



# SQF Food Safety Audit Edition 9

Crane Ranch Packing & Orchards, LLC dba Crane Ranch -  
80108

## Summary

**Audit Decision**

Certified

**Certificate Number**

80108

**Audit Rating**

Excellent

**Decision Date**

December 4, 2025

**Audit Type**

Unannounced

**Recertification Date**

November 1, 2026

**On-Site Audit Dates**

October 23, 2025 - October 24, 2025

**Expiration Date**

January 15, 2027

**ICT Dates**

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**Issue Date**

December 4, 2025

## Facility and Scope

**Crane Ranch Packing & Orchards, LLC dba Crane Ranch - 80108**

18 Crane Warehouse Road  
Brewster, WA 98812 United States

**Products**

Apples

**Food Sector Categories**

04. Fresh Produce, Grain, and Nut Packhouse  
Operations

**Scope of Certification**

Fresh Produce, Grain, and Nut Packhouse Operations

## Certification Body and Audit Team

**EAGLE Food Registrations, Inc.**

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

**CB#:** 40756

**Accreditation Body:** ANAB

**Accreditation Number:** 894

**Lead Auditor:** Bachir Abi Salloum (C-427090)

**Technical Reviewer:** Christina Ramsey (C-427351)

**Hours Spent on Site:** 14

**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:** BRIAN THOMPSON

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

**Response:** THOMPSONB@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:** JACK SULLIVAN: GM, BRIAN THOMPSON: SQF PRACTITIONER, TIM SHOMLER: PRODUCTION MANAGER, BACHIR ABI SALLOUM: LEAD 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:** CRANE FARMS PACKING IS A GEBBERS FARMS SISTER PACKING FACILITY. THE FACILITY IS LOCATED IN THE CITY OF BREWSTER WA. THERE IS ONE PACKING LINE, WITH AN 8-LANE COMPACT AND AWETA SIZER. AT FULL CAPACITY, THE FACILITY EMPLOYEES APPROXIMATELY 90 WORKERS, WHO WORK ON ONE OF 1 SHIFTS AND A SEPARATE CLEANING AND SANITATION CREW THAT WORKS FROM ABOUT 6:00 AM UNTIL 4:30 PM. A SECOND SHIFT IS FOR SATURDAY DURING PEAK SEASON. THE DAY OF THE AUDIT APPLES WERE BEING PACKED ENVY APPLES. CRANE PACKING ALSO HAS ASSOCIATED COLD STORAGE AND CA STORAGE ON SITE. ALL AREAS OF THE FACILITY WERE VIEWED. SITE HAS BEEN ASSESSED TO SQF DESIGNATED CUSTOMER SPECIFIC REQUIREMENTS WHERE NOTED.

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

**Response:** JACK SULLIVAN: GM, BRIAN THOMPSON: SQF PRACTITIONER, TIM SHOMLER: PRODUCTION MANAGER, BACHIR ABI SALLOUM: LEAD AUDITOR

**Auditor Recommendation** - Auditor Recommendation

**Response:** RECERTIFICATION AFTER ADDRESSING NON-CONFORMANCES.

### 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:** The site has mission statement in English and Spanish and SQF 9.0 commitment signed by the GM 09/05/2025. These documents pledge to respect and implement procedure to keep safety quality, legality and integrity of the product and to provide all resources to meet regulatory, quality and customer expectations. The site promotes food safety cultures through annual and inception training and trough daily at the beginning of the shift production meeting. The SQF practitioner sends emails related to food safety to all

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department. The SQF (Brian T) practitioner is trained on HACCP on 01/6, 01/07/2011 and refresher 02/23/2021, SQF Practitioner 05/23, 05/24/2011, Internal auditor on 03/21/2012. The site has back up procedure and matrix the SQF Practitioner has Back-up the Director of Food Safety is trained on HACCP. There is organizational Chart reviewed on April 2024 formed of The SQF (Brian T) practitioner reports to the Food safety Director. The auditor reviewed the Job description of sanitation supervisor, quality Operation Manager. The annual review of the food plan and SQF modules was conducted between 10/13/2025. There is daily meeting for management at the beginning of the production were food safety and other issues will be discussed with manager and associates. The site encourage employees to report on and food safety Issue. The SQF practitioner oversee all operations. The site has mechanism of reporting in case of deviation. The food safety culture is promoted through training and continuous communication with operators on the floor. The update in science, legal and recalls is through SQF WA department of agriculture, membership in professional association. The site provides annual training including skills, company policy, employee power point (Food safety, allergen, awareness of pest management, glass and brittle plastic, fire evacuation, GMPs, SOPs. Food defense training was noted in 2.9 During the assessment the site was verified to comply with customer specific requirements.

## 2.1.2 - Management Review (Mandatory)

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

**Response:** Compliant

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

**Response:** Compliant

### Summary -

**Response:** The annual review of the food plan and SQF modules was conducted 10/13/2025. There is daily meeting for management at the beginning of the production were food safety and other issues will be discussed with manager and associates.

## 2.1.3 - Complaint Management (Mandatory)

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

**Response:** Compliant

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

**Response:** Compliant

**2.1.3.3** - Corrective and preventative action shall be implemented based on the seriousness of the incident and the

root cause analysis as outlined in 2.5.3. Records of customer complaints, their investigation and resolution shall be maintained.

**Response:** Compliant

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#### Summary -

**Response:** The site has procedure for complaints reviewed. The complaints are received Through Chelan Fresh sales agency and redirected to different department according to type of complaints. This includes the SQF practitioner, sales manager and the GM. The agency will generate quarterly reports about trending of most complaints most of them are quality. The auditor reviewed a complaint dated on 06/17/2025 related to rejection of Honey crisp because of puncture, decay, bitterpit. The cases were repacked and credit was released the case was closed on June 18 2025.

