etc. Training is provided in English and Spanish. Training records are maintained from each training session and include attendee names, skills, training topics, trainer, date. Reviewed training packet for each employee which includes all onboarding training, food safety training, and employee signatures. Ex. 2/12/25 for 77 workers on Doc QP-01-08 Personnel Processing Practices.

10.1.1 - Premise Exterior

10.1.1.1 - The location and construction of the premises and building shall ensure that: i. Adjacent and adjoining buildings, operations, and land use do not interfere with safe and hygienic operations; and ii. Relevant regulatory authority approval has been obtained and is on file.

Response: Compliant

10.1.1.2 - The methods and responsibilities applied to maintain a suitable exterior environment shall be documented and implemented. These include: i. Effective, periodic monitoring and/or inspection of the premises, the surrounding areas, storage facilities, machinery, and equipment; ii. Controls to ensure that the exterior is kept free of waste and/or accumulated debris to prevent the attraction of pests and vermin; iii. Paths, roadways, loading and unloading areas are adequately drained and maintained; and iv. Records of inspections and correction actions are maintained.

Response: Compliant

Summary -

Response: A site risk assessment has been conducted that addresses the location, neighboring properties/activities, construction activities, and is reviewed at least annually or as changes occur. Most recent: 7/12/24 Identified risks: Neighboring orchards and workers are identified but as low risk.

10.1.2 - Building Interior

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

Response: Minor

Evidence: • MINOR: Standing water with thick mud observed in the Seg room during inspection.

Root Cause: Maintenance and cleaning is not being performed on these refrigeration units on a regular basis. The drain pans are not draining quick enough causing leaking. These units have been added to the facility cleaning record.

Corrective Action: This area is being cleaned using the floor scrubber. The refrigeration units have been cleaned, drain pans are being repaired, and piping is being insulated wrapped to prevent condensation, and freezing.

Verification Of Closeout: Please provide the updated facility cleaning log (weekly records of cleaning referred to in cleaning schedule) and record of maintenance that you referred to. Please provide the monthly audit conducted to verify cleanliness. Approved per HS.

Completion Date: April 4, 2025

Closeout Date: May 27, 2025

10.1.2.2 - Drains and waste/material trap systems shall be constructed and located so that they can be easily cleaned and not present a hazard to products.

Response: Compliant

10.1.2.3 - Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have even, smooth light-colored finishes, be impervious to liquids, and shall be kept clean (refer to 10.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

Response: Compliant

10.1.2.4 - Ducting, conduit, and pipes that convey 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 (refer to 10.3.2).

Response: Compliant

10.1.2.5 - Adequate ventilation shall be provided in enclosed product handling and storage areas and meet commodity-specific regulations where applicable. All ventilation equipment and devices shall be adequately cleaned per the cleaning and sanitation program.

Response: Compliant

10.1.2.6 - 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.

Response: Compliant

10.1.2.7 - Doors, hatches, and windows and their frames in food handling or storage areas shall be of a material and construction that meets the same functional requirements 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

10.1.2.8 - 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 10.3.2).

Response: Compliant

10.1.2.9 - The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/packed (refer to 2.4.4 for internal lab requirements). 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

10.1.2.10 - Lighting and light fixtures in product handling areas, inspection stations, ingredient/ input and packaging storage areas, and all areas where the product is exposed shall be: i. Of appropriate intensity to enable personnel to carry out tasks efficiently and effectively; and ii. Shatterproof, manufactured with a shatterproof covering, or fitted with protective covers. Where fixtures cannot be recessed, including in warehouses, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program.

Response: Compliant

Summary -

Response: Buildings on site were observed to be well constructed and well maintained to include cold storage, packing lines, break rooms, and maintenance/storage areas. QC area is designated and observed to be clean, well maintained, and sound. Walls, junctions, partitions, ceilings, windows and doors observed to be structurally sound and cleanable. Drop ceilings are not present. Ducting, pipes, and overhead structures are in good condition with no issues observed. Stairs and catwalks are made of stainless steel and are not observed to present a risk to product. Lighting observed to be sufficient in brightness, are shatterproof, and are including in the site's glass and brittle plastic register. MINOR: Standing water observed in the cold room at the time of the audit coming from the overhead cooling units.

10.1.3 - Dust, Insect, and Pest Proofing

10.1.3.1 - 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 provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against ingress of dust, vermin, and other pests.

Response: Compliant

10.1.3.2 - 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 entry 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

10.1.3.3 - 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 operating equipment. Poison rodenticide bait shall not be used inside packing rooms, product storage areas, or food handling areas.

Response: Compliant

Summary -

Response: External doors including man doors and dock doors, windows, and vents were properly sealed at

the time of the audit as to prevent pest entry. Bait stations are placed on the exterior of the building. ILT's and bait stations are properly located.

