



# SQF Food Safety Audit Edition 9

Brewster Heights Packing & Orchards DBA Gebbers Farms -  
10928

## Summary

**Audit Decision**

Certified

**Certificate Number**

12047

**Audit Rating**

Good

**Decision Date**

November 20, 2025

**Audit Type**

Recertification

**Recertification Date**

October 1, 2026

**On-Site Audit Dates**

September 29, 2025 - October 2,  
2025

**Expiration Date**

December 15, 2026

**ICT Dates**

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**Issue Date**

November 20, 2025

## Facility and Scope

**Brewster Heights Packing & Orchards DBA  
Gebbers Farms - 10928**

25985 Highway 97  
Brewster, WA 98812 United States

**Products**

Growing and harvesting of Apples, Cherries, Pears

**Food Sector Categories**

03. Growing and Production of Fresh Produce and  
Nuts

**Scope of Certification**

Growing and Production of Fresh Produce and Nuts

## Certification Body and Audit Team

**EAGLE Food Registrations, Inc.**

220 E Monument Ave  
510  
Dayton, OH 45402-1287 United States

**CB#:** 40756

**Accreditation Body:** ANAB

**Accreditation Number:** 894

**Lead Auditor:** Todd McNeill (C-367501)

**Technical Reviewer:** Lisa Crawford (C-424990)

**Hours Spent on Site:** 26

**Hours of ICT Activities:**  
**Hours Spent Writing Report: 8**

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## Section Responses

### Audit Statement - Audit

**SQF Practitioner Name** - Name the designated SQF Practitioner

**Response:** Bob Grandy

**SQF Practitioner Email** - Email of the designated SQF Practitioner

**Response:** grandyb@gebbersfarms.com

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

**Response:** Miguel Garcia, Food Safety, Luis Garcia, Food Safety, Bob Grandy, SQF Field Practitioner, and Todd McNeill, Auditor

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

**Response:** Gebbers Farms has been SQF certified at the packing level for well over a decade and Food safety is managed by Gebbers Farms. Gebbers Farms has a robust food safety system over the past 20 years with a GFSI-accredited program. All orchards grow Apples, Cherries and pears, either organic or conventional. Gebbers produces 9542 Apples, 2132 cherries Pears 87 acres A food safety system based on SQF Version 9.0 . Harvest is sighted at 16 sites broken down in the North Central and South Districts. All farm locations are sighted and include all chemical Shed and Fill Sites. H2A workers and Local Hires are used for harvesting. Number of full-time employees on site for chemical application, irrigation and maintenance, along with Training records. Fruit is Packed by Gebbers Packing, Apple House and other packing facilities for club varieties. Harvest is inspected. No CCPs in the Food Safety Plan

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

**Response:** Miguel Garcia, Food Safety, Luis Garcia, Food Safety, Bob Grandy, SQF Field Practitioner, and Todd McNeill, Auditor

**Auditor Recommendation** - Auditor Recommendation

**Response:** To approve once CA's are corrected.

### 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

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**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

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**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

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**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

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**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

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**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

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**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

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#### **Summary -**

**Response:** A policy Statement is presented stating the commitment to SQF 9.0 for Gebbers Farms. The Program includes Pre-Requisite programs for all farm sites in Washington State to ensure the Food Produced on farms meets all GFSI, State and Federal Requirements. Gebbers Farms shows commitment to the Food Safety Culture by having a food safety team with 2 employees who go to each farm and block site to ensure

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compliance with the Food Safety System. Gebbers has a Food Safety Practitioner is the Person who communicates all policies and procedure to Orchard Managers and Personnel. Logs of communication are in the program. The policy is signed by the SQF Practitioner and Ownership. This commitment is to be posted at each farm site. The policy statement (Owner Commitment) postings on sites under SQF 9.0. Apple House has a robust Food Safety Program to follow the SQF Program. The program is managed by Apple House and Gebber Farm Food Safety. Responsibility has been identified with the organizational chart. Chart indicates the Food Safety Director and the Backup Practitioners and both are HACCP and SQF trained within the last 5 years. The Director and ownership signed for the group on 4-1-2025. Gebbers Farms is responsible for the Programs, including the following: Training, Farming Practices, and Testing programs. The Commitment letter is posted on the reader boards at each site.

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## 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

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**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

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### Summary -

**Response:** A SQF system review was conducted by Gebbers management over a one-week period on April 1 2025, against version 9.0 . A list of the reviewed documents, activities, Records of amendments and changes has been documented with the date, change implemented and the new version number. 9.0 Signed by the Food Safety Manager and Compliance Manager, who does the annual review. Document 2.1.1.1 V 9 All Managers and Supervisors are trained for each orchard site on HACCP and Food Safety with responsibilities. All employees all trained by Gebbers on Hygiene and farm practices to comply with SQF and Government oversight. Each orchard has a poster board stating the policies, safety and Chemical information with Phone numbers and contacts. The commitment letter is posted on site at the reader board at the entrance to the orchards or fill sites.

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## 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

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**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**

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**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**

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**Summary -**

**Response:** A compliant procedure and document have been provided that includes the orchard name, date, Owner, explaining in detail the complaint issue, Manager, signature and date. Sales are through Chelan Fresh marketing in Washington, who handle complaints from Customers. Policy is in the GAP manual created by Gebber Farm Food Safety. A form is present in all manuals provided. Sales is by Chelan Fresh Marketing only and issues are communicated at Monday production meetings to address any issues weekly. Complaints are sited for Spray drift, noise at the farm level on an isolated basis. No Food Safety complaints from the sales organization in the past year.

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## 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**

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**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**

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**Summary -**

**Response:** A food safety manual has been provided that includes the orchard location, Fruit varieties, fertilizer handling, irrigation water, chemicals/pesticides, orchard supplies and equipment, orchard staff training and education, worker hygiene, harvest container and equipment cleaning, pests and domestic animal control, harvesting, transportation, product trace-backs and recalls, documentation, corrective actions, internal audit and system review, product identification, Harvesting inspection and analysis, monitoring PHI's, Bin management, Environmental Monitoring, portable toilet maintenance, complaints, standard operating procedures meeting GAP Requirements. The Gebbers plan is reviewed on 4-1-2025 by the food safety team to follow the SQF 9.0 program.

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## 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

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**Summary -**

**Response:** A document control program is in place and updated annually. All manuals have recorded numbers and document control in the manual provided, meeting the control points for SQF 9.0.

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### 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

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**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

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**Summary -**

**Response:** Methods and responsibilities have been created for the record keeping of the calibration, training, chemical recommendations, ordering chemicals and aids, spraying, chemical inventory, container disposal, orchard posting, workers posting, applicators, license holders and license numbers, pest monitoring and food defense. Monitoring activities are present for Chemical and Fertilizer applications, cleaning records and Irrigation water testing for E. coli.. Etc. Records are held at the main Food Safety office in Brewster, WA.

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### 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

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**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

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**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

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**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

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## Summary -

**Response:** The Gebbers Farm program has no product development done by any Orchard in the group. All Fruit varieties as risk-assessed prior to planting by Gebbers. Approved Nurseries are used and certified root stocks are only planted. Planting records are recorded for Apples in Cherries in 2025. Sugar Bee and Cherries for various blocks. 210 acres total replanted to profitable varieties. 9 new acres plant for Lucy Rose in 2025. All Processes used for farming are correct.

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### 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

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**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

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**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

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**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

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**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

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## Summary -

**Response:** All packing is done at Gebbers farms for Cherries, Apples Pears, or packed at another GFSI-approved and Certified facility for club varieties. No field packing is done at the farm level. All harvest bins are Macro Plastic and Wood. Bags and buckets are provided by Gebbers and stored in sealed on-site at the packing facility. All equipment used on the farm is cleaned prior to harvesting using Clorox water and pressure washing system. All bins are stored at various farm locations. All chemicals are stored in sheds or containers at 23 sites for all orchard and block locations. The main site is located in Brewster, WA. All finished product specifications are held with Gebbers Farms to meet all legislative and customer Requirements. A program for assessing contract service providers is in the master binder for all farm sites. Gebbers does not have contracted services in 2024 for any farming activity. The new plantings are from Treco and Willow Drive and

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approved for planting. Gebber has the intellectual rights for growing various varieties of fruit.

