SQF Food Safety Audit Edition 9

Brewster Heights Packing & Orchards DBA Gebbers Farms (Packhouse) - 10928

Summary

Audit Decision
Certified

Decision Date
September 18, 2026

Recertification Date
June 28, 2027

Expiration Date
September 11, 2027

Issue Date
September 18, 2026

Certificate Number
101507

Audit Type
Recertification

On-Site Audit Dates
June 30, 2026 - July 2, 2026

ICT Dates
-

Audit Rating



Good

Facility and Scope

Brewster Heights Packing & Orchards DBA Gebbers Farms (Packhouse) - 10928

25985 Highway 97
Brewster, WA 98812 United States

Products
Apples, Cherries

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: 24
Hours of ICT Activities:

Hours Spent Writing Report: 8

Section Responses

Audit Statement - Audit

SQF Practitioner Name - Name the designated SQF Practitioner

Response: Brain Thompson

SQF Practitioner Email - Email of the designated SQF Practitioner

Response: Thompsonb@gebbersfarms.com

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

Response: Brian Thompson SQF Practitioner, Bob Grandy FS Director, Luis Garcia Food Safety, 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: Brewster Heights Packing and Orchards dba Gebbers Farms Main is a packer of fresh Apples and Cherries for the retail market. The facility is located in the City of Brewster, WA. There is one pre-size Apple line, 4 dedicated apples packing lines and 2 cherry packing lines. At full capacity, the facility employees approximately 450 workers, who work on one of 2 shifts and a separate cleaning crew that works from about 8:30pm until 7:30am for both Apples and Cherries facilities. The day of the audit Apples were being packed on 4 lines as well as Cherries on two lines. Repacking was present at the North plant building. The cherry line has 1 CP for monitoring Calcium Hypochlorite in the Hydro cooler. The Apple packing lines use the dump tank as the primary CP with Chlorinated water and a PAA spray bar as the back-up. No CCP's are written into the program. All area of the facility were viewed during inspection.

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, Bob Grandy FS Director, Luis Garcia Food Safety, Todd Mcneill Auditor

Auditor Recommendation - Auditor Recommendation

Response: To approve once all 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: Compliant

2.1.1.4 - Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review, and maintenance of the SQF System, including Good Agricultural/Operating Practices outlined in 2.4.2, and the food safety plan outlined in 2.4.3. ii. Take appropriate action to ensure the integrity of the SQF System; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System

Response: Minor

Evidence: • On review of meeting with supervisors and management on the Apple Production lines some manager are not communicating with Food Safety Department when new procedures are implemented.

Root Cause: A formal change-management and communication process had not been followed closely enough to require management and supervisors to notify the Food Safety Department before implementing new or revised procedures. Responsibilities for reviewing changes for food safety and SQF program impacts were not clearly assigned.

Corrective Action: Management and supervisors were instructed to notify the Food Safety Department of all recently implemented or revised procedures. The Food Safety Department reviewed the identified changes to determine whether applicable procedures, HACCP plans, training materials, monitoring forms, or SQF records required updating. Issue was discussed with all supervisors when reviewing the Personnel Process Practices procedures. Training attached.

Verification Of Closeout: New SOP QP 01-08 shows the formal change of management and communication. Food Safety is to be included on implementing new procedures and revised procedures. The Food Safety Department reviewed the identified changes to determine whether applicable procedures, HACCP plans, training materials, monitoring forms, or SQF records required updating. Issue was discussed with all supervisors when reviewing the Personnel Process Practices procedures. Training attached.

Completion Date: July 3, 2026 **Closeout Date:** September 16, 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 The Gebber Farms BHPO commitment to providing Food Safety for whole Cherries and Apples to the retail market. Gebbers meets this by taking control measures and precautions to ensure food safety is met for the packing storage and shipping of Cherries and Apples. In order to maintain a healthy food safety culture, this site ensures that shared values and behaviors towards food safety are implemented and communicated. Gebbers Farm BHPO has developed a culture of food safety through training and an open communication system from employees to supervisors to upper management through meetings held daily employees and weekly with management which are detailed in the minutes. The commitment is posted in an easily visible location in the front reception area on a bulletin board. An Organizational Chart for this facility shows the key personnel responsible for food safety. Job descriptions for the General Manager, Director of Food Safety, Quality Assurance, Packing Line Managers, Receiving Inspector, and Maintenance Technician were available in the SQF Manual Monthly Food Safety meeting are presented by the Food Safety Director to Ownership and then presented to staff monthly. The culture for Gebbers Farms BHPO includes a robust food safety system which includes management commitment for improving the systems as part of the Chelan Fresh Marketing group requirement. The staff is trained to bring any Food Safety or quality concerns to management. The company management appears to have an open door policy in place which was event during inspection by interviewing key line personnel on communication and understanding of Food Safety. The Commitment policy is Form QP-01-05 Signed by on 4-3-2026 by Management. The Practitioner is HACCP trained on Feb 23, 2024, who manages the SQF Program Gebbers Farms BHP Main. The backup is the Director of Food Safety and is HACCP and PCQI certified as well as a certified PCQI trainer. 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: Management Review is completed annually by Gebbers Food Safety for Brewster Heights Packing. A HACCP Team of 7 people meet monthly to discuss issues new packing equipment. The review includes: customer complaints, internal and external audit findings, corrective actions taken and a review of the entire system and the HACCP Plan. There are steps for reviewing the system and validating any new changes in the past year. Management Review meetings are conducted annually and records for the annual review conducted on 3-25-2026 along with monthly update meetings demonstrated a thorough review of the SQF program. The agenda, minutes reviewed demonstrating management and Food Safety Compliance holds meeting on customer expectations and training of H2A workers in March 2026. The SQF Practitioner and Director of Food Safety have daily meeting on expectations and compliance issues. The Compliance Director meets with ownership weekly to discuss Food Safety and Compliance issues and minutes of meetings are recorded with action items.