10.2.1 - Equipment and Utensils

10.2.1.1 - The methods and responsibility for purchasing and specifications development for equipment and utensils shall be documented and implemented. The methods shall ensure that equipment and utensils: i. Are designed, constructed, installed, and operated so as not to pose a threat to products; and ii. Meet any applicable regulatory requirements.

Response: Compliant

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

Response: Compliant

10.2.1.3 - Benches, tables, conveyors, shellers, graders, packers, and other mechanical equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious, and free from cracks or crevices.

Response: Compliant

10.2.1.4 - Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned per the cleaning and sanitation program. Bins used for inedible material shall be clearly identified.

Response: Compliant

10.2.1.5 - All equipment and utensils shall be cleaned after use and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

Response: Compliant

10.2.1.6 - Vehicles and/or other devices used to transport and move products 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

Summary -

Response: The purchasing program is the responsibility of the SQF practitioner and the orchard manager. Procedure is outlined within the Purchasing SOP. Utensils, tubs, bins, and equipment were observed to be clean, well maintained and are constructed of appropriate materials. Utensils were stored properly and appeared to be clean. Not-in-use equipment was not observed.

10.2.2 - Equipment Maintenance and Repair

10.2.2.1 - The methods and responsibility for the maintenance and repair of equipment and buildings and facilities shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination. The methods shall include procedures to ensure: i. Routine preventive maintenance of facilities and equipment in any food handling or storage area is performed according to a maintenance control schedule; ii. Preventive maintenance and repair of items identified as impacting food safety controls and practices

are prioritized for completion according to defined schedules or immediately when they are not properly functioning; and iii. Records are maintained for all preventive maintenance and equipment failure/immediate repair activities and corrective actions. The maintenance schedule shall cover buildings, equipment, and other areas of the premises critical to the maintenance of product safety and quality.

Response: Minor

Evidence: • MINOR: Maintenance program does not include areas of the facility outside of the packing line. Specifically, CA rooms, dock doors, forklifts, etc. Pm Records provided for Apple Packing Line. PM records for Cherry Packing Line not available.

Root Cause: The facility maintenance form was not being completed as required, and it was a generic form for all facilities. This form has been modified for only the North facility, and it now includes the areas we were missing in the cold rooms, seg room, and shipping dock.

Corrective Action: The facility maintenance log for cleaning was not being completed as needed. The log has been created specifically for the North facility with items to be checked and cleaned. The ceiling on the shipping dock has been cleaned, as well as at the ca rooms pressure washed.

Verification Of Closeout: This NC is referring to the Maintenance program, not sanitation. Please review and provide response regarding maintenance. The root cause mentions maintenance form but it was not provided for review. Refrigeration forms provided for review. Approved. CM

Completion Date: April 15, 2025

Closeout Date: June 1, 2025

10.2.2.2 - The maintenance supervisor and/or site supervisor shall be informed when repairs or maintenance are undertaken in product handling or storage areas and when the 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

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

Response: Compliant

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

Response: Compliant

10.2.2.5 - Paint used in a food handling or contact zone shall be suitable for use, in good condition, and shall not be used on any product contact surface.

Response: Compliant

10.2.2.6 - Compressed air systems, and systems used to store or dispense other gases used in the operational process that come into contact with food or food contact surfaces, shall be maintained and regularly monitored for quality and applicable food safety hazards.

Response: Compliant

Summary -

Response: Maintenance procedure has been developed and is the responsibility of Maintenance Manager/Refrigeration Manager. Procedure includes a preventive maintenance schedule and instructions,

maintenance hygiene requirements, etc. PM maintenance includes production line, conveyors, tables, machines, and dryers. Production Line Mechanic Clean-Up log is the verification step for tool removal and cleaning after maintenance tasks. MINOR: Maintenance program does not include areas of the facility outside of the packing line. Specifically, CA rooms, dock doors, forklifts, etc. Pm Records provided for Apple Packing Line. PM records for Cherry Packing Line not available.

10.2.3 - Maintenance Personnel and Contractors

10.2.3.1 - Maintenance personnel and contractors shall comply with the site's personnel and operational hygiene requirements (refer to 10.5).

Response: Compliant

10.2.3.2 - 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

10.2.3.3 - Maintenance personnel 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. Maintenance, operations, and/or sanitation shall sign-off on communications.

Response: Compliant

Summary -

Response: Maintenance staff are required to follow the site's food safety and hygiene policies. Contractors sign in at the front desk and review the site's policies. Maintenance request forms are filled out for each maintenance task to be completed during production hours and include tool removal and sanitation verification. Reviewed training records for maintenance staff regarding glass and plastics, tool removal and maintenance during production.

