SQF Food Safety Audit Edition 9

Brewster Heights Packing and Orchards LP dba Gebbers Farms Oroville - 17435

Summary

Audit Decision
Certified

Decision Date
June 2, 2026

Recertification Date
March 28, 2027

Expiration Date
June 11, 2027

Issue Date
June 2, 2026

Certificate Number
17435

Audit Type
Recertification

On-Site Audit Dates
April 8, 2026 - April 9, 2026

ICT Dates
April 8, 2026 - April 9, 2026

Audit Rating

90

Good

Facility and Scope

Brewster Heights Packing and Orchards LP dba Gebbers Farms Oroville - 17435

58 Jennings Loop Road
Oroville, WA 98844 United States

Products
Apples, Cherries, Pears

Food Sector Categories
04. Fresh Produce, Grain, and Nut Packhouse Operations

Scope of Certification
Receipt of raw material, sorting, grading, packaging, storage and distribution of fresh fruit.

Certification Body and Audit Team

Mérieux NutriSciences Certification LLC

401 N Michigan Ave
Suite 1400
Chicago, IL 60611 United States

CB#: 40757
Accreditation Body: JASANZ
Accreditation Number: Z3720906AB

Lead Auditor: Todd McNeill (C-367501)
Technical Reviewer: Sandra Luttrell (C-371630)

Hours Spent on Site: 18
Hours of ICT Activities: 8

Hours Spent Writing Report: 8

Section Responses

Audit Statement - Audit

SQF Practitioner Name - Name the designated SQF Practitioner

Response: Brian Thompson

SQF Practitioner Email - Email of the designated SQF Practitioner

Response: bthompson@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: Brian Thompson: SQF Practitioner, Bob Grandy: Director of Food Safety, Luis Garcia: Food Safety, Martin Fowell: Witness and Todd McNeill: Auditor

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

Response: BHP Oroville and Gebbers Farms company is an Apple, Pear and Cherry Packing and Storage Facility. Two 30,000 Sq Ft packing buildings are used for packing of Apple and Cherry Packing area. One for Apples and Pears and One for packing of Cherries. The packing house address is 58 Jennings Loop Road Oroville WA and business office located two blocks away at 25985 US 97 Oroville WA. Apple line has bagging lines and tray packing line. Cherries have a Clam shell and volume fill line. A Total 407,000 total sq. feet, including cold and CA storage. Located in Oroville, Washington, BPHO Gebbers Farms packs Apples Pears and Cherries both Organic and Conventional. The facility operates one shift 6:00 am-2:30pm 5 days week, during peak season, with 70 people on the Apple Pear Shift and Cherries operates 140 personnel on two shifts for 2 months. There are no CCP's in the program and CP are present for chemical control in the hydro cooler and dump tanks. All control points re monitored every two hours. Pears are packing the day of the audit. All areas of the operation are included in the audit. The site is a USDA registered facility.

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

Response: Brian Thompson: SQF Practitioner, Luis Garcia: Food Safety, Martin Fowell: Witness and Todd McNeill: Auditor

Auditor Recommendation - Auditor Recommendation

Response: To Approve once Corrective Actions are met.

2.1.1 - Management Responsibility (Mandatory)

2.1.1.1 - Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to: i. Supply safe food; ii. Establish and maintain a food safety culture within the site; iii. Establish and continually improve the site's food safety management system; and iv. Comply with customer and regulatory requirements to supply safe food. The policy statement shall be: v. Signed by the senior site manager and displayed in prominent positions; and vi. Effectively communicated to site personnel in language(s) understood by all site personnel.

Response: Compliant

2.1.1.2 - Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment and documentation of clear and concise food safety objectives and performance measures and their communication to all relevant staff; ii. Adequate resources are available to meet food safety objectives and performance measures; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Staff are informed and are aware of their food safety and regulatory responsibilities; v. Staff are informed and held accountable for their food safety and regulatory responsibilities; vi. Staff are positively encouraged and required to notify management of actual or potential food safety issues; and vii. Staff are empowered to act to resolve food safety issues within their scope of work.

Response: Compliant

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

Response: Minor

Evidence: • Job descriptions are not complete for all key personnel

Root Cause: While there were documented job descriptions, there was no formal written procedure in place to designate and name responsible individuals to specific job descriptions.

Corrective Action: Job descriptions were updated and specific employees are assigned to each position. Complete list of job descriptions with assigned employee included with attachments. Attachments include procedure to identify responsible individuals by name for each job description.

Verification Of Closeout: Updated written procedures are now in place for all jobs and responsibilities. While there were documented job descriptions, there was no formal written procedure in place to designate and name responsible individuals to specific job descriptions.

Completion Date: April 16, 2026 **Closeout Date:** May 8, 2026

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: Minor

Evidence: • Communication between chemical operator and senior management is lacking .

Root Cause: Clear communication and escalation procedures had not been fully explained to define when and how chemical operators should report food safety concerns, deviations, equipment failures, or out-of-specification conditions to management. Employee not fully aware of procedures to follow when machines not operating properly.

Corrective Action: Maria S the chemical operator was trained on F-04-20 Flume Water Monitoring Log, QP-03-17 HACCP, communicating issues to supervisors, documenting corrective actions when readings are outside of compliance. Management increased direct involvement in production floor verification activities, including employee interviews and observation of monitoring procedures.

Verification Of Closeout: Taining procedures are updated to include how to report chemical deviations and to who to notify. Clear communication and escalation procedures had not been fully explained to define when and how chemical operators should report food safety concerns, deviations, equipment failures, or out-of-specification conditions to management. Employee not fully aware of procedures to follow when machines not operating properly.

Completion Date: April 21, 2026 **Closeout Date:** May 8, 2026

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: A policy statement states BHPO Oroville's policy commitment to providing Tree Fruits (Apples Pears and Sweet Cherries) to the retail market through a comprehensive Food Safety program based on HACCP for the packing, storage and shipping of Tree Fruits. Signed on April 2 2026 by ownership. In order to maintain a healthy food safety culture, Gebbers Farm ensures that food safety fundamentals are implemented and communicated through 4 full time Food Safety compliance personnel who oversee all aspect of compliance and regulatory agencies.. Gebbers Farms and BPHO Oroville communicates to management and customers food safety issues based on SQF and HACCP programs.. Chelan Fresh Marketing, the sales organization, also communicates with customer to ensure all requirements for packing are met. Documents show meeting dates with Food Safety Personnel and upper and middle management daily through phone and emails. The commitment letter is posted in an easily visible location in the front reception area and the break room at Oroville WA. An Organizational Chart for this facility shows the key personnel responsible for food safety. Job descriptions for the General Managers daily responsibilities. The Director of Food Safety, Quality Assurance, Director of Operations, Receiving, Packing Line personnel are present as job descriptions. Missing are Refrigeration and Oroville Food Safety. The Director of Food Safety communicates with ownership daily through emails and morning conference calls on issues for Food Safety and Compliance. Management is committed to improving the programs by having multiple food safety and other related audits annually. The company management appears to have an open-door policy in place, which was evident during inspection by interviewing personnel from Sanitation, Segregation, Packers, Sorters, and Supervisors. Those personnel knew their job and reporting structures. Communication between chemical operator and senior management is not clear on how to handle deviations on the wet end of the line. The Practitioner and Oroville GM are both HACCP trained having been trained on February 22 2023. The backup Practitioner for the operation is the Director of

Food Safety who is currently HACCP trained and PCQI certified/ trainer. This person is also senior management. Blackout dates are written in the program for holiday and maintenance scheduled times.