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### 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:** Compliant

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**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

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**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

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#### Summary -

**Response:** All approved suppliers must meet the minimum requirements under the Gebber Farm program for vetted and established suppliers, which are standard for the industry. Gebbers Farms provides a list of approved suppliers based on GAP Principles and meets the annual requirements of the company. This would include spray services and any other business on-site. An annual review is conducted by Gebbers Farms to approve suppliers and monitoring their processes to ensure compliance and deliveries are met. All suppliers are vetted by having 3rd party audits or letter of guarantee for providing services for Gebber Farms. No packing is done at any farm site, but taken Gebber Packing. A list of Approved suppliers is Sighted : i.e. GS Long, NW Wholesale, Nutrien Ag, Wilbur Ellis, Tibbs Toilets, Handy Can, Apple Valley, and Morgan and Sons. Zippy Disposal, Upper Valley and Gebbers' own dump trucks are used to keep the farm sites maintained. Treco and Willow Drive and PVM provide trees.

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### 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

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**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

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**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](mailto:foodsafetycrisis@sqfi.com).

**Response:** Compliant

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#### Summary -

**Response:** Gebbers Farms complies with food safety rules and legislation as per customer and government policies. A program is in place for meeting requirements and Chelan Fresh Marketing and Gebbers Farms. Packing requirements. They are all used to keep informed of the latest requirements through annual training by Gebbers Farms. Procedures and Policies are held in the Food Safety Manual at Gebbers Farms' Food Safety Office. A policy is in place to notify SQFI and Eagle in the event of an issue.

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### 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

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#### Summary -

**Response:** GAP police states Gebbers Farms complies with the GAP Manual presented with each farm in the group. The food safety program is designed on Codex HACCP and GAP guidelines for tree fruit. A consultant helped form the program. Chemical Recommendations are made by Certified crop Consultants, along with using the Washington of Ag crop guidelines and Washington Horticulture. and Tree Fruits. GAP Programs are met through a robust Pre-requisite Program

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### 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:** Compliant

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**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

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**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

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**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

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**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

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**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

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**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

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**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

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**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

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**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

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**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

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**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

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**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

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**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

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**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

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

**Response:** Compliant

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**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

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#### **Summary -**

**Response:** A food Safety plan is in place and based on HACCP and Codex for monitoring control points in the HACCP GAP program. The HACCP Plan is designed around Tree Fruit Production and includes all risk and associated controls through Pre-Requisite Programs. The Food Safety Plan monitors all activities, including CPs that are identified and have controls in place through Monitoring during growing and harvesting. Chemical applications are recorded and PHI's are monitored along with Irrigation and Potable water sources. Testing is done through ISO 17025 Certified Labs from the Orchard. Monitoring is also done for the following: Fertilizer

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use and handling, irrigation water, chemicals/pesticides use, orchard supplies and equipment, orchard staff training and education, worker hygiene, harvest container and equipment cleaning, pests and domestic animal control, harvesting, transportation, product trace-backs and recalls, documentation, corrective actions, internal audit and system review, product identification, Harvesting inspection and analysis, PHI monitoring, empty crop protection material, block and body fluid contamination, procedures for portable toilet contamination, complaint standard operating procedures. Equipment etc is stored near chemical shed and maintenance shops in Brewster, Oroville, Chelan and Quincy, WA. The effectiveness of the programs is verified in the Food Safety Manual policies, procedures and records.

#### 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:** Fruit is inspected during harvesting and at receiving the packing facilities. Washington for Quality and condition. Fruit is pooled based on size and quality. Gebbers Farm's food safety has in-house testing for the fruit testing, Sugars, Pressures and fruit fly etc. Irrigation and potable Water are tested by IEH an ISO 17025 company and MRL testing is completed by PAL in Portland Oregon. MRL's testing is taken at the Packing Facilities in Brewster, WA. Apples cherries and Pears are inspected at arrival at each packing facility to determine quality and storage requirements. Water for agricultural use is tested at least annually by IEH an approved ISO 17025 company. Post-harvest applications for TBZ, DPA Pymethinil are done per customer requirement at the packing house level.

#### 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

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#### Summary -

**Response:** Methods and responsibilities have been created for non-conforming products and materials used in farming tree fruits. Fruit is harvested by Maturity, pressure and sugars. All non-conforming product is taken to the packing house for culls and or Juice etc. This is determined by training packinghouse employees evaluate the fruit for quality and safety.

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### 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

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#### Summary -

**Response:** No product is packed at the farm level. All fruit is taken to Gebber Farms packing or other facility. The packing facilities determine the condition of the fruit. Gebbers Farms Packing takes possession from the farms at loading at each ranch. All fruit is delivered to Gebber Farms. Staddle Carrier truck and sent to the various packing Facility. No product is reworked at the Farm Level.

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### 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

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#### Summary -

**Response:** All finished product is inspected and packed by Gebbers Packing or other GFSI-approved facilities that are approved for packing. Gebber Farm orchards does not control the fruit once taken to the packing facilities.

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### 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**

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**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**

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**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**

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**Summary -**

**Response:** Gebbers Farms BPHO Packing does an environmental test program at the packing facility level. Test is done Weekly by Gebbers Farms. Gebbers Farms is SQF Certified packing houses in 2025. The findings are in the annual SQF 9.0 Audit for the facility, annually for review. Each orchard unit monitors harvesting practices to include cleaning and sanitation of equipment, harvesting aids. The program is for all contact surfaces during harvest to be cleaned prior to harvesting and daily hygiene assessments are to be done and recorded on the daily harvest log provided in the program. Cleaning records are present at the main orchard site. Cherry Lugs, Apple Bags are cleaned Chlorine water in a pressure washing system in a drencher. Bins are cleaned prior to use by Gebber Farms. Packing at Gebbers Farms and Apple House in a dedicated bin washer prior to harvest.

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## 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**

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**Summary -**

**Response:** Validation is met through the WSDA requirements and the USDA Gebbers Farms food safety program requires monitoring of PHI's, and irrigation water testing verified 3 times annually and validated by an approved lab. Records are present for testing of irrigation water, MRL counts taken at the packing house level, Washington Hort, and WSU provide validation for each control point to be met. Irrigation samples are taken for 68 samples 3 times annually so all water systems are monitored.

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## 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**

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**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

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**Summary -**

**Response:** The food Safety plan developed by Gebber Farms Food Safety and is created due to the risk assessment and is monitored and assessed for the Orchard sites. Irrigation and potable water, chemical and fertilization monitoring are recorded. Monitoring is done for PHI's and irrigation water is done for each farm site. All records are present for monitoring activities. Irrigation Water is risk assessed against National Standards annually to comply with FSMA and EPA.

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### 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

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**Summary -**

**Response:** Procedures for Corrective actions are in place for monitoring that is outside of compliance in the Food Safety Manual. I.e. PHIs are monitored and assessed for each farm site. Internal audits are reviewed and any corrective actions are taken prior to 3rd party audits. All fruit is harvested to meet the requirements of the WSDA for growing and packing. A system is in place for determining root cause analysis is completed for all findings as to why this occurred, to prevent issues from happening again. Root causes are met for each incident. i.e. Accidents and injuries on the farm are reviewed to reduce likely likelihood of repeating the event. Internal audit findings are also corrected after the internal audit.