10.2.4 - Calibration

10.2.4.1 - The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in Good Operating Practices, food safety plans, and other process controls or to demonstrate compliance with customer specifications shall be documented and implemented. The procedures shall ensure: i. Calibration is performed according to regulatory requirements and/or the equipment manufacturer's recommended schedule; ii. Calibrated measuring, testing, and inspection equipment is protected from damage and unauthorized adjustment; iii. Affected product is handled according to non-conforming product procedures when equipment is found to be out of calibration; iv. Software used for calibration activities is effective and appropriate; and v. Records of calibration activities are maintained.

Response: Compliant

10.2.4.2 - Equipment shall be calibrated against manufacturer, 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

Summary -

Response: Control of Inspection, Measuring, and Test Equipment Rev 2. has been developed, implemented and is the responsibility of the food safety department. Calibration records reviewed: Room Probes/thermometers- monitored daily electronically and calibrated annually by 3rd party. Scales- Calibrated by Western Scales. All equipment calibration is up to date as of audit date.

10.3.1 - Pest Prevention

10.3.1.1 - The methods and responsibility for pest prevention shall be documented and effectively implemented. The pest prevention program shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity so as 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 bait stations set on a site map; 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 personnel 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 personnel 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

10.3.1.2 - 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. Maintain a site map indicating the location of bait stations, traps, and other applicable pest control/monitoring devices; and v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments.

Response: Compliant

10.3.1.3 - Inspections for pest activity shall be conducted on a regular basis by trained 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 pest activity inspections and pest control devices shall be maintained.

Response: Compliant

10.3.1.4 - 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

10.3.1.5 - No domestic animals shall be permitted on the site in food handling or storage areas

Response: Compliant

Summary -

Response: Pest control program is the requirement of the SQF practitioner and is contracted to a 3rd party service, Sprague Pest Control. The site is serviced monthly and includes interior stations, exterior traps and bait stations for the Apple/Pear and Cherry Line. Map dated 5/2/24 shows devices for each room and building. Records are current and reviewed during audit. No outstanding recommendations in service reports, no issues

observed. Program is reviewed quarterly by the company. Reviewed CoI, business license, and applicators licenses which are current. SDS for approved chemicals are in the pest control binder.

10.3.2 - Cleaning and Sanitation

10.3.2.1 - The methods and responsibility for cleaning of the product handling equipment and environment shall be documented and implemented. Cleaning procedures and schedules shall include: i. A list of equipment, utensils, and storage areas that require periodic cleaning; ii. Instructions on how cleaning is performed for the various areas and equipment; iii. The frequency of when cleaning is to be completed; iv. Personnel responsible and the methods used to verify the effectiveness of the cleaning and sanitation program (e.g., validation of procedures, concentration of detergents and sanitizers); and v. Records of cleaning activities and effectiveness reviews/inspections are maintained.

Response: Minor

Evidence: • MINOR: Cleaning schedule includes areas of the facility: Seg room, CA room, shipping, and packing lines. However, the cleaning is not being done according to schedule and there are no cleaning records available for CA rooms, shipping, and seg. Observed significant buildup/dirt on overhead beams, cooling units, doors, walls, etc.

Root Cause: The facility cleaning record has not been getting completed, and it was a generic document for all facilities This document was not set up for some of these specific areas at the North facility. Because of how the form was set up it was lacking detail on what and how to clean.

Corrective Action: The shipping dock ceiling beams have been cleaned, as well as the refrigerated cold rooms were pressure washed with dirty pipes. The facilities cleaning document has been created for just the North facility, and updated with specific cleaning requirement. The documentation of cleaning will be done on QP-03-46GFN under corrective action. When an issue is found while doing the inspection the time for cleaning or date cleaning was completed will be documented. This will allow for cleaning to be done more often if needed.

Verification Of Closeout: Photos of overhead areas after cleaning were provided for review. Please provide cleaning records/form that will be used for future cleaning. How will this be verified in the future to prevent recurrence? Approved per HS.

Completion Date: May 15, 2025

Closeout Date: May 27, 2025

10.3.2.2 - Detergents and sanitizers shall be suitable for use in a food 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 purchased and used chemicals is maintained; iii. Detergents and sanitizers are properly stored as per the storage program; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained personnel handle sanitizers and detergents.

Response: Compliant

10.3.2.3 - Detergents and sanitizers that are mixed for use shall be correctly mixed according to the manufacturer's instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified, and records maintained.

Response: Compliant

10.3.2.4 - Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils. Racks and containers for storing cleaned utensils and protective clothing shall be clearly identified

and maintained in a manner that prevents contamination of products, equipment, or storage areas.