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: F-04-07 is the systems review of the SQF Program. Pending 2026. The SQF system is reviewed annually. Latest on 6-20-2025 and done annually for BHPO Gebbers Oroville WA.. Form F-04-07 shows that both Gebbers Food Safety and BPHO Oroville WA reviewed the program within the past year. A system is in place for reviewing the entire system to achieve certification. Pre requisite programs are present reviewed and updated as needed. A food Safety plan is sighted for the Storage, Packing and re re-packing and shipping of Apples Pears and Cherries. Records and Documents have document control numbers and reviews are completed annually and internal audits are completed annually prior to the annual SQF audit by a 3rd party. The Food Safety Culture is evaluated through meeting objective of risk and compliance set by management, customers and regulatory bodies. BHPO Oroville is operated along with 5 Packing houses under the Gebbers Food Safety Program management system. Daily and weekly meetings with Food Safety, supervisors and Ownership are used to discuss operational and food safety compliance issues. The onsite practitioner is HACCP trained along with the FS Practitioner discuss objective for SQF and other compliance requirements at least monthly.

2.1.3 - Complaint Management (Mandatory)

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Complaints are directly taken and handled by Chelan Fresh Marketing who initiates the complaint from customers. The data is shared with Gebbers ownership and QA daily known as trouble reports to determine corrective actions and the root cause of defects.. Reviewing of the trouble reports for the past year were for quality issues found due to growing conditions in the past year that lead to break down of the fruit. i.e. A Retail Distribution Center in Pennsylvania noted a 15% decay rate in Anjou Pears on February 15 2026. Fruit was reject and sent to a re packer and sale on the wholesale market. No Food Safety issues raised in 2025 or 2026 to date.

2.2.1 - Food Safety Management System (Mandatory)

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

Response: Compliant

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

Response: Compliant

Summary -

Response: A Food Safety manual and system are updated annually and activities are on Safety Chain and hard copy. A manual and program are in place based on HACCP and Codex requirements. SQF 9.0 is in effect. An organizational chart is reviewed for the whole company and BHPO with reporting structures. Chelan Fresh Marketing updated BHPO on customer and country of origin requirements for packing. The Food Safety plan GMP's are reviewed annually by the Food Safety Staff and communicated through Phone calls. emails and site visits. Changes to structure, equipment or legislation is updated annually during the review. A Food Safety manual is present based on SQF 9.0. The manual references policies and procedures for achieving food safety and quality controls programs.

2.2.2 - Document Control (Mandatory)

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

Response: Compliant

Summary -

Response: The Food Safety Practitioner for Gebbers and BHPO Oroville is responsible for the document control. All documents have control numbers with a revision date attached to each form. i.e. QP-05-01 rev 6. Documents are stored on site at the packing facility and or in the food safety office in Brewster WA for Gebbers Oroville WA. Access is granted by management through computer access.

2.2.3 - Records (Mandatory)

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Sighted and reviewed document for a variety of control documents. Reviewed documents for traceability, sanitation, receiving, maintenance and other documents in the pre requisite programs. The Food Safety Practitioner verifies Sanitation documents, chemical monitoring and usage, traceability, and other Prerequisite documents. i.e. All SQF documents and records are kept on printed forms and or on Safety Chain. Reviewed documents for chemical monitoring in the dump tanks and flume for February March 20256. Inventory records, sanitation records, shipping documents, and reports were reviewed for Cherries 2025 and Apples Pears in Fall and Winter 2025 and 2026. Records are kept at the office at Gebbers Food Safety in Brewster WA or at the packing facility in Oroville WA. All records are current and accessible.

2.3.1 - Plant Variety/Hybrid or Product Development

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: No new packing equipment installed in the past year. No new varieties are packed in 2025 or 2026. The process flow of the facility is correct, and raw fruit is separate from packed fruit. in storage areas for raw unpacked fruit and packed fruit. Testing for MRL's is completed at the farm level and reviewed for BHPO packing and Chelan Fresh Marketing. Only fruit meeting customer of destination requirement is shipped to those Countries where testing allows.

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

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Material Receiving Guidelines detail the requirements for purchasing and receiving procedures for Apples Pears and Cherries, to include fruit and packing inputs and additives. Storage and handling procedures are written in the system with all input from suppliers. SOPs are written and reviewed against all procedures used for packing fruit to meet WSDA guidelines. All companies are vetted to ensure all materials, ingredients, packaging materials, and services (contracted) that impact finished product safety and quality are supplied by approved suppliers. Reviewed updated supplier agreements used in packing by BHPO Oroville. Non-approved suppliers are not typically used, and in emergencies, may be used after meeting the requirements outlined in the program. Validation activities meet WSDA, USDA, and FDA requirements for packaging. A register of approved suppliers and products used post-harvest is kept in the vendor manual, as well as electronically. Randomized fruit varieties are tested for MRLs to determine where they can be sold to by PAL Matrix in Portland, Oregon. Pace Inc. is used for inline chemical use, wax applications at both packing lines for Apple Pears and the other for Cherries. Cleaning Chemicals are through the Wesmar Chemical. All fruit is SQF Certified or Global GAP which are on file for the 2025 growing season. List of approved companies includes NW Wholesale for packing material, GP Graders, FDS Manufacturing, Wesmar Industries, and IFCO plastics, with third-party audit certifications in 2025.

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

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Supplier approval is provided by both Letters of Product Guarantees and 3rd party audits. Records show that all products and packaging are from approved suppliers who are under a food safety certificate program. This is managed by the procurement teams and kept at the corporate offices for BHPO and Gebbers Food Safety. Specifications for finished product packaging and Chemical used are current and meet industry specifications. Incoming Materials Inspection Log (F-02-02, rev 6). Approved Suppliers List (QP-02-04, rev 6). Supplier Approval, Evaluation and Management Procedures, schedule, and the person responsible for validating raw and packaging materials are provided. An unapproved program is in place if needed but not being used at this time. Packing materials and products are purchased as part of the GFSI-approved 3rd party audits. Fruit varieties are approved through certification of Root Stock and Sienne by Nurseries and WSU. All Apples Pears and Cherries are certified under SQF or Global GAP in 2025 growing year and approved for packing.