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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

**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:** The site has developed a food safety management system based on HACCP of Codex Alimentarius. The system has prerequisite program, GMPs, risk analysis with Control Points and Critical Control. The documents are kept in electronic forms with restricted access using password and locked in the office of plant manager and SQF practitioner. The SQF practitioner and Food Safety Director are responsible in the change of procedures changes are noted with name of person and date. The SOPs or changes are communicated to all level of production through training and meetings. The site uses cold storage and CA storage for packing and finished product. Procedures are in place to report problems or safety issues when they occur. Sighted the Management commitment covers cross references to job descriptions, HACCP team, and Management Reviews. The records are kept in of Food Safe 360.

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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:** The site has Documents, Data Control and records in place (P-01-12 Rev 1). There is a list of documents. The documents are kept in electronic forms with restricted access using password and locked in the office of plant manager and SQF practitioner. The SQF practitioner and Food Safety Director are responsible in the change of procedures changes are noted with name of person and date. The SOPs or changes are communicated to all level of production through training and meetings. The number, title, version, revision and reviewed and the person who made the review. The site has list of documents with document type version, date changed, new version number and reason, and reviewed by.

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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:** Records are clear legible clean and not adulterated. They are kept for a minimum of two years. They are kept for prerequisite programs, CPs. Records are kept on Safe Foods 360.

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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:** N/A

**Evidence:** • No product development is done or processes at the facility level.

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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:** N/A

**Evidence:** • No product development is done or processes at the facility level.

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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:** N/A

**Evidence:** • No product development is done or processes at the facility level.

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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:** N/A

**Evidence:** • No product development is done or processes at the facility level.

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**Summary -**

**Response:** Not Applicable: No product development is done at the facility level.

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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:** The site has Specification procedure in place. It outlines the supplier of apple should have a good history, GAP certification, MRL, COAs, LOG for the Packaging. The site has list approved supplier for packaging and service providers. The auditor reviewed General Specifications for supplier reviewed 03/24/2025. Product description for apples was reviewed including pH waster activity apples waxing cold storage, inner packaging, storage, distribution conditions. The site follows Grading of WA and USDA for apples and customer requirements 10/31/2019). SQF certificates for orchards and farms are kept under Chelan Fresh sales agency. The auditor reviewed MRL samples 09/24/2025. The auditor reviewed SQF certificates of orchards Brewster

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Heights Packing and Orchards owning Crane Ranch valid until 12/15/2025. The auditor reviewed LOG for packaging from HI LOG from 01/01/2025 outlining that product are food grade and according to FFDC., with SQF for packaging valid until 06/18/2025. The auditor reviewed harvest records for 10/07/2025.

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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:** The site has Supplier Approval program in place. The supplier management program is managed by the Mother Company Gebbers. The Mother company will send out an approved supplier survey including information regarding company, program related to allergen control continuing guarantee, country of origin, FDA registration, GFSI compliance Liability audit lot code interpretation SDS, HACCP plan Food security plan. The questionnaire will be conducted annually. The auditor reviewed the wax Pace the SQF certificate expiring 2025-04-01. SQF certificates for orchards and farms are kept under Chelan Fresh sales agency. The auditor reviewed MRL samples 09/24/2025. The auditor reviewed SQF certificates of orchards Brewster Heights Packing and Orchards owning Crane Ranch valid until 12/15/2025. The auditor reviewed LOG for packaging from HI LOG from 01/01/2025 outlining that product are food grade and according to FFDC., with SQF for packaging valid until 06/18/2025. The auditor reviewed harvest records for 10/07/2025. The auditor reviewed the SQF certificate HR Spinner Corporation for packaging material expiring 06/18/2025. The auditor reviewed LOG from same company dated 03/06/2024 outlining

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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

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

**Response:** Compliant

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

**Response:** Compliant

### Summary -

**Response:** The site abide by the legislation of USDA, Idaho DA. The site has risk assessment based on HACCP of Codex Alimentarius. Management will comply with legislation of country of origin and the country of destination. The site is inspected by The WA Department of Agriculture. Records are kept to comply with USDA standards related to grown product, packaged product and shipped product to US locations. New requirements for new market are obtained from professional membership and SQF and WA DA. A SOP is in place stating SQFI and the CB will be notified in 24 in the event of a recall. The sales Agency will send the requirement for the country destination for the site prior to export so that these latter can be met.

## 2.4.2 - Good Agricultural/Operating Practices (Mandatory)

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

**Response:** Compliant

### Summary -

**Response:** The site is registered as s a packing storage and distribution facility with WA DA. The site is in rural area next to orchards in Brewster WA. The site is surrounded by pavement by pavement. The exterior is well maintained. It included car parking areas around the facility. Implemented cleaned up program were efficient. Supervisors verifies records. The records included pre-requisite programs, QC inspections, chemical use, water, testing, cleaning procedure, hygiene, storage shipping, preventive control that are implemented.

## 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:** The site has develop two HACCP plan based on the 7 principles and 12 steps of the Codex Alimenteruis. There is multi-disciplinary team formed on SQF Practitioner, General Manager, Packing Manager, Warehouse Manager, Maintenance Manager and Plant Manager. The SQF practitioner is trained on HACCP on 01/6, 01/07/2011 and refresher 02/23/2021, SQF Practitioner 05/23, 05/24/2011, Internal auditor on 03/21/2012. The site has back up procedure and matrix the SQF Practitioner has Back-up the Director of Food Safety. The HACCP plan has a pre-requisite program. There is a product description with intended use. It has flow chart reviewed on 10/11/2025. From receiving of apples for QC checks, Drench tank, CA cold storage Storage, Desatcker, dump tank (ORP Chlorine), elevator, leaf eliminator rinse, cleaning brushes, drying fans, wax applicator, drying, sort grade, singulator, Aweta optic sorting for inside and outside sizer, weight defects, Labeling, sorting grading Tray filling, check weigh (inline) Top pad inspection, correction of boxes, stamper, In process QC checks, WSDA inspection taper, palletizing storage, WSDA inspection, shipping. The CP is the ORP The HACCP risk assessment reviewed on 10/11/2025 including physical (extraneous material), biological (E. coli)and chemical hazards (pesticides residues) for all receiving material and all process steps, potential risk yes or no, justification, preventive measures, CCP yes or no. The site has no CCP but there is preventive control points such as ORP , Free Chlorine level, pH level and concentration of PAA. The CP are as follows CP's: -Dump tank: ORP 650Mv minimum to 1101 (control Point PH 5-7) Free Chlorine is 9 -40 ppm. PAA Spray bars 60 PPM (60-80 ppm) Peracetic acid 40 ppm is low for the control point. Fruit is testing for MRLs ( Chemical Residue), Flume temperature (32 to 70°) . Safe Foods 360 is used for monitoring all CP activities and is recorded on computer systems. These are monitored every hour and with every change over. This CP is ORP the oxidation reduction potential in microvolt and pH measured every two hour for washing recirculated water (mV 655 to 1000), pH between 7 to 8.5. This is based on Trevor V Suslow 2004 University of California publication 8149. The auditor reviewed the records of CPs for 06/12/2025, 08/07/2025,10/09/2025. There is a mechanism of corrective actions but no deviation occurred. The device of CP is calibrated monthly. The auditor reviewed the monthly calibration of September, October 2025. CP training was on 09/15/2025. The site abide by the rules of the USA and country of destination.