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### 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

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**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**

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**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**

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#### **Summary -**

**Response:** Internal audits are done by Gebbers with a trained internal auditor with years of experience under global GAP and SQF. Certificate is present for the auditor from through SQF e-course on 3-10-2023. Every supplier is audited annually. There are 94 audits completed. The program is for annual audits to be done and corrected prior to 3rd party audits. The internal audit is to ensure all documents and pre-harvest assessment to ensure food Safety fundamentals are met for An internal audit is completed and a pre-harvest internal audit. Internal audit are completed for North Central and South locations. South Internal audited on May 22 2025. North internal audited on May 21, 2025. Gebbers Farms Central on May 20, 2025. No findings were found during the audit for site visits. Internal audit for the program is audited by the Food Safety Director over a week on April 1, 2025. Findings are corrected for updated irrigation water requirements and sanitation of picking aids in 2025. All risk assessments are updated annually by Gebbers Farms.

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### **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**

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**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**

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#### **Summary -**

**Response:** All fruit is identified by Farm picking tickets and is available for identifying products from the orchards to the Packinghouse. I.e. Ticket numbers are used to identify fruit on bins. Those numbers match receiving records by Lot code, Grower Code and pick dates. The program is for all fruit to be identified from harvest through packing. This includes varieties, Organic Status and grower numbers. There is an extensive list of grower numbers and varieties of fruit that are identified with picking tickets. The list is updated annually by Food Safety and Receiving.

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## 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](mailto:foodsafetycrisis@sqfi.com).

**Response:** Compliant

### Summary -

**Response:** The Gebbers Farms facility and Orchards program requires written records that adequately reflect tree fruit product information, growing practices, operations and corrective action measures will be developed to demonstrate the effectiveness of control of food safety hazards. It is the responsibility of Apple House to identify, locate and control recalled products, to investigate other possible affected products which could consequently be included in the recall, and monitor the effectiveness of the recall at least annually as per the GAP policy for Apple House. Each block has a unique grower and lot number to track fruit through the packing process. All fruit is conventional or organic grown and sent to Gebber BHPO where the fruit is received by Lot number. All Fruit bins have picking tickets that match the grower number to show the date of Harvest, harvester, and Block number and variety of fruit harvested and receiving date by Gebbers Farms i.e. Mock Test is done annually by Gebbers Farms for the whole farm entity. The Recall was tested on March 11, 2025, at 3:16 - 3:40. Publix Order Atlanta, Georgia. A Packed at Gebbers packing Central Sugar Bee Apples. Pack date Feb 13 2025. Lot A 410 packed on 2-17-2024, 12/2 packed 1052 boxes packed and all sent to Publix Atlanta. Fruit bins received on 10-12-2023 167 bins. All fruit is identified by pick tickets and Computec computer systems.

## 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**

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**Summary -**

**Response:** A crisis plan is in place by Gebbers Farms in Washington and the Suppliers for the orchards in the event of a crisis. This could include Biological Controls, Bioterrorism, Floods, Chemical, Labor and Packing house capabilities. All fruit must be deemed acceptable and is to be well-identified is the responsibility of the individual Orchard. The crisis plan is based on Risk for Tree Fruits in Washington State. The test is done annually through Gebbers Farms, Gebbers Packing and Chelan Fresh Marketing. Policies and procedures are written in the GAP Manual. The Crisis Management plan is tested by all farms in the group. i.e. A list of scenarios and tests is done for each ranch in case of a crisis event. i.e. Listeria Outbreak test on Gala Apples from a Gebbers orchards Block B071. Fruit is quarantined for the entire block of fruit and all fruit is identified. Chelan Fruit Marketing will communicate with all affected parties. Other orchard blocks are fine and can be used to fill orders. Tested on January 23, 2025.

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### 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**

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**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**

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**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**

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**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**

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**Summary -**

**Response:** A food Defense program is written and implemented. All buildings are secure and locked. All orchards are posted with signs No Trespassing. All visitors must sign in at the home on site. All fruit orchards are monitored daily with trained personnel on site. All chemicals are registered and secure in a locked Shed on

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site and all fruit harvested is removed from the orchards daily. A test of the food Defense plan is to be done annually as per the SOP. A test is done prior to harvest and on a Sunday for 5 chemical sheds in and around Brewster to ensure all gates and chemical sheds are secure. Completed by Gebbers Food Safety personnel on August 17, 2025.

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## 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

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**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

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**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

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### Summary -

**Response:** A food Fraud Assessment is done, or a vulnerability mitigation plan is sighted in the Gebbers Farms Manual ( GAP Procedures). Records are in place for conventional non-organic Chemicals used are all certified from vetted companies. All Chemicals used on Fruit are approved by EPA for all tree fruits packed by Gebber or another GFSI-approved facility that is approved to pack fruit.

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## 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

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

**Response:** Compliant

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### Summary -

**Response:** Basic Allergy training is given to all employees by No Allergen associated with growing and harvesting of Tree Fruits. That needs to be controlled. All post-harvest products that could contain allergens

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are applied at the packinghouse level. No such chemical is presently being used.

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## 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

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**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

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### Summary -

**Response:** The SQF program requires all growers to have a robust training and monitoring program for workers. Annual training program is conducted for all employees. Training has been conducted in Hygiene, lockout out tagout, first aid locations, fire extinguisher locations, SDS's, stay out of the orchard when posted, 911 location , tractors, mowers, all equipment, check guards and all parts, ladder safety checks. All ladders to ensure that they are in good shape, laundry room, any needs or concerns, check out tractor drivers, spray safety, eye protection, breathing protection, spray suites, proper glove use, list of chemicals, respirator, PTO guards, hygiene practices and ladder safety. Records are on file for all trainings for Chemical Application, Harvest records training. Chemical program is managed by 3 crop advisors WSDA Lic #60587 and another WSDA Lic # 36541, WSDA Lic # 63448. There are 18 orchard managers with licenses and WPS training is completed for 396 applicators in 2025 over various dates and recorded in a matrix. Hygiene and harvest training is completed for all 4000 employees in the orchards for growing and harvesting. 3500 H2A and 500 Local hired personnel. All training records are done each month of activity.

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## 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

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**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

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**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

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## Summary -

**Response:** A training program is in place and from Apple House for each grower through the in-house training program held annually. Records are in place for training for each crop and chemical application. Training records for all Producer and Contractors are present and reviewed annually to ensure compliance to meet requirements. HACCP training has been provided for 3 food safety personnel in the past 5 years. A List of all trainings in 2025 is reviewed. This includes Pruning, Chemical Application, Harvesting, Water Changing etc. Records of training are present with signatures for all employees. Training is to be annually for each worker and job description on the farm. Training records are present for harvesters for each crop: Apples, Pears and Cherry Harvest. WPS Chemical training for 90 personnel as well as WSDA certified. Training is complete for each crop and activities for the farm. A dedicated Gebbers representative is responsible for training on Health and Hygiene for all Gebbers Farms employees. Various dates of training are reviewed for 4000 personnel in 2025 for harvesting Apples Pears and Cherries, as well as farm growing activities. All trainings completed and recorded on a matrix. Tractor safety, chemical safety maintenance safety are also trained on and recorded on 2025. A list of Chemical applicators is present who are certified in chemical application. i.e. WSDA Lic 22948. Handler cards are also present who mix the chemicals. A

## 7.1.1 - Property Location

**7.1.1.1** - Production and growing sites shall conduct a risk assessment to evaluate and document the risk to crops due to prior land use, adjacent land use, and other environmental factors, including structures and equipment. Consideration shall be given to the following: i. History of land use; ii. Topography; iii. Adjacent land use; and iv. Other factors that may impact the ability to supply safe product. Where risks are identified, control measures shall be implemented to reduce the identified hazards to an acceptable level, and the risks shall be re-evaluated in the event of any circumstances or changes that may impact the production of safe product.

**Response:** Compliant

**7.1.1.2** - Records shall be maintained for each production site listing what crops have been planted and harvested on the site.