2.4.1 - Food Legislation (Mandatory)

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Procedures to meet requirements are written in the program. A Risk Assessment has been performed by BHPO Oroville around HACCP-based methods. The Director of Food Safety and the Food Safety Practitioner is responsible for implementing procedures to comply with the origin of the Country with input from Chelan Fresh Marketing. Sighted Documents for WSDA standard for products grown in Washington State and shipped to the US, Canada, Mexico, EU, Asia, and other markets. Legislative requirements for new markets are obtained from the professional membership of company staff of committees like the NW Tree Fruit Association, Washington Hort and WSDA. A FIFO system is present to ensure longevity of fruit post harvest. Compliance is reviewed annually to ensure compliance with MRL';s and WSDA requirements for products shipped through BHPO Oroville and sold through Chelan Fresh Marketing. There is a document P 2.4.1.3 included for notification of a SQFI, FDA, Eagle and Merieux NutriSciences (the change to Merieux Nutrisciences happened in March 2026) within 24 of a food safety recall.

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: GMP and GAP programs are written for the farms and the packing facility. Sighted the GMPs for BHPO Oroville to meet Food Safety and operational requirements. SOP's and GMPs are appropriate for ensuring Food Safety Risks are controlled and met by BHPO and Gebbers Food Safety. This facility has been in good standing since 2011. Program in place are all standard for the industry and met all risk based on HACCP.

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

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Minor

Evidence: • CP monitoring records are not correct for monitoring Pear spray bar recorded as 50 PPM and found to be 0 during testing at the audit.

Root Cause: Training on control point monitoring requirements and proper sanitizer testing procedures was insufficient to ensure employees understood the importance of accurate real-time verification and documentation.

Corrective Action: Maria S trained on properly documenting levels, and what they should be at according to food safety policies. Showed employee how to document corrective actions electronically when found to be out of compliance. This includes documenting reading out of compliance adding corrective action on what was done to fix issue, following this up with another check shortly after the corrective action was made to document now in compliance.

Verification Of Closeout: Lack of a verifiable training program for chemical operators lead to Monitoring logs being recorded incorrectly. Training on control point monitoring requirements and proper sanitizer testing procedures was insufficient to ensure employees understood the importance of accurate real-time verification and documentation. Logs and training are up to date for chemical operators to ensure understanding of protocols.

Completion Date: April 21, 2026 **Closeout Date:** May 8, 2026

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

Response: Compliant

Summary -

Response: Document QP-03-01 discusses the food safety plan and HACCP plan to ensure all risk and procedures are met. Product descriptions are in place for Fresh Apples Pears and Cherries. A food safety team for BHPO Oroville and Gebbers Food Safety is diverse and annually review of the program is done to meet SQF, WSDA and other stake holder requirements. A flow chart and hazard analysis is part of the plan that includes storage, grading, packing, and shipping of fruit. A risk assessment for food safety and quality are written into the program. The program is based on Codex, the 12 steps of HACCP. The Hazard Analysis report is reviewed for the packing of Apples Pears and Cherries annually by the Food Safety Team. The plan covers inputs, control measures. CP's are written in the program and no CCP are used do to the whole fresh fruit is not ready to eat and require washing prior to consumption. Apple Pears and Cherries 2025 documents state the ranges of chemical used in the dump tanks, hydrocoolers and flumes to prevent cross contamination of fruit. Procedures for deviation are present to bring levels out of control into compliance. The hazard analysis also addresses water quality, foreign object control, pathogens of concern: (listeria, E. coli, and Salmonella) are controlled through chemicals in the dump tank, hydrocoolers and flumes. Ranges are determined by industry standards. Post-Harvest applications of Fludioxonil MCP and DPA are used for quality purposes. Sighted the following HACCP documentation: -HACCP food safety Team. -Product Description & intended use for Tree Fruits. -Flow Chart for Apples Pear and Cherries. -Hazard Analysis Report for process steps, and materials. Only CP's are monitored for the Dump tank and Flume in Apples and Pears. Cherries CP is monitored at the Hydro cooler water. Ex: CP's: -Dump tank: ORP 650 mV minimum (CP), Ph 7.8. Free Chlorine is >0 PPM. Sighted 780 mv and 7.7 PH day of audit at the dump tank 2 PPM in the dump tank. No Cherries day of audit. Records for 2025 crop reviewed. Controls are met to prevent cross-contamination of the fruit. Cherries - Calcium Hypochlorite >675 MV in the flumes and hydrocoolers were met in 2025. Records are present and complete for the 2025 packing season. 20-100 PPM for PAA used on Apples and Pears. with optimal amount 60 to 80 optimal. PAA is not used in Cherry packing. CP monitoring records are not correct for monitoring Pear spray bar recorded as 50 PPM and found to be 0 during testing at the audit. Optical scanning and visual inspections are done at various points in packing to ensure packed fruit has no physical issues. Chemical MRL's are tested to ensure Countries of destination are met for each Country sold to.

2.4.4 - Product Sampling, Inspection and Analysis

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Methods for sampling or inspection of Apples Pears and Cherries. Visual Inspections are done in-house and by WSDA, who comes weekly to inspect for quality. BHPO Oroville does inspections on the line and QC checks post-packing. Records are maintained for inspections, and visual inspections are done at various locations to ensure that food safety and quality are maintained. IEH labs is used for environmental testing using PCT testing which is standard for the tree fruit industry. Pace international test Post harvest chemicals, PAL for MRL. There are no labs on site. All external labs are ISO 17025 approved.

2.4.5 - Non-conforming Agricultural Inputs and Products

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

Response: Compliant

Summary -

Response: A list of non-conforming products with cross reference to rework, damage, and waste is in place.

Fruit needing repacking is stored near the segregation room and identified by location. Sighted documents load rejection, Procedure for inspection of incoming product. Rejected Apples and Pears for repacking procedures. A damaged product policy with procedures for expired products are monitored. Records of repacking are in place and reviewed numerous dates in February and March 2026. Repacking reviewed for changing from tray packs to bags to meet customer specifications near the segregation line. Cherries are not repacked due to their short shelf life.

