

Company Number: 5673  
Audit Number: 3535653

## SQFI Audit Report Edition 9

I. Company Information					
<b>Company Name</b>	Colo-Pac Produce, Inc.			<b>Company #</b>	5673
<b>Address</b>	4345 Oneida Street				
<b>City</b>	Denver	<b>State</b>	Colorado	<b>Zip Code</b>	80216
<b>Country</b>	United States	<b>Phone #</b>	303-291-0155		
<b>Primary Contact</b>	Angel Mondragon	<b>Email</b>	Angelm@colo-pac.com		
<b>Food Sector Categories</b>	26 - Storage and Distribution				
<b>Modules Audited</b>	Storage and Distribution Module 2 Good Storage and Distribution Practices Module 12				
<b>Certified Products</b>	Ambient and Refrigerated Storage and Distribution				

II. Certification Body					
<b>Certifying Body</b>	NSF Certification LLC			<b>CB #</b>	CB-1-NSF
<b>Address</b>	789 N. Dixboro Rd.				
<b>City</b>	Ann Arbor	<b>State</b>	MI	<b>Zip Code</b>	48105
<b>Country</b>	United States of America	<b>Phone #</b>	(734) 769-8010		
<b>Accreditation Body</b>	ANSI Accreditation Program	<b>Accreditation Number</b>	1181		

III. Audit Schedule			
<b>Certification Type</b>	Recertification	<b>Audit Level</b>	HACCP-Based Food Safety
<b>Start Date</b>	30/Nov/2023 09:30:00 AM	<b>End Date</b>	01/Dec/2023 02:15:00 PM
<b>Scope of Certification</b>	Exclusions: Scope: Ambient and Refrigerated Storage and Distribution		

IV. Audit Team			
<b>First Name</b>	<b>Last Name</b>	<b>Person #</b>	<b>Role</b>
Michelle	Muse	129499	Lead Auditor

V. Audit Duration			
<b>Actual Start Date</b>	30/Nov/2023 09:30:00 AM	<b>Actual End Date</b>	01/Dec/2023 02:15:00 PM
<b>Hours Spent on Site</b>	12	<b>Hours Spent Writing Report</b>	8

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<b>Hours of ICT Activites</b>	NA		
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VI. Certification Decision			
First Name	Last Name	Person #	Role
Michael	Govro	208245	Technical Reviewer
<b>Certificate Decision Date</b>	08/Dec/2023	<b>Certificate Issue Date</b>	11/DEC/2023
<b>Audit Score</b>	99	<b>Audit Rating</b>	Excellent
<b>Certification #</b>	C0212407-SQF9		
<b>Re-certification Date</b>	04/DEC/2024	<b>Expiration Date</b>	17/FEB/2025
<b>Surveillance Audit Due Date</b>		<b>Certification Decision</b>	Certified

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VII. Non-Conforming	
	Evidence
<b>Clause</b>	12.5.2.1 Microbiological analysis of the water and ice supply that comes into contact with food or food contact surfaces shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Verification, at minimum, shall be made annually.
<b>Response</b>	Minor
<b>Evidence</b>	The water has not been tested for micro within the last year. It was last tested on 10/19/2022.
<b>Root Cause</b>	During the annual internal review, both SQF practitioners failed to complete the microbiological test for water. There were no safety nets in place to prevent them from missing this test, such as a calendar reminder, during the review
<b>Corrective Action</b>	Both the SQF Practitioners have set a repeating calendar reminder for the first week of October. This will ensure that the microbiological water sample will not be forgotten going forward.
<b>Verification of Closeout</b>	Approved based on attached test results. BH
<b>Completion Date</b>	08/Dec/2023
<b>Closeout Date</b>	24/Dec/2023

Audit Statements		
	Item	Evidence
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas)	Angel Mondragon: Plant Manger/SQF Practitioner, Andrew Owens: PCQI/Substitute SQF Practitioner, and Michelle Muse: Lead Auditor
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details)	Colo -Pac Produce, Inc. is located in an industrial area. The scope of certification is category 26: repacker of fresh fruits and vegetables. The facility repacks tomatoes, vegetables, and some fruits. The facility also does receiving, storage, and distribution. Eggs are also stored in addition to produce. This was an announced audit to the SQF Version 9 Storage and Distribution Module. There are two buildings: building B is 16,000 square feet and distributes fresh produce and eggs and building A is 18,763 square feet and repacks tomatoes and vegetables. There are 6 coolers in building

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		A and 2 coolers in Building B. There are 64 full time employees. The facility is open from 4 am to 2:30 pm 6 days per week Monday through Saturday. The produce is only shipped within the state of Colorado.
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)	Angel Mondragon: Plant Manger/SQF Practitioner, Andrew Owens: PCQI/Substitute SQF Practitioner, and Michelle Muse: Lead Auditor
Auditor Recommendation	Auditor Recommendation	Issue of Certification of Registration recommended once deficiencies rectified

### 2.1.1 Management Responsibility Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
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 all site personnel in language(s) understood by all site personnel.	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, documentation, and communication to all relevant staff of food safety objectives and performance measures; ii. Adequate resources are available to meet food safety objectives; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Staff are informed and held accountable for their food safety and regulatory responsibilities; v. Staff are positively encouraged and required to notify management of actual or potential food safety issues; and vi. Staff are empowered to act to resolve food safety issues within their scope of work.	Compliant	
2.1.1.3	The reporting structure shall identify and describe 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. Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.	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; 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.	Compliant	
2.1.1.5	The primary and substitute SQF practitioner shall: i. Be employed by the site; ii.	Compliant	

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	Hold a position of responsibility in relation to the management of the site's SQF System; iii. Have completed a HACCP training course; iv. Be competent to implement and maintain HACCP-based food safety plans; and v. Have an understanding of the SQF Food Safety Code: Storage and Distribution and the requirements to implement and maintain an SQF System relevant to the site's scope of certification.		
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 meet the required competencies to carry out those functions affecting the legality and safety of food products.	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.	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.	Compliant	

**SS 2.1.1 Management Responsibility Summary**

The site has a food safety commitment statement that senior management has implemented. It was signed by the President and the SQF Practitioner on 11/6/2023. The policy statement covers customer and regulatory requirements and the use of continuous improvement of the system. The policy is communicated to the facility's staff in a training. The policy statement is posted in English and Spanish in both buildings at the hand wash sink. An organizational chart dated 10/6/2023 outlines the structure of staff having responsibility for food safety. Senior management has communicated this to the organization and provides the resources for implementation of the food safety systems. The Plant Manager is the designated SQF Practitioner, is a full-time employee of the facility and has a FSMA Preventive Controls certificate dated 3/10/2022 and a HACCP certificate dated 11/4/16 from the International HACCP Alliance. The PCQI is the Substitute SQF Practitioner and he has a FSMA Preventive Controls certificate dated 9/22/2022. The SQF Practitioner is responsible for the development, implementation, and maintenance of the SQF System. Job descriptions are written for staff responsible for food safety with coverage for absenteeism assigned. Job descriptions for were reviewed for the Customer Service Representative and Plant Manager and were found to contain alternates. Plant staff is required to report food safety issues to management. Employees are trained to report any food safety issues to management. There are adequate resources to maintain food safety culture. Senior site management has processes in place to demonstrate continuous improvement and to ensure the integrity of the food safety systems when there are organizational or personnel changes. The food safety culture objectives are: SQF audit goal of Excellent, all documents validated and verified monthly, and food safety training completed within 14 days of hire and these are discussed in the monthly management reviews.

**2.1.2 Management Review Module 2 Storage and Distribution**

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Element	Description	Primary Response	Evidence
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. 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.	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.	Compliant	
<b>SS 2.1.2 Management Review Summary</b>			
<p>There is a "Management Review" policy dated 11/18/16. The entire SQF System is reviewed annually by the Plant Manager/SQF Practitioner, President, Corporate Secretary, and Treasurer. The annual management review was done on 10/6/2023 and the following topics were discussed: key performance indicators, management commitment for the SQF audit, customer complaints, supplier management, vendor performance, internal audit results, food defense/food fraud, verification and validation, and facility/building corrective actions. Monthly management reviews included the Plant Manager/SQF Practitioner, President, Corporate Secretary, Treasurer, and PCQI/Substitute SQF Practitioner. These were reviewed for 1/12/2023, 2/16/2023, 3/16/2023, 4/19/2023, 5/15/2023, 6/14/2023, 7/26/2023, 8/16/2023, 9/20/2023, 10/11/2023, and 11/22/2023 and included the following topics: control points, internal and external audits, customer complaints, pest control program, environmental testing, food defense program, and food safety culture objectives.</p>			

### 2.1.3 Complaint Management Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
2.1.3.1	The methods and responsibility for handling, investigating, and resolving food safety complaints from commercial customers, consumers, and authorities, arising from products stored or handled on-site shall be documented and implemented.	Compliant	
2.1.3.2	Adverse trends of customer complaint data shall be investigated and analyzed and the root cause established by personnel knowledgeable about the incidents.	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.	Compliant	

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	Records of customer complaints, their investigation, and resolution shall be maintained.		
<b>SS 2.1.3 Complaint Management Summary</b>			
<p>The site's written Complaint policy is found in the document "Complaint Program." It defines the methods and responsibilities for handling customer complaints and has been implemented. The investigation of complaints is handled by the SQF Practitioner with corrective actions and records kept of each complaint and resolution. There is a binder of complaints and each complaint includes a description of the problem, possible cause, action taken, and whether the customer wants it replaced. The following employees sign off on each complaint: Officer, Plant Manager, Salesman, and Warehouse Manager. Detailed complaints were reviewed for 12/13/2022, 4/29/2023, 5/23/2023, 5/29/2023, and 5/30/2023 for shorts due to mis-picks and credits were issued. The scans were correct so these issues were thought to be due to driver errors. Detailed complaints were reviewed for 1/9/2023 for avocados, 5/20/2023 for avocados, 5/30/2023 for tomatoes, and 11/9/2023 for strawberries with poor quality due to bad cases. Credits and return merchandise authorizations were given. Detailed complaints were reviewed for bananas too green for 10/25/2023 and credits were given. Complaint trend reports were available for January to December of 2023 and were broken into: quality (soft/decay), wrong item, item not picked, and input errors/office. There were minimal input errors.</p>			

<b>2.2.1 Food Safety Management System Module 2 Storage and Distribution</b>			
<b>Element</b>	<b>Description</b>	<b>Primary Response</b>	<b>Evidence</b>
2.2.1.1	The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Storage and Distribution shall be maintained in electronic and/or hard copy documentation. It will be made available to relevant staff and include: i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard; ii. The food safety policy statement and organization chart; iii. The processes and products included in the scope of certification; iv. Food safety regulations that apply to the site and to the country of sale (if known); v. Raw material, ingredient, packaging, and finished product specifications; vi. Food safety procedures, pre-requisite programs, food safety plans; vii. Process controls that impact product safety; and viii. Other documentation necessary to support the development and the implementation, maintenance, and control of the SQF System.	Compliant	
2.2.1.2	Food safety plans, Good Storage and Distribution Practices and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any changes implemented have an impact on the site's ability to deliver safe food. All changes to food safety plans, Good Storage and Distribution Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the changes shall be documented.	Compliant	



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**SS 2.2.1 Food Safety Management System Summary**

A food safety manual has been developed and is maintained in hard copy and electronic form and is maintained by the SQF Practitioner. The food safety manual contains the scope of the certification, a list of products in the scope, the organizational chart, and food safety policies, programs, and procedures that make up the site's SQF System. It is made available to all relevant staff as all polices are listed in binders in the conference room.