Response: Compliant

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

Response: Compliant

10.3.2.6 - 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

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

Response: Compliant

Summary -

Response: Sanitation program has been developed and implemented and is the responsibility of the Food Safety Coordinator. Sanitation shift operates after the production shift. Employees have been trained on handling, mixing, and titrating chemicals. Lunchroom cleaning and sanitizing log and Restroom cleaning and sanitizing log provided for review for 2024-2025 season. Wesmar services and calibrated the auto-dosing equipment for sanitation chemicals monthly. Reviewed records for 12/5/24, 1/6/25, 2/17/25, and 3/12/25 provided by Wesmar. Cleaning chemicals used are FRM 63 CBS, Lift Off SGF, Wax-gone, Master sanitation schedule has been developed and includes production lines, warehouse, breakroom and bathroom areas. Cleaning tasks are documented daily, weekly, monthly and quarterly.

10.4.1 - Personnel Practices

10.4.1.1 - A documented and implemented procedure for personal hygiene and personnel practices shall ensure that personnel engaged in the handling of product use appropriate personal hygiene practices. The procedure shall include instructions that: i. Jewelry and other loose objects that pose a threat to the safety of the product are not worn or taken into any product handling or storage operations. ii. Fingernail polish, artificial nails, and long nails are not permitted where product is handled with bare hands; iii. False eyelashes and eyelash extensions are not permitted; iv. Hair restraints are used where product is exposed; and v. Smoking, chewing, eating, drinking (except for water which shall be available to all personnel), or spitting are not permitted in any packing or storage areas. Note: The wearing of plain bands with no stones or jewelry accepted for religious or cultural reasons and prescribed medical alert bracelets can be permitted; however, the site will need to consider its customer requirements and the applicable food legislation. Personnel and visitor practices, including all those listed in 10.4.1, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices. 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

10.4.1.2 - 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 packhouse operations.

Response: Compliant

10.4.1.3 - Procedures and responsibilities shall be in place that specify the handling of product and/or product contact surfaces that have been in contact with or exposed to blood or other bodily fluids.

Response: Compliant

10.4.1.4 - Personnel with exposed cuts, sores, or lesions shall not be engaged in handling product or product contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a suitable waterproof and colored dressing.

Response: Compliant

Summary -

Response: Procedures regarding personnel practices have been implemented and include the use of protective clothing, good hygiene, handwashing, and designated areas for eating and drinking. Evidence of employees competency was observed during the inspection as I observed employees washing hands appropriately and following hygiene and safety procedures.

10.4.2 - Sanitary Facilities and Handwashing

10.4.2.1 - Toilet and handwashing facilities shall be provided and designed, constructed, and located in a manner that minimizes the potential risk for product contamination. The following shall be considered: i. There shall be sufficient toilet facilities for the maximum number of personnel, and they shall be constructed so they can be easily cleaned and maintained; ii. Handwash basins with clean and potable water, hand soap, disposable towels or effective hand drying devices, waste bins, and a tank that captures used handwash water for disposal (if not connected to drains) shall be provided inside or adjacent to toilet facilities and in accessible locations throughout food handling areas as required; iii. Signage in appropriate languages shall be provided adjacent to handwash basins instructing personnel to wash their hands after each toilet visit; iv. Racks for protective clothing used by personnel and visitors shall be provided; and v. Toilet and wash stations shall be maintained in clean and sanitary conditions. Tools/equipment used for cleaning toilet rooms shall not be used to clean operational areas.

Response: Compliant

10.4.2.2 - Personnel shall have clean hands, and hands shall be washed by all personnel, contractors, and visitors: i. On entering food handling areas, and before putting on gloves; 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 products, or contaminated material.

Response: Compliant

10.4.2.3 - 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 as per regulations.

Response: Compliant

Summary -

Response: Handwashing is required for all employees before entering the production area. Handwash stations are provided in the restrooms and inside the production area. Observed employees properly washing their hands before leaving the breakroom after lunch. Warm water and liquid soap were provided at each handwashing station as well as paper towels. Hand wash signs were posted at each sink in English and Spanish. Toilet facilities are provided and are appropriate in number and location. Procedure for sanitary

drainage reviewed and no issues observed.

10.4.3 - Protective Clothing

10.4.3.1 - Protective clothing (e.g., uniforms and smocks) shall not pose a food safety threat or be a risk to product contamination. Protective clothing shall be: i. Manufactured from material that can be effectively maintained, stored, and laundered after use or at a frequency that does not create risks of cross-contact with products. Excessively soiled uniforms shall be changed or replaced where they become a product contamination risk; and ii. Temporarily stored on racks, when personnel leave operating areas or use toilet facilities and the clothing can be easily removed (e.g., smocks and aprons).

Response: Compliant

10.4.3.2 - Where applicable, clothing (i.e., any outer garment), including footwear, shall be in good condition, cleaned, and worn to protect product from the risk of contamination.