2.4.6 - Product Rework

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

Response: Compliant

Summary -

Response: Records of non-conformance, Quarantine records are reviewed for repacking of Apples. A dedicated area of the warehouse is set aside for storing product on hold. Corrective actions, repacking are recorded each time fruit is repacked. Disposition of product is in place and recorded as per SOP in the Document Control per Brewster Height Packing/ Gebbers Oroville. Requirements. I.e. form F-03-10 Honey Crisp Apples 40 boxes 100 count repacked due to decay. 28 back in inventory. 12 cartons lost. Cherries are not repacked.

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: Sighted the following procedure: Product Release Policy, Product put on hold procedures in place for issues arising from Quality. QP-03-68 and F -04-61. Records are maintained and verified for release by QA on-site. Records are maintained and verified for release by QA on-site for BHPO and Chelan Fresh Marketing and the Shipping Manager.

2.4.8 - Environmental Monitoring

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Environmental Monitoring is tested by IEH for BHPO Oroville WA . Environmental monitoring is based on zones of testing from zones 2 thru 4. The testing is done for generic bacteria that includes in the sampling Generic Listeria and E coli as well as other sub-bacteria. Frequency is based on risk, and sampling is based on an Algorithm for storing and packing Apples and Cherries in wet and dry zones. Testing was reviewed for Samples tested at the South plant on 4-22-2025 . Zones 2 through 4 are the areas tested. Non contact zones, dryers, simulators, packing bins, floors and drains. A test less than 5 and below 9 is the line to determine if the pathogen is a risk to the product or surfaces tested. IEH environmental swabs are done monthly for zone 2-4 PCT for Zone 2-4, and APT for Zone 1. ATP is done daily after sanitation for contact surfaces zone 1 on the wet areas and during clean break, which is scheduled every two weeks. BPHO Oroville WA. 12 randomized swabs are completed weekly. Results are in the Hygiene Sure Touch recorder but not trended or shown when out of range. (See 2.4.3.16) finding. When testing zones 2-4 are outside of range retesting would be immediately taken. All PCT testings were with in range done monthly in 2025 and 2026. When ATP is outside of range re cleaning and testing is to be completed. Forms F-03-46 are used for recording all ranges.

2.5.1 - Validation and Effectiveness (Mandatory)

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

Response: Compliant

Summary -

Response: Validation comes from multiple sources for packing in the tree fruit industry. WSU, Washington Hort, Washington Tree Fruit. Pace Industries and Wesmar . Sanitation and Chemical applications on the fruit and in dump tanks and flumes are formulated for the fruit packing industry. Chemical concentrations, MRL's on fruit. Sanitation chemicals, Post harvest application of waxes and fungicides, grading standards are all validated and correct.

2.5.2 - Verification Activities (Mandatory)

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

Response: Compliant

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

Response: Compliant

Summary -

Response: All CP's are monitored and verification activities are being done. See Food Safety plan for monitoring CP's. Reviewed numerous documents for Apples and Cherry Packing with in the past 12 months. . i.e. Dump tanks chemical logs, Shipping documents, Sanitation and cleaning documents. Training records, maintenance are reviewed and found to be being done at the stated frequencies in the SOP's. All documents are filled out and verified by Food Safety through Gebbers Food Safety. The operation manager signed off on the records prior to being sent to Gebbers Food Safety in Brewster WA.

2.5.3 - Corrective and Preventative Action (Mandatory)

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

Response: Compliant

Summary -

Response: Corrective action procedures are in place for any controls falling out of ranges. i.e.. Temperature control in cold storage falls out of range, corrective actions are in place and recorded to tolerance levels. Less than 650 MV outside of Control Limits. >0 ppm of Chlorine in dump tank for Apples and Pears. Cherries >5 PPM. No deviations from records and range 20-100 ppm for PAA. PAA is not being recorded correctly. See 2.4.3.16. Other corrective actions are for Internal audits have corrective actions raised from the 3rd party internal auditor. 5 NC's were found and corrected prior to the Audit. This facility was internal audited on 3-25-2026 and all corrections were made prior to the audit all by April 2 2026.

2.5.4 - Internal Audits and Inspections (Mandatory)

2.5.4.1 - The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code: Primary Plant Production are audited per the SQF audit checklist or a similar tool, and objective evidence is recorded to verify compliance and/or non-compliance; ii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken (refer to 2.5.3); iii. Audit results are communicated to relevant management personnel and personnel responsible for implementing and verifying corrective and preventive actions; and iv. Changes implemented from the internal audit that have an impact on the site’s ability to deliver safe food result in a review of applicable aspects of the SQF System (refer to 2.3.1.3). Records of internal audits and any corrections and corrective action taken as a result of internal audits are maintained.

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: An internal audit is to be done annually as per SOP QP-04-09. Internal inspection are done by the SQF Practitioner monthly, and an annual internal audit by a contracted 3rd party inspector. Form F-04-04 is used by the SQF Practitioner and trained in internal auditing. Training was through WSU Food Science in 2012. SQF code 9.0 Module 2 and 10 were audit. An outside consultant is used for internal audits. 5 NC's were found and corrected prior to the Audit. All were 5 minor conformities. This facility was audited on 3-25-2026 and all corrections were made prior to the audit all by April 2 2026.

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: Written in the SOP and prerequisite programs are listed how product is identified from receiving to Shipping. Receiving Tickets, Grower number, lot codes, and pallet tags are in place to identify all products at any stage of packings. Specifications for customers and packs meeting WSDA standards. Traceability is also being met for any step in the packing process for fruit, packaging and chemical used. All fruit is well identified.

2.6.2 - Product Withdrawal and Recall (Mandatory)

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: A mock recall is done 3 times annually by Gebbers Farms for BHPO Oroville and once more by Chelan Fresh Marketing for BPHO Oroville WA. Gebbers and Chelan Fresh Marketing operate potential recall with personnel in place to address to meet FDA USDA and SQF requirements. QP -06-02 Started at 2:30 PM and ended at 2:45 PM. Packing dates October 22, 2025. Lot number matches the grower lot number A 351 and A 424. There are 490 packs shipped on 11-4-2025. Order Number 54494: A class 3 recall was done. Fruit sold to HEB from a total run of 12/4 bags packed totaling 966 cases. Shipped 460 cases to HEB. on 11-4-2025 All fruit and packaging are included in the report, with a record of shipment and records of product still on hand. All recalls take less than 2 hours to complete using the Chelan Fresh Inventory system. A customer specific recall was completed at the audit. Start time at 10:52 to 11:53 when notified back audit was completed. Customer ordered packs DP94 9/4 packs. Packed on 3-23-2026 for a total of 1145 cartons. There were 185 bins used from 4 growers on 9-6-2025. Growers were A075 A2600 A370 A 2020. Honey Crisp Apples were packed and or repacked and shipped 805 boxes to customer in Atlanta on 3-25-2026. The rest 187 boxes were shipped to other customer-specific facilities from the 9/4 packs. The recall program is effective at recalling all fruit, packaging, and chemicals used in the packing process.