**Response:** Compliant

## Summary -

**Response:** A land history and map have been provided for each Orchards. Google Maps provides with acreage and land use. The site is assessed monthly during the growing season for food safety issues. A risk assessment was written for the farm site. The farms are located in Douglas ,Okanagan, Grant ,Chelan and Counties in 2025 broken down into North Central and South Regions. There are 23 zones within the North Central and South Sites. All sites are mapped with GPS and all sites and sub-sites are visited during the audit over 3 days. Water pumps and systems are on the maps.

## 7.2.1 - Field and Storage Buildings

**7.2.1.1** - All buildings used to store equipment, field chemicals, field packaging materials, and/ or field products shall be designed and constructed to enable compliance with good hygiene practices, avoid product contamination, and in a manner that does not affect the purity, strength, and composition of final products.

**Response:** Compliant

**7.2.1.2** - Buildings designated to store field product or packaging shall be of durable construction. Internal surfaces

shall be smooth and impervious with a light-colored finish and shall be kept clean.

**Response:** Compliant

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**7.2.1.3** - Storage rooms shall be designed and constructed to allow for the separate, hygienic storage of harvesting and packing utensils away from farm machinery and hazardous chemicals and toxic substances.

**Response:** Compliant

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#### Summary -

**Response:** All buildings used for farming on the farm site are part of the program and must meet all program requirements for hygiene and building codes and security. stores all equipment and chemicals in an approved building for chemicals at 23 sites. All PPE is controlled in on-site storage in lockers at all fill sites. Harvest aids are cleaned and stored in shipping containers at Gebbers and North Central and South Locations. All buildings meet code requirements and are checked by L and I for the State of Washington for compliance.

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### 7.2.2 - Controlled Temperature and Atmosphere Storage

**7.2.2.1** - The producer shall ensure any chilling, cold storage and controlled atmosphere facility is of suitable size, design, and construction, and is capable of effective operational performance, which includes sufficient refrigeration and controlled atmosphere capacity for chilling or storing the maximum anticipated throughput of products with allowance for periodic cleaning of storage.

**Response:** N/A

**Evidence:** • None are at the orchard sites

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**7.2.2.2** - Chilling, cold storage, and controlled atmosphere storage facilities shall ensure the following design and construction standards are being maintained: i. Floors are constructed of smooth, dense, impact-resistant material that is impervious to liquid and easily cleaned; ii. Floors are effectively graded to allow the effective removal of all overflow or wastewater under normal conditions; iii. Walls, ceilings, doors, frames, and hatches are of solid construction, and internal surfaces are smooth, impervious, and with a light-colored finish; iv. Lighting is shatter-proof, non-breakable, or provided with protective covers; v. Discharge from defrosting and condensate lines is controlled and discharged to the drainage system; and vi. Loading dock areas are appropriately sealed, drained, and graded.

**Response:** N/A

**Evidence:** • None are at the orchards sites

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**7.2.2.3** - Chilling, cold storage, and controlled atmosphere facilities shall be fitted with temperature monitoring equipment or a suitable temperature monitoring device that is properly located to monitor the warmest part of the room and is fitted with a temperature gauge that is easily read and accessible.

**Response:** N/A

**Evidence:** • None are at the orchard sites.

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#### Summary -

**Response:** Non are at the orchard sites.

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### 7.2.3 - Storage of Agricultural Chemicals, Soil Amendments, and Toxic Substances

**7.2.3.1** - Agriculture chemicals, fertilizers, manure, soil amendments, and other toxic substances shall be stored so

as not to present a hazard to personnel, product, 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

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**7.2.3.2** - Chemical storage locations shall: i. Be compliant with national and local legislation; ii. Be designed to ensure there is no cross-contamination between chemicals, proper ventilation to the exterior, and spill control or containment (including tank capacity); iii. Be equipped with details of purchase, appropriate and compliant labels, vendor approval, and an up-to-date inventory of all chemicals contained within and removed from the storage location; and iv. Be equipped with personnel health and safety requirements, such as signage, safety data sheets, instruction, emergency wash facilities, and other labor law requirements.

**Response:** Minor

**Evidence:** • Hole in wall of chemical shed at Columbia view chemical shed

**Root Cause:** Lack of a consistent and comprehensive facility maintenance inspection program specific to chemical storage areas. Routine inspections focused primarily on production areas, resulting in less frequent checks of outbuildings. This is the orchard managers responsibility and this wasn't being done. Procedure was reviewed with orchard manager.

**Corrective Action:** Repair completed immediately after finding. Discussed issue with orchard manager and instructed him to monitor the condition of buildings in his orchard and to notify maintenance crew when repairs are needed. In addition to training we have done with orchard managers, we conducted training with food safety staff that does the internal inspections and emphasized importance of inspecting condition of storage building, confirming they are secure, along with verification that chemicals are stored properly inside building. Food safety staff is required to notify orchard managers when deficiencies are found, so maintenance personnel can do any needed repairs. These standards apply to all chemical storage buildings.

**Verification Of Closeout:** Repair completed immediately after finding. Discussed issue with orchard manager and instructed him to monitor the condition of buildings in his orchard and to notify maintenance crew when repairs are needed. Lack of a consistent and comprehensive facility maintenance inspection program specific to chemical storage areas. Routine inspections focused primarily on production areas, resulting in less frequent checks of outbuildings. This is the orchard managers responsibility and this wasn't being done. Procedure was reviewed with orchard manager.

**Completion Date:** October 15, 2025

**Closeout Date:** November 10, 2025

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**7.2.3.3** - Product contact chemicals such as pesticides, herbicides, rodenticides, fumigants, insecticides, sanitizers, and detergents shall be stored separately and in their original containers.

**Response:** Compliant

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**7.2.3.4** - Soil amendments shall be stored separately from crop, field, or irrigation water sources, so that contamination from runoff is avoided either by locating the soil amendments a reasonable distance from the crop or through the use of other physical barriers.

**Response:** Compliant

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**7.2.3.5** - The site shall dispose of chemical waste and empty containers in accordance with regulatory requirements and ensure that: i. Empty chemical containers are not re-used; ii. Empty containers are labeled or rendered unusable, 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: Minor**

**Evidence:** • Chemical containers are not all secure.

**Root Cause:** Some chemical containers were found not properly secured within the storage area. The issue was caused by inconsistent follow-through on the chemical storage policy and insufficient verification during internal inspections. Staff may not have been fully aware of the requirement that all containers, including partially used or secondary ones, must be secured at all times.

**Corrective Action:** Storage areas were inspected by orchard managers and any unsecured chemical containers were secured. Conducted training with orchard managers to review chemical storage requirements. In addition to training we have done with orchard managers, we conducted training with food safety staff that does the internal inspections and emphasized importance of inspecting condition of storage building, confirming they are secure, along with verification that chemicals are stored properly inside building. Food safety staff is required to notify orchard managers when deficiencies are found, so immediate corrections can be made. These standards apply to all chemical storage buildings.

**Verification Of Closeout:** Storage areas were inspected by orchard managers and any unsecured chemical containers were secured. Training records were provided to show that orchard managers were retrained on chemical storage requirements. Corrective actions are sufficient for closure.

**Completion Date:** October 17, 2025

**Closeout Date:** November 10, 2025

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**Summary -**

**Response:** Chemical storage Sheds are all visit are compliant for storing chemicals with liquid and dry areas. There are 22 sheds at various locations as sub sub-site chemical storage. The main storage is in Brewster, WA. Fertilizers are stored in another area. A list of chemicals stored is updated monthly. Warning Signage is posted as well as the inventory and spill kit. Eye Wash and Shower are at the fill sites at all locations. The Sheds are secure and meet all requirements of the SQF including an area for empty containers at the Dowell location, where they are secure until Agri Plas picks them up for removal. Liquids were stored above dry products at all locations. All other 22 Chemical sheds were well controlled and tidy except for one location. See above.