#### 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

**Evidence:** • The site does not produce high risk product and it meets customer requirements

**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

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#### Summary -

**Response:** There different procedure for sampling for agricultural inputs or for quality control of the product during the process, for controlling Pcs, for environmental monitoring and the like. SQF Practitioner will verify and validate any changes with food safety plans or fundamentals to ensure the safety and quality of the products. There are SOPs for non-conforming material such as raw material, equipment, ingredients, chemical, finished product with corrective actions. Records reviewed for MRLs and LOG for packaging for example for apples it should meet 21 CFR Part 176.170 requirements. During the assessment the site was verified to comply with customer specific requirements. All Raw product is under SQF Certification Raw Material specifications are provided. Sighted Bin tags and grower numbers for Apple Sighted document for Cardboard Boxes. Packing MRL Testing for Raw Products is done by the Growers. MRL testing is provided at audit for apples. None were out of compliance with EPA regulations. The site does not produce high risk product and it meets customer requirements

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### 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:** Non-conforming product as raw material, ingredients, packaging or finished product will be put on hold for investigation. Non-conforming apples will put on hold for repack. QC will oversee the task and non-conforming product will be sent to juice or culled. HACCP non conformity will be assessed and overseen by the HACCP team. No issues for food safety. The auditor reviewed records for 07/11/2025 for honey crisp.

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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:** The site has a rework program any rework is documented on Rework form including lot number grower, storage, variety, grade, size, day packed. The auditor reviewed records for 07/11/2025 for honey crisp.

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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

### Summary -

**Response:** Product release outlines completion of loading document based FIFO (by pack dates). Product is put on hold if there is issue by QC and sales will notify concerned parties.

## 2.4.8 - Environmental Monitoring

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

**Response:** Compliant

**2.4.8.2** - An environmental sampling and testing schedule shall be prepared. It shall at a minimum: i. Detail the applicable pathogens or indicator organisms to test for in that industry; ii. List the number of samples to be taken and the frequency of sampling; iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and iv. Describe the methods to handle elevated or undesirable results.

**Response:** Compliant

**Evidence:** • The site complies with customer 1 requirement

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

**Response:** Compliant

### Summary -

**Response:** The site has Environmental ATP swabbing program. For food contact surface the site will do ATP swabbing after cleaning and sanitation and recorded in the Pre-Op SafeFood 360 based on the type of surface. The auditor reviewed records for Pre-Op for 10/09/2025, 08/07/2025, and 06/12/2025. ATP swabbing records were reviewed for ATP 06/12/2025, 08/07/2025, and 10/10/2025 including sample point reading pass or fail. The pass Fail level are programmed in Hygiena machine. The site conducts for zone 2, 3 and 4 monthly swabbing for PCT. This sampling is randomized in each area. The numbering score below 9 is negative. The sampling scheme is 12 from zone 2, seven from zone three, and one from zone 4. This is performed at IEH laboratories. Records reviewed for 09/24/2025, 08/20/2025, 06/25/2025. There was four high scores. Re-cleaning and 5 for each location vector swabbing were conducted and results came back satisfactory on 06/27/2025. The site complies with customer 1 requirement

## 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:** The methods, responsibilities and criteria for ensuring the effectiveness of Good Manufacturing Practices (GMPs), critical food safety limits (C.Ls) and all other applicable elements of the SQF System have been documented and implemented in Validation and Verification Program. The methods were found to ensure that each has been implemented effectively. Methods to ensure that process changes are still effective in controlling food safety are in place and documented in Validation Schedule. Records of all verifications of effectiveness and validations are maintained by the SQFP. A Validation Schedule date was reviewed. Records for the following validation activities were reviewed: Chemical flume water PPM and MV counts- Calibration of Equipment: Evaluation of procedure, weekly calibration records, and annual calibration schedules. - Internal and external audits, - Cleaning and Sanitation: Environmental Swabs and ATP testing by IEH and Anateck Labs. Packing Requirements is through the WSDA.

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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 site has established a verification schedule, as per policy, Validation and Verification Program outlining the verification steps, procedures and responsibilities for each verification activity. The schedule is maintained by the SQFP and it is the SQF responsibilities for verification. The procedures for verifying Good Manufacturing Practices (GMPs), CPs, other food safety controls and regulatory compliance, include utilizing authorized personnel to verify all monitoring activities. Records of verification of monitoring activities including Verification for cleaning, Chemical use on the line, and truck inspections. Refrigeration, Loading, and Receiving, as per schedule were reviewed. Food Safe 360 is used for the recording of all operations in the facilities.