2.6.3 - Crisis Management Planning

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

Response: Compliant

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

Response: Compliant

Summary -

Response: A crisis plan is written QP-06-03. The Crisis management plan is focused on crisis that could affect the facility and operations, such as fires, floods, and other localized natural or man-made disasters. Management and the Companies ownership 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 criteria would be isolated, tagged, and/or destroyed as per SOP. The plan is tested by Gebbers Farms Food Safety annually. A crisis test was completed on January 15 2026. Internet outage caused by weather. No orders could be taken or filled until resolved. All fruit is quarantined and evaluated for condition, Lead to evacuation for days and not being able to pack. This did not affect shipping due to other locations meeting demand. No fruit is affected by this incident. Chelan Fruit Marketing is notified, and customers are contacted. All fruit in storage can be moved to another facility with power until the issue is resolved to ensure shipping is not disrupted.

2.7.1 - Food Defense Plan (Mandatory)

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Preventative Food Defense Procedures, site security in place. QP-03-55 Revision 6 stating Visitor and employee responsibilities to protect the fruit are written in the program. All exterior doors checked are locked. Company personnel are trained in sight assessment. Master Key list is presented. Employees are encouraged to watch out for personnel or others not invited into the facility. The Food Safety Director and SQF Practitioner are responsible for Food Defense of the fruit. The GM is responsible for the site security at Oroville WA . Doors are locked from the outside and tested during the audit at 3 non access doors to the exterior. .Keys are held by management only. Training is done for employees to watch for unauthorized personnel. Food Defense training is done as part of the food defense training for personnel to recognize unauthorized persons on site. A test is completed on February 23 2026 10 door checked for unauthorized car in the parking lot and door check. Gates by lumber company next door and secured nightly according to QP-01-09 procedures.

2.7.2 - Food Fraud (Mandatory)

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

Response: Compliant

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

Response: Minor

Evidence: • Plan does not address all specific fraud potential that is relevant to BHP and Gebber Farms.

Root Cause: The existing Food Fraud Risk Assessment was developed using a generic/template-based approach and was not fully customized to reflect the specific commodities, supply chains, and operational risks unique to our operations, such as acknowledging the existence of both conventional and organic fruit.

Corrective Action: Food Fraud policy was updated to address additional fraud potential. See updated Risk Analysis R20

Verification Of Closeout: Updated fraud and vulnerabilities are updated to include Organic handling which was missing from the previous list of potential risk. The existing Food Fraud Risk Assessment was developed using a generic/template-based approach and was not fully customized to reflect the specific commodities, supply chains, and operational risks unique to our operations, such as acknowledging the existence of both conventional and organic fruit.

Completion Date: April 16, 2026 **Closeout Date:** May 8, 2026

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

Response: Compliant

Summary -

Response: QP-03-56 states the Food Fraud Policy. The plan address many of the common issues for food fraud including weights, varieties and packs. All pack types are to meet regulatory and Customer requirements. A System is in place to monitor and control fruit from harvest through shipping. Signed the SQF Practitioner and Food Safety Committee members on April 1 2026. The however does plan does not address specific fraud potential that is relevant to BHP and Gebber Farms.

2.8.1 - Allergen Management (Mandatory)

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

Response: Compliant

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

Response: Compliant

Summary -

Response: An allergen control program is in place for packing of Apples Pears and Cherries are not considered an Allergen in any Country of destination. SOPs are in place for controlling of potential allergens brought into the facility by workers or found in vending machines. All personnel are trained annually at least on Allergen controls in the facility along with hygiene.

2.9.1 - Training Requirements

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

Response: Compliant

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

Response: Minor

Evidence: • Line chemical personnel are not adequately trained in tasks and how to report.

Root Cause: The training program for line chemical personnel was not sufficiently detailed to ensure employees fully understood their specific responsibilities, monitoring procedures, documentation requirements, and escalation procedures for out-of-specification conditions. Supervisory oversight and follow-up were inadequate to ensure employees consistently followed established monitoring and reporting procedures during operations.

Corrective Action: Maria S has been trained on chemical monitoring food safety policies. This included notifying supervisors of issues with equipment.

Verification Of Closeout: Supervisory oversight and follow-up were inadequate to ensure employees consistently followed established monitoring and reporting procedures during operations was not clearly written. This is now updated and all personnel are updated on responsibilities as part of the ongoing training program for chemical line personnel.

Completion Date: April 21, 2026 **Closeout Date:** May 8, 2026

Summary -

Response: Sighted the BHP Oroville Management Policy for Training of Employees. The program states: QP-01-08 Gebber Farms Food Safety is responsible for training all employees in the facility at Oroville to ensure all personnel are properly trained in Health Hygiene and individual job responsibilities. "Training records for: CP training for ORP/pH/Cl monitoring with written assessment: CP operators, Trained by Pace chemical who trains the CP operators, Sighted records of compliance for recording Levels of Chlorine on the dump tank, Cleaning Crew with chemical training by BHP Oroville Management and chemical company Pace. This is not presented in past year. sorters, Mechanics, Packer, Segregators Forklift operators and shipping personnel. Training records are kept in employee records and on a training attendance record, which is used to document employee, training, or skills description, trainer, and date of training. A complete training program is in place for all areas of the company on SOP for hygiene and health and GMP practices. last trained on 2-20-2026. Wesmar Sanitation trained in 2-18-2026. Line chemical personnel are not adequately trained in tasks and how to report.

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: Training records were reviewed for all CPs on Forms F-01-02 from Cleaning, shipping, Chemical, Packing and maintenance personnel. I.E. Sorters and Packing line personnel are in place. Forklift drivers, Shipping department, and cleaning personnel. SQF Training is done for the cleaning crew at Gebbers Oroville for Wesmar on cleaning crew of 4 people. Interviewed cleaning crew personnel at audit. is the Supervisor for the team, ORP and PAA monitoring is managed by mechanics. Documents show training has been done by Cleaning crew, training by BHPO, and Gebbers Food Safety Practitioner for 19 employees and supervised. Sighted mechanics training for 19 employees on Sanitation. A master register is in place and held in the office and within the Food Safety Office. The master register contains names, date of training, type of Training, and Trainer. Pace trains all chemical operators annually. A Wesmar representative who trains the cleaning staff for all of on sanitation procedures. Trainings are completed in English and Spanish for all workers.