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: Customer Complaint Management program states process for receiving and handling complaints. BHPO and Gebbers Farms uses Chelan Fresh marketing for sales of fruit and they compile any complaints known as trouble reports: 1. Direct complaints from the customer, and 2. Complaints from the sales department. Complaints are categorized are Urgent High risk, and Non-Urgent Low risk. A complaint log was reviewed. Details of the complaints and corrective actions implemented are documented in a log. investigations reviewed were observed to detail the issue, describe the product in question, corrective action implemented, the department responsible, and the investigation outcome. All complaints reviewed from in 2026 were for quality issues only issued by Chelan Fresh Marketing from customers. No food safety issues have ever been raised in 20 years of certification with SQF.

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: The SQF Practitioners are responsible for developing and maintaining g the SQF System. The SQF Practitioner also ensure that the Food Safety manual is available for all relevant team members. At minimum, the following are documented in the system manual: Scope of Certification (Apples and Cherries). Food Safety Management System. Any changes made must be justified and validated by the facility SQF Practitioners. The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code. Food Manufacturing shall be maintained in electronic and hard copy A documents will be made available to relevant staff and include: A summary of the organization's food safety policies and the methods it will apply to meet the requirements of SQF 9.0 The food safety policy statement and organization chart. All produce and input complies to FSMA standards and domestic and international requirements.

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 methods and responsibility for maintaining document control is documented. Editing are accessible only to relevant staff. A register of SQF system documents was presented for review. The register was observed maintained with the latest revision of documents. Master documents are maintained electronically and are password protected. Only authorized personnel from the Food. Safety team have access to documents. Safety Chain and the companies server. All documents were reviewed and updated on 4-17-2026. All documents are current.

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: Methods and responsibilities are documented for records control. Verification activities are conducted by QA/QC personnel and Verified by Food Safety. Records readily accessible upon request and legible. The following were provided for review, Reviewed documents for cleaning and Sanitation, Shipping, Chemicals inventory and use on the packing line. Sighted on control document forms. i.e. In line Chemical Monitoring Logs are electronic. Reviewed documents for chemical usage and inventory. Sanitation records, Shipping documents. All documents reviewed were the current format for 2026 with correct ranges for chemical usage and state ranges. Records are kept at the office or in the Food Safety Office in Brewster WA.

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 equipment or fruit or trials have been changed in 2026. The processes and flow are the same and all procedures are validated for the tree fruit industry though best practices and following the WSDA, Washington Horticulture guidelines.

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: Product and Packaging materials Receiving Guidelines detail the requirements for QA and acceptance, receiving procedures for Apples and Cherries. Storage and handling procedures are written. No packing is done at the farm level. Once harvested, all fruit is taken to BHP in Brewster for storage and packing of both Cherries and Apples. All materials, ingredients, packaging materials, and services that impact finished product safety and quality are supplied by approved suppliers. Non-approved suppliers are not used in 2026. Validation activities meet WSDA requirement for packing. A register of approved suppliers and product used post harvest is kept in the vendor manual, as well as electronically. All Cherry and Apple varieties are tested for MRL's to determine where they can be sold too. MRL testing is done by PAL Matrix in Portland Oregon. This information is passed onto Chelan Fresh Marketing to ensure customer and Countries legislation is met.

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: QP -02-04 shows the list of approved suppliers updated in 2026 who we the requirements required by customers and WSDA. Phone calls and questionnaires are sent to distributors. Reviewed on 4-6-2026. . All suppliers are vetted based on quality, capability to delivery products, meet industry requirements, customer requirements. Audit certificates for 3rd party audits as well as letter for manufacturing guarantees are present. A list with documentation on the services provided with in the facility. Chamberlin Dist, CIntas, CBC, Decco, Pace Industries, Sprague, Sims and over 50 others. A register of Contract services and agreement are updated in 2026 and are complete.

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: Food Legislation which describes the methods for maintaining a register for requirements to storage and shipping of Apples and Sweet Cherries. The methods include the review of information provided by the Produce Management Association (IFPA), the FDA, USDA, WSDA . Both SQFI and Merieux in 2026 are

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listed on the contacts list for any food safety event with in 24 hours.

2.4.2 - Good Agricultural/Operating Practices (Mandatory)

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

Response: Compliant

Summary -

Response: Good Agricultural and Operational Practices are met. The practices used are standard for the industry. The program is based on HACCP and SQF version 9 Module 2 and 10. The site is a small town with orchards and natural range lands around them. All clauses of the SQF Edition 9.0 have been implemented and the effectiveness of the pre-requisite programs are verified by monitoring cleanliness, customer complaints, and internal audits and trending.