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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:** The site has Corrective and Preventive action Procedure documented on the corrective action Plan the reviewed CAR for the internal audit and the monthly inspections. The related Corrective action forms included level description of the requirement conforms (yes or no), comments, CAR#. The NCs were against 2.7.14 related to food defense addressed on 08/31/2025, 10.2.1.2 related to padding to be replaced will be completed on 11/09/2025, 10.5.1.1. Partially eaten apple found closed to production line employee was retrained on 10/20/2025.

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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 preventative 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:** The site has internal audit program. The site has conducted internal audit 10/09/2025. 3 NC were identified and CA have been established. With relevant work orders. The auditor reviewed corrective actions records of 10/09/2025. The related Corrective action forms included level description of the requirement conforms (yes or no), comments, CAR#. The NCs were against 2.7.14 related to food defense addressed on 08/31/2025, 10.2.1.2 related to padding to be replaced will be completed on 11/09/2025, 10.5.1.1. Partially eaten apple found closed to production line employee was retrained on 10/20/2025. The third party food safety consultant has conducted the internal audit and trained on internal audit. There is daily personnel hygiene inspection and monthly facility inspection. For the daily inspection the auditor reviewed records for

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10/09/2025, 08/07/2025, and 06/12/2025. Record reviewed for the monthly inspection for June, August, and October 2025.

## 2.6.1 - Product Identification (Mandatory)

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

**Response:** Compliant

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

**Response:** Compliant

### Summary -

**Response:** Product identification it includes Farm plot of land (location, Grade, size and tray packs, packing date and lot number or run number), raw material farm, block, variety day picked, PO#, Case quantity, and Person Receiving the Product. All product comes to the facility in bins with Lot tickets. During the assessment the site was verified to comply with customer specific requirements. . Pickers. This is tracked through COGNOS software.

## 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 site has Product Identification Traceability, Trace back and Notification Directions. The site has Committee formed of GM, Operations Manager, Food safety director, and SQF practitioner. Mock recall are conducted annually. During the audit the site has conducted to a mock recall on customer 1 product related to order number 67863, ship date 08/30/2025 Lot number R301, 210 cases were packed on 08/19/2025. The fruits were received on 09/09-09/12 from Lot # A170 (OPHR Grade farm), A061 (Detering Farm) B204 (Howards Reds) The product were shipped to DC center Monrovia MD. There is list of contact of FDA SQF. SQFI and Eagle will be notified within 24 hours. The mock recall started 1:31 pm and finished at 2:08 pm (duration 37 minutes. 100% recovery. The annual mock recall was conducted on 10/10/2025 start 2:19 pm and finished 3:39 pm. (1 hour 20 minutes). There was 100% recovery. The pack date was 09/15/2025

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## 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

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**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

**Evidence:** • The site complies with customer 1 requirement

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### Summary -

**Response:** The site has a crisis management plan there is a committee with assigned responsibilities. Company President are responsible for the decision-making and communication in the event of an incident. The operations manager is available to make decisions on product condition and quality. Maintenance would determine the condition of the facility. The SQF practitioner and QA would determine the condition of staff and the facility and communicate this to management and authorities. Product not meeting the criteria would be isolated, tagged, and/or destroyed as per SOP. The plan was tested on 09/15/2025, there was an angry truck driver with non-documented paper and law enforcement officers were called on the site. Evaluation was conducted on 09/15/2025. List of contact GM, Maintenance, WH manager, Sales, Power WA department of Agriculture, attorney fire department city office. The site complies with customer 1 requirement

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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:** The site has Food Defense plan Visitor and contractor should sign in from the main entrance. Procedure are in place for inbound and outbound. The Food defense plan. The site has conducted an audit for the Food defense plan and Food assessment was conducted on 08/31/2025 and challenge on 09/15/2025 visitor intruder. Intruder was stopped in two minutes. There is a daily check within the prestart on doors. The site has cameras on the site. There is dedicated entrance for employees. Security checks from 10/09/2025 were reviewed.

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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:** The site has Food Fraud and Food Fraud Mitigation plan. The food fraud assessment was

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conducted 09/08/2025. The risk is low. The food fraud plan includes a vulnerability plan with documentation of review. i.e. Only non-organics packed. All chemicals and varieties of fruit are well marked as what they are and are labeled correctly throughout the entire process, the risk is low.

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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:** No allergens are stored in the facility. A training log for employees on Allergens is performed at hire and annually during the refresher training done by Crane Ranch for foods that employees could bring to the facility

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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:** Appropriate training is provided to all plant personnel for all tasks to ensure the effective implementation of the FS/SQF system, as per Training Requirement Programs. Training programs are the assigned responsibility of SQFP/QA Manager & QA staff along with department managers. The effectiveness of the facility's training program was evidenced through interviews with plant employees including CP/machine operators, shipping associate, sanitation manager, production/packaging foreman, maintenance manager, and other employees. Training records dated 09/15/2025 were reviewed with sign off sheet and exit criteria. The program includes: Shipping receiving, chemical cleaners training, handling breakdowns, maintenance and sanitation, foreign material glass and brittle plastics, Personnel Processing Practices including allergen, Equipment Purchasing locating and maintenance, Employee and Visitor Hygiene, Chemical handling, Maintenance, Chemical Control Points Monitoring, Break bathroom.

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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

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

**Response:** Compliant

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

**Response:** Compliant

### Summary -

**Response:** Appropriate training is provided to all plant personnel for all tasks to ensure the effective implementation of the FS/SQF system, as per Training Requirement Programs. Training programs are the assigned responsibility of SQFP/QA Manager & QA staff along with department managers. The effectiveness of the facility's training program was evidenced through interviews with plant employees including CP/machine operators, shipping associate, sanitation manager, production/packaging foreman, maintenance manager, and other employees. Training records dated 09/15/2025 were reviewed with sign off sheet and exit criteria. The program includes: Shipping receiving, chemical cleaners training, handling breakdowns, maintenance and sanitation, foreign material glass and brittle plastics, Personnel Processing Practices including allergen, Equipment Purchasing locating and maintenance, Employee and Visitor Hygiene, Chemical handling, Maintenance, Chemical Control Points Monitoring, Break bathroom.