Response: Compliant

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

Response: Compliant

Summary -

Response: Clothing was observed to be well maintained and cleaned with no issues observed. Policy states that disposable gloves are worn per customer requirements. If cotton/rubber gloves are worn, disposable gloves are worn over them when required by customer.

10.4.4 - Visitors

10.4.4.1 - All visitors, including management, shall be required to adhere to site personnel practices and specifically: i. Remove jewelry and other loose objects as per 10.4.1.1; ii. Wash hands as per 10.4.2.2; iii. Wear suitable clothing and footwear when entering any operational or food handling area; and iv. Enter and exit food handling areas through the proper entrance points.

Response: Compliant

10.4.4.2 - Visitors who are exhibiting visible signs of illness or have been in recent direct contact with other sites, animals, or produce shall be prohibited from entering any growing or product handling or harvesting operation.

Response: Compliant

Summary -

Response: Visitors are required to sign in at the front office upon arrival, where they read and agree to GMP's and visitor policies. Visitors and contractors are required to remove jewelry and wear hair/beard restraints, and clean suitable clothing. Visitors showing signs of illness are not permitted access into the facility.

10.4.5 - Personnel Amenities (change rooms, toilets, lunchrooms/breakrooms)

10.4.5.1 - Staff facilities shall be supplied with appropriate lighting and ventilation and provided to enable staff and

visitors to: i. Change into and out of protective clothing, if applicable; ii. Store street clothing, footwear, and personal items separate from food handling, packing, and storage areas.

Response: Compliant

10.4.5.2 - Separate lunchroom and/or breakroom facilities shall be provided away from product contact/handling zones. Lunchrooms/breakrooms shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to accommodate the maximum number of personnel 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 personnel to store or heat food and prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests.

Response: Compliant

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

Response: Compliant

Summary -

Response: Staff amenities are cleaned following a written schedule provided during the audit. Change rooms are not necessary, but storage lockers are provided for storage of personal items. Toilet rooms are adequate in number and are separate from production and storage areas. Handwashing stations are provided outside of the toilet stalls. Break areas were observed to be neat and well maintained with no concerns observed.

10.5.1 - Product Handling and Packaging Operations

10.5.1.1 - All personnel engaged in any food handling operations shall ensure that products and materials are handled and stored to prevent damage or product contamination. They shall comply with the following operational practices: i. No eating or tasting any product in the food handling/contact zone, except as noted in element 10.5.1.2; ii. Entry into operational areas is only through the personnel access doors; iii. All doors are kept closed. Doors are not open for extended periods when access is required for waste removal, or receiving and/or shipping of products, ingredients, or packaging. iv. Packaging, product, and ingredients are kept in appropriate containers as required and off the floor; v. Waste is contained in the bins identified for this purpose, removed from operational areas regularly, and not left to accumulate; and vi. All wash down and compressed air hoses are stored on hose racks after use and not left on the floor.

Response: Compliant

10.5.1.2 - In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone, the site shall implement proper controls and procedures to ensure: i. Food safety is not compromised; ii. Sensory evaluations are conducted by authorized personnel only; iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations; iv. Sensory evaluations are conducted in areas equipped for the purpose; and v. Equipment used for sensory evaluations is sanitized, maintained, and stored separately from operational equipment.

Response: Compliant

10.5.1.3 - The flow of personnel in food handling areas shall be managed so that the potential for contamination is minimized.

Response: Compliant

10.5.1.4 - Personnel practices and activities, including those listed in 10.5, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices.

Response: Compliant

Summary -

Response: Employees were observed to be compliant with the site hygiene procedures. Entry into packing and storage areas is limited to personnel access doors and waste is properly contained. Hoses are properly stored on designated hooks. The process flow is well designed to mitigate risk of cross contamination.

10.5.2 - Control of Foreign Matter Contamination Operations

10.5.2.1 - The methods and responsibility for the prevention of foreign matter and glass contamination shall be documented and implemented. Procedures and resulting records shall ensure: i. Containers, equipment, and other utensils made of glass, porcelain, ceramics, brittle plastic, or similar materials are not permitted where exposed product is handled, unless clearly identified, required for effective operational controls, and regularly inspected; ii. Regular inspections are conducted to ensure food handling/contact zones areas are free of glass and brittle plastic and any items made from the previously identified materials are in good repair; iii. Wooden pallets and other wooden utensils or tools used in food handling/contact zones are dedicated for that purpose. Their condition is subject to regular inspection, and they are cleaned and maintained in good order; iv. Product handling areas are routinely inspected to remove risks from foreign material, such as debris, wood, stones, metal, detached/deteriorated equipment, and other physical hazards; and v. Personnel are to be made aware of their responsibility to adhere to the site's foreign matter and glass controls.