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: Compliant

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

Response: Compliant

Summary -

Response: The Food Safety Plan has been developed and implemented using HACCP and Codex Alimentarius methods. The plan is reviewed at least annually and was last reviewed during the annually review on 4-6-2026 and again on 6-26-2026 prior to the audit to ensure the entire system is current and correct. SOP QP-03-11. is the risk assessment and hazards analysis is in place. No CCPs are determined by the Analysis but CP's are for monitoring chemical levels in the wash water to prevent cross contamination. There are two control points for Temperature in the coolers and Chemical monitoring in the hydro cooler, dump tank and flumes. The following were reviewed: Risk Assessment, Hazards, Process flow, HACCP Team with meeting records, and Intended use of the product. 7 steps of HACCP is followed. A Multidisciplinary HACCP team has been designated, and their names, position and contact information is noted in the plan. HACCP verification procedures are outlined. A reassessment of the plan is conducted annually or when changes are made. Verification and validation activities are conducted by HACCP trained personnel. Reviews and changes to the plan are documented. i.e. Hazards identified are controlled by control points and testing. i.e. Wash water, foreign object control, Pathogen listeria, E.coli and Salmonella control. Pre and Post Harvest aids. I.e. FDL, MCP and DPA Sighted the following HACCP documentation: -HACCP food safety Team. -Product Description & intended use for Tree Fruits. -Flow Chart for 4 apple lines and Pre Sizer and 2 Cherry line with all inputs from receiving to Shipping Hazard Analysis for CP including all inputs, process steps. -Hazard Analysis Report for process steps, ingredients and materials. CP’s: -Dump tank: ORP 650Mv minimum (lower Control level) Ph 7.8 Free Chlorine is 4-100 PPM range. PAA Spray bars 40- 80 PPM Peracetic acid 20 ppm is lower Control Limit. For Cherries 650 mv Calcium Hypochlorite in the flume and dump tank. Fruit is tested for MRLs (Chemical Residues to determine where fruit can be sold). Validation says Total chlorine is to be tested and anything above 1 PPM is effective control allowing for 100 to 150 PMM free Chlorine which is validated by Universities. WSU and UC Davis.

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: Product and or equipment not meeting tolerances would require a corrective action and preventive action. SOP's are written into the program for inspection of fruit to meet quality standards and Food Safety protocols. The final disposition of the product is authorized by QC and QC at Chelan Fresh Marketing. No in house labs are present. External labs are ISO 17025 certified for incoming water testing, MRL's, Post harvest chemicals, scale calibration and Refrigeration temperature control.

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: Procedures are in place for dealing with non conforming product. Non-conforming product is culled for m the line during the packing pro process and sent to juice producers, peelers or trashed. A cull analysis report is run for each lot. Reviewed cull analysis report for Honey Crisp Apples being repacked day of audit on June 30 2026 were for 12/3 bags of Organic Honey Crisp to be repacked into 12/3 bags. This is necessary due customer wanting poly bags instead of pouch bags. New manifest counts are adjusted showing any loss found during repacking.

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: No Cherries are recouped. Apples are only reworked. Procedures and a dedicated area present for repacking. Only the site manager is allowed to release any product placed on hold. Records show product was destined for hold and to be repacked by variety, date of pack and loss of product. All product is traceable and a new manifest is in the US Agri system network for Gebbers. Chelan Fresh Marketing uses the same system in 2026 to maintain and JIT inventory and status of fruit.

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: Only the GM, QA, Chelan Fresh Marketing can release any products (Fruit Packaging, Chemicals) placed on hold. Sighted the following procedure Product Release Policy Product put on hold procedures in place for issues arising from Quality. QP-03-68. Records are maintained and verified for release by QA or Chelan Fresh Marketing. Records are maintained and verified for release by QA on site.

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: Gebbers Farms Monitoring Program states frequency of testing. For incoming water Apple line monthly and Cherries once at the start of the season. Environmental testing of the packing lines (Zone 2-4 monthly totaling 40 swabs) are taken. Zone 1 ATP is completed daily. Trending of data is monthly and stored in IEH I core. Responsibility is with the Food Safety Practitioner. ATP is done daily for Zone 1 contact surfaces. Procedures for collecting samples, documentation, etc. were available for review. COA test results from IEH Laboratories dated 5-27-2026 latest testing from reports, process control testing on equipment and environment with results are done by PCT testing with a range of 0-4 IEH does the environmental testing prior to Cherry packing and then monthly for Apples and Cherries lines. Checks are for Listeria, Salmonella and E coli are tested. 40 locations per month during Cherry and Apple packing. Any number above 9 is required and re clean and retested on any surface 2-4. All testing is 0 to 4 that is recorded in the past year. All locations pass inspection. The environmental program is a robust system for detection of pathogen on the line equipment.

2.5.1 - Validation and Effectiveness (Mandatory)

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

Response: Compliant

Summary -

Response: The effectiveness of the Food Safety programs is validated by various entities for the packing of Apple and Cherries. All system are validated by WSU, Cal Davis, IFPA, EPA FDA USDA. Records for the following validation activities were reviewed: Chemical flume water PPM and MV counts- Calibration of Equipment: Evaluation of procedure, incoming water, weekly calibration records, and annual calibration schedules. - Internal and external audits. - Cleaning and Sanitation: Environmental Swabs and ATP testing. Visual inspecting and observation is at various locations on the packing line. Monitoring of incoming water is done annually for Cherries and Monthly for Apple.