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## 7.2.4 - Farm Machinery, Product Handling Equipment, and Utensils

**7.2.4.1** - The methods and responsibilities to ensure that farm machinery, equipment, vehicles, tools, utensils, harvest containers, and other items or materials used in farming operations that may contact produce do not pose a risk to product safety, shall be documented and implemented. Procedures shall ensure that these items are: i. Designed and constructed to allow for the efficient handling of product and that surfaces in direct contact with product are constructed of materials that will not contribute a food safety risk; ii. Identified and included in preventive maintenance and cleaning schedules; iii. Stored to avoid contamination of inputs or products; and iv. Not used for non-harvest purposes, unless this is clearly identified, and the items or materials are not returned to use for harvest.

**Response: Compliant**

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**7.2.4.2** - Vehicles used for the transport of produce shall be adequate for that purpose and shall not be used to carry waste materials, manure, chemicals, or other hazardous substances that could cause produce contamination without thorough cleaning and inspection.

**Response: Compliant**

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**7.2.4.3** - Tractors, harvesters, field packing equipment, and machinery driven over ground crops shall be fitted with

drip trays to prevent contamination of the crop by lubricants and oils.

**Response:** Compliant

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#### Summary -

**Response:** The Gebbers Farm program includes monitoring all machinery, equipment used for growing and harvesting of Tree Fruit. Tractors, sprayers, weed sprayers, and mowers are maintained and stored on site at the main site. Harvest aids are to be kept on site in secure and dry locations for each of the 3 groups. Maintenance logs are present for all maintenance on tractors and equipment, which are logs on forms provided. An extensive list of records is present for Tractor Sprayer and truck maintenance. Recorded by Paper. ie Tractor EF 60 clutch repair on 9-5-2025. All maintenance is completed at two main mechanic sites in Brewster, which are centrally located for South and North major repairs. Manager Plus Aptura is the recording system used for recording and ensuring all equipment is maintained per manufacturer's recommendations. Records that are complete are reviewed for all maintenance.

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### 7.3.1 - Equipment Maintenance and Calibration

**7.3.1.1** - The maintenance of equipment and buildings shall be planned, scheduled, and carried out in a manner that prevents any risk of contamination of product or equipment. Maintenance and calibration records shall be maintained.

**Response:** Compliant

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**7.3.1.2** - The calibration and re-calibration of chemical application, measuring, testing, and inspection equipment used in the growing and harvesting process shall be documented and implemented.

**Response:** Compliant

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**7.3.1.3** - Equipment shall be calibrated against manufacturer, national or international reference standards, methods, and schedules. In cases where such standards are not available, the site shall indicate this and provide evidence to support the calibration reference method used.

**Response:** Compliant

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#### Summary -

**Response:** A calibration schedule is written into the Gebbers Farm Program. The program is to calibrate chemical application equipment and scales and all sprayers and Farming equipment. Turbo Mist and Rears sprayers are calibrated annually by using the time speed distance nozzle setting method. Records are to be sighted. There are 170 sprayers for the group and calibrated annually by Crop advisors and orchard managers. All are WSDA certified for Calibration of Equipment. Weed sprayers are calibrated as well annually. There are a total of 65 weed sprayers and or chemical scales in 2025 that are calibrated.. 50 scales, all calibrated each time chemicals are applied. Spreader is calibrated annually by Valley Tractor for Gebbers Farms.

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### 7.3.2 - Pest Prevention

**7.3.2.1** - The property adjacent to buildings, storage facilities, machinery, and equipment shall be kept free of waste or accumulated debris so it does not attract pests and vermin. Harvested products and food contact packaging materials shall be free of evidence of pest and vermin infestation.

**Response:** Minor

**Evidence:** • Pest control not in all chemical storages with rodent activity present.

**Root Cause:** Rodent activity was noted in a chemical storage area that did not have an active pest control device installed. The root cause was a gap in the pest control program coverage. Routine inspections also did not consistently verify that pest control measures were in place at every site.

**Corrective Action:** Reviewed with orchard managers on 10-16-25 training. Chemical Storage sheds are now closed for the season and are not in operation. Traps will be ordered this winter to be placed in all chemical storage sheds when they are put in service for the next season. Conducted training with orchard managers to address this issue per the attached training. As all storage sheds are now closed for the season, traps are ordered for placement by orchard managers prior to the beginning of next season.

**Verification Of Closeout:** Traps will be ordered this winter to be placed in all chemical storage sheds when they are put in service for the next season. .Conducted training with orchard managers to address this issue per the attached training The root cause was a gap in the pest control program coverage. Routine inspections also did not consistently verify that pest control measures were in place at every site.

**Completion Date:** October 16, 2025

**Closeout Date:** November 10, 2025

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**7.3.2.2** - 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 to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the methods used to eliminate pests when found; v. Outline the frequency with which pest status is to be checked; vi. Include on a site map the identification, location, number, and type of bait stations set; and vii. List the chemicals used. Chemicals are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available. Records of pest inspections and pest applications shall be maintained.

**Response:** Compliant

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#### Summary -

**Response:** All buildings for chemicals and storage of harvest equipment are approved for use. Pest traps are in the 20 of 23 Chemical sheds storage. The Gebbers Farms GAP Manual states all IPM programs are to comply with State of Washington and EPA requirements and recorded on forms along with access to SDS. A inventor is current and match inventory on hand and is compliant with EPA and WSDA rules for use and storage. Harvest equipment is stored outside in the summer and in winter covered or inside structures. Harvest aids are in bins or sealed shipping containers in Brewster, Oroville, Chelan and Quincy, WA.

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### 7.3.3 - Animal Control

**7.3.3.1** - The operation shall have a written risk assessment on animal activity in and around the production of produce that has been implemented and monitored.

**Response:** Compliant

**7.3.3.2** - Measures shall be in place to control domestic and wild animals in the growing fields and to prevent the presence of domestic or wild animals in storage and product handling areas.

**Response:** Compliant

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#### Summary -

**Response:** The Gebbers program has a policy for each orchard to have a risk assessment and monitoring of animal activity on the farm site. Forms are provided for recording activity. Deer, Birds are on the register and bird bangers. Deer Fencing is around some locations where deer migrate. All sites have personnel onsite daily and harvest crews of 40 people per crew with a supervisor do pre pre-harvest assessment and completes daily

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on the daily pre op, harvest and hygiene logs

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### 7.3.4 - Cleaning

**7.3.4.1** - The cleaning of product contact surfaces, field harvesting equipment, and sanitary facilities shall be documented and implemented. Cleaning procedures and schedules shall include: i. A list of equipment, harvesting tools, sanitary facilities, and storage areas that require periodic cleaning; ii. Instructions on how cleaning is to be performed for the various areas and equipment; iii. The frequency of when cleaning is to be completed; iv. Personnel responsible for performing and evaluating the cleaning; and v. Records of cleaning activities.

**Response:** Compliant

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**7.3.4.2** - A schedule shall be prepared that indicates the frequency of verifying the effectiveness of cleaning product contact surfaces, field harvesting equipment, and sanitary facilities, and who is responsible for completing verification activities.

**Response:** Compliant

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#### Summary -

**Response:** Gebbers cleans bins at the packing house and Apple House Packing. All other cleaning activities are done at the farm level. Ladders, tractors, trailers, Clippers, Buckets, bags, and toilets and hand hand-wash system. Forms are provided for recording. Cleaning records for ladders, bags are present as well as tractor, trailers and sprayers. An Extensive list of hundreds of Apple Bags is sighted and being cleaned on Various dates in Summer 2025. Picking buckets are clean using a pressure washer. Photos and dates are presented. A drencher system for the Gebbers Farm orchard. on 5-4-2025. Bags are dried and stored in totes or bins at H2A housing or farm shop areas. Ladders, clippers and totes are cleaned annually at least with soap and water.