Response: Compliant

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

Response: Compliant

10.5.2.3 - Gaskets and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency (refer to 2.5.4.3).

Response: Compliant

Summary -

Response: Control of Foreign Materials procedure dated 4/27/24 which requires that no glass or plastic is permitted in the packing or storage areas. Pallets and bins are inspected daily during shipping and receiving. Knives are checked out to employees at the beginning of each shift and documented on knife register. Glass and Hard Plastic Register includes each line and the glass/hard plastic surrounding, including lights, mirrors, gauges, etc.

10.5.3 - Detection of Foreign Objects Operations

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

Response: Compliant

10.5.3.2 - Metal detectors or other physical contaminant detection technologies shall be routinely monitored,

validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.

Response: Compliant

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

Response: Compliant

10.5.3.4 - In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition.

Response: Compliant

10.5.3.5 - 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 the completed actions approved by a suitably responsible person before restarting operations.

Response: Compliant

Summary -

Response: Visual inspections are conducted continuously through packing operations. If foreign materials are identified, the non-conforming product procedure is initiated. The site has implemented a procedure for the cleanup of glass and brittle plastics. There are not metal detectors in place.

10.5.4 - Receiving and Shipping

10.5.4.1 - Personnel conducting receiving activities shall ensure agricultural inputs, packaging materials, and product are not contaminated during the unloading process. Work instructions and training shall include the following practices: i. Vehicles are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the agricultural input, packaging, or product; ii. Vehicles (e.g., trucks/vans/containers) are secured from tampering using a seal or other agreed-upon and acceptable device or system; iii. Unloading docks are designed to protect the product and in good operating condition (refer to 10.1.2.7); and iv. Where temperature control is required, the refrigeration unit's storage temperature settings and operating temperature are checked and recorded before opening the doors. Unloading is completed efficiently, and product temperatures are recorded at the start of unloading and at regular intervals during unloading. Recording documents for vehicle inspection, identification of approved suppliers, and temperature checks shall be maintained.

Response: Compliant

10.5.4.2 - Personnel conducting loading and transporting of harvested and/or packaged product shall ensure that product integrity is maintained. Work instructions and training shall include the following practices: i. Inspections for ensuring vehicles are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on products; ii. Securing vehicles (e.g., trucks/vans/containers) from tampering using a seal or other agreed-upon and acceptable device or system; iii. Loading docks are designed to protect the product and in good operating condition (refer to 10.1.2.7); iv. Verification that appropriate storage conditions are maintained during transportation to final destinations; v. Prevention of cross-contamination with other hazards and potential spoilage; vi. Use of appropriate stock rotation practices; and vii. Recording and maintaining documents for vehicle inspection, transport conditions, and stock rotation.

Response: Compliant

Summary -

Response: The site has implemented policies to ensure that proper loading and unloading procedures are followed. Shipping and receiving policies are in place. Trailers are inspected following procedure and documented on the receiving form. Reviewed trailer inspection records related to trace exercise and up to current date, no non-conformances noted. All incoming and outgoing trailers are inspected for odor, damage, and cleanliness and non conformances are documented on the log. Seal numbers are documented for all trailers when required by customers.

10.6.1 - Water Supply

10.6.1.1 - A water supply plan shall be prepared that describes the water sources and the operational areas they serve and shall include the location of water sources, permanent fixtures, and the flow of the water system. The plan shall be kept current and revised when changes occur. 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

10.6.1.2 - Adequate supplies of potable water drawn from a known clean source shall be provided for use during operations, cleaning the premises and equipment, and handwashing.

Response: Compliant

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

Response: Compliant

10.6.1.4 - The use of non-potable water shall be controlled so that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent backflow or back siphonage; and iv. Testing of the backflow system, where possible, is conducted at least annually and records are maintained.

Response: Compliant

10.6.1.5 - Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.

Response: Compliant

Summary -

Response: Water Management Plan has been developed and is the responsibility of SQFP. Includes contingency plan. Water source is City of Brewster. Water samples taken monthly. Reviewed results from 8/23-current. Most recent samples taken on 2/21/25 and show <1 CFU for EC and TC.

10.6.2 - Water Treatment

10.6.2.1 - Water treatment methods, equipment, and materials if required, shall be designed, installed, and operated to ensure water receives effective treatment. Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

Response: Compliant

10.6.2.2 - Water used as an aid to operations (e.g., fluming, final product spray) or for cleaning and sanitizing equipment, shall be tested and, if required, treated to maintain potability (refer to 10.6.2.1).

Response: Compliant

10.6.2.3 - Treated water shall be regularly monitored to ensure it meets the specified indicators. Water treatment chemical usage shall be monitored to ensure chemical residues are within acceptable limits. Records of testing results shall be kept.