**2.2.2 Document Control Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
2.2.2.1	The methods and responsibility for maintaining document control and ensuring staff have access to current requirements and instructions shall be documented and implemented. Current SQF System documents and amendments to documents shall be maintained.	Compliant	

**SS 2.2.2 Document Control Summary**

The site has implemented its policy called "Document Control and Record Retention" dated 11/18/16 defining the methods and responsibilities for document control. Records were found during the audit to be readily accessible and properly stored. A current list of all SQF documents is maintained and documents were observed to be stored securely and are accessible. The register of SQF documents is called "Standard Operating Procedures (SOPs) and Registers." All documents were updated on 10/17/2023.

**2.2.3 Records Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
2.2.3.1	The methods, frequency, and responsibility for verifying, maintaining, and retaining records shall be documented and implemented.	Compliant	
2.2.3.2	All records shall be legible and confirmed by those undertaking monitoring activities that demonstrate inspections, analyses, and other essential activities have been completed.	Compliant	
2.2.3.3	Records shall be readily accessible, retrievable, and securely stored to prevent unauthorized access, loss, damage, and deterioration. Retention periods shall be in accordance with customer, legal, and regulatory requirements, at minimum the product shelf life, or established by the site if no shelf life exists.	Compliant	

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**SS 2.2.3 Records Summary**

The site has implemented its policy for verifying and retaining records found in the document called "Document Control and Record Retention." The facility has documented procedures for recording production as well as the proper correcting and initialing of errors. These are based on customer, company and regulatory requirements. Records were observed to be readily accessible, legibly filled out, securely stored to prevent damage and have documented retention times. Records are retained for 2 years on-site in the conference room and electronically.

**2.3.1 Product for Storage and Distribution Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
2.3.1.1	Product handling and storage requirements for all products received, stored, and intended for distribution, shall be documented, current, approved by the site and their customer (if applicable), accessible to relevant staff, and include temperature requirements, storage conditions, packaging requirements, and handling and transportation conditions.	Compliant	

**SS 2.3.1 Product for Storage and Distribution Summary**

There is a product list that shows a description of the products. The HACCP risk assessment lists the products and whether the items should be refrigerated or ambient. Customers that have specific requirements for sorting tomatoes or repacking produce put in specific orders through a computer program that outlines the quantities of product and the configuration for repacking. Specifications were reviewed for the limes, tomatillos, red seedless grapes, green bell peppers, jalapenos and these included the case size, case dimensions, and pallet ti and hi. There was also a list of repacked items and it included the customer item numbers, description, item number, and specifications.

**2.3.2 Supplier Approval and Incoming Supplies Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
2.3.2.1	The methods and responsibility for developing and approving product descriptions shall be documented. Product descriptions for all incoming supplies used by the site but not intended for distribution, including, but not limited to hazardous chemicals, ice, food packaging materials, or janitorial supplies that are used on-site and impact on product safety shall be documented and kept current.	Compliant	
2.3.2.2	All incoming supplies shall comply with the relevant legislation.	Compliant	

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2.3.2.3	Incoming supplies shall be verified to ensure product safety is not compromised and the material is fit for its intended purpose. Verification of incoming materials shall include a review of the product description to determine conformance.	Compliant	
2.3.2.4	Incoming goods that may have an impact on product safety shall be supplied by an approved supplier. The responsibility for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented.	Compliant	
2.3.2.5	Incoming goods received in emergency situations shall be acceptable provided they are inspected or analyzed before use and the supplier has been evaluated.	Compliant	
2.3.2.6	Incoming goods and packaging received from other sites under the same corporate ownership shall be subject to the same product requirements and approved supplier requirements as all other material providers.	Compliant	There are not any sister sites.
2.3.2.7	Specifications, product requirements, and incoming supplies shall be reviewed annually or as changes occur.	Compliant	

**SS 2.3.2 Supplier Approval and Incoming Supplies Summary**

There is a "Supplier Management Program" dated 10/28/2021. The program allows for the use of emergency suppliers but none have been used within the last year. The boxes and bags used for repacking are on the raw material register. There is a list of approved suppliers for produce. There are letters of guarantee for the boxes used for repacking, the poly bags used for repacking, and the plastic trays used for repacking. The letters show they are food grade. A third party audit was available for the supplier of chipboard. Third party audits were reviewed for the suppliers of cucumbers, eggplants, and tomatoes. The vendors were evaluated on 10/6/2023 by the Plant Manager/SQF Practitioner. There are not any sister sites.

**2.3.3 Contract Service Providers Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
2.3.3.1	Description of services for contract service providers that have an impact on product safety shall be documented, current, include a full description of the service to be provided, and the relevant food safety training requirements of all contract personnel prior to conducting work.	Compliant	
2.3.3.2	Contracted services that have an impact on product safety shall be reviewed against the description. The methods and responsibilities for contracted services review shall be documented and validated as needed or at a minimum of annually.	Compliant	
2.3.3.3	A record of all contract service descriptions that have an impact on product safety shall be maintained.	Compliant	

**SS 2.3.3 Contract Service Providers Summary**

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Descriptions of services provided by all contract service providers having an impact on food safety are documented on the Contract Service Provider Register. It was found to include the following companies: chemical supplier, truck leasing, back-flow, and pest control. Contracts were reviewed for the pest control company, trash removal company, and HVAC company.

### 2.3.4 Contract Third-Party Storage or Distributor Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
2.3.4.1	The methods and responsibility for ensuring all agreements relating to food safety and customer product requirements and its realization and delivery are specified and agreed shall be documented and implemented.	Not Applicable	There are not any contract storage providers.
2.3.4.2	The site shall: i. Ensure changes to contractual agreements are approved by both parties and communicated to relevant personnel; ii. Verify compliance with the SQF Code and that all customer requirements are being met at all times.	Not Applicable	There are not any contract storage providers.
2.3.4.3	Records of all contract reviews and changes to contractual agreements and their approvals shall be maintained.	Not Applicable	There are not any contract storage providers.
<b>SS 2.3.4 Contract Third-Party Storage or Distributor Summary</b>			
There are not any contract storage providers.			

### 2.4.1 Food Legislation Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
2.4.1.1	The site shall ensure that food stored and delivered to customers is handled in a manner that complies with the relevant legislation in the country of its production and destination.	Compliant	
2.4.1.2	The methods and responsibility for ensuring the site 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.	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	Compliant	

by email to [foodsafetycrisis@sqfi.com](mailto:foodsafetycrisis@sqfi.com).

#### SS 2.4.1 Food Legislation Summary

There is a "Food Legislation" policy dated 10/28/2021. The site has ensured that products delivered to its customers comply with regulatory requirements in the country of use. Regulatory compliance for this operation includes the FDA and USDA. Senior Management is responsible for keeping up with current legislation. The site keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by means of subscribing to FDA and USDA alerts and getting the monthly AIB newsletter. The facility also includes the country of origin on the products. The "Recall and Traceability" program states that the Recall Coordinator will contact NSF and SQFI within 24 hours upon a product recall.

### 2.4.2 Good Storage and Distribution Practices Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
2.4.2.1	The site shall ensure the Good Storage and Distribution Practices described in Module 12 of this Food Safety Code are applied 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.	Compliant	
2.4.2.2	The Good Storage and Distribution Practices applicable to the scope of certification that outline how food safety is controlled and assured shall be documented and implemented.	Compliant	

#### SS 2.4.2 Good Storage and Distribution Practices Summary

The property, buildings, and equipment are located, constructed, and designed to ensure food is manufactured in a safe, hygienic environment. The site has written and implemented those Good Manufacturing Practices applicable to the scope of this certification. These food safety pre-requisite programs are found in the SQF Manual. The effectiveness of the pre-requisite programs has been verified based on a verification schedule.

### 2.4.3 Food Safety Plan Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
2.4.3.1	A hazard and risk management system shall be developed and take into consideration relevant legislation in all countries of operation. The system shall be risk based, systematic and comprehensive, and based on HACCP or	Compliant	

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	preventive controls. The food safety plan shall be effectively implemented, maintained, and outline the means by which the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one food safety plan may be required to cover all products included in the scope of certification.		
2.4.3.2	The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, storage and distribution, and facility /maintenance knowledge of the relevant products and associated processes. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.	Compliant	
2.4.3.3	The scope of each food safety plan shall be developed and documented including the start and endpoint of the processes under consideration and all relevant inputs and outputs.	Compliant	
2.4.3.4	Product requirements shall be developed and documented for all products (or groups of products) included in the scope of the food safety plans. This shall reference the product descriptions (refer to 2.3.2.1) plus any additional information relevant to product safety, such as temperature for storage, how the product is packaged, allergen requirements, raw or cooked, etc.	Compliant	
2.4.3.5	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, all raw material, packaging, service inputs (e.g., water, steam, gases as appropriate), scheduled process delays, and all process outputs including waste, rework, and recoup. Each flow diagram shall be confirmed by the food safety team during all stages and hours of operation.	Compliant	
2.4.3.6	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 food products received and stored.	Compliant	
2.4.3.7	The food safety team shall conduct a hazard analysis for every identified hazard, to identify which hazards are significant. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.	Compliant	
2.4.3.8	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.	Compliant	
2.4.3.9	Based on the results of the hazard analysis (refer to 2.4.3.7), the food safety	Compliant	There are not any CCPs.