## 10.1.1 - Premise Exterior

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

**Response:** Compliant

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

**Response:** Compliant

## Summary -

**Response:** The facility has an orchard on one side and one other fruit packing warehouses on the other side. The location is appropriate for packing of Fresh Tree Fruits and the surrounding is well maintained and pose no risk of contamination. A business License is in place for Brewster WA. The facility is licensed for USDA under Number 44181.

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### 10.1.2 - Building Interior

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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**10.1.2.4** - Ducting, conduit, and pipes that convey products or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning (refer to 10.3.2).

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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**10.1.2.8** - Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed

so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 10.3.2).

**Response:** Compliant

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**10.1.2.9** - The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/packed (refer to 2.4.4 for internal lab requirements). The inspection area shall: i. Have easy access to handwashing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination.

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** Crane Ranch is a packing facility for apples located in Brewster WA surrounded by apple orchards. The Cooler and packing houses are around 150 000of sq. ft. The site is in rural area. The walls are from metallic sheet with insulation or concrete. The floor is from concrete the construction is well maintained there is enough lighting protected with shatterproof covers. The cooler has foam as insulation material in the innermost wall. The site has two main entities the coolers and the packing room inside the main building that is kept clean well maintained and shoes cleaner is applied at the entrance There is well drainage of the water there is no build-up. The equipment used for packaging is stainless steel or food grade plastic. The equipment is mainly hand free or robotic except sorting and filling in boxes. Compressed air is used in the operations on the sticker machine.

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### 10.1.3 - Dust, Insect, and Pest Proofing

**10.1.3.1** - All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed and proofed against dust, vermin, and other pests. External personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against ingress of dust, vermin, and other pests.

**Response:** Minor

**Evidence:** • The brush of the south door for packing material has worn off rubber allowing potential entry of agent of pest.

**Root Cause:** Door sweep was overlooked by management, and not viewed as an item needing replace due to the fact of gap being very small.

**Corrective Action:** Door seal was replaced on door to keep it pest free.

**Verification Of Closeout:** Installation of door sweep is a satisfactory corrective action.

**Completion Date:** October 27, 2025

**Closeout Date:** November 21, 2025

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**10.1.3.2** - External doors, including overhead dock doors in food handling areas used for product, pedestrian, or

truck access, shall be designed and maintained to prevent pest entry by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas.

**Response:** Compliant

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**10.1.3.3** - Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or operating equipment. Poison rodenticide bait shall not be used inside packing rooms, product storage areas, or food handling areas.

**Response:** Compliant

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#### **Summary -**

**Response:** External doors and other openings were observed to be properly sealed to prevent entry to pests or dust. The doors, including personnel access doors, are self-closing and were observed closed when not in use and are speed doors. Adequate provision is made for sealing around trucks in docking areas. Insect light traps are not present. Interior traps are tin cats and are properly located along the perimeter wall with a numbering system. Pest chemicals are not stored on-site. Minor 10.3.1.1 The brush of the south door for packing material has worn off rubber allowing potential entry of agent of pest.

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### **10.2.1 - Equipment and Utensils**

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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**10.2.1.6** - Vehicles and/or other devices used to transport and move products in food contact, handling, or processing zones, or cold storage rooms shall be designed and operated so as not to present a food safety hazard.

**Response:** Compliant

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**Summary -**

**Response:** The line equipment is designed for the packing of Apples, one line in total. It is originally designed for packing of Apples. All areas are cleanable and have cleanable and accessible contact surfaces. There are forklifts in the facility. Produce storage racks and calibrated equipment were observed well maintained. Protective clothing (hairnets, beard net and aprons) are provided. Racks for clothing are provided near the break and restroom. All cleaning aids are identified and stored in a locked closet on site. In the interior there is electric powered MHEs and in the outside there are propane MHEs (forklifts)

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## 10.2.2 - Equipment Maintenance and Repair

**10.2.2.1** - The methods and responsibility for the maintenance and repair of equipment and buildings and facilities shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination. The methods shall include procedures to ensure: i. Routine preventive maintenance of facilities and equipment in any food handling or storage area is performed according to a maintenance control schedule; ii. Preventive maintenance and repair of items identified as impacting food safety controls and practices are prioritized for completion according to defined schedules or immediately when they are not properly functioning; and iii. Records are maintained for all preventive maintenance and equipment failure/immediate repair activities and corrective actions. The maintenance schedule shall cover buildings, equipment, and other areas of the premises critical to the maintenance of product safety and quality.

**Response:** Compliant

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**10.2.2.2** - The maintenance supervisor and/or site supervisor shall be informed when repairs or maintenance are undertaken in product handling or storage areas and when the activities pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times.

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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### Summary -

**Response:** There is Maintenance procedure in place. The site has annual schedule for PMs including weekly, monthly and annually PMs. The auditor reviewed weekly PM for 10/14-10/22/2025, 09/02/2025-09/10/2025 and August Monthly PMs in 2025 (shed crane preventive maintenance). There are 3 staff responsible for the maintenance and a maintenance supervisor. Maintenance staff will account for tools and sanitation after repair. Lighting, ventilation, refrigeration, draining, equipment for handling merchandise, packing equipment are included in the maintenance a master checklist. The site uses Food grade lubricant stored in a separate cabinet from nonfood grade lubricant. Records are kept on Safe Food 360. Training records for training on GMPs and Food Safety are present and ongoing training is sighted throughout the year Air Test is on and pending for the annual test. Filters are replaced annually as per PMs.

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## 10.2.3 - Maintenance Personnel and Contractors

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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### Summary -

**Response:** The site has a maintenance team of three associate maintenance associate all repair are conducted on house. The site has maintenance procedure in place. The site has a maintenance supervisor and maintenance associates all repair are conducted on house. There are three staff responsible for the maintenance. Maintenance staff will account for tools and sanitation after repair. Lighting, ventilation, refrigeration, draining, equipment for handling merchandise, packing equipment are included in the maintenance a master checklist. The site uses Food grade lubricant stored in a separate cabinet from nonfood grade lubricant. The contractor will sign in at entrance and receive training on GMP and Food Safety. There is inspection of equipment prior to start of operations on daily basis.