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### 7.4.1 - Personnel Practices

**7.4.1.1** - 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 onto any growing, 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; and iv. Smoking, chewing, eating, drinking (except for water which shall be available to all personnel), or spitting is not permitted in any growing areas including on field harvesting rigs and during harvesting and packing operations. Personnel and visitor practices shall be routinely monitored for compliance, and any resulting corrective actions shall be implemented and recorded for personnel who violate food safety practices (refer to 7.5.3.3).

**Response:** Minor

**Evidence:** • Evidence of eating food in orchards during harvest.

**Root Cause:** Food waste and wrappers found in the orchard indicate that harvest workers were eating in the field. The root cause was a lack of strict enforcement and supervision of the "No Eating in Orchard" policy, especially during busy harvest shifts. Some seasonal workers were not fully aware of the contamination risks and did not consistently follow the designated eating area requirements.

**Corrective Action:** A retraining session was held with all orchard managers on hygiene and contaminations prevention policies, specifically no eating in the orchard areas and that they must enforce these rules with the

harvest crews. See attached training information. All orchard workers are trained at the beginning and during the season on hygiene requirements.

**Verification Of Closeout:** A retraining session was held with all orchard managers on hygiene and contaminations prevention policies, specifically no eating in the orchard areas and that they must enforce these rules with the harvest crews. See attached training information's. All orchard workers are trained at the beginning and during the season on hygiene requirements. The root cause was a lack of strict enforcement and supervision of the "No Eating in Orchard" policy, especially during busy harvest shifts. Some seasonal workers were not fully aware of the contamination risks and did not consistently follow the designated eating area requirements.

**Completion Date:** October 16, 2025

**Closeout Date:** November 10, 2025

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**7.4.1.2** - Personnel who are suffering from or are carriers of an infectious disease that can be transferred through food shall not engage in growing, product handling, or field harvesting operations.

**Response:** Compliant

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**7.4.1.3** - A medical screening procedure shall be in place for all personnel who handle product or food contact materials and shall also apply to all visitors and contractors.

**Response:** Compliant

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**7.4.1.4** - Procedures, including methods 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

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**7.4.1.5** - Personnel with exposed cuts, sores, or lesions shall not engage 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

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#### Summary -

**Response:** All personnel in the Gebbers farm program has requirement for inspection of all personnel daily during harvest. Employees are required to have proper dress, not be ill, no injuries that are not a risk to the fruit or other employees, medical screening is done during the morning tailgate meetings and records on the logs presented for 2025. Daily Harvest logs are reviewed and complete for harvest in 2024. Sited 10 harvest crews of 40 people each during the audit in the North, South and Central District. Issues were few but one supervisor was not following policies for one crew having energy drinks in the orchard.

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### 7.4.2 - Sanitary Facilities and Handwashing

**7.4.2.1** - Toilet facilities shall be provided and designed, constructed, and located in a manner that minimizes the potential risk for product contamination. 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; 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 shall be provided; v. Toilets shall be located to provide easy access for farmworkers; and vi. 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

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**7.4.2.2** - Personnel shall have clean hands, and hands shall be washed by all personnel: i. Before handling product; ii. Before putting on gloves; iii. After each visit to a toilet; iv. After using a handkerchief, handling dirty or contaminated material; and v. After smoking, eating, or drinking.

**Response:** Compliant

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#### Summary -

**Response:** Hygiene training and facilities are to be provided for all employees. Toilets are clean, have signage. Handwashing is done in outside hand-washing stations that are to be well-stocked. Policy states that no gloves are to be worn in toilets and must be controlled and clean. Toilets are provided by an approved supplier or permanent and plumbed on site for each site and during Apples being harvested with service records. Toilets are provided by Handy Can Sanitation, Morgan, Apple Valley and Tibbs. Inspected 4 toilets on site for each 40-person crew at 6 harvest sites inspected during the audit. There were 24 plus portable toilets inspected at various sites. All toilets and handwashing are well stocked and in a tidy condition.

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### 7.4.3 - Protective Clothing

**7.4.3.1** - Protective clothing (e.g., uniforms and smocks) shall be effectively maintained, stored, laundered, and worn to protect product from the risk of contamination.

**Response:** Compliant

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**7.4.3.2** - 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

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**7.4.3.3** - If rubber or disposable gloves are used, the operation shall have a glove-use policy in place, and personnel shall still adhere to the handwashing practices outlined above.

**Response:** Compliant

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#### Summary -

**Response:** PPE is clean and kept separate from Chemicals. Gloves are plastic and clean. Gloves and spray coat are washable. Tyvek is used for most applicators and stored in lockers or changing areas at each fill site. Gloves used for harvesting are maintained and cleaned daily by sanitizers soap and Water. All PPE is stored in lockers at all fill sites, which are lockable and secure.

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### 7.4.4 - Visitors

**7.4.4.1** - All visitors, including management and maintenance personnel, shall follow all personnel practices designated by the site when entering or close to fields, sheds, packing facilities, or storage locations. These practices include, but are not limited to, the removal of jewelry and other loose objects and wearing suitable protective clothing.

**Response:** Compliant

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

**Response:** Compliant

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**7.4.4.3** - Unsupervised children shall not be permitted to enter any harvesting, packing, or food storage areas.

**Response:** Compliant

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**Summary -**

**Response:** A visitor policy is written into the program for GAP practices. All visitors must read and agree to the policy on one site. Name, Company, reason for visit shall be recorded. A visitor log is signed and completed in 2025. No children are allowed near fruit-growing areas. Most labor is H2A and local hires are 20% of the labor force. No children are sighted and visitors are required to check into the main office in Brewster, WA.

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### 7.4.5 - Personnel Food, Drink, and Personal Storage

**7.4.5.1** - Provision shall be made to store personal belongings away from crops, harvesting, field and packing operations, and harvesting equipment.

**Response:** Compliant

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**7.4.5.2** - Areas for meal breaks shall be designated and located away from food contact/ handling zones and harvesting equipment.

**Response:** Compliant

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**Summary -**

**Response:** There are locations at each orchard block for eating and drinking. All personnel are trained on proper hygiene and policies annually. Personnel vehicles and buses are for leaving all items for H2A and local hires. This was assessed during harvest inspection for Apples. 6 groups were inspected harvesting. All eating locations are compliant and outside of the orchard.

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### 7.5.1 - Growing and Harvesting Inspection

**7.5.1.1** - The methods and responsibility for conducting inspections to assess biological, chemical, and physical hazards and their risks to products being harvested shall be documented and implemented. Inspections shall occur prior to and during harvesting and through to the transport of product to its next destination (refer to 7.5.2 and 2.5.4.3). Records of field and harvesting inspections shall be maintained.

**Response:** Compliant

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**Summary -**

**Response:** The Gebbers Farm program has a pre-harvest assessment for all block and orchard sites. All North Central and South Zones are preharvest for crop, block and zone. The assessment is to ensure all growing areas, and a pre-harvest inspection is to be made and recorded. All equipment and personnel are ready for harvesting to ensure all risks are minimized. Trained by each orchard manager and Gebbers' food safety staff. Inspection sheet is present for each day of harvesting. This includes corrective actions that are closed prior to harvesting. Pre-Harvest inspections are to be completed prior to harvesting all orchard site locations by farms managers and recorded. Supervisors for the orchard blocks due the preharvest and are verified by Gebbers Food Safety.

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### 7.5.2 - Foreign Matter and Glass Hazard Control

**7.5.2.1** - The methods and responsibility for the prevention of foreign matter and glass contamination shall be documented and implemented. Procedures shall ensure: i. Containers, equipment, and other utensils made of glass, porcelain, ceramic, 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. Product harvesting and handling areas are routinely inspected to remove risks from foreign materials such as debris, wood, stones, metal, and other physical hazards; and iv. Personnel are made aware of their responsibility to adhere to the site's foreign matter and glass controls. Records of foreign material and glass inspections shall be maintained.