	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 (e.g., a preventive control {PC} or critical control point {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.		
2.4.3.10	For each identified step requiring control (e.g. PC or CCP) the food safety team shall document the limits that separate safe from unsafe product. The food safety team shall validate the critical limits to ensure the designated 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 2.5.1.1).	Compliant	There are not any CCPs.
2.4.3.11	The food safety team shall develop and document procedures to monitor identified steps requiring control (e.g. PC or CCP) to ensure they remain within the established limits (refer to 2.4.3.12). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the testing frequency.	Compliant	There are not any CCPs.
2.4.3.12	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 an identified step requiring control (e.g. PC or CCP). The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.	Compliant	
2.4.3.13	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.	Compliant	

**SS 2.4.3 Food Safety Plan Summary**

A Food Safety Plan/FSMA Preventive Controls plan has been developed, implemented, and maintained by the site. It covers category 1: not ready-to-eat and ready-to-eat bagged produce, chilled, and refrigerated produce and category 2: not ready-to-eat, chilled washed fresh tomatoes. The food safety plan has been prepared in accordance with the 12 steps identified in the Codex Alimentarius Commission HACCP guidelines. A multi-disciplinary food safety team consists of 5 people who represent upper management, production, and the SQF Program. The SQF Practitioner is the HACCP Coordinator. The plan includes a list of all products in the scope of the certification, a complete product description, intended product use (including vulnerable populations), and flow diagrams for each process including all input and output steps in the process. The process flow diagram was verified on 11/9/2023. The food safety team has analyzed all hazards reasonably likely to occur including physical, chemical, and microbiological hazards for each process step, ingredient, and packaging. A raw material hazard analysis and process hazard analysis was available. There are not any CCPs. Storage must be maintained under 50°F and shipping is done at ≤41°F. The plan is verified as part of the SQF System and reviewed annually or when changes occur. There is a HACCP Verification Schedule. HACCP team meetings were held on 4/25/2023 and 10/11/2023. An annual

HACCP training was done on 11/8/2023. There are not any CCPs.

### 2.4.4 Non-conforming Product and Equipment Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
2.4.4.1	The responsibility and methods outlining how non-conforming product, raw materials, ingredients, work-in-progress, packaging, or equipment detected during receipt, storage, handling, or delivery and including food found to be damaged and/or returned from customers is handled shall be documented and implemented. The methods applied shall ensure: i. Non-conforming product is quarantined, identified, handled, and / or disposed of in a manner that minimizes the risk of inadvertent use, improper use or delivery, or risk to the integrity of the product; ii. Non-conforming equipment is effectively identified, repaired, or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; and iii. All relevant staff are aware of the organization's quarantine and release requirements applicable to equipment or product placed under quarantine status.	Compliant	
2.4.4.2	Quarantine records and records of the handling, corrective action, or disposal of nonconforming product or equipment shall be maintained.	Not Applicable	A hold log was available but there have not been any product holds within the last year.

#### SS 2.4.4 Non-conforming Product and Equipment Summary

The site has written procedures for withholding non-conforming products, repacked items, packaging, and equipment in the "Hold and Release Program" dated 11/18/2016 which were found to be properly implemented in the facility. Methods to segregate, identify, handle, and dispose of product include placing an orange hold tag on the products and placing the items on hold on the second-tier level. A QA Hold form is completed as well that states the amount of product placed on hold, reason for the hold, product location, notification to the Plant Manager or Designee, and Disposition instructions. Nonconforming products or equipment is identified, segregated, or disposed of, with records maintained by the SQF Practitioner. A hold log was available but there have not been any product holds within the last year.

### 2.4.5 Product Recoup Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
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2.4.5.1	The responsibility and methods outlining how product is recouped shall be documented and implemented. The methods applied shall ensure: i. Recouping operations are conducted by trained personnel; and ii. Recouped product is traceable.	Compliant	
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**SS 2.4.5 Product Recoup Summary**

There is a "Rework Policy" dated 11/19/2016 that covers the repacking operation. Items are repacked to sort out defects and to sort tomatoes by color. Items are also repacked into smaller counts and pounds. The customer sends the desired pack size through a computer program. Employees must wash their hands, wear a hair net, gloves, and a lab coat. Repack records were reviewed for the fruits and vegetables for 3/3/2023, 5/31/2023, 6/26/2023, 8/2/2023, 8/28/2023, 10/6/2023, 10/25/2023, and 11/29/2023 and included the date, lot number of food contact packaging, and product description of the food contact packaging. Repack records for the tomatoes were reviewed for the tomatoes for 4/13/2023, 5/30/2023, 6/21/2023, 7/26/2023, 8/22/2023, 9/12/2023, 9/25/2023, 10/24/2023, and 11/27/2023 and included the date, lot number of the food contact packaging, and product description of the food contact packaging.

**2.4.6 Product Release Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
2.4.6.1	The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released by authorized personnel.	Compliant	
2.4.6.2	Records of all product release shall be maintained.	Compliant	

**SS 2.4.6 Product Release Summary**

The site has written procedures in the "Hold and Release Program" implemented for releasing finished products. These release procedures include ensuring that all product inspections and analyses have been verified and documented by authorized personnel to show that all food safety and quality controls have been met. Finished products here are automatically released. Shipping records were reviewed for the items in the trace conducted during the audit. Five random SKUs per day are spot checked prior to shipping. "Finished Product Evaluation Logs/Spot Checks for Pre-Shipment Review" were reviewed for -1/9/2023-1/30/2023, 4/3/2023-4/28/2023, and 10/27/2023-11/20/2023 and included the date, product name, lot code number, label check, packaging ok, outside appearance (color, shape, etc.), HACCP program ok (CPs ok), and pack count/weight ok.

**2.5.1 Validation and Effectiveness Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
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2.5.1.1	The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented, implemented, and effective. The methods applied shall ensure that: i. Good Storage and Distribution Practices are confirmed to ensure they achieve the required result; 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 controls are still effective. Records of all validation activities shall be maintained.	Compliant	
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**SS 2.5.1 Validation and Effectiveness Summary**

The methods, responsibilities, and criteria for ensuring the effectiveness of Good Manufacturing Practices, critical food safety limits, and all other applicable elements of the SQF System have been documented and implemented in the "Verification and Validation Program" dated 10/27/2017. There is a verification and validation schedule. The following criteria is used to validate the following pre-requisite programs: food defense- mock drill, supplier approval- annual supplier review program, sanitation- pre-op swabs, maintenance- down time evaluation, and pest control- placement of physical item for PCO to find. There are not any CCPs. Records of all verifications of effectiveness and validations are maintained by the SQF Practitioner. The validations were done on 10/5/2023. A 2023 validation summary report was available and included employee interviews on cross-docking eggs. It also consisted of a review of calibrations, master sanitation schedules, foreign material controls/complaints, supplier performance, customer complaints, employee GMP warnings, and internal audits.

**2.5.2 Verification Activities Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
2.5.2.1	The methods, responsibility, and criteria for verifying monitoring of Good Storage and Distribution Practices, critical control points, and other food safety controls shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record.	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 verification of activities shall be maintained.	Compliant	

**SS 2.5.2 Verification Activities Summary**

The site has established a verification schedule, dated 9/29/2022, outlining the verification steps, procedures, and responsibilities for each verification activity. The schedule is maintained by the SQF Practitioner. The procedures for verifying Good Manufacturing Practices and other food safety controls and regulatory compliance include utilizing authorized personnel to verify all monitoring activities. The SQF Practitioner and Substitute SQF Practitioner do the verifications.

### 2.5.3 Corrective and Preventative Action Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
2.5.3.1	The responsibility and methods outlining how corrective and preventative actions are determined, implemented, and verified, including identification of the root cause and resolution of non-compliance of critical food safety limits and deviations from food safety requirements, shall be documented and implemented. Deviations from food safety requirements may include customer complaints, non-conformances raised at internal or external audits and inspections, non-conforming product and equipment, or withdrawals and recalls, as appropriate.	Compliant	
2.5.3.2	Records of all investigation, root cause analyses and resolution of non-conformities, their corrections, and implementation of preventative actions shall be maintained.	Compliant	
<b>SS 2.5.3 Corrective and Preventative Action Summary</b>			
There is a "Corrective and Preventative Actions" program dated 11/20/2016. It describes the methods and responsibilities for investigating, resolving, and managing corrective actions. Corrective actions have root cause analysis. Corrective actions were reviewed for self-inspection findings and pre-operational inspections.			

### 2.5.4 Internal Audits and Inspections Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
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: Storage and Distribution are audited as per the SQF audit checklist or similar tool; ii. Objective evidence is recorded to verify compliance and/or non-compliance; iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.	Compliant	

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2.5.4.2	Staff conducting internal audits shall be trained and competent in internal audit procedures. Where practical, staff conducting internal audits shall be independent of the function being audited.	Compliant	
2.5.4.3	Regular inspections of the site and equipment shall be planned and carried out to verify Good Storage and Distribution Practices and facilities and equipment maintenance are compliant with the SQF Food Safety Code: Storage and Distribution. The site shall: i. Take corrections or corrective and preventative action; and ii. Maintain records of inspections and any corrective action taken.	Compliant	
2.5.4.4	Records of internal audits and inspections and any corrective and preventative actions taken as a result of internal audits shall be recorded as per 2.5.3. Changes implemented from internal audits that have an impact on the site's ability to deliver safe food shall require a review of applicable aspects of the SQF System.	Compliant	

**SS 2.5.4 Internal Audits and Inspections Summary**

The site's procedure for scheduling and conducting internal audits to assess the effectiveness of the SQF system has been documented and implemented per document "Internal Audit Procedures" dated 11/20/16. The Internal Audit Program is maintained by the SQF Practitioner. Facility and equipment inspections are conducted regularly to ensure Good Manufacturing Practices are followed. Monthly self-inspections were reviewed for 1/18/2023, 2/16/2023, 3/8/2023, 4/19/2023, 5/18/2023, 6/14/2023, 7/12/2023, 8/16/2023, 9/13/2023, 10/11/2023, and 11/7/2023 and included findings and corrective actions. The internal audit of HACCP, sanitation, module 2, and module 12 was done on 10/17/2023 by the SQF Practitioner and Substitute SQF Practitioner. Records were reviewed and employees were interviewed as well. Personnel conducting audits have been properly trained and where practical audit areas independent of their function.