2.5.2 - Verification Activities (Mandatory)

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

Response: Compliant

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

Response: Compliant

Summary -

Response: The SQF practitioner is responsible for verification activities. Verification activities are scheduled to be conducted at various frequencies depending on the program or activity. All documents outline responsibility, frequency, and methods for monitoring activities and processes. Reviewed Verification for sanitation/ cleaning, shipping, refrigeration. QC, CP monitoring of chemical levels in the flumes etc.

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: Minor

Evidence: • Some testing results that were outside of control ranges were not corrected when deviation occurred from the document review.

Root Cause: The procedure did not clearly define the required actions, responsibilities, documentation, and escalation process for results outside established control ranges. In addition, employees responsible for reviewing the results did not ensure deviations were promptly investigated and resolved.

Corrective Action: The affected testing records were reviewed. Where possible, each out-of-range result was investigated, the disposition of affected product was verified, and the correction and corrective action were documented. Food Safety management was notified of any results that could have affected product safety or regulatory compliance.

Verification Of Closeout: Where possible, each out-of-range result was investigated, the disposition of affected product was verified, and the correction and corrective action were documented. Food Safety management was notified of any results that could have affected product safety or regulatory compliance. Employees responsible for reviewing the results did not ensure deviations were promptly investigated and resolved.

Completion Date: July 3, 2026 **Closeout Date:** September 16, 2026

Summary -

Response: Corrective action procedures are in place. i.e. Corrective action procedures are written when processes fall out of range. For Example: Temperature control of refrigeration falls out of range, corrective actions are in place and recorded to tolerance levels. Less than 650 MV outside of Control Limits Apple and Cherries. 40 - 100 ppm for PAA for Apples and lower control is 20 PPM Cherries flume water is constantly monitored and pumps maintained greater than 650 mv for Calcium Hypochlorite with Total Chlorine level PPM is >1 PPM maintaining a 100 PPM to 150ppm Free chlorine range. . Forms are filled out for adding more Chlorine as needed is present and verified on site for all of 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 audits are to be done annually as per SOP QP-04-09. Internal audits are done by an Outside Consultant. SQF Consultant. An annual audit was for the entire facility including lines and storage areas and internal audit completed on 6-15-2026. Monthly site audits are also present and completed by Gebbers Food Safety. 7 NC's were found and corrected prior to the audit. Form F-04-04 is a the SQF Practitioner and Trained in internal auditing . The consultant is an internal auditor and SQF Consultant for years. Some Correction are made and others are pending from the internal audit completed 14 day prior to the recertification audit. All issues raised that are pending are 'Minor" issues.

2.6.1 - Product Identification (Mandatory)

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Product Identification is done for all items in the warehouse. The SOP reviewed QP-06-02 describes how products are tracked at all stages. The company uses KPG, which identifies the product by the product description, date of receipt, PO#, case quantity, person Receiving Product. All product comes to the facility in

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bins with Lot tickets to ensure all product is identifiable from harvest through shipping to the customer.

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: All Fruit, packaging and post harvest waxes and aids are recallable and traceable as defined in the process and includes classes of recalls, the recall team, corrective actions. Mock recalls are conducted twice per year by Gebbers and once annually by Chelan Fresh Marketing. Form F-04-07 states the procedures for recall. The includes notification of FDA USDA and Merieux in the event of a recall with in 24 hours as stated. A mock recall is done 2 times annually for a specific customer and 1 times for SQF. A Trace and Mock recall were conducted on 7-1-2026 Cosmic Crisp 9/4 boxes packed on 6-4 to May 29 2026 4435 boxes packed. Order 91973. Grower Lot is A618. Ship date was on 5-25-2026. Gebbers Main. Shipped 840 9/4 master cartons to a specific customer in Monroe Township NJ. All other packed were in inventory and sold over a period of a month to other specific customer locations. Packing material and any post harvest chemicals applied are all retraceable as part of the recall plan.

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: The Crisis management plan is focused on crisis that could effect the facility and operations such as fires, floods, Epidemics and other localized natural or man-made disasters. SOP QP-06-03. The plan is written by a outside consultant. The Food Safety Management and the Company President/ 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 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 BHP Main Plant and for the Sales Organization Chelan Fruit. Tested on 3-36-2026. Internet outage effecting shipping department on January 15 2026 by BHP and Chelan Fresh. A back up internet through multiple connections are used in the event of on system going down to maintain the continuity of shipping. A manual system can also be used in the event of a completed shut down.

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. Method to maintain the integrity of the building and fruit security are in place. This includes visitors and employees. Employees have ID Cards and visitors sign in and out at the main office or Food Safety Office. at the facility. Signs are posted

exterior Doors are locked Company personnel are trained sight assessment Master Key list across both sites. Employees are encouraged to watch out for personnel or others not invited into the facility. The Food Safety Director and responsible for Food Defense of the fruit Doors are locked from the outside. Security cameras are sighted at shipping dock. Key are held with management only. Training is done for employees to watch for unauthorized personnel. A Food Defense Challenge is done annually. On June 25 2026 a test was done. Test of all exterior doors after hours at MAF Pre size and Shipping and main office. All doors in office and shipping closed MAF pre size had 3 doors not secure but a second cherry line ship was operating so people were in the next breezeway building area. All fruit, chemicals were secure.