Response: Compliant

Summary -

Response: Water is treated with Chlorine, PAA spray bars in place. Chlorine ORP- 650 with PH of 6.4-7.5. PAA must not be lower than 20 PPM. Reviewed monitoring records for the year, no deviations noted. Water is tested at monthly. Most recent samples taken on 2/21/25 and show <1 CFU for EC and TC.

10.6.3 - Water Quality

10.6.3.1 - 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 operational 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

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

Response: Compliant

10.6.3.3 - Water and ice shall be analyzed using reference standards and methods.

Response: Compliant

Summary -

Response: Water is used for product washing, hand washing, and sanitation. No ice or steam used in the process. Water source is municipal and is sampled regularly. Water samples taken monthly from each line. Reviewed results from 8/23- current. Most recent samples taken on 2/21/25 and show <1 CFU for EC and TC.

10.6.4 - Ice Supply

10.6.4.1 - Ice provided for use during operations, as a processing aid, or an ingredient shall comply with 10.5.3.1.

Response: N/A

Evidence: • NA, ice is not used

10.6.4.2 - Ice that is purchased shall be from an approved supplier and included in the site's food safety risk assessment. Ice shall be supplied in containers that are appropriate for use, cleanable if reused, and be tested as appropriate (refer to 2.3.3).

Response: N/A

Evidence: • NA, ice is not used

10.6.4.3 - Ice rooms and receptacles shall be constructed of materials as outlined in 10.1 and designed to minimize contamination of the ice during storage, retrieval, and distribution.

Response: N/A

Evidence: • NA, ice is not used

Summary -

Response: NA, ice is not used

10.6.5 - Air and Other Gasses

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

Response: Compliant

10.6.5.2 - Compressed air systems and systems used to store or dispense other gases used in the operational process that come into contact with food or food contact surfaces shall be maintained and regularly monitored for quality and applicable food safety hazards. The frequency of analysis shall be risk-based and at a minimum annually.

Response: Compliant

10.6.5.3 - Ambient air shall be tested at least annually to confirm that it does not pose a risk to food safety.

Response: Compliant

Summary -

Response: Compressed and ambient air are tested annually, most recently on 6/1/24 Results for CA: 1 CFU. Results for AA: 19 CFU. Filtration for compressed air is managed by maintenance and filters to 25 microns for air, particulates, and liquids.

10.7.1 - Ambient/Dry Storage

10.7.1.1 - The responsibility and methods for ensuring proper storage of inputs, packaging, and finished product shall be documented and implemented. The methods shall ensure: i. Effective stock rotation; ii. Utilization of inputs, work-in-progress, and finished product within their shelf life; iii. Risks to temporarily stored materials and/or products are analyzed, and controls are applied if necessary; iv. Rooms used for the storage of product ingredients, packaging, and other dry goods are located away from wet areas (refer to 10.1.2); and v. Records are maintained to control storage and stock rotation.

Response: N/A

Evidence: • NA, no ambient storage for product. All product is stored in CA rooms or refrigerated coolers prior to shipment. Packaging stored in ambient areas was observed to be well maintained and protected from contamination.

10.7.1.2 - Dry ingredients and packaging shall be received and stored separately from field product or chilled materials to ensure there is no cross-contamination. Unprocessed field products shall be received and segregated

to ensure there is no cross-contamination.

Response: N/A

Evidence: • NA, no ambient storage for product. All product is stored in CA rooms or refrigerated coolers prior to shipment. Packaging stored in ambient areas was observed to be well maintained and protected from contamination.

10.7.1.3 - Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and areas behind the racks. Storage areas shall be cleaned at a predetermined frequency (refer to 10.2.5.1) and designed and constructed to prevent packaging from becoming a harborage for pests or vermin.

Response: N/A

Evidence: • NA, no ambient storage for product. All product is stored in CA rooms or refrigerated coolers prior to shipment. Packaging stored in ambient areas was observed to be well maintained and protected from contamination.

Summary -

Response: NA, no ambient storage for product. All product is stored in CA rooms or refrigerated coolers prior to shipment. Packaging stored in ambient areas was observed to be well maintained and protected from contamination.

10.7.2 - Cold Storage, Controlled Atmosphere Storage, and Chilling of Foods

10.7.2.1 - The site shall provide confirmation of the effective operational performance of coolers, controlled atmosphere facilities, and cool rooms. They shall be designed and constructed to allow for the hygienic and efficient refrigeration and storage of food and be easily accessible for inspection and cleaning.

Response: Compliant

10.7.2.2 - Sufficient refrigeration and controlled atmosphere capacity shall be available to chill or store the maximum anticipated throughput of products with allowance for periodic cleaning of storage rooms.