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 is approved by the City of Oroville Washington for packing for fruit. Business Lic for BHPO Oroville. The facility is located in a small rural area near Oroville, Wa. The facility is not a FDA facility. The facilities are next to lumber mill and rural homes. The USDA inspects the facility and is current with license 5574. The exterior of the premises is maintained by Management and inspected monthly through formal inspections. Paths road and area surrounding the exterior are maintained.

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

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

10.1.2.8 - Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 10.3.2).

Response: Compliant

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

Response: Compliant

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

Response: Minor

Evidence: • Missing shatter proof bulb outside of Cherry Line.

Root Cause: The facility’s preventive maintenance and GMP inspection programs did not consistently verify that all lights in product handling and adjacent areas were shatterproof, covered, or protected from accidental breakage. Responsibility for inspecting and documenting light protection status was not clearly assigned or consistently followed.

Corrective Action: Lights in receiving area have been removed, and will be replaced with shatter proof bulbs prior to this area being put into service for cherry harvest. Maintenance and food safety personnel were notified of the requirement.

Verification Of Closeout: Light bulbs are removed from the facility as they were not in used nor protected. The facility’s preventive maintenance and GMP inspection programs did not consistently verify that all lights in product handling and adjacent areas were shatterproof, covered, or protected from accidental breakage. Responsibility for inspecting and documenting light protection status was not clearly assigned or consistently followed.

Completion Date: May 1, 2026 **Closeout Date:** May 8, 2026

Summary -

Response: Plastic belts and cups and rollers are used for carrying apples through the production line. All equipment is designed for the packing of Apples and Cherries. (MAF , Van Doren, GP Graders) All equipment is food grade, safe, and cleanable. Walls in the segregation room and cold storage are concrete and Spray retardant. No direct food contact in storage areas is sighted. Floors are sealed concrete with some cracking in the shipping areas. All floors are properly sloped with trench drains running under the water flume and dump tanks. Waste traps and located away from the fruit being packed. Under the tables and drained to the exterior plumbed sewer system. Drains are accessible and cleaned out daily as per SOP and records review. Catwalks and stairs are maintained. Doors are designed properly. Hand washing is present in break room and toilet areas separate from the packing area. Access to amenities is easily accessible for all personnel.

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: • Loading dock doors do not seal directly. One door was left open on the loading dock with no truck in sights.

Root Cause: The loading dock door was left open and unsecured due to a combination of inadequate employee awareness, inconsistent monitoring practices, and lack of clear accountability for dock door management. Personnel did not fully appreciate the food safety and pest control risks associated with leaving dock doors open when not actively loading or unloading product. In addition, routine supervisory verification of dock door status was not consistently performed, allowing the condition to occur without immediate correction.

Corrective Action: The loading dock door with poor seal has been sealed off, and turned into a man door. Door security and requirements to keep them locked and secured was discussed with loading dock manager.

Verification Of Closeout: ,Routine supervisory verification of dock door status was not consistently performed, allowing the condition to occur without immediate correction. This is due to the lack of supervision. The loading dock door with poor seal has been sealed off and turned into a man door. Door security and requirements to keep them locked and secured is now being met

Completion Date: May 4, 2026 **Closeout Date:** May 12, 2026

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

Response: Compliant

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

Response: Compliant

Summary -

Response: All openings and doors close properly with door curtains installed on cold storage and packing facility doors, electronic insect devices are away from food. The facility seal from the outside and verified by Pest control records show few catches compared to outside activity. Tin cats are present inside door self closing devices are installed. Fruit is loaded inside the facility. All fruit is protected from weather. These shipping docks are used for direct shipment and transfers to other BPHO Packing loading docks for distribution. Electronic traps are in place. Door bumpers and dock plates are sound. Loading dock doors do not seal directly. One door was left open on the loading dock with no truck in sights.

10.2.1 - Equipment and Utensils

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: All equipment used in packing is designed and manufactured for packing tree fruit. One MAF line for Apple's packing and bagging. GP Graders line for packing of Cherries. Continuous improvement of the facility is being met by continually upgrading of the facilities. All utensils and Protective clothing for cleaning are sighted and well-maintained. Racks in break rooms are present for personnel belongings. All smocks etc., are on hooks inside the facility, and Laundry is available on site. Tubs are well marked for intended use and equipment is properly stored equipment is stored properly. Water is directed into the floor drains to the City of Oroville WA Sewer System. Back flow test is done annually by Plumbco and contract company.

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

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Forms F-03-36 record all maintenance and schedules for the facility. There is a maintenance schedule written down for daily weekly monthly and Annual service. . Maintenance work activity is recorded. i.e. Belts replace. Sighted training records maintenance staff. 2 on staff are trained and interviewed during inspection and are knowledgeable about the facility and required maintenance. The maintenance team has a caged area on the production floor for the storage of tools, etc. are to be cleaned after use per policy. Maintenance and the cleaning crew both clean areas after maintenance or repairs are done. No paint on contact zones but present on non-contact surface as the powder coating has come off over time. Lubricants are stored, and well repair log for each service. Western Scale, Wesmar, Sprague. i.e., changing the chain on the brush bed. Training records for training on GMPs and Food Safety are present and ongoing training is sighted throughout the year. Compressed air is maintained and tested annually

10.2.3 - Maintenance Personnel and Contractors

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: A two-person team handles maintenance during production. A list of contractors is written for work in the facility. Trucks are maintained by Gebber Farms mechanics. Refrigeration is maintained by inhouse training and probes tested by Pacific CA. Sprague Pest control, and Pace Chemical all are in the facility for contracted work. All work is done after the line is down per policy. Pre op is done daily by the Production Manager. Pace is used for injection pumps and PAA monitoring and calibration. Mechanic maintain the equipment and facilities to ensure all machinery is in good, safe condition for the packing of fruit. Production Records are online and in a logbook for Fall and Winter 2025and Spring 2026.

10.2.4 - Calibration

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Sighted the following procedures: Work Procedures are present: Packing Line Equipment has Calibration Instructions, Refrigeration Penetrometers, Thermometers, scales, and ORP injection pumps are all calibrated as scheduled. Western Scales calibrates all dock scales bag scales and finished product weighty scales updated on ORP calibration by Pace weekly along with PAA spray pump. Refrigeration is done annually for probe calibration by Pacific CA 9-1-2025. F-04-01. Penetrometer 3-24-2026 to 3-27--2026 in house.