**2.6.1 Product Identification Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
2.6.1.1	The methods and responsibility for identifying products during all stages of storage shall be documented and implemented. The product identification system shall be implemented to ensure: i. Proper stock rotation; and ii. Accurate location of product.	Compliant	
2.6.1.2	Records of product receipt and use and product dispatch and destination shall be maintained.	Compliant	

**SS 2.6.1 Product Identification Summary**

A policy defining how products are identified from receipt through production and shipping has been documented in the "Lot Numbers" policy. The site's identification system ensures all

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products and packaging materials are clearly identified at all stages of their process. Lot numbers are assigned based on the POs. The lot numbers of the incoming produce are captured on the production records. These were reviewed for 3/14/2023, 5/17/2023, 11/6/2023, 11/7/2023, 11/8/2023, 11/9/2023, and 11/13/2023. The Country of Origin is placed on the labels as well. The Buyers are in charge of printing off the labels.

### 2.6.2 Product Trace Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
2.6.2.1	The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Traceability of food products to the customer (one step forward); ii. Traceability of product to the supplier or manufacturing supplier with date of receipt (one step back); iii. Traceability is maintained where product is recouped; and iv. The effectiveness of the product trace system is reviewed at least annually as part of the product recall and withdrawal review (refer to 2.6.3.2).	Compliant	

#### SS 2.6.2 Product Trace Summary

A policy defines the methods and responsibilities for tracing product to the customer (one up) and from vendors of raw materials and packaging (one back). This is written in the "Recall and Traceability" program. Repack is traceable. The effectiveness of the trace system is conducted at least annually, as part of the product withdrawal and recall program. Records of the receipt use and dispatch of finished product are maintained. A trace was done during the audit on repacked round tomatoes from 11/6/2023. There were 80 cases or 2,000 lbs. received on 11/3/2023. There were 178 lbs. of trash that went to trash. There were 1,825 lbs. that were shipped. There were 2,003 lbs. recovered for an overage of 3 lbs. The excess 3 lbs. was thought to be due to overpack by the raw material supplier. Shipping records were available and the product shipped between 11/6/2023-11/13/2023. The trace took 1 ½ hours to complete and 100.15% was recovered.

### 2.6.3 Product Withdrawal and Recall Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
2.6.3.1	The responsibility and methods used to withdraw or recall products 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 management procedures to be implemented including sources of legal, regulatory and expert advice, and essential traceability information; iii. Outline a communication plan to inform employees, customers, consumers,	Compliant	

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	authorities, and other essential bodies in a timely manner appropriate about the nature of the incident; iv. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and notified in instances of a food safety incident of a public nature or product recall for any reason.		
2.6.3.2	The product withdrawal and recall system shall be reviewed, tested, and verified as effective at least annually. Testing shall include incoming materials (one back), inhouse identification and isolation/quarantine, and where the product is shipped to (one forward).	Compliant	
2.6.3.3	Records shall be maintained of withdrawal and recall tests, root cause investigations into actual withdrawals and recalls, and applied corrective and preventative actions.	Compliant	
2.6.3.4	SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that has been initiated by the site requires public notification. SQFI shall be notified at <a href="mailto:foodsafetycrisis@sqfi.com">foodsafetycrisis@sqfi.com</a> .	Compliant	

**SS 2.6.3 Product Withdrawal and Recall Summary**

The site has a "Recall and Traceability" program dated 11/19/2019 defining the methods and responsibilities for withdrawing and recalling product if necessary. A recall team has been designated and is led by the President who is the Recall Coordinator. The withdrawal policy includes the requirement to investigate a recall and determine the root cause of a recall/withdrawal with a corrective action. It also includes a communication plan to notify customers, consumers, regulatory authorities, and other essential bodies. This includes SQFI and NSF, the Certification Body. Investigation into the root cause of any product recall or product withdrawal, with actions taken, was observed to be documented. Mock trace exercises are completed annually, one step forward and one step back, to verify the effectiveness of the system. A mock recall was done on 9/20/2023 on Pueblo Anaheim extra hot tomatoes. These were received on 8/29/2023 in the amount of 100 cases. The trace took 1 hour to complete and 100% was recovered. A mock recall was done on 4/13/2023 on 10 lb. Organic Heirloom Tomatoes. These were received on 3/9/2023 in the amount of 99 cases. There were 90 cases used in production. There were 9 cases that were discarded due to spoilage or poor quality. This trace took 1 hour to complete and 100% was recovered.

**2.6.4 Crisis Management Planning Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
2.6.4.1	A crisis management plan based on the understanding of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather event, warfare or civil unrest, computer outage, pandemic, loss of electricity or refrigeration, ammonia leak, labor strike) that can impact the site's ability to deliver safe food, shall be documented by senior management outlining the methods and responsibility the site shall implement to cope with such a business	Compliant	

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	crisis. The crisis management plan shall include at a minimum: i. A senior manager responsible for decision making, oversight, and initiating actions arising from a crisis management incident; ii. The nomination and training of a crisis management team; iii. The controls implemented to ensure a response does not compromise product safety; iv. The measures to isolate and identify product affected by a response to a crisis; v. The measures taken to verify the acceptability of food product prior to release; vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers; vii. Sources of legal and expert advice; and viii. The responsibility for internal communications and communicating with authorities, external organizations, and media.		
2.6.4.2	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.	Compliant	

**SS 2.6.4 Crisis Management Planning Summary**

The site's written Crisis Management Plan is found in document "Crisis Management Plan" dated 10/24/18. The plan has been implemented and addresses serious disaster threats to the extended interruption of the business. The President has oversight of the Plan and a Crisis Management team has been identified and trained as evidenced by a training on 11/10/2023. The plan includes responses to a business interruption, isolating and identifying affected product, and a current crisis alert list. The Crisis Management Plan includes internal/external communications and sources of legal and expert advice. A test of the plan was conducted on 10/17/2023 on cooler 6 having warm temperatures due to a coolant leak at the outside condenser. The product was removed from cooler 6 to another cooler. The leak was repaired. All steps of the plan were challenged.

**2.7.1 Food Defense Plan Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
2.7.1.1	A food defense threat assessment shall be conducted to identify potential threats that can be caused by a deliberate act of sabotage or terrorist-like incident.	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 the food defense plan; iii. The methods implemented to ensure only authorized personnel have access to equipment and vehicles and storage areas through designated access points; iv. The methods	Compliant	

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	implemented to protect sensitive operational points from intentional adulteration; v. The measures taken to ensure the secure receipt and storage of products, packaging, equipment, and hazardous chemicals to protect them from deliberate act of sabotage or terrorist-like incidents; vi. The measures implemented to ensure products, packaging (including labels), work-in progress, and process inputs are held under secure storage and transportation conditions; and vii. The methods implemented to record and control access to the premises by employees, contractors, and visitors.		
2.7.1.3	Instruction shall be provided to all relevant staff on the effective implementation of the food defense plan (refer to 2.9.2.1).	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 and tests of the food defense plan shall be maintained.	Compliant	

**SS 2.7.1 Food Defense Plan Summary**

The site has a "Food Defense/Food Fraud Policy" dated 12/8/2020 in which the procedures, responsibilities and criteria for preventing deliberate food adulteration have been documented and implemented. A food defense protocol includes the name of the senior manager responsible for food defense, the President. The Plant Manager/SQF Practitioner is the Recall Coordinator. Control measures include exterior cameras, a fence around building A, locks used on outgoing trailers, locked chemicals, escorted visitors, a social accountability audit for employees, tamper evident seals, and drivers must check in with receiving. A facility risk assessment was done on 11/22/2023 and included the location and outside perimeter, access to the facility, human resources, access by visitors and truck drivers, chemical storage, and construction areas. A food defense vulnerability assessment was available and included all processing steps from receiving to distribution. It was reviewed on 10/24/2022 and during the food defense and food fraud meetings on 4/25/2023 and 10/11/2023. Receiving, Shipping, and Distribution were identified as medium risk. Control measures were identified as inspecting the trailers, employees working in their assigned areas, and employees are trained in food defense. A food defense meeting was done on 10/20/2023 and included the following people: President, Corporate Secretary, Treasurer, SQF Practitioner, and Substitute SQF Practitioner. The team determined that the plant security is thorough, the trucks are locked at the end of the shift, the gate is kept closed at all times, and the door and gate codes are changed periodically. A food defense challenge was done on 10/6/2023 on three unescorted people trying to enter the facility. They were stopped half way down the warehouse by a Supervisor and escorted back through the gate to the waiting area.

**2.7.2 Food Fraud Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
2.7.2.1	The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud including susceptibility to product substitution, mislabeling, dilution, or counterfeiting shall be documented, implemented, and maintained.	Compliant	



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2.7.2.2	A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled.	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.	Compliant	
2.7.2.4	Records of reviews of the food fraud vulnerability assessment and mitigation plan shall be maintained.	Compliant	

**SS 2.7.2 Food Fraud Summary**

There is a "Supplier Management Program/Food Fraud" dated 10/28/2021 and a "Food Defense /Food Fraud Policy" dated 12/8/2020. Incoming products are inspected for label verification, mislabeling, country of origin, and packaging configuration. Mitigation strategies include approved suppliers, and inspecting trailers for condition, inspecting products for signs of tampering, and inspecting product returns. The vendors were evaluated on 10/6/2023 for food fraud by the Plant Manager/SQF Practitioner. The HACCP hazard analysis also includes economically motivated hazards. None were identified. The food fraud plan was reviewed on 4/25/2023 and 10/11/2023 during the HACCP and Food Defense and Food Fraud meetings.