Response: Compliant

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

Response: Minor

Evidence: • MINOR: Discharge observed from overhead cooling units dripping onto the ground in the seg room and several CA rooms.

Root Cause: No cleaning being performed on refrigeration units in these areas. These rooms were not on the facility cleaning log, and the facility cleaning log was a generic form set up for all facilities, and did not address specific items. Refrigeration maintenance has also been getting performed at a minimal level.

Corrective Action: These are records of cleaning on the refrigeration units. Cleaning was performed with floor scrubbing machine to remove any water accumulation on floors. The Facility Inspection for has been modified to include these cold rooms and items to be cleaned and or checked. The facility cleaning log has been created now specifically for each facility rather than one generic form for all facilities together on one log. The refrigeration units and piping have been cleaned. Drains unplugged, as well as drain pans are being repaired. Insulation is also being wrapped around piping to prevent condensation and freezing.

Verification Of Closeout: Approved per HS

Completion Date: April 15, 2025

Closeout Date: May 27, 2025

10.7.2.4 - Cool and controlled atmosphere rooms shall be fitted with temperature and atmosphere monitoring equipment and located to monitor the warmest part of the room and fitted with measurement devices that are easily read and accessible.

Response: Compliant

Summary -

Response: Cold and controlled atmosphere storage facilities are well maintained and monitored and are sufficient in capacity. No issues observed with discharge. Rooms are monitored continuously via digital software which alerts the team in the event of a deviation. Rooms are monitored with physical thermostat throughout the day to verify. MINOR: Discharge observed from overhead cooling units dripping onto the ground in the seg room and several CA rooms.

10.8.1 - Storage of Hazardous Chemicals and Toxic Substances

10.8.1.1 - Hazardous chemicals and toxic substances with the potential for food contamination shall be stored so as not to present a hazard to personnel, product, packaging, product handling equipment, or areas in which product is handled, stored, or transported. Specifically, they shall not be stored inside food handling areas and product and packaging storage rooms.

Response: Compliant

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

Response: Compliant

10.8.1.3 - Hazardous chemical and toxic substance storage facilities shall: i. Be compliant with national and local legislation and designed so there is no cross-contamination between chemicals; ii. Be adequately ventilated; iii. Be provided with appropriate signage indicating the area is a hazardous storage area; iv. Be secure and lockable to restrict access only to personnel with formal training in handling and use of hazardous chemicals and toxic substances; v. Have instructions, including up-to-date Safety Data Sheets (SDS), on the safe handling of hazardous chemicals and toxic substances, readily accessible to personnel; vi. Be equipped with a detailed and up-to-date inventory of all chemicals contained in the storage facility; vii. Have suitable first aid equipment and protective clothing available close to the storage area; viii. In the event of a hazardous spill, be designed such that spillage and drainage from the area is contained; and ix. Be equipped with spillage kits and cleaning equipment.

Response: Compliant

10.8.1.4 - Hazardous chemical and toxic substances shall be handled and applied by properly trained personnel. These materials shall be used by, or under the direct supervision of, trained personnel with a thorough understanding of the hazards involved, including the potential for the contamination of food and food contact surfaces.

Response: Compliant

10.8.1.5 - 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 awaiting authorized disposal by an approved vendor.

Response: Compliant

Summary -

Response: All cleaning chemicals/hazardous chemicals were observed to be stored securely in locked chemical cages that were properly labeled. Janitorial chemicals are stored inside a locked janitor closet with limited access. Chemicals were observed to be properly labeled in original containers. Training for maintenance and janitorial staff was on file and reviewed for handling chemicals, mixing, and titration. Chemical storage access is restricted to management and sanitation crew leaders. SDS are on file for all chemicals observed and storage includes appropriate containment capacity.

10.9.1 - Waste Management

10.9.1.1 - The methods and responsibilities that describe the effective and efficient disposal of dry, wet, liquid, and solid waste, including inedible material, unusable packaging, and trademarked materials, from the premises shall be documented and implemented. Reviews of the effectiveness of waste management will be part of the site's daily inspections, and the results of these inspections shall be included in the relevant reports.

Response: Compliant

10.9.1.2 - Waste shall be regularly removed from food handling or processing areas so it does not create food safety risks for finished product and packing operations. Designated waste accumulation areas shall be maintained in a clean, tidy conditions until external waste collection occurs.

Response: Compliant

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

Response: Compliant

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

Response: Compliant

10.9.1.5 - Inedible waste designated for animal feed shall be stored and handled so it does not cause a risk to the animals or to further processing.

Response: Compliant

Summary -

Response: Waste management plan has been developed and implemented. Dry waste is recycled when possible or goes to general waste. Fruit culls are sold for juice and decay fruit is taken to landfill. Waste water goes to septic.