10.3.1 - Pest Prevention

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Sprague Pest Control designed a pest control program for the facility both interior and exterior. Sprague Pest Control is contracted to monitor and implement the pest control program. The company is licensed for Pest Control in Washington State. The company is insured by Accord for 3,000,000 liability. Bait stations are used outside the buildings and tin cats inside and Outside. All are monitored. Monitoring records on file show devices are inspected monthly and trended Pest Control procedures reviewed for monthly inspections by Sprague and weekly checks by BPH Oroville on interior traps.. -Pest Control Work Procedure. A licensed pesticide control operator in Washington state. WSDA# 94864. Records are held in the Pesticide binder from Sprague and on line Service Reports. A map is present and reviewed. Last visit April 3 2026 and each month in 2025 and 2026 to date of audit. No packaging stored under cover outside or inside show evidence of contamination.

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: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Minor

Evidence: • Unable to verify ATP results and corrective actions.

Root Cause: The computer software was not working properly that supports the previous ATP tester which prevented facility productions manager from downloading ATP results, analyzing these results, and showing pass fail levels which are included in the software analysis.

Corrective Action: Replaced the current ATP tester has been purchased and is in service. Replaced with The EnSURE® Touch is an advanced ATP hygiene monitoring system delivering rapid cleaning verification results in just 10 seconds. Replaces the current ATP tester, and new pass/fail levels will be established for dirty vs. clean surfaces.

Verification Of Closeout: Procedures for ATP recording is being met but the Analyzer was not operating properly. The computer software was not working properly that supports the previous ATP tester which prevented facility productions manager from downloading ATP results, analyzing these results, and showing pass fail levels which are included in the software analysis. The ATP recording system is corrected and being done a scheduled daily.

Completion Date: May 1, 2026 **Closeout Date:** May 8, 2026

Summary -

Response: A cleaning and sanitation program is written for all areas for the line equipment and storage areas. A total of 16 people are involved with sanitation for the clean break and daily sanitation by 2 staff.. Protective clothing for cleaning is sighted and well-maintained. Racks in break rooms are present for personnel belongings. All smocks, and clothing are on hooks inside the facility. Tubs are well marked for intended use and equipment is properly stored Pre Pre-operational inspections are done by the Line Supervisors who verifies this prior to start up, and walks are made in the facility throughout the day. Chemicals are stored in a locked cage and have appropriate for cleaning amenities. All containers are properly disposed of in an onsite dumpster cleaning logs are kept. i.e. Zone 1 is the wet area is tested with ATP daily. and 2 -3 are line equipment and floor, ceiling walls. Zone 4 is storage area. All line equipment is tested with ATP but numbers are not retrievable to show if the numbers require recleaning. ATP records of testing for the past monthly show numbers 1-5 data but not if recleaning is required. IEH is used for environmental monitoring of contact and non contact surfaces monthly taking an average of 25 swabs. Unable to verify ATP results and corrective

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actions. ATP is used for Zone 1 verification (contact surfaces). It was being done but not being trended correctly for monitoring as per environmental program.

10.4.1 - Personnel Practices

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Policies are in place for controlling all worker health. Daily supervision is in place for monitoring the health and condition of workers. A policy for controlling spills or incidents is in place. ex. blood, glass etc. and how to clean and quarantine the product. A policy is in place for not eating, smoking, or drinking outside of approved areas. No NC sighted during inspections as all personnel were following GMP's.

10.4.2 - Sanitary Facilities and Handwashing

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

Response: Compliant

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

Response: Minor

Evidence: • Policy states handwashing is to be done for all personnel. Hand sanitizers are being used with glove over them but not all are hand washing

Root Cause: The facility did not provide adequate supervision, and verification to ensure all employees understood that handwashing is required before using sanitizer and before putting on gloves. The hand hygiene policy was not being consistently enforced at entry points, production areas, or handwashing stations. Company policy allowed for the use of hand sanitizer by employees before returning to the packing line.

Corrective Action: Hand wash sink will be installed in packing area for personnel, and visitors use before entering the line. Workers are instructed not to just rely on hand sanitizers and to use existing bathroom and breakroom sinks to wash hand before entering production areas.

Verification Of Closeout: Hand washing stations are plentiful and provided. Employees were not all washing hands as hand sanitizers were preferred since COVID. This policy is now updated and all employees after breaks, bathroom and meals are expected to wash hands. Gloves are worn by all employees. The facility did not provide adequate supervision, and verification to ensure all employees understood that handwashing is required before using sanitizer and before putting on gloves. The hand hygiene policy was not being consistently enforced at entry points, production areas, or handwashing stations. Company policy allowed for the use of hand sanitizer by employees before returning to the packing line.

Completion Date: May 1, 2026 **Closeout Date:** May 8, 2026

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

Response: Compliant

Summary -

Response: Policy states handwashing is to be done for all personnel and a requirement after meals breaks and bathroom visits. 7 toilet stalls and 4 restrooms are sighted in the facility for BHP Oroville. All a restrooms and sinks are plumbed with hot water, liquid Soap, and paper towels. 70 employees were sighted during the audit. Hand-washing basins are in the restroom and outside on the production floor. Drains are connected to the City of Oroville, Washington Sewer System. Hand washing basins are made of porcelain and well-maintained at each of the 4 bathrooms. Hand washing is in the break rooms as well and well stocked including hot water. Hand sanitizer are being used with glove over them but not all personnel are hand washing. Personnel belongings are stored in break areas and on hooks. None are taken to the restrooms.

10.4.3 - Protective Clothing

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Employee clothing is compliant for a fruit packing operation. Company provided smocks, nitrile gloves are used by most packers and sorters. Smocks used are left in the packing area and on hooks. Clothing is compliant for the packing of Apples and Pears. Cherries are not being packing until July 2026. No high-risk areas are present. All gloves are single-use nitrile gloves or Atlas gloves and cleaned and left on site. All gloves are controlled, inspected, and have a storage area inside the facility Smocks are used to protect clothing and laundered on site.

10.4.4 - Visitors

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Visitor GMP policy is reviewed and cover health, hygiene and protocols. All visitors must read and sign before entry. ID is checked and escorts are provided at all times per GMP's posted. Reviewed list of visitors and were all appropriate for services being provided.

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

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Staff amenities (Break Rooms, outside eating area and restrooms) are in good condition and capable of handling all personnel in the two break areas and outside the facility. Lunch rooms are provided for all personnel. Sinks refrigerators and microwaves are present and in clean condition. Signage to hand washing are posted above the sinks and at all hand wash station in both English and Spanish located in each rest room.

10.5.1 - Product Handling and Packaging Operations

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: All personnel sighted were compliant with GMP practices sighted in the food safety plan and Monitoring programs. Packing materials are off the ground inside the facility. Containers are well identified for use or non use. Wash down hose are off the floor. Some packing material is stored outside under a roof structure and shrouded by Plastic. This is standard for many tree fruit packing facilities. No evidence of contamination from Birds or rodents.