**2.8.1 Allergen Management Module 2 Storage and Distribution**

Element	Description	Primary Response	Evidence
2.8.1.1	The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management controls shall be based on a risk assessment and include the identification, labeling, and handling of allergen-containing product, including product recoup, to prevent inadvertent cross contact.	Compliant	
2.8.1.2	Recouped product containing food allergens (refer to 2.4.5) shall be repackaged under conditions that ensure product safety and integrity is maintained. Recouped product containing allergens shall be clearly identified and traceable.	Compliant	No allergens are repacked.
2.8.1.3	Sites that do not handle allergenic materials or store allergenic products shall document, implement, and maintain an allergen management program that addresses, at a minimum, the mitigation of introduced or unintended allergens from suppliers, contract manufacturers, site personnel, and/or visitor activities.	Compliant	

**SS 2.8.1 Allergen Management Summary**

The site's Allergen Management Policy to control allergens and prevent contamination of other products is found in document "Allergen Program" dated 11/18/2016 and is the responsibility of the Plant Manager/SQF Practitioner. Allergens of concern in this operation were observed to be eggs. Eggs are stored in a designated area. If a spill occurs cones are placed out, a

mop is used, and the mop head is discarded after cleaning. No allergens are repacked.

### 2.9.1 Training Requirements Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
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 product legality and safety shall be defined and documented (refer to 2.1.1.6).	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.	Compliant	

#### SS 2.9.1 Training Requirements Summary

There is an "Employee Training" program dated 11/20/2016. Appropriate training is provided for all plant personnel for all tasks to ensure the effective implementation of the SQF system. Training programs are the assigned responsibility of the SQF Practitioner and Substitute SQF Practitioner. Employees receive new hire training and annual refresher training. The effectiveness of the facility 's training program was evidenced by interviews with the two Tomato Supervisor, three Tomato Repackers, and Restaurant and Distribution Services Assistant Manager. All of these employees were found to have current training records.

### 2.9.2 Training Program Module 2 Storage and Distribution

Element	Description	Primary Response	Evidence
2.9.2.1	A training program shall be documented and implemented that, at a minimum, outlines the necessary competencies for specific duties and the training methods to be applied for personnel carrying out tasks associated with: i. Developing and maintaining food safety plans to meet regulatory requirements and the SQF Code; ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs); iii. Personal hygiene for all staff involved in handling of food products and food contact surfaces; iv. Good Storage and Distribution Practices and work instructions for all staff engaged in food handling, food storage and transport, and associated equipment; v. Allergen	Compliant	

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	management, food defense, and food fraud for all relevant staff; and vi. Tasks identified as critical to meeting effective implementation and maintenance of the SQF Code. The training program shall include provision for identifying and implementing the refresher training needs of the organization.		
2.9.2.2	Training materials, the delivery of training, and procedures on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in languages understood by staff.	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.	Compliant	

**SS 2.9.2 Training Program Summary**

The site has implemented a training program entitled "Employee Training" dated 11/20/2016 which covers the necessary competencies for plant personnel. This program requires training to be conducted in the following topics: HACCP, GMPs, food safety, allergens, sanitation, food defense, and SQF to ensure regulatory, food safety, and food quality and all other requirements of the SQF System are met. This training program is administered by both the SQF Practitioner and Substitute SQF Practitioner. A training skills register was available and included a listing of the trainee, trainer, the description of the training, and the date of training. Quizzes are given for GMPs and were reviewed for various employees for: GMPs and HACCP.

**12.1.1 Premises Location and Approval Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.1.1.1	The site shall assess local activities and the site environment to identify any risks that may have an adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities. The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.	Compliant	

**SS 12.1.1 Premises Location and Approval Summary**

The site's buildings, property and surroundings were observed during the audit to not pose a food safety risk to products. Measures have been established to maintain a suitable external environment and the facility performs external inspections as part of their internal audit program. The facility re-registered with the FDA on 11/29/2022.

**12.1.2 Building Materials Module 12 Good Storage and Distribution Practices**

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Element	Description	Primary Response	Evidence
12.1.2.1	Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, is impervious to liquid, and easily cleaned. When drains are present in the warehouse, floors shall be sloped at gradients suitable to allow for the effective removal of all overflow or wastewater under normal working conditions.	Compliant	
12.1.2.2	Drains shall be constructed and located so they can be easily cleaned and do not present a hazard. Drains if located in storage and handling areas, shall be kept clean.	Compliant	
12.1.2.3	Waste trap system shall be located away from any food handling or storage area or entrance to the premises.	Compliant	
12.1.2.4	Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 12.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.	Compliant	
12.1.2.5	Doors shall be of solid construction. Windows shall be made of shatterproof glass or similar material, or otherwise protected.	Compliant	
12.1.2.6	Drop ceilings (where applicable) shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.	Not Applicable	There are not any drop ceilings.
12.1.2.7	In warehouses where food products are recouped or exposed, the product contact surfaces shall be constructed of materials that will not contribute a food safety risk	Not Applicable	There are not any waste traps.

**SS 12.1.2 Building Materials Summary**

Floors are constructed of smooth and dense impact resistant material. Drains were observed to be located and constructed for ease of cleaning and inspection. Walls, ceilings, and doors are of durable construction with smooth and light-colored surfaces. These areas were observed to be clean during the audit tours. Wall to wall and wall to floor junctures were observed to be sealed and free of debris. Doors, windows, and frames in product areas were observed to be properly constructed of materials with the same functional requirements as internal walls and partitions. The food contact surfaces were smooth, clean, and in good condition. There are not any drop ceilings. There are not any waste traps.

**12.1.3 Lightings and Light Fittings Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
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12.1.3.1	Lighting in warehouses where food product is recouped or exposed shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.	Compliant	
12.1.3.2	Light fittings in areas where food product is recouped or exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling.	Compliant	
12.1.3.3	Light fittings in other areas of the warehouse where product is covered or otherwise protected shall be designed to prevent breakage and product contamination.	Compliant	

**SS 12.1.3 Lightings and Light Fittings Summary**

Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting is either covered or is shatter-proof.

**12.1.4 Dust, Insect, and Pest Proofing Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.1.4.1	All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed and proofed against dust, insects, birds, 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 entry of dust, birds, and other pests.	Compliant	
12.1.4.2	Electric insect control devices, pheromone, or other traps and baits shall be located and operate so as not to present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredient of product storage areas where ingredients, packaging, and product are handled, processed, or exposed.	Compliant	

**SS 12.1.4 Dust, Insect, and Pest Proofing Summary**

External windows, doors, and other openings were observed during facility tours to be properly sealed to prevent any pest infestation or dust coming into the facility. External personnel doors were observed to be self-closing and sealed to prevent dust and pest ingress. All external doors and dock doors were sealed to prevent infestation. Electric insect devices, interior, and exterior rodent stations are located so the product is not at risk for contamination. Rodenticide bait is only used on the outside of the facility.

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### 12.1.5 Ventilation Module 12 Good Storage and Distribution Practices

Element	Description	Primary Response	Evidence
12.1.5.1	Adequate ventilation shall be provided in enclosed storage and food handling areas.	Compliant	
12.1.5.2	All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 12.2.5 and effectively sealed against dust, insects, and other pests as per 12.1.4.	Compliant	
<b>SS 12.1.5 Ventilation Summary</b>			
Adequate ventilation was available, where needed, in enclosed repacking and storage areas. Ventilation equipment was seen to be adequately cleaned, insect-proofed, and located to not pose a risk of contamination.			

### 12.1.6 Equipment and Utensils Module 12 Good Storage and Distribution Practices

Element	Description	Primary Response	Evidence
12.1.6.1	Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.	Compliant	
12.1.6.2	Equipment and utensils shall be designed, constructed, installed, operated, and maintained to meet any applicable regulatory requirements and not pose a contamination threat to products.	Compliant	
12.1.6.3	Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers. Where possible, food contact equipment shall be segregated from non-food contact equipment.	Compliant	
12.1.6.4	All equipment and utensils shall be cleaned (refer to 12.2.5.1) at a frequency to control contamination and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.	Compliant	
12.1.6.5	Vehicles used in handling areas or in cold storage rooms shall be designed, cleaned, and operated so as not to present a food safety hazard.	Compliant	
12.1.6.6	In addition to the above, locations handling exposed products and recouping products on-site shall have: i. Product contact equipment and utensils constructed of materials that are non-toxic, smooth, impervious and readily cleaned as per 12.2.5; ii. Clearly identified equipment and utensils that are used for inedible material; and iii. Clearly identified waste and overflow handling	Compliant	

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	equipment and utensils. The waste material is discharged hygienically and according to local regulatory requirements.		
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**SS 12.1.6 Equipment and Utensils Summary**

The repacking tables were in good condition and clean. The food contact surfaces of the re-pack table are cleaned daily. The forklifts and pallet jacks were in good condition and clean. The equipment storage areas were properly maintained. Waste bins were properly identified and waste is recorded. Repacking tables were found to be clean, smooth, and properly maintained. The employees in building B wear uniforms for the storage, receiving, and shipping and the employees in building A wear lab coats for the repacking operation. The lab coats are properly made and do not pose a contamination risk to the product. A rack is provided for the storage of lab coats at the entrance to the repack area in Building A.

**12.1.7 Grounds and Roadways Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.1.7.1	The grounds and area surrounding the premises shall be maintained to minimize dust and kept free of waste or accumulated debris so as not to attract pests and vermin.	Compliant	
12.1.7.2	Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operation of the premises.	Compliant	
12.1.7.3	Surroundings shall be kept neat and tidy and shall not present a hazard to the hygienic and sanitary operation of the premises or provide harborage for pests.	Compliant	

**SS 12.1.7 Grounds and Roadways Summary**

The grounds and surrounding areas were observed to minimize dust and be free of any waste, so pests are not attracted. Paths, roadways, and dock areas were seen to be adequately and properly drained and well maintained, so they do not present a hazard. No ponding of water was observed. Walkways from the parking lot and other employee amenities were paved or effectively sealed.