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## 10.2.4 - Calibration

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

calibration activities is effective and appropriate; and v. Records of calibration activities are maintained.

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** The site has calibration procedure in place. There is schedule for calibration of scales, ORP machine, sensors in the refrigeration system and scales Scales were calibrated on 06/20/2025, 09/04/2025 ORP machine calibrated monthly. The auditor reviewed the monthly calibration of September, October 2025 Sensors in the refrigeration system were calibrated on 08/19/2025. Sizer Awita is calibrated annually in house the last one was on 09/06/2025

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### 10.3.1 - Pest Prevention

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

**Response:** Minor

**Evidence:** • The auditor observed MRT 26, 45 destroyed and not replaced at the exterior of the cooler and MRT 39 destroyed and not removed at the interior of the cooler.

**Root Cause:** Exterior rodent traps are located in high traffic area, and were not equipped with proper protection to prevent damage to traps.

**Corrective Action:** Rodent company were contacted and trap protectors were put in place.

**Verification Of Closeout:** The replacement of MRTs with placement of proper protection is a sufficient corrective action

**Completion Date:** October 29, 2025

**Closeout Date:** November 21, 2025

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**10.3.1.2** - Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators, who comply with regulatory requirements; iii. Use only approved chemicals; iv. Maintain a site map indicating the location of bait stations, traps, and other applicable pest control/monitoring devices; and v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments.

**Response:** Compliant

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**10.3.1.3** - Inspections for pest activity shall be conducted on a regular basis by trained personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of pest activity inspections and pest control devices shall be maintained.

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** The site conducts contract S for pest management control. The company pays monthly inspections for the interior and the exterior. PCO is Larry Scott licensed for WA DA license number 11512. The map was updated 08/18/2025. The site has exterior RBS, exterior mechanic traps, ILTs, Pheromone traps, Interior Mechanic Traps. Pesticides are not kept on the site SDS are online. The auditor reviewed trending report from October 2024 to October 2025. Most activity Fruit/Vinegar Flies. There was some Gnawing activity. The auditor reviewed service reports from July (07/22/2025) there was one mice caught in MRT 3 in the interior, August (08/21/2025), September 09/10/2025. Observation during the audit showed low and stable activity. There is no increasing trend. Minor 10.3.1.1. The auditor observed MRT 26, 45 destroyed and not replaced at the exterior of the cooler and MRT 39 destroyed and not removed at the interior of the cooler.

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### 10.3.2 - Cleaning and Sanitation

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

**Response:** Minor

**Evidence:** • The lockers of personal belongings had significant amount of debris and dust and are not included in cleaning/sanitation or inspection schedule.

**Root Cause:** Locker cleaning was not on the master list of items needing cleaned in the packing facility. This was an oversight on management due to the fact that these lockers are only used for shoes, and not personnel garments.

**Corrective Action:** Lockers were cleaned and painted where needed. They have been added to cleaning schedule for cleaning.

**Verification Of Closeout:** Cleaning and painting of lockers and adding it to the cleaning schedule it is a satisfactory corrective action

**Completion Date:** October 25, 2025

**Closeout Date:** November 21, 2025

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

**Response:** Compliant

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

**Response:** Compliant

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**10.3.2.4** - Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils. Racks and containers for storing cleaned utensils and protective clothing shall be clearly identified and maintained in a manner that prevents contamination of products, equipment, or storage areas.

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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### Summary -

**Response:** The Site has master sanitation schedule daily, weekly. The auditor reviewed the records for daily cleaning apples line, common line, dump tank, elevator rollers, dump tank room, elevator and brush area, sizer, dryer staging area, chemical cage for 10/09/2025, 08/07/2025, and 06/12/2025. The auditor reviewed records for Pre-Op for 10/09/2025, 08/07/2025, and 06/12/2025. ATP swabbing records were reviewed for ATP 06/12/2025, 08/07/2025, and 10/10/2025 including sample point reading pass or fail. The pass Fail level are programmed in Hygiena machine. The auditor observed the sanitation on 10/24/2025 and there was no issues. L was proficient. The auditor reviewed SSOP Cleaning and Sanitation program, instruction of cleaning are on master sanitation log and the training of sanitation (where PPEs, according to 21 CFR 120 8(b), 120 (6) b, 120.12. The auditor reviewed SDS for Prima fresh 360, Acidex Max, Drench Phos) SDS are on binder and online . Minor 10.3.2.1. The lockers of personal belongings had significant amount of debris and dust and are not included in cleaning/sanitation or inspection schedule.

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## 10.4.1 - Personnel Practices

**10.4.1.1** - A documented and implemented procedure for personal hygiene and personnel practices shall ensure that personnel engaged in the handling of product use appropriate personal hygiene practices. The procedure shall include instructions that: i. Jewelry and other loose objects that pose a threat to the safety of the product are not worn or taken into any product handling or storage operations. ii. Fingernail polish, artificial nails, and long nails are not permitted where product is handled with bare hands; iii. False eyelashes and eyelash extensions are not permitted; iv. Hair restraints are used where product is exposed; and v. Smoking, chewing, eating, drinking (except for water which shall be available to all personnel), or spitting are not permitted in any packing or storage areas. Note: The wearing of plain bands with no stones or jewelry accepted for religious or cultural reasons and prescribed medical alert bracelets can be permitted; however, the site will need to consider its customer requirements and the applicable food legislation. Personnel and visitor practices, including all those listed in 10.4.1, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices. Code Amendment #1 A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

**Response:** Compliant

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**10.4.1.2** - Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in packhouse operations.