10.5.2 - Control of Foreign Matter Contamination Operations

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: An SOP is in place for controlling contamination potential during the storage, packing and shipping of Apples. Glass windows at the control tower over the line are not protected from breakage. The glass is double-pane but not shatterproof. Knives are checked in and out with procedures present. No loose objects are sighted or temporary repairs. All bins are marked for intended use. All glass and foreign materials are inspected daily during packing for condition during the pre-operational inspection reports daily and at monthly inspections. knife and Sharps log is F-5-03-08,

10.5.3 - Detection of Foreign Objects Operations

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Only visual inspections are done or required for the packing of Tree Fruits. Inspections are present by QC at multiple locations to ensure compliance with WSDA is met. WSDA is on site daily for inspection as well as Chelan Fresh QC for quality or potential food safety issues.

10.5.4 - Receiving and Shipping

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

Response: Compliant

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

Response: Compliant

Summary -

Response: All product incoming is on flat-bed trucks and taken immediately to storage rooms. Outbound loads are staged indoors and loaded under a protected environment. Trained personnel are documented for loading procedures. All incoming fruit is separated from the finished product in storage rooms. Seals are used for OTR loads per buyer request. Temperature checks and the condition of the trailers are done by Gebbers Farms Oroville . All trucks are inspected for each outbound load. All loads are FOB shipping point and the buyer is responsible for shipping. Temp loads and load out inspections are in place and sighted for the condition of trailers and odors and attached to the BOL's. Bills of Lading show the temperature all products are to be stored and the driver signs that they will. comply. Temp recorders are present on FOB loads per customer request. Incoming product is inspected by trained personnel and recorded for condition and against SOP for product integrity. This is for both raw product, chemical additives and packing materials.

10.6.1 - Water Supply

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Water is from the municipality of Pateros, Washington. Water is tested by IEH for incoming water into the dump tank. Water is tested monthly for E coli which includes . IEH incoming Water tested by TCC test shows negative for coliforms according to representative who was asked during the audit and presented findings to the Food Safety Practitioner. Report reviewed is 4-5-2026 show <1 E. coli on from City testing shows class A system in 2025 pending 2026. Water by the City is monitored daily. A back Flow test is done by Plumbco annually for Brewster and Pateros Washington as per Code each August. Last tested in 2025.

10.6.2 - Water Treatment

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Dump tank and Flume water is treated with chlorine through an Injection system. Monitoring is done and recorded every 2 hours at the dump tank. Calcium Hypochlorite is used for Apples and Pears. Sighted 855 MV and 6.80 PH PAA 50 but tested zero. See 2.4.3.16 finding. All systems are in place to prevent cross contamination potential.

10.6.3 - Water Quality

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

Response: Compliant

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

Response: Compliant

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

Response: N/A

Evidence: • N/A non on site

Summary -

Response: Water is supplied by the City of Oroville WA. Hot and cold water are present. Backflow devices are inspected and maintained annually by Plumbo each August. pending 2026. Only potable water is delivered and used. Incoming Water samples are analyzed by IEH annually. Testing is done monthly and findings were reviewed showing <1mpn/100cfu E. coli. Samples were taken at the incoming water for the dump tanks. The incoming water system is a class a municipal system used for fruit and cleaning and sanitation. Reviewed water test records over the past 3 years and all tests monthly show water is acceptable for washing fruit and cleaning of the line and handwashing.

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

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

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

Summary -

Response: No ice is used

10.6.5 - Air and Other Gasses

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Air quality is tested for Apples Pears and Cherries packing areas and on the compressed air system for Cherries annually. Testing is done by Eurofins an ISO 17025 company stating compressed air is Nov 14 2025 2 cfu for the Cherries line equipment and ambient air is 30cfu/1000l making the compressed filtered air compliant per Eurofins assessment report on November 13 2025. No compressed air is used for the Apple or Pears packing equipment.

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

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

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: Minor

Evidence: • RPC are stored outside under a roof structure. Bird nest is sighted and on pallet is not covered

Root Cause: The facility was not consistently inspecting external packaging storage areas. Responsibilities for monitoring pest activity, structural conditions, housekeeping, and proper covering of stored packaging materials were not routinely verified. area has not been getting regularly inspected for bird nests as needed, by facility maintenance.

Corrective Action: Bird nests have been removed. This area will be inspected for bird nests regularly and the requirement for regular inspection has been communicated with sanitation crew members.

Verification Of Closeout: Personnel responsible for inspecting the outside of the facility where packing material is stored were not inspecting for bird nest as required. The policy is now updated. Responsibilities for monitoring pest activity, structural conditions, housekeeping, and proper covering of stored packaging materials were not routinely verified. area has not been getting regularly inspected for bird nests as needed, by facility maintenance.

Completion Date: May 4, 2026 **Closeout Date:** May 8, 2026

Summary -

Response: Storage rooms are separate from finished product to raw product. A FIFO system is used for moving of finished product and packing materials. Packing materials are not stored near raw product. A covered area outside is used for storage are shook materials, which protect the packaging. All storage areas are appropriate for storage of shook (Packaging) and equipment. A Cognos inventory system is used for finished product as well as inventory. RPC are stored outside under a roof structure. Bird nest is sighted and on pallet is not covered. RPC are stored outside under a roof structure. Bird nest is sighted and on pallet is not covered

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

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: All refrigerated storage is monitored and inspected daily for condition and temperature by trained in house staff. No issues were found with leaking dripping water in common and CA storages. Sufficient storage is present for all Apples Pears and Cherries in the facility. Testing is done on wall surfaces monthly for Pathogen and no issues were found from records in as part of zone 3 testing program for generic Sp pathogens. No positives were recorded in the past year in 2025 and to date April 2026.

10.8.1 - Storage of Hazardous Chemicals and Toxic Substances

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Chemicals are stored in a caged area in the packing facility on accessible only to authorized personnel. Chemicals are separate from all other materials on site. The storage area is compliant for the storage of chemicals with are inventoried with usage logs present on forms in the chemical cage area. Spill containment is provided for liquids. A spill kit is near the cage in the event of a spill. PPE is stored next to the chemical cage. Empty containers are sent back to the Pace or Wesmar Chemical. All cleaning and pump equipment is designed for chemical application. SS sheets are present and accessible to relevant personnel. Personnel are trained in chemical application by Wesmar and pending for Pace in 2026.

10.9.1 - Waste Management

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Liquid waste water is sent to the city of Oroville Washington treatment system. The areas outside the facility are maintained and no waste is attracting birds or other animals. The waste container is located outside the facility and dumped at least weekly by Upper Valley Disposal Company. Cull Bins of fruit are well market are marked as waste and taken to feed lot or composted. Weekly service is being met and the area surrounding the waste dump is clear of debris.