**Response:** Minor

**Evidence:** • A few glass bottles were on the ground at the main labor camp just outside of the growing area

**Root Cause:** Lack of consistent enforcement regarding the no-glass policy in non-harvest and adjacent areas.

**Corrective Action:** Glass was immediately removed from area observed. Conducted trainings with both orchard managers and food safety staff regarding standards for trash and in this case glass found on the ground in orchards. This is a task of observing the orchard area and correcting problems when they are observed. Due to the size of the orchard areas, signage is not a feasible answer. -There is a regular cleaning crew that drives the orchards and picks up trash on a daily and weekly basis to reduce the potential for this issue. Attached is training documentation on this issue.

**Verification Of Closeout:** Root cause of lack of consistent enforcement of no-glass policy and training with orchard managers and food safety staff is acceptable for closure

**Completion Date:** October 16, 2025

**Closeout Date:** November 10, 2025

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### Summary -

**Response:** A policy for controlling glass and sharps on the farm is sited. The policy is for no plastic, glass, or sharps to be in the growing areas. Daily inspections are made during harvest and recorded on the daily harvest logs for each day of harvest in 2025 for Apples, Cherries and Pears. A few glass bottles were on the ground at the entrance to Indian Dan location.

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## 7.5.3 - Harvesting and Field Packing Practices

**7.5.3.1** - Personnel conducting activities where harvested product is being packaged in the field shall ensure that utensils, personal effects, and inputs/materials used during field packaging do not pose a food safety risk to products. These can include: i. Aprons and gloves are kept clean and not left on product, work surfaces, equipment, or packaging material but hung on apron and glove racks provided; ii. Harvest containers, if used, are inspected prior to use to ensure they are clean and free from physical debris or materials; iii. Knives and cutting instruments where used are approved for use, controlled, and kept clean and well maintained; iv. Cloths, towels, or other cleaning materials that pose a risk of cross-contamination are not used to wipe produce; v. All packaging materials are appropriate for their intended use, kept off the ground out in the fields and off the floor of transport vehicles; and vi. Non-food waste is contained in bins identified for this purpose. Waste does not come into contact with produce and is removed regularly and not allowed to accumulate (refer to 7.8).

**Response:** Compliant

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**7.5.3.2** - Personnel conducting harvesting activities shall ensure product is not contaminated during the harvesting process. Work instructions and training shall include the following practices: i. Commodity specific handling and harvesting instructions; ii. Personnel access and controls on movement/traffic flow; iii. Ensuring damaged or

decayed product is not harvested or culled; and iv. Ensuring product that contacts the ground is not harvested (unless that product typically contacts the ground).

**Response:** Compliant

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**7.5.3.3** - Personnel practices and activities, including those listed in 7.5, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices.

**Response:** Compliant

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#### Summary -

**Response:** All harvesting aids were inspected and recorded on the daily harvest log for compliance. Instructions on cleaning procedures are to be met. Supervisors inspect and ensure all employees comply with the program. Daily harvest logs are at each harvest site and filled out daily by crop and location. Harvest logs are completed and filled out for Apples Pears and Cherries. Reviewed numerous documents showing compliance. The log inspects bags, buckets, clippers, ladders, Glass, tractors, toilets. No issues were found and all harvest aids are well cared for. No issues sighted with employees not following GAP procedures.

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### 7.5.4 - Transport

**7.5.4.1** - 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. Verification that appropriate storage conditions are maintained during transportation to final destinations; iv. Prevention of cross-contamination with other hazards and potential spoilage; v. Use of appropriate stock rotation practices; and vi. Recording and maintaining documents for vehicle inspection, transport conditions, and stock rotation.

**Response:** Compliant

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#### Summary -

**Response:** Gebbers Farms delivers the fruit, and it is taken to Gebbers Farms for packing or another GFSI-approved facility. Individual growers also take fruit to other GFSI-approved facilities. Clean equipment and a trained driver are required per policy through Gebbers Farms. All fruit is inspected at arrival for condition and recorded by the grower number, lot, variety and condition of fruit.

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### 7.6.1 - Water Systems

**7.6.1.1** - A water description plan shall be prepared that describes the water sources and the production blocks they serve, and shall include one or more of the following: maps, photographs, drawings, or other means to communicate the location of the water sources, permanent fixtures, and the flow of the water system. The plan shall be kept current and revised when changes occur.

**Response:** Compliant

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**7.6.1.2** - Agricultural water shall be sourced from a location and in a manner that is compliant with applicable regulations.

**Response:** Compliant

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**7.6.1.3** - Water system intended to convey untreated human or animal waste shall be separated from conveyances utilized to deliver agricultural water.

**Response:** Compliant

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**Summary -**

**Response:** A description and history of all water sources used for irrigation and cleaning and drinking is provided. Maps are present showing the water source. The irrigation water is from an approved source. Gebbers systems include the Columbia River, Methow River, Brewster Flats irrigation, Oroville Tonasket irrigation, Bridgeport Bar, Lake Chelan Reclamation District and the QCID. The water sources are from the Columbia River or Cascade Mountain Snow pack and all sources are renewable annually.

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## 7.6.2 - Irrigation Water

**7.6.2.1** - Agricultural water shall be drawn from a known clean source or treated to make it suitable for use. Irrigation during growing and/or harvesting periods shall be conducted so that it does not contaminate the crop and shall include documentation of the source, type, and timing for each commodity and field or plot location. Hazards and risk associated with irrigation water, including types, sources, storage, proximity to concentrated animal feeding operations (CAFOs), untreated soil amendments, wildlife, pre-harvest intervals, and resulting preventive controls will be in accordance with the water management plan outlined in 7.6.3.

**Response:** Compliant

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**7.6.2.2** - In circumstances where irrigation water is treated to render it acceptable, the water after treatment shall conform to the microbiological standards as outlined in element 7.6.3.

**Response:** Compliant

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**Summary -**

**Response:** Irrigation water is applied by under-tree sprinklers for Cherries and Overhead and below tree for Apples and Pears. Testing for E coli is to be done at least annually for each site irrigated. An approved irrigation system provided the water. IEH another ISO 17025-approved lab is to be used. Water test records are to be supplied for at least one test annually during the growing season to meet FSMA compliance. Any time a test is above 126 mpn/100ml a retest is done. The new test surpassed the original test. Reviewed Testing records for all districts. 68 samples are taken from the water sources on 7-1-2025 and analyzed by IEH. The highest recording was 57.8mpm/100ml from the Okanagan River. The mean for all sites was 2 mpn.100ml E. coli. All sources are compliant for agricultural use under tree and overhead. No harvest is done 5 days prior to harvest. All water is compliant for agricultural use.

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## 7.6.3 - Water Management Plan

**7.6.3.1** - The water description plan described in 7.6.1.1 shall have a documented hazard analysis conducted annually and whenever changes occur to its sources, methods of transportation, storage conditions, or environmental conditions impacting it (refer to 2.4.3). Control methods applied to minimize risks associated with the hazards shall be included in the water management plan (refer to 7.6.3.2).

**Response:** Compliant

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**7.6.3.2** - A water management plan describing the methods and responsibilities for managing the different types and uses of water at the site (farm) shall be documented and implemented. The plan shall include: i. Description of where and how water is used (e.g., washing and treating products, irrigation, pesticide application, etc.); ii.

Maintenance and cleaning of the water system (refer to 7.3.1 and 7.3.4); iii. The hazard analysis and preventive controls that are to be applied for the use of water during growing and harvesting, including monitoring, corrective action, and verification for each control measure; and iv. Documentation and records referenced. Control measures may include: i. Water treatment and/or testing; ii. Water temperature; iii. Re-circulation, aeration; iv. Source alteration or change scheduling; v. Timing of use or application; and vi. Temporary or permanent protection of water sources from possible contamination (e.g., livestock [CAFO], sewage treatment, human habitation, heavy rains, flooding).