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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### Summary -

**Response:** The site has procedure for the inspection of personnel in the pre-start inspection. Staff are trained on GMP. In case of glazes or wounds the site will cover them with bandage and gloves. Sick people will report to supervisor and are sent home. Drinking and eating is prohibited in the production area. Visitor will sign in from main entrance and will be trained on GMP prior of visiting the facility. Interviews with production supervisor, QA Manager, and sorter and packer demonstrated their proficiency in this aspect. No deviation was observed. The site does not require specific PPEs. But long sleeves clothing, hair is restrained, closed shoes. The smoking is in designated areas outdoor.

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## 10.4.2 - Sanitary Facilities and Handwashing

**10.4.2.1** - Toilet and handwashing facilities shall be provided and designed, constructed, and located in a manner that minimizes the potential risk for product contamination. The following shall be considered: i. There shall be sufficient toilet facilities for the maximum number of personnel, and they shall be constructed so they can be easily cleaned and maintained; ii. Handwash basins with clean and potable water, hand soap, disposable towels or effective hand drying devices, waste bins, and a tank that captures used handwash water for disposal (if not connected to drains) shall be provided inside or adjacent to toilet facilities and in accessible locations throughout

food handling areas as required; iii. Signage in appropriate languages shall be provided adjacent to handwash basins instructing personnel to wash their hands after each toilet visit; iv. Racks for protective clothing used by personnel and visitors shall be provided; and v. Toilet and wash stations shall be maintained in clean and sanitary conditions. Tools/equipment used for cleaning toilet rooms shall not be used to clean operational areas.

**Response:** Compliant

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**10.4.2.2** - Personnel shall have clean hands, and hands shall be washed by all personnel, contractors, and visitors: i. On entering food handling areas, and before putting on gloves; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After handling wash down hoses, cleaning materials, dropped products, or contaminated material.

**Response:** Compliant

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**10.4.2.3** - Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system as per regulations.

**Response:** Compliant

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#### Summary -

**Response:** The restrooms and lockers were kept clean. All hand washing stations in the restrooms or in the break room and at the entrance of the packing area were supplied with touch free dispenser of towels, soaps and water except unless exceptions are noted in the report. Staff was observed washing hands prior entering the operation area. There were hand washing stations with appropriate signage and instructions on hand washing.

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### 10.4.3 - Protective Clothing

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

**Response:** Compliant

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

**Response:** Minor

**Evidence:** • The auditor observed more than six female associates not covering entirely their hair (more than 1/4 outside hairnet) on the production line.

**Root Cause:** Employees were not wanting to adjust hairnets because of need to leave line to wash hands after touching hair to adjust hairnet, and not wearing hairnet correctly.

**Corrective Action:** Training conducted with line employees on proper wearing of hairnets.

**Verification Of Closeout:** Training of associates was satisfactory corrective action

**Completion Date:** October 24, 2025

**Closeout Date:** November 21, 2025

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**10.4.3.3** - Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and, when not

in use, stored on racks provided in the processing area or designated sealed containers in personnel lockers and not on packaging, ingredients, product, or equipment.

**Response:** N/A

**Evidence:** • The site is not a ready to eat product.

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#### Summary -

**Response:** Clothing worn by personnel was observed clean and in good condition. Gloves policy in case of wounds people are asked to wear bandages. Disposable hairnets, and beard nets were observed worn and changed as required. The associates will wear aprons. The only jewelry cannot be worn. Jewelry was not observed worn during the audit by any personnel. Cell phones were below the belt line. 10.4.3.2. Minor The auditor observed more than six female associates not covering entirely their hair (more than 1/4 outside hairnet) on the production line. NA 10.4.3.3 The site is not a ready to eat product.

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### 10.4.4 - Visitors

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

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** Visitors must sign and agree to follow GMPs prior to entry into the facility. Visitors exhibiting signs of illnesses are not allowed to enter the facility. Visitors enter and exit the facility through a designated door.

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

**10.4.5.1** - Staff facilities shall be supplied with appropriate lighting and ventilation and provided to enable staff and visitors to: i. Change into and out of protective clothing, if applicable; ii. Store street clothing, footwear, and personal items separate from food handling, packing, and storage areas.

**Response:** Compliant

**Evidence:** • This meets customer 1 requirements.

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

**Response:** Compliant

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**10.4.5.3** - Where outside eating areas are provided, they should be kept clean and free from waste materials and

maintained in a manner that minimizes the potential for the introduction of contamination, including pests, to the site.

**Response:** Compliant

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#### Summary -

**Response:** The staff break room was observed adequately lit and well-ventilated. No changing rooms are needed. The break room is located in a designated location away from processing or packaging areas. Refrigerators, microwaves, tables, and chairs are available. This meets customer 1 requirement.

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### 10.5.1 - Product Handling and Packaging Operations

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** Personnel observed were following the GMPs for packing of Apples. All product is QC at arrival for Apples. Apples are assessed as to short or long-term storage and if any post-harvest application is required. Supervisors inspect the employees at the beginning of each shift. Truck inspection logs are present for each incoming load. All finished product is separate from the raw product Receiving tickets including farm, block, variety, date, number of bins, driver and site verification look visual inspection on bins or fruits. Records reviewed dated 10/07/2025.

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## 10.5.2 - Control of Foreign Matter Contamination Operations

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

**Response:** Compliant

**Evidence:** • The site has register of glass and brittle plastics with locations.

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

**Response:** Compliant

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

**Response:** Compliant

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### Summary -

**Response:** At sorting table defect fruits and leaves are removed based on visual inspection. There is Electronic visual sorting size, defects, color, internal browning (Awida) Environmental testing every month. The site carries out monthly inspection for glass and brittle plastics. The site has register of glass and brittle plastics with locations. The auditor reviewed records for 06/03/2025, 07/03/2025, 08/03/2025. A glass register is present showing all glass and hard plastics in the facility are in good condition.

## 10.5.3 - Detection of Foreign Objects Operations

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

**Response:** Compliant

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**10.5.3.2** - Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.

**Response:** N/A

**Evidence:** • There is no metal detection.

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

**Response:** Compliant

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

**Response:** Compliant

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**10.5.3.5** - In circumstances where glass or similar material breakage occurs, the affected area shall be isolated, cleaned, and thoroughly inspected (including cleaning equipment and footwear), and the completed actions approved by a suitably responsible person before restarting operations.