**12.2.1 Repairs and Maintenance Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.2.1.1	The methods and responsibility for the maintenance and repair of facility, equipment, and buildings shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination.	Compliant	

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12.2.1.2	The maintenance schedule shall be prepared to cover building, equipment, and other areas of the premises critical to the maintenance of product safety. Routine maintenance of plant and equipment in any food handling or storage area shall be performed according to a maintenance control schedule and recorded.	Compliant	
12.2.1.3	Failures of facility and equipment in any food storage and handling area shall be documented, reviewed, and necessary repair incorporated into the maintenance control schedule.	Compliant	
12.2.1.4	Site supervisors shall be notified when maintenance or repairs are to be undertaken in any food handling or storage area.	Compliant	
12.2.1.5	The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance 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.	Compliant	
12.2.1.6	Temporary repairs, where required, shall not pose a food safety risk and shall be included in the cleaning program. There shall be a plan in place to address completion of temporary repairs to ensure they do not become permanent solutions.	Compliant	
12.2.1.7	Equipment located over exposed product shall be lubricated with food grade lubricants and their use controlled to minimize the contamination of the product.	Compliant	
12.2.1.8	Paint used in a food handling or contact zone shall be suitable for use, in good condition (i.e., no chips), and shall not be used on any product contact surface.	Compliant	

**SS 12.2.1 Repairs and Maintenance Summary**

The site has a "Maintenance and PM Program" that defines the responsibilities for the maintenance and repair of all plant equipment and buildings. All of the maintenance is contracted out. There is a preventative maintenance schedule that includes the contracted company that does the dock doors, back flow company, forklifts/pallet jacks, calibration, and all areas of the facility. PMs for the leased and owned straight trucks were reviewed for 1/1/2023-11/30/2023 and were complete. Invoices from the contracted company that maintains the coolers was available from 1/16/2023, 2/24/2023, 3/31/2023, 5/15/2023, 6/14/2023, 7/30/2023, and 8/30/2023 and showed the PMs were completed. Work orders include a check for food safety and tool reconciliation. Maintenance work orders were reviewed for 1/9/2023 for replacing the battery tray, 1/12/2023 for repairing the forklift, 4/24/2023 for the garage door repair, 8/11/2023 for the cooler evaporator repair, and 10/24/2023 for replacing cooling and were complete. Paint is not on food contact surfaces. Temporary repairs are not allowed.

**12.2.2 Maintenance Staff and Contractors Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.2.2.1	Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 12.3).	Compliant	



12.2.2.2	All maintenance staff and 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. Records of training shall be documented and retrievable.	Compliant	
12.2.2.3	Maintenance staff 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 that appropriate hygiene and sanitation can be completed and an inspection conducted prior to restarting site operations. The inspections shall be documented.	Compliant	
<b>SS 12.2.2 Maintenance Staff and Contractors Summary</b>			
Maintenance contractors must sign the Visitor's Log when they come to do maintenance. The log includes a check for complying with the GMPs and not being ill.			

### 12.2.3 Calibration Module 12 Good Storage and Distribution Practices

Element	Description	Primary Response	Evidence
12.2.3.1	The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, shall be documented and implemented. Software used for such activities shall be validated and secured as appropriate.	Compliant	
12.2.3.2	Equipment shall be calibrated against 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. A list of measuring, testing, and inspection equipment requiring calibration shall be maintained.	Compliant	
12.2.3.3	Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule.	Compliant	
12.2.3.4	Procedures shall be documented and implemented to address the disposition of potentially affected products should measuring, testing, and inspection equipment be found to be out of calibration state.	Compliant	
12.2.3.5	A directory of measuring, testing, and inspection equipment requiring calibration and records of calibration tests shall be maintained.	Compliant	

**SS 12.2.3 Calibration Summary**

A "Calibration Program" dated 11/10/17 defines the methods and responsibilities for calibrating measuring, testing and inspection equipment, and has been implemented. No software requires calibration. The facility has developed a calibration schedule for all devices listed. The frequency of calibrations is based on the manufacturer's recommendations or customer requirements. The scales are verified weekly and the infrared thermometers are verified monthly. The policy includes the procedures to address the disposition of any affected product should inspection equipment be found to be out of calibration. Inspection and testing equipment are protected from damage or unauthorized use by keeping it out of traffic ways. The scales were calibrated on 6/26/2023. Equipment is calibrated against national or international standards. Scale verifications are done weekly and were reviewed for 3/27/2023, 4/17/2023, 5/23/2023, 6/27/2023, 7/31/2023, and 11/27/2023 and were complete. Thermometer verifications were reviewed for 3/13/2023, 5/1/2023, 7/3/2023, 8/21/2023, 10/2/2023, 10/23/2023, and 11/27/2023 and were acceptable. The laser guns were purchased within the last year and are NIST certified.

**12.2.4 Pest Prevention Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.2.4.1	A documented pest prevention program shall be effectively implemented. It shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include on a site map the identification, location, number, and type of applied pest control/ monitoring devices; 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 staff aware of the bait control program and the measures required when they come into contact with a bait station; ix. Outline the requirements for staff 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 identify trends.	Compliant	
12.2.4.2	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. Provide a pest prevention plan (refer to 12.2.4.1), which includes a site map indicating the location of bait stations traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; vi.	Compliant	

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	Provide regular inspections for pest activity with appropriate action taken if pests are present, and vii. Provide a written report of their findings and the inspections and treatments applied.		
12.2.4.3	Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be undertaken on a regular basis by trained site 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 all pest control inspections and applications shall be maintained.	Compliant	
12.2.4.4	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 investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.	Compliant	
12.2.4.5	Pesticides shall be clearly labeled and stored per 12.6.4 if kept on-site.	Not Applicable	The facility is not applying nor storing their own pesticides.
12.2.4.6	No animals shall be permitted on-site in food handling or storage areas.	Compliant	

**SS 12.2.4 Pest Prevention Summary**

A policy defines the site's program for pest prevention and the appropriate follow up to pest prevention issues that may occur. The program was observed during the audit to be effectively implemented. The premises were free of waste and debris as observed during the interior and exterior tours. No pest activity was identified or noted during tours that presented a risk for product contamination. A Pest Contractor has been contracted for pest prevention and an updated scope of service dated 1/5/2023 defines the methods of pest prevention. The interior and exterior devices are checked monthly. The certificate of liability insurance for the contracted pest control company is current through 10/1/2024. The contracted pest control company has a current license valid through 12/31/2023. The pest applicator has a current license valid through 3/16/2025. A current site map dated 10/3/2022 showed the location of the external and internal devices. An approved product list of chemicals used by the pest contractor was available and dated 1/5/2023. SDS sheets were reviewed for the bait. A pest sighting log was available. Inspection activity reports were reviewed for 2/7/2023, 3/7/2023, 4/27/2023, 5/18/2023, 6/15/2023, 7/26/2023, 8/17/2023, 9/21/2023, 10/19/2023, and 11/21/2023 and were acceptable. Pest control trend reports were reviewed for December of 2022 to November of 2023 and were acceptable. No animals are allowed on-site. The facility is not applying nor storing their own pesticides.

**12.2.5 Cleaning and Sanitation Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.2.5.1	The methods and responsibility for the effective cleaning of the food storage and handling areas, staff amenities, and toilet facilities shall be documented and implemented. Consideration shall be given to: i. What is to be cleaned; ii. How it	Compliant	

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	is to be cleaned; iii. When it is to be cleaned; iv. Who is responsible for cleaning; v. Validation of cleaning procedures; vi. Methods used to confirm the correct concentrations of detergents and sanitizers, and vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.		
12.2.5.2	Detergents and sanitizers shall be suitable for use in a food and storage and 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 chemicals purchased and used is maintained; iii. Detergents and sanitizers are stored as outlined in element 12.6.4; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained staff handle sanitizers and detergents.	Compliant	
12.2.5.3	Detergents and sanitizers that have been mixed for use shall be correctly mixed according to manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.	Compliant	
12.2.5.4	Provision shall be made for the effective cleaning of equipment, utensils, and protective clothing.	Compliant	
12.2.5.5	Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing, product handling equipment, and storage areas as well as the tools themselves.	Compliant	
12.2.5.6	Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel to ensure the areas are clean and at a defined frequency.	Compliant	
12.2.5.7	Records of cleaning and sanitation activities, verification, and inspections shall be maintained.	Compliant	
12.2.5.8	Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel at a defined frequency to ensure the areas are clean.	Compliant	
<b>SS 12.2.5 Cleaning and Sanitation Summary</b>			
<p>The site has a "General Sanitation Program," "Chemical Control Program," and "Environmental Monitoring Program" that describes the methods and responsibilities for cleaning of processing equipment, the environment, storage areas, bathrooms and break rooms. Sanitation Standard Operating Procedures are written and include what is cleaned, chemical usage (concentrations, etc.), cleaning methods and who is responsible. A master sanitation plan includes all areas of the facility with frequencies and responsibilities for deep cleaning. Every morning during pre-op ATP swabbing is done on the packing tables in both Buildings A and B. "Daily Sanitation and Pre-Operational Inspection Checklists" were reviewed for 3/3/2023, 5/30/2023, 7/31/2023, 8/28/2023, 10/11/2023, and 11/28/2023 for Building A and 1/11/2023, 2/25/2023, 3/30/2023, 5/27/2023, 7/10/2023, 9/11/2023, 10/3/2023, 10/14/2023, 11/21/2023, and 11/29/2023 for Building B and included the visual inspection results and ATP swab results for the packing tables, benches, and conveyors and were acceptable. The pre-op forms also included the daily sanitizer concentrations for the Oxonia and these were acceptable. Post-operational Inspection forms include a visual inspection for cleanliness and were reviewed for</p>			

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1/17/2023, 3/10/2023, 5/10/2023, 7/19/2023, 8/14/2023, 9/28/2023, 10/26/2023, and 11/29/2023 for Building A and 3/6/2023, 4/7/2023, 5/15/2023, 7/11/2023, 8/8/2023, 8/30/2023, 11/9/2023, and 11/29/2023 for Building B and were complete. Environmental monitoring for listeria species is also being done monthly and results were reviewed for 1/26/2023, 2/17/2023, 3/28/2023, 4/26/2023, 5/23/2023, 6/22/2023, 7/26/2023, 9/13/2023, 10/24/2023, and 11/16/2023 and were acceptable. There is a list of approved chemicals along with SDS sheets. SDS sheets were reviewed for the Oxonia sanitizer. The concentration of the sanitizer used for sanitizing the tables and production belts for repack is recorded on the monthly self-inspections and these were reviewed for 1/18/2023, 3/8/2023, 4/19/2023, 8/16/2023, 9/13/2023, and 11/7/2023 and were acceptable. A chemical handling training was done on 10/11/2023.