2.7.2 - Food Fraud (Mandatory)

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: This site has developed and implemented a Food Fraud Mitigation Plan. A vulnerability assessment will be conducted annually and records of a review conducted in April 7 2026 for the main plant. At this time produce managed at this site was assessed as low risk Mitigating strategies practiced include maintaining raw product specifications, supplier relationships, conducting supplier audits, having a streamlined supply chain in order to improve transparency. A system for proper identification of all fruit is done to ensure organics and inorganics are not cross mixed or contaminated or labeled. Annual audits by the WSDA are completed to ensure no fraud or mis labeled product is present. 18

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: No allergens are stored in the facility from packing of Tree Fruits Cherries and Apples. Allergen Food was in the food handling area. QP 01-08 A training log for employees on Allergens is performed at hire and annually during the refresher trainings done by Gebbers Farms BHP for foods that employees could bring to the facility.

2.9.1 - Training Requirements

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

Response: Compliant

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

Response: Compliant

Summary -

Response: The SQF Practitioner is responsible for training, which includes both basic training in HACCP, SQF and GMPs, as well as specialized training in job-specific skills required in the warehouse. Training of Personnel is done annually. The training program includes training of all employees on Food Safety, GMPs, Loading, Pallet Jack, HACCP, Allergens, Sanitation, Food Defense, and worker position requirements Training records for all employee of the facility is sighted i.e. Sorter and Packing line personnel are trained in Hygiene annually. SQF Training is done for the Sanitation and cleaning crew by BHP Supervisors and outside consultants. Interviewed Line Chemical injection personal for Apples and Cherries. Trained internal and by Pace. Documents show training has been done in 2026 for all personnel on the SQF system and protocols. All training records are on paper forms in the Food Safety Office.

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: The SQF Practitioner, HR, Specific Supervisors are responsible for training. This includes both basic training in HACCP, SQF and GMPs, as well as specialized training in job-specific skills required in the warehouse. Training of Personnel is done annually and recorded. Training is conducted in English for Management supervisors and English/Spanish for Workers. A robust program is used based on Alchemy which was used in the past. A in house training system and matrix is used for training of all personnel. The training program includes training of all employees on Food Safety, GMPs, Loading, Pallet Jacks, fork Lift, HACCP, Allergens, Sanitation, Food Defense, and worker position requirements. Tests are conducted following training for GMPs and Food Safety. Instructions for all job functions are provided in the training manual and are available to relevant workers. Refresher training is performed annually. Refresher training for all employees has been conducted and records are maintained in a binder. Sighted and reviewed multiple date of trainings on Form F-01-02. for employee training for Apples and Cherries. 450 plus people with date of 5-27-2026 and various other dates 2-5-2026 for health hygiene allergen trainings. Training are done by supervisors and Food Safety. Trainings are ongoing year around for new and returning personnel. Training is done for Wesmar for Cleaning crew annually on 6-12-2026 for 12 People on the nightly crew. Pace (AgroFresh) also does training for Chemical monitoring on 6-8-2026 for a total of 7 people.

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 in good condition and is well maintained. The outside area is maintained and monitored and by internal staff and supervisors. The surrounding are mostly orchard and fallow land. The location and surrounding property do not pose a contamination risk. The facility is approved by The City of Brewster, Washington for packing for fruit. Business Lic for of Brewster raw 16-79768 Valid through 2026. Gebbers BHPO falls under the Produce Rule for FSMA.

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: Compliant

Summary -

Response: The 3 main building on site are maintained. Floors are observed to be smooth, impact-resistant, and sloped towards the floor drains. Floors are sloped to floor drains; no standing water was observed. Drains were constructed in a manner that allows for ease of cleaning. Drains were observed very clean and well maintained. Walls, partitions, ceilings, and doors were observed constructed of materials suitable for food Packing. Wall to floor, and wall to wall junctions were properly sealed and no accumulation of debris was observed. There are no windows in the produce handling areas and all doors are solid. Stairs and catwalks are protected with stainless Steel plates and 3 inch lip. Repacking for apples is done in building 2 and building 3 near shipping. Pre op inspections are done and all employees have appropriate amenities near the packing areas. Glass in the facility is protected for shattering.

10.1.3 - Dust, Insect, and Pest Proofing

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: External doors and other openings were observed to be properly sealed to prevent entry to pests or dust. The doors, including personnel access doors are self-closing and were observed closed when not in use. Adequate provision is made for sealing around trucks in docking areas. Insect light traps are not present. Interior traps are tin cats and are properly located along the perimeter wall with a numbering system. Pest control chemical are not stored on-site.

10.2.1 - Equipment and Utensils

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: The line equipment is designed by MAF and designed for packing of cherries. Apple packing lines (4) are all designed for packing of Apples exclusively. Cherry Lines (2) are all designed for packing and are cleanable. There are forklifts in the facility. Produce storage racks and calibrated equipment were observed well maintained. Protective clothing (gloves and hairnets) are provided. Racks for clothing are provided near the break and restroom. All cleaning aids are identified and stored in a locks closet on site. All containers are well marked for intended purpose. Fork lift are propane and electric. Propane is used mostly outdoors and transferring fruit from rooms to the packing facility.

10.2.2 - Equipment Maintenance and Repair

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

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

Response: Minor

Evidence: • Preventative maintenance is lacking in some areas of the facility in timely repair of issues raised. i.e. Door Jams. Door Sweeps, metal surfaces repair and plastic dividers at dump tank.