**Response:** Compliant

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#### **Summary -**

**Response:** An SOP is in place for products not meeting legislation or customer requirements to be placed on hold with a red card and placed in storage for rework or disposal. A glass clean-up and chemical spill procedure is signed in the SOP. No metal detection or other devices are used. NA 10.5.3.2. There is a metal detector.

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### **10.5.4 - Receiving and Shipping**

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

**Response:** Compliant

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

**Response:** Compliant

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#### **Summary -**

**Response:** The site has SOP for shipping and receiving in place. This includes inspection of the seal, loads, condition of material and trailer and check of temperature or precooling in case of shipping of packed fruits at temperature around 33°F. The site has Incoming Product receiving log records. The auditor reviewed receiving records for receiving 10/23/2025, 10/09/2025. The auditor reviewed records for incoming apples on Harvest record dated 10/07/2025 it has parcel number, starch test, pressure test, sugar test, color and grading. The

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auditor reviewed shipping records it includes variety time, temperature (32-51°F), trailer cleanliness and seal. Record reviewed for 10/09/2025, 08/07/2025. The auditor observed shipping and receiving during the audit.

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### 10.6.1 - Water Supply

**10.6.1.1** - A water supply plan shall be prepared that describes the water sources and the operational areas they serve and shall include the location of water sources, permanent fixtures, and the flow of the water system. The plan shall be kept current and revised when changes occur. Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** N/A

**Evidence:** • No water stored onsite

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#### Summary -

**Response:** The site received water from a well. Backflow checked are checked annually checked on 08/26/2025. There was from the southwest district health a check on 04/24/2024. The piping system is underground. There is separate system for wastewater that goes into a evaporation pond. Water testing is conducted quarterly. The auditor reviewed records for E. coli and total coliform the sample is sent to Anatek labs. The test was on 09/03/2025, 07/09/2025there was no contamination.

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### 10.6.2 - Water Treatment

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

**Response:** N/A

**Evidence:** • No water treatment

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

**Response:** N/A

**Evidence:** • No water treatment

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

**Response:** N/A

**Evidence:** • No water treatment

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**Summary -**

**Response:** Not Applicable: No water treatment

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### 10.6.3 - Water Quality

**10.6.3.1** - Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required, when used for: i. Washing, thawing, and treating food; ii. Handwashing; iii. Conveying food; iv. An ingredient or operational aid; v. Cleaning food contact surfaces and equipment; vi. The manufacture of ice; or vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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**Summary -**

**Response:** The site received water from a well. Backflow checked are checked annually checked on 08/26/2025. There was from the southwest district health a check on 04/24/2024. The piping system is underground. There is separate system for wastewater that goes into a evaporation pond. Water testing is conducted quarterly. The auditor reviewed records for E. coli and total coliform the sample is sent to Anatek labs. The test was on 09/03/2025, 07/09/2025, there was no contamination.

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### 10.6.4 - Ice Supply

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

**Response:** N/A

**Evidence:** • No ice is used in the process

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

**Response:** N/A

**Evidence:** • No ice is used in the process

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

**Response:** N/A

**Evidence:** • No ice is used in the process

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**Summary -**

**Response:** Not Applicable: No ice is used in the process

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## 10.6.5 - Air and Other Gasses

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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**Summary -**

**Response:** There is annual test for compressed air for APC last test was on 02/13/2025 from certified ISO 17025 Lab.

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## 10.7.1 - Ambient/Dry Storage

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

**Response:** Compliant

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

**Response:** Compliant

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

predetermined frequency (refer to 10.2.5.1) and designed and constructed to prevent packaging from becoming a harborage for pests or vermin.

**Response:** Compliant

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#### Summary -

**Response:** Storage racks and pallets were observed constructed of approved materials. Racks were observed clean and well-maintained. Vehicles used in the warehouse are electric. Gas fork lifts are used in outside and cold storage areas. All were observed well maintained. The FIFO method for stock rotation is used in the inventory control system. No other storage exists off-site. The facility also has CA rooms present at various locations which are not accessible due to sealed rooms.

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

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** There is continuous monitoring of the temperatures of coolers. In case of out of range temperatures notifications are sent to the plant manager and maintenance supervisor through text messaging. The temperature ranges from 34 to 38°F. The auditor reviewed records from 10/01/2025 room one around 37.1°F (finished product), current CA rooms around 35°F. Sensors in the refrigeration system were calibrated on 08/19/2025.

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### 10.8.1 - Storage of Hazardous Chemicals and Toxic Substances

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

**Response:** Compliant

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**10.8.1.2** - Daily supplies of chemicals used for continuous sanitizing of water, as a processing aid, or for emergency

cleaning of food handling equipment and surfaces in food contact zones may be stored within or in close proximity to a food handling area, provided that access to the chemical storage facility is restricted to authorized personnel.

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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#### Summary -

**Response:** Chemicals are stored in a cage off the segregation room. Protected from unauthorized entry. Located away From Fruit or packing materials Protected from unauthorized entry. Located away From Fruit or packing materials. Chemicals used on the line for the wash flume and stored next to the line with protective containment under them. Chemicals are inventoried with SDS sheets but No FIFO system verification is being done for cleaning and in-line chemicals used. Signs are posted and all containers have original labels chemicals are stored in a well-ventilated areas. PPE is stored nearby and clean and maintained.

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### 10.9.1 - Waste Management

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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

**Response:** Compliant

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#### **Summary -**

**Response:** Wastewater from production goes to drain field. Domestic waste water goes into septic tank. Cardboards will be sent burn pile. Apples sent to tree top for juices. Regular waste is disposed in dumpster that is emptied weekly through third party company. The site removes waste periodically. The auditor did not find any overflowed trash can. Waste disposal is used for hauling away waste. The site trash cans are well maintained clean and accessible to be clean and they had no leak.

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