### 12.3.1 Personnel Welfare Module 12 Good Storage and Distribution Practices

Element	Description	Primary Response	Evidence
12.3.1.1	Personnel suffering from infectious diseases or who are carriers of any infectious disease shall be restricted from working on the site or in the transportation of food and shall not engage in food handling operations or be permitted access to storage areas where the product is exposed or there is a risk of contamination of food.	Compliant	
12.3.1.2	The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids from open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury that causes spillage of bodily fluid, a properly trained staff member shall ensure that all affected areas, including handling and storage areas, have been adequately cleaned and that all materials and products have been quarantined and/or disposed of.	Compliant	
12.3.1.3	Personnel with exposed cuts, sores, or lesions shall not engage in handling exposed products, recoup, repack or processing products, or handling primary packaging or food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a protective bandage or alternative suitable dressing. A colored bandage or alternative suitable waterproof and colored dressing is recommended for handling exposed products, recoup, or repack processes.	Compliant	

#### SS 12.3.1 Personnel Welfare Summary

A "GMPs" policy for all employees has been documented and implemented. Employees are prohibited from working in food handling or open food storage areas who are suffering from, or who are or were carriers of, an infectious disease that may be passed through food. The monthly self-inspections include a check for any evidence of illness or open wounds and these were reviewed for 2/16/2023, 8/16/2023, 9/13/2023, 10/11/2023, and 11/7/2023. The site has documented measures to prevent contact of product materials with bodily fluids and respond

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appropriately to any bodily fluid spillage. There is a biohazard kit. The SQF Practitioner has first aid training. The policy includes the prohibition of any food handling activity for persons with exposed cuts, sores or lesions and requires that minor cuts or abrasions be covered with a waterproof colored bandage or dressing.

### 12.3.2 Handwashing Module 12 Good Storage and Distribution Practices

Element	Description	Primary Response	Evidence
12.3.2.1	All personnel shall have clean hands and hands shall be washed by all staff, contractors, and visitors: i. On entering food handling, storage, and processing areas; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After sneezing or coughing.	Compliant	
12.3.2.2	Handwash stations shall be available and accessible as required.	Compliant	
12.3.2.3	Handwash stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with: i. A potable water supply at an appropriate temperature; ii. Liquid soap; iii. Paper towels; and iv. A means of containing used paper towels. An effective hand dryer may be used in instances where there is no direct hand contact of food or food contact surfaces.	Compliant	
12.3.2.4	Signage in appropriate languages instructing people to wash their hands shall be provided in a prominent position.	Compliant	
12.3.2.5	When gloves are used, personnel shall maintain the handwashing practices outlined above.	Compliant	

#### SS 12.3.2 Handwashing Summary

A policy covering hand washing requirements has been documented and implemented. Hand wash basins are located at appropriate employee access points to processing areas. Hand wash sinks are made of non-corrosive materials and supplied with tempered potable water. Soap in a fixed dispenser, paper towels, and waste containers are available. Signs are posted reminding employees to wash their hands before returning to work. Signs are posted at hand wash stations and in bathrooms. Employees are required to wash hands when wearing gloves. Employees were observed to wash their hands properly during the audit and to use proper glove procedures when repacking.

### 12.3.3 Clothing and Personal Effects Module 12 Good Storage and Distribution Practices

Element	Description	Primary Response	Evidence
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12.3.3.1	Clothing worn by staff engaged in handling food shall be maintained, stored, laundered, and worn so as not to present a contamination risk to products.	Compliant	
12.3.3.2	Clothing, including shoes, shall be clean at the commencement of each shift and maintained in a serviceable condition.	Compliant	
12.3.3.3	Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned.	Compliant	
12.3.3.4	Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or any area where food is exposed. The wearing of plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided it is properly covered and does not pose a food safety risk. All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management.	Compliant	

**SS 12.3.3 Clothing and Personal Effects Summary**

Employees wear lab coats, hair nets, and gloves in the repacking area. The warehouse employees wear uniforms. A policy defining jewelry use has been written in the GMP policy and has been implemented. Jewelry and other loose objects are prohibited in food processing and handling areas. Employees were observed to comply with the jewelry policy during the audit tours.

**12.3.4 Visitors Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.3.4.1	All visitors shall be required to comply with all Good Storage and Distribution Practices and hygiene standards required by the site, including those applying to clothing and personal effects, hand-washing, and illness (refer to 12.3.1, 12.3.2 and 12.3.3).	Compliant	
12.3.4.2	All visitors, including management staff, shall wear suitable clothing and footwear when entering any food storage and handling area.	Compliant	
12.3.4.3	Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled or processed (refer to 12.3.1).	Compliant	
12.3.4.4	Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements.	Compliant	
12.3.4.5	All visitors shall be trained in the site's food safety and hygiene procedures before entering any food processing or handling areas or shall be escorted at all	Compliant	

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	times in food handling and storage areas.		
12.3.4.6	The site shall have a documented procedure for how driver access is managed to minimize food safety risk and designated driver areas are maintained to prevent food contamination or other food safety risks.	Compliant	

SS 12.3.4 Visitors Summary

There is a "Visitor Contractor Program" and it has been documented and implemented. The policy requires that visitors be trained in hygiene and food safety requirements before entering food processing or handling areas, or that they be continually escorted while in those locations. The requirements for visitors in those areas include the proper use of access points, hand wash requirements, removal of jewelry or other loose objects, and an absence of visible signs of illness. Truck drivers are required to check in at receiving.

12.3.5 Staff Amenities (change rooms, toilets, break rooms) Module 12 Good Storage and Distribution Practices

Element	Description	Primary Response	Evidence
12.3.5.1	Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for the use of all persons engaged in the handling and processing of product.	Compliant	
12.3.5.2	Provision shall be made for staff to store their street clothing and personal items separate from food contact zones and food storage areas.	Compliant	
12.3.5.3	Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any food handling operations; ii. Accessed from the warehouse or food handling area via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; and v. Kept clean and tidy.	Compliant	
12.3.5.4	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. Procedure shall be documented and implemented to properly manage sewage back-ups to minimize the potential for contamination.	Compliant	
12.3.5.5	Handwash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 12.3.2.2.	Compliant	
12.3.5.6	Separate break room facilities shall be provided away from a food handling or storage areas. Break rooms shall be kept clean and tidy and free from waste materials and pests.	Compliant	
12.3.5.7	Where outside eating areas are provided, they shall be kept clean and free from waste materials and maintained in a manner that minimizes the potential for	Not	There is not an outside eating area.



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	introduction of contamination including pests to the site.	Applicable	
12.3.5.8	Signage in languages understood by staff advising people to wash their hands before entering the food storage areas shall be provided in a prominent position in break rooms and break room exits.	Compliant	

**SS 12.3.5 Staff Amenities (change rooms, toilets, break rooms) Summary**

Employee bathrooms and break rooms were observed to be appropriately lit and ventilated and available for all personnel at the facility. There are not any change rooms. Employees in the warehouse put their uniforms on at home. Employee bathrooms and break rooms were observed to be appropriately lit and ventilated and available for all personnel at the facility. There are not any change rooms. Employees in the warehouse put their uniforms on at home. Restrooms and washrooms were observed to be separate from food processing and handling areas and accessed via a separate room or airlock. An area has been provided for the storage of outer garments and other items while using the facilities. Sanitary facilities were observed to be sufficient in number for all employees and were cleaned and maintained on a scheduled basis. Sanitary drainage is separated from plant drainage and that it is disposed of in accordance with regulations. The sanitary facilities have hand wash sinks that comply with the requirements of the SQF Code. The lunchroom is properly separate from production. It is well lit, properly ventilated, and appropriately sized for the number of facility employees. It includes food storage areas and refrigerators. A sign reminding employees to wash their hands before returning to work were observed at the exit to lunchroom. The lunch room was observed to be clean during the audit tour. There is not an outside eating area.

**12.4.1 Personnel Processing Practices Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.4.1.1	All personnel shall comply with the following practices: i. Personnel entry to food handling areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be left open for extended periods when access is required for waste removal or stock transfer; iii. The wearing of false fingernails or fingernail polish is not permitted when handling exposed food; iv. Materials and products shall be kept in appropriate containers as required and off the floor; v. Waste shall be contained in the bins identified for this purpose and removed from the operational area on a regular basis and not left to accumulate; vi. Staff shall not eat or taste any product in the food storage or handling area; vii. Smoking, chewing, eating, or spitting is not permitted in any food handling or storage areas; and viii. Drinking of water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers shall be stored in clear, covered containers, and used in designated areas only.	Compliant	
12.4.1.2	All personnel engaged in storage, transport, and handling of packaged products and materials shall ensure that products and materials are handled and stored in	Compliant	

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such a way as to prevent damage or product contamination.

**SS 12.4.1 Personnel Processing Practices Summary**

Food handling procedures for all employees are documented and implemented. Personnel are required to access the processing areas through personnel doors only and doors were observed closed. False fingernails or fingernail polish, long nails, false or extended eyelashes are prohibited, and no violations were noted. Hair nets were observed to be worn where the product is repacked.

**12.5.1 Water Supply Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.5.1.1	Adequate supplies of water drawn from a known clean source shall be provided for use during holding, storage and cleaning of the premises and equipment.	Compliant	
12.5.1.2	Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.	Compliant	
12.5.1.3	Supplies of hot and cold water shall be provided as required to enable the effective cleaning of the premises and equipment.	Compliant	
12.5.1.4	The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.	Compliant	
12.5.1.5	The use of non-potable water shall be controlled such that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; and iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent back flow or back siphonage.	Not Applicable	There is not any non-potable water in the facility.
12.5.1.6	Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.	Not Applicable	No water is stored on-site.

**SS 12.5.1 Water Supply Summary**

Potable water is sourced for use in the facility for processing and cleaning the premises and equipment. Potable water is supplied from the city of Denver and a water report from 2023 was available. It was determined that there was adequate hot and cold water for cleaning and processing. The back-flow was checked on 3/22/2023 and 4/14/2023. The crisis plan addresses what would be done in the event that the water is not potable. There is not any non-potable water in the facility. No water is stored on-site.