Root Cause: Maintenance issues identified during inspections were not consistently entered into the centralized tracking system, prioritized according to food safety risk, assigned a completion date, and followed through to closure. Communication and follow-up between Maintenance, Operations, and the Food Safety Department were insufficient to ensure repairs were completed promptly.

Corrective Action: The identified maintenance issues and F and G Lines were documented and evaluated for potential food safety risks. Temporary controls were implemented where needed to protect exposed product. Damaged door jambs, door sweeps, metal surfaces, and plastic dump-tank dividers were repaired or replaced. The areas were inspected and cleaned before being returned to use. Conducted training with supervisors while revieweing Personnel Processing Practices and Equipment Maintenance. Photos of areas where the plastic shields were removed.

Verification Of Closeout: The identified maintenance issues and F and G Lines were documented and evaluated for potential food safety risks. Communication and follow-up between Maintenance, Operations, and the Food Safety Department were insufficient to ensure repairs were completed promptly. Food Safety and maintenance will have monthly inspections and Food Safety will inspect and make sure PM's are adhered to

Completion Date: August 3, 2026 **Closeout Date:** September 16, 2026

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: SOP F-03-31 is reviewed on site. There are the Three mechanics on site at all times. There is a maintenance schedule written down. Maintenance work activity is recorded. i.e. Belts replace and Cup sizers replaced. Sighted training records maintenance staff. The maintenance team have 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. No temporary repairs are seen. Lubricants are stored and well repair log each monthly march thru May reviewed. Chain replace on sizer belt. Training records for training on GMPs and Food Safety are present and ongoing training is sighted throughout the year. Compressed air is used for Cherry sorting and for Apple Bagging. Hepa filter is replaced annually in October of each year. The latest test of the air was on 11-13-2025 30cfu/100l ambient and compressed are 2 cfu/100ml. Eurofins air test. Apple and Cherry Compressor air. Preventative maintenance is lacking in some areas of the facility in timely repair of issues raised. i.e. Door Jams. Door Sweeps, metal surfaces repair and plastic dividers at dump tank.

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 Team of 10 personnel handle all maintenance during production employed by Gebbers BHP. A list of contractors is reviewed for those needing access or work in the facility. Trucks maintained by Gebbers Farm Mechanics, Double Kold and Shifflet refrigeration is used for maintaining the refrigeration systems. Sprague Pest control, Pace and Decco for Chemical all are in the facility for contracted work. All work is done after the line is down per policy for maintenance. Pace monitors pumps weekly. Sprague Pest control inspect monthly.

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: Reviewed the following procedures: Work Procedure Packing Line Equipment Calibration Instructions, refrigeration, Thermometers, Scales, ORP injection pumps fungicide applications for Cherries and PAA spray bars is completed by Agro Fresh/Pace completed weekly for Apples. Sighted in the external calibration records were verification activities. Washington State Weights and Measures and Western Scales are used for scale calibration. ORP for the hydrocooler and flumes are calibration by Pace Instrumentation week and daily calibration is done by BHP Brewster for Scales 6-4-2026. Refrigeration probes are calibrated annually by Double Kold multiple times annually. 6-10-2026 latest calibration on BHP Main common storage rooms main building.

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 and interior and exterior. Sprague Pest Control is used to help with the pest control program. Bait station are used outside the buildings and tin cats inside. Monitoring records on file, externals twice per month, internal weekly. Pest Control procedures sighted: -Packing line Quarantine. -Pest Control Work Procedure). A licensed pesticide operator in Washington state Lic # 111592 does the inspection. Records are held in the Pesticide binder from Sprague and Service Reports. reviewed pest control reports for each month in 2026. 6-18-2026 Report 4821945 is reviewed with trending done for the facility. Reports show minor activity and the plant is well controlled.

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: Compliant

Summary -

Response: A cleaning and line sanitation program is written for the entire facility. Document P-03-15 show: A Lead Sanitation manager with a crew of 12 cleans and sanitizer 7 days weekly. The Food Safety manager oversees all cleaning. Wesmar Chemicals is hired to help train personnel with the cleaning program. ATP testing on zone one contact surfaces is completed daily. ATP swabbing is used to used to verify the effectiveness of the cleaning program on zone 1. Reviewed records for "Daily Shed Cleaning Log" for each line. Pre operational inspections are done by supervisors on each line and presented to the Food Safety Manager each morning. Records show Form P-03-15 stated the procedures for sanitation and cleaning of Zones 1-4. Sighted procedures for: -Main production Room and presize operations on what is to be cleaned and sanitized each day of production. Sighted inventory and SDS for: -Pac Chlor 12.5% . -Natures Shield 440-BF . -Shield-Brite FDL . -Result degreaser. -Accutab . D Brite Plus . -Orange Citrus Clean. -Sodium Thiosulfate (is 5-22). - Clor Cling 525. Form P-03-15 has the manifest of approved cleaners and sanitizers. Cleaning jugs and barrels are taken back to the supplier for proper disposal. Agri Plas in Pasco WA picks up the plastic containers. Reviewed records for: environmental lab results for 40 randomized swabs monthly (listeria, salmonella, E.coli) of belts, debris table, rollers brushes , Belts and drains. ATP Testing is done daily using a Hygiena suretrend tester. Records show counts and corrective actions for recleaning if positive counts. All areas of the facility are cleaned at a rate frequency and effectiveness for all contact and non contact areas. I.e. singulators and belts are cleaned inspected and tested daily. Protective clothing for cleaning is sighted and well maintained. Racks in break rooms are present for personnel belongs. All smocks etc. are on hooks in side the facility. Mixing tubs are well marked for intended use and equipment is properly stored. Pre operational inspection are done daily prior to start up and walks are made in the facility through out the day Form F-03-30. ATP testing is done after each cleaning to verify cleaning effectiveness. Chemicals are stored in a locked closet and appropriate for cleaning amenities. All containers are properly disposed of in an onsite dumpster. Food Safety oversees all cleaning operations for all lines in the facility.