**Response:** Compliant

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**7.6.3.3** - Water used for washing and treating product, cleaning of product contact surfaces, and handwashing shall be monitored to ensure it complies with potable water microbiological and chemical standards or criteria established in the country of production and destination. The monitoring procedures shall include: i. A schedule indicating the location and frequency of monitoring (refer to 7.6.3.2), which shall be decided by the risk assessment, best practices within the country of production, or applicable legislation; ii. Reference to the potable water criteria or standards; iii. List of microbiological and/or chemical testing being conducted; iv. Reference to the approved laboratory that is accredited to ISO 17025 or equivalent; v. Corrective actions that will be taken if water and/or ice do not meet established criteria or standards including further water treatment, other source possibilities, non-conforming products that might be affected, or other alternative actions; and vi. Records maintained for monitoring and/or corrective actions. Where ice is purchased and/or made on-site, it shall meet the microbiological and quality standards stated above.

**Response:** Compliant

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#### **Summary -**

**Response:** Water used for irrigation, or cleaning and cooling of fruit is risk assessed and use provided for each block farm site. A schedule for water use and how applied is written into the plan. Mitigation plans are in place for water not meeting National or FSMA standards. The irrigation system which each farm in the Cascade Mountains. Testing is done by Gebbers Farms using 2 acre feet and acre annually and 200 GPM at the incoming water pump. Potable water is tested at all housing sites where cooking and drinking water are supplied. All tests by IEH show coliform-free on 7-1-2025. The entire farm usage of irrigation water in 2025 was 7.0 billion Gallons for Gebbers Farms.

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### **7.7.1 - Purchasing Chemicals**

**7.7.1.1** - Purchased fertilizers, agricultural chemicals, and soil amendments shall be approved for use in the country of production (site location), the country of destination, and for the specific commodity. Purchased chemicals, where required by regulation, shall be labeled with the active ingredient(s), applicable dosage rates, and application instructions. Where no regulations or partial regulations govern the use of chemicals, the grower/producer shall have a documented risk assessment on the justification for use of non-regulated chemicals.

**Response:** Compliant

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**7.7.1.2** - Chemicals that are specifically banned for use in the country of production or the country of destination shall not be purchased or stored.

**Response:** Compliant

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**7.7.1.3** - Suppliers of chemicals shall be included in the approved supplier program (refer to 2.3.4), and a current inventory of all chemicals purchased and used shall be maintained (refer to 7.2.3).

**Response:** Compliant

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**Summary -**

**Response:** All chemicals used on the farm shall meet EPA, WSDA, Washington Hort and tree fruit labels for use. SDS and tree fruit guides for controlling insects and mildew are to be approved for use. Suppliers are vetted and part of the approved supplier program for Ag Chemicals and Fertilizers. All orchards have chemicals applied by an approved applicator through the WSDA. All chemicals are purchased from Nutrien Ag and Wilbur Ellis or another approved supplier are sighted through invoices and stored at the accounting for Gebbers Farms in Brewster, WA.

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### 7.7.2 - Soil Amendments

**7.7.2.1** - The methods and responsibility for soil amendment preparation and/or treatment shall be documented, implemented, and designed to prevent contamination of product. The procedures or work instructions shall outline how to treat manure and other untreated organic fertilizers ensuring: i. Treatments and application methods are verified as being in compliance with the approved or recommended methods applied and do not pose a hazard to the soil amendment; ii. Treatment methods applied are validated as being appropriate and effective at inactivating pathogens in organic soil amendments; iii. No raw untreated manure is used; and iv. Records of the approvals, validation, and verification of organic soil amendment treatments are maintained.

**Response:** Compliant

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**7.7.2.2** - The methods and responsibility for soil amendment applications shall be documented and implemented to ensure organic soil amendment applications are timed to pose minimum risk to product safety including: i. All applications of soil amendments are in accordance with national or local guidelines best practices and codes of Good Agricultural Practice; ii. Equipment used for soil amendment application is maintained in good condition and calibrated to ensure accurate application (refer to 7.3.1); iii. Records of all equipment maintenance and calibration are maintained; iv. Signage complies with national and local codes of practice; and v. Records of soil amendment applications are maintained and contain sufficient detailed data.

**Response:** Compliant

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**Summary -**

**Response:** Soil amendments or fertilizers are to be approved for organic or inorganic used on tree fruits. A form is provided for recording type of fertilizer use and NPK content. Compost or organic fertilizers. The NPK is Inorganic Fertilizers are applied by ground and in the Sprayer or fertigation and recorded. 46-0-0, 15.5-0-0 11-52-0 used in 2024 along with Foliar Feeds. No animal compost is applied in 2025. Organic mulch is applied and overwintered derived by Fruit culls and cutting only. Triple G Pauly Compost is applied to organic blocks and overwintered to make the PHI of 90 days. No E.coli tested positive, and the mulch tested by IEH in 2025.

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### 7.7.3 - Agricultural Chemicals

**7.7.3.1** - A spray or crop protection program indicating the applications used for a target pest or disease and the threshold levels that initiate application shall be documented and implemented. Records of all chemical applications include: i. The chemical used; ii. Crop information; iii. Date, method, concentration, and frequency of application; and iv. Evidence that the timing between chemical application and harvest complies with the approved harvest interval for the chemical application.

**Response:** Compliant

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**7.7.3.2** - The person making decisions on chemical applications shall: i. Demonstrate knowledge of and access to information regarding chemical applications and the maximum residue limits allowable in destination markets; ii. Use only chemicals approved for cultivation of the specified products and approved for use in the intended market; and iii. Demonstrate competence and knowledge of chemical applications and crop withholding periods. Code Amendment #4 This requirement shall apply to the person(s) applying chemicals as well as the person making decisions on chemical application.

**Response:** Compliant

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#### Summary -

**Response:** All chemicals applied shall be approved for use. A competent person shall recommend chemicals for use that comply with EPA WSDA use. Forms are to be provided for recording use, along with a recommendation for use and need for use by a trained, competent advisor. An Approved Consultant for Gebbers Farms is WSDA Lic # 36541 and another WSDA Lic #A writes the recommendation and has years of experience. PHI's are monitored and recorded on Agrian. Apples chemical applications are recorded. All chemical applications are to be recorded. Pears Anjou's Applied on 8-26-2025 Refine Naphalene with a 2-day PHI. First day harvest is 9-5-2025. Cherries applied 7-7-2025 Mustang Max Zeta cypermethrin Benson block with 3-day PHI First day harvest is 7-14-2025. Apples 9-6-2024 P&G Honeycrisp. Hone crisp Apples applied refine Naphalene and Topsin with a 2-day PHI. First day harvest 8-30-2025.

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### 7.8.1 - Waste Handling and Disposal

**7.8.1.1** - The methods and responsibility that describes the effective and efficient disposal of all waste shall be documented and implemented. Waste includes: i. Inedible material; ii. Unusable packaging, including trademarked material; and iii. Liquid and unsanitary waste from the farm.

**Response:** Compliant

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**7.8.1.2** - Waste systems shall be designed and constructed, and waste shall be regularly removed from the farm, field, and packing facility so that it does not become a food safety risk to finished product, growing, harvesting, and packing operations and adjoining or adjacent waterways and fields.

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** The Apple House program has a program for all farm sites to be organized and cull fruit to be kept away from harvested fruit. All waste is removed and all farm sites. Zippy , Upper valley and Gebbers' own dump trucks are used for hauling Garbage, Milar and waste. All sites were maintained in the orchards and at fill sites for all 23 farm site locations inspected in 2025.

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