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: Minor

Evidence: • Glove are not always worn as required for packing line personnel.

Root Cause: Glove-use requirements were not consistently reinforced or monitored by line supervisors. Some employees did not fully understand when gloves were required, and routine GMP inspections did not adequately identify and document noncompliance.

Corrective Action: Supervisors were trained on requirements, implementation and control of the use of gloves by production line workers and are authorized to enforce glove policies. Training is attached, Item #25 - QP-01-08

Verification Of Closeout: Dur to lack of supervision on the packing line and lack of enforcement gloves were not all being worn as required in the SOP for packing. Some employees did not fully understand when gloves were required, and routine GMP inspections did not adequately identify and document noncompliance.

Completion Date: August 10, 2026 **Closeout Date:** September 16, 2026

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: An SOP is present for inspection of Personnel daily prior to start up A policy is in place in the SOPs and training is sighted on for all employees. All employees agree to the polices at training. Interviews of supervisors on start up procedures and hygiene and employee inspection was done and meet SOP's as written. Supervisor ensure hand washing protocols were observed compliant with written policy. Gloves are not always worn as required for packing line personnel. No observation of food or packaging materials on the floor. Waste containers were properly identified and hoses securely stored off the floor. Supervisors are present managing all personnel.

10.4.2 - Sanitary Facilities and Handwashing

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: There are 35 stalls and 4 restroom areas for all packing areas in the 3 buildings on site. Temporary toilets and handwash stations are provided as well incase of overflow during peak times. All a plumbed with hot water liquid Soap and paper towels. 300 personnel at the Apple and Cherry lines between all shifts. Hand washing basins are in the restroom and outside on the production floor. Portables are brought in during the Cherry season to handle the extra work force. Drains are connected to the City Sewer system. Hand washing basins made of Stainless steel or temporary handwashing is plastics. The restrooms on site are well-supplied hands-free operated hand wash sink was observed at the entrance of the storage and repack area. Hand wash signs were observed posted next to all hand wash sinks and in the break room. Personnel entering the warehouse were observed washing their hands as trained at permanent and portable hand wash stations.

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: Minor

Evidence: • Some gloves are not stored correctly when on breaks at the packing line.

Root Cause: Glove-use requirements were not consistently reinforced or monitored by line supervisors. Some employees did not fully understand when gloves were required, and routine GMP inspections did not adequately identify and document noncompliance.

Corrective Action: Supervisors were trained on requirements, implementation and control of the use and storage of gloves by production line workers and are authorized to enforce glove policies. Training is attached, Item #25 - QP-01-08

Verification Of Closeout: Gloves are now being worn by all employees as per GMP as stated in the SOP. Food Safety and supervisors will enforce the policy. Monthly GMP inspections did not adequately identify and document noncompliance.

Completion Date: August 10, 2026 **Closeout Date:** September 16, 2026

Summary -

Response: Uniforms are not required. Clothing worn by personnel was observed clean and in good condition. Disposable gloves, hairnets, sleeves and beard nets were observed worn and changed as required. The only jewelry that can be worn is a single plain wedding band and medic alert bracelet. Jewelry was not observed worn during the audit. PPE is stored in controlled areas of the facility and is stored in a dry and secure manner for cleaning purposes.

10.4.4 - Visitors

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

Response: Compliant

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

Response: Compliant

Summary -

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

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: The staff break rooms was observed adequately lit and well ventilated at four locations including a portable tent structure brought in during Cherry season. No changing rooms are needed. The break room is located in a designated location away from processing or packaging areas. Refrigerators, microwaves, tables. Sinks and Potable water are present. Outside eating area are present as well and maintained. All areas are well kept and tidy.

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: Minor

Evidence: • Some food items were present in non food areas on fork lifts and breeze ways.

Root Cause: Employees were not consistently following the facility's designated eating-area requirements. The policy was not adequately reinforced, and routine supervisory and GMP inspections did not consistently identify and correct food stored or consumed in unauthorized areas.

Corrective Action: The food items were immediately removed from the forklifts and breezeways. The affected areas were inspected and cleaned as necessary. Employees involved were reminded that food may only be stored and consumed in designated break or lunch areas. All supervisors trained and instructed to enforce this policy. Training attached.

Verification Of Closeout: Food policy is strictly enforced by supervisors after some employees were not following the SOP and GMP of the facillity. GMP inspections did not consistently identify and correct food stored or consumed in unauthorized areas. Supervisor accountability is now being done by Food Safety to ensure policy is

adhered to.

Completion Date: August 10, 2026 **Closeout Date:** September 16, 2026

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: Personnel observed were following the GMP's for packing of Apples and Cherries . All product is QC at arrival. Cherries are sent through a hydro cooler with Sodium Hypochlorite and PAA in the Volm Packer. Apples are drenched and QC determines for short or long term storage. All Apples and Cherries are inspected for quality, fruit fly and condition. Supervisors inspect the employees at the beginning of each shift. Cherries are inspected at various locations on the packing line and are following procedures. All Apples and cherries are brought to the facility on straddle carriers or refrigerated vans. Truck inspection logs are present for each incoming load. All finished product is separate from raw product Packing materials. Some food items were present in non food areas on fork lifts and breeze ways.

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: Minor

Evidence: • Box cutter was found on packing trays and not controlled.

Root Cause: The box-cutter control procedure was not consistently followed or enforced. Employees had not been adequately trained on proper storage and accountability, and supervisory inspections did not include verification that box cutters were secured and accounted for.

Corrective Action: The box cutter was immediately removed from the packing tray and secured in its designated storage location. The packing trays and surrounding product-contact area were inspected for loose or broken blade pieces. Supervisors were trained on managing glove program correctly. Training attached

Verification Of Closeout: A storage location is present for box cutters and box cutter are being controlled by being checked in and out daily. Supervisory inspections did not include verification that box cutters were secured and accounted for.

Completion Date: August 10, 2026 **Closeout Date:** September 16, 2026

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: Visual and Electronic inspections are done by sorting Apples and Cherry Packing, QA of finished product to ensure no product contamination. Environmental testing is done listeria weekly and E.coli and Salmonella testing monthly. Sighted numerous documents for prior 2 weeks of inspections show inspection are done. No temporary repairs are observed during the inspection. A glass register is present form F -04-15 showing all glass and hard plastics. Box cutter was found on packing trays and not controlled.

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: N/A

Evidence: • None present

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

Response: N/A

Evidence: • None Present

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: N/A

Evidence: • None present

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: An SOP is in place for product no meeting legislation or customer requirements is to be placed on hold with a red card and placed in storage for rework or disposal A glass clean up and chemical spill procedure is sighed in the SOP. No metal detection or other devices are used.

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: Loading and unloading SOP are written into the program. Trained personnel are documented for loading procedures. All incoming fruit is separate from finished product. Truck inspection sheets are provided and recorded for each load of incoming and outgoing trailer. Seals are used per customer requirement. All fruit is stored at 33 degrees during transportation. A recorder is added for LTL load and per customer requirement. Load sheets are reviewed and completed show inspection and proper loading instructions are being met.

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 City of Brewster Washington Municipal system. There is also wells present in the event of a water shortage or issue with the main supply. Water samples are taken from the site and analyzed for microbes at IEH on June 1 2026. Negative coliforms at incoming water accredited laboratory (Cert exp. 4/20/27). Samples were obtained from the warehouse handwash sink. Testing is done quarterly but only annual is required. Water is provided by a pressurized underground piping system in the City of Brewster WA. A water hold pond is on site for temporary use should the municipal water become not available.

10.6.2 - Water Treatment

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Water is treated at the Hydro Cooler dump tanks and water Flumes. Minimum 650 mv. Is to be met. Calcium Hypo Chlorite is used in the Water Flume and records of testing is present. Test of water for potability was completed on June 1 2026 by IEH and ISO 17025 LAB. Results are negative for Coliform. An evaporation pond is used for spent water. Water is treated at the Hydro Cooler dump tanks and water Flumes. Minimum 650 mv. Is to be met. Calcium Hypo Chlorite is used in the Water Flume and records of testing is present.

10.6.3 - Water Quality

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Water is supplied by the City of Brewster WA. Hot an cold water is present. Backflow devices are inspected and maintained in good condition annually by The City of Brewster WA. Only potable water is delivered and used. Water samples are analyzed by Eurofins an ISO17025:2005 accredited laboratory (Cert exp. 5/7/27) annually. Test results dated 6/1/26 were reviewed and all water is tested as potable at the incoming water pump. Samples were taken at the incoming water valve.

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: An air test is done for the cherry and Apple Lines. Cherries used compressed air to blow cherries for sizing. Apples use compressed air for bagging. Eurofins does the testing annually. A test is sighted for 20cfu/100ml which is deemed passing.

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: Compliant

Summary -

Response: Storage racks and pallets were observed constructed of approved materials. Racks were observed clean and well maintained. Vehicles used in the warehouse are electric. Gas fork lifts are used in outside and cold storage areas. All were observed well maintained. The FIFO method for stock rotation is used. No other storages exist. The facility also has CA rooms for Apple Storage which are packed in Brewster WA.

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: Multiple Cold Storages and CA storage are on site and off site. The coolers and dock area are on independent thermometers to verify temperature. The Refrigerators are fitted with a catch basin and drainage. In addition, there is a policy to not store products directly under the chillers. Temperature monitoring records are maintained in a designated binder. The cold storage temperature are maintained at 33 to 38 degrees. Tunnel cooling is used for cherries as well to get temperature down to 33 degrees. Thermometers are maintained calibrated and temperatures were correct.

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 to authorized personnel. Chemicals are separate from all other materials on site. Storage area is compliant for storage of chemicals inventoried with inventory and usage logs present. All equipment is designed for chemical application and labeled appropriately for each chemical used. Chemicals used in the dump tanks are stored outside and not secure.

10.9.1 - Waste Management

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: Waste collection areas were observed clean and well maintained. Waste was not overflowing and trash compactors were not leaking. Waste bins were maintained in a serviceable condition and were not overflowing. Inedible waste is clearly identified and properly stored. The effectiveness of waste removal is verified during daily inspections. Zippys Waste disposal.