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**12.5.2 Water and Ice Quality Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.5.2.1	Microbiological analysis of the water and ice supply that comes into contact with food or food contact surfaces shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Verification, at minimum, shall be made annually.	Minor	The water has not been tested for micro within the last year. It was last tested on 10/19/2022.
12.5.2.2	Water and ice shall be analyzed using reference standards and methods.	Compliant	
12.5.2.3	Ice rooms and receptacles shall be constructed of materials as outlined in elements 12.1.2 and designed to minimize contamination of the ice during storage and distribution.	Not Applicable	No ice is used here.

**SS 12.5.2 Water and Ice Quality Summary**

The water is tested once a year for micro by a third party lab. It was last tested on 10/19/2022 for E. coli and total coliforms and was acceptable. No ice is used here. Minor: The water has not been tested for micro within the last year. It was last tested on 10/19/2022.

**12.5.3 Air and Other Gases Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.5.3.1	Compressed air or other gases (e.g. nitrogen, carbon dioxide) that contact food or food contact surfaces shall be clean and present no risk to food safety.	Not Applicable	No compressed air touches the products.
12.5.3.2	Compressed air systems and systems used to store or dispense other gases used in food storage and distribution process shall be maintained and regularly monitored for quality and applicable food safety hazards.	Not Applicable	No compressed air touches the products.

**SS 12.5.3 Air and Other Gases Summary**

No compressed air touches the products.

**12.6.1 Receipt, Storage and Handling of Goods Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.6.1.1	The site shall implement an effective storage plan that allows for the safe, hygienic storage of ice, food products (frozen, chilled, and ambient), packaging, equipment, and chemicals.	Compliant	
12.6.1.2	Dry food products shall be received and stored in a way to prevent cross-contamination with frozen and chilled products.	Compliant	
12.6.1.3	The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented.	Compliant	
12.6.1.4	Procedures shall be in place to ensure that all food products and recouped products are utilized within their designated shelf life.	Compliant	
12.6.1.5	Where goods are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there is no risk to the integrity of those goods, or contamination, or adverse effects on food safety.	Not Applicable	There are not any temporary control measures for storage of raw materials.
12.6.1.6	Records shall be available to verify alternate or temporary control measures for storage of raw materials, ingredients, packaging, equipment, chemicals, or finished products.	Not Applicable	There are not any temporary control measures for storage of raw materials.
12.6.1.7	Racks provided for the storage of food products shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room. Storage areas shall be cleaned at a predetermined frequency.	Compliant	

**SS 12.6.1 Receipt, Storage and Handling of Goods Summary**

The site has implemented a "Storage and Shipping Protocols SOP" dated 11/20/16 for the storage of products, packaging, equipment, and chemicals. FIFO is used here. An aged inventory report is done daily here to make sure products do not expire. Racks were clean. There are not any temporary control measures for storage of raw materials.

**12.6.2 Cold Storage, Freezing and Chilling of Foods Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.6.2.1	The site shall provide confirmation of the effective operational performance of freezing, chilling, and cold storage facilities. Chillers, blast freezers, and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient refrigeration of food and shall be easily accessible for inspection and cleaning.	Compliant	

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12.6.2.2	Sufficient refrigeration capacity shall be available to store chilled or frozen food at the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.	Compliant	
12.6.2.3	Discharge from defrost and condensate lines shall be controlled and discharged to the drainage system.	Compliant	
12.6.2.4	The site shall have a written procedure for monitoring temperatures of storage rooms, including the frequency of checks, and corrective actions if the temperature is out of specification. Cold and chilled storage rooms shall be fitted with temperature monitoring equipment, located to monitor the warmest part of the room, and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures.	Compliant	
12.6.2.5	Procedures shall be in place to identify the methods and responsibilities used to ensure that processes applied to materials prior to distribution (e.g. thawing, slacking, labeling) do not pose a risk to product safety or loss of traceability.	Compliant	

**SS 12.6.2 Cold Storage, Freezing and Chilling of Foods Summary**

Chillers and cold storage areas are designed and constructed to allow for hygienic and efficient refrigeration. There are not any freezers. There appeared to be sufficient capacity for the facilities requirements and sufficient space for periodic cleaning. The condensate lines were connected directly to the plant drainage system. Temperature monitoring devices are located at the warmest part of the refrigerators/freezers. The coolers are monitored for temperature three times per day. The "Cooler Temperature Monitoring Logs" were reviewed for 1/30/2023-2/4/2023, 3/20/2023-3/25/2023, 6/5/2023-6/9/2023, 7/31/2023-8/4/2023, 10/16/2023-10/20/2023, and 11/20/2023-11/24/2023 and were acceptable. There have not been any issues with the coolers going out of range. An outside contractor maintains the refrigeration equipment.

**12.6.3 Storage of Dry Goods Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.6.3.1	Dry goods shall be located away from wet areas to protect the product from contamination and deterioration and to prevent packaging from becoming a harborage for pests or vermin.	Compliant	

**SS 12.6.3 Storage of Dry Goods Summary**

Storage areas for products and finished goods were observed to be located away from any wet areas, clean, and well maintained. The product is protected from contamination, deterioration, and pest harborage. Racking is designed and constructed from impervious materials and located so storage areas can be cleaned and inspected. Forklifts and other vehicles in processing areas and storage areas were observed to not present a food hazard.

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**12.6.4 Storage of Hazardous Chemicals and Toxic Substances Used On-site Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.6.4.1	Hazardous chemicals, toxic substances, and pesticides that are for use on the site with the potential for food contamination shall be: i. Used only according to manufacturers' instructions; ii. Controlled to prevent contamination or a food safety hazard to raw material, packaging, work-in-progress, finished product, or product contact surfaces; iii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; iv. Supplemented with a current Safety Data Sheet (SDS) made available to all staff; v. Controlled to track usage and ensure return to the appropriate storage areas after use; vi. Be compliant with national and local legislation; and vii. Used so that there is no cross-contamination between chemicals.	Compliant	
12.6.4.2	Hazardous chemicals and toxic substances shall be stored: i. In an area with appropriate signage; ii. Accessible only by personnel trained in the storage and use of chemicals; iii. Separated from the distribution storage area so as not to present a hazard to staff, product, packaging, or product handling equipment; iv. In their original containers, or in clearly labeled secondary containers if allowed by applicable legislation; and v. Stored so that there is no cross-contamination between chemicals.	Compliant	
12.6.4.3	Personnel who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals: i. Shall be fully trained in their purpose, storage, handling, and use; ii. Be provided first aid equipment and personnel protective equipment; and iii. Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements.	Compliant	
12.6.4.4	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 waiting authorized disposal by an approved vendor.	Compliant	
12.6.4.5	In the event of a hazardous spill, the site shall: i. Have spillage clean-up instructions to ensure that the spill is properly contained; and ii. Be equipped with spillage kits and cleaning equipment.	Compliant	

**SS 12.6.4 Storage of Hazardous Chemicals and Toxic Substances Used On-site Summary**

Any hazardous chemicals were observed to be properly stored and labeled and did not appear to present a hazard to personnel or food products. No packaging nor products were stored next to chemicals. Chemical storage areas were observed to be locked and had instructions on handling hazardous chemicals, an up-to-date inventory of all chemicals, available first aid and spill containment equipment. Daily supplies of chemicals were properly stored. All stored chemicals have current SDS information on file at the facility. The SDS was reviewed for the manual ware washing detergent. No pesticides are stored on-site. A SDS sheet was reviewed for the Oxonia sanitizer.

### 12.6.5 Loading, Transport, and Staging Practices Module 12 Good Storage and Distribution Practices

Element	Description	Primary Response	Evidence
12.6.5.1	The practices applied during loading, transport, and unloading of food products and materials shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Practices shall protect against contamination from biological, chemical, and physical hazards, and under conditions that prevent cross-contamination.	Compliant	
12.6.5.2	Sites shall have a procedure in place that is documented and implemented to ensure trailers are inspected prior to receiving shipments or loading to ensure that the trailer is in good repair, clean, secured and at the required environmental condition and temperature.	Compliant	
12.6.5.3	Vehicles (e.g. trucks/vans/containers) used for transporting food shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the product.	Compliant	
12.6.5.4	Receiving, staging, loading, and unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product integrity.	Compliant	
12.6.5.5	Where applicable, food transport vehicles' refrigeration units shall maintain the food at the required temperatures and the units' temperature settings shall be set, checked, and recorded before loading and product temperatures monitored at regular intervals during loading as appropriate. The refrigeration units shall be operational at all times and checks shall be completed of the units' operation, the door seals, and the storage temperature at regular intervals during transit.	Compliant	
12.6.5.6	Upon arrival and prior to opening the doors, the food transport vehicles' refrigeration unit storage temperature settings and operating temperature shall be checked and recorded. Receiving shall be completed efficiently and product temperatures shall be recorded at the commencement of unloading and at regular intervals during unloading.	Compliant	

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**SS 12.6.5 Loading, Transport, and Staging Practices Summary**

There is a "Storage and Shipping Protocols" policy dated 11/20/16 and a "Shipping and Receiving" policy dated 8/1/2012. Trailers are inspected for temperature and condition prior to unloading and shipping. It was observed during the audit tours that food is unloaded, stored, and loaded under conditions that prevent cross contamination. Incoming Product Examination Records include the trailer condition (free of foreign objects, pest evidence, smells, or off odors, and trailer floor and walls in good condition), trailer temperature at the tail, middle, and nose, and presence of a lock or seal. The quantities of the different items received along with whether or not they are acceptable and the temperature is documented. These forms were reviewed for 3/9/2023, 5/20/2023, 7/23/2023, 8/28/2023, and 11/3/2023 and were acceptable. Shipping records were reviewed for 3/15/2023, 5/17/2023, 7/20/2023, 9/2/2023, 11/7/2023, 11/8/2023, 11/10/2023, and 11/13/2023 and included the trailer condition (free of foreign objects, pest evidence, smells, or off odors), loaded by and were acceptable. The "Picking and Shipping Sheets" include a check for acceptable condition and truck box temperate and these were reviewed for 7/20/2023, 9/2/2023, and 11/28/2023 and were acceptable. Refrigerated trailer temperatures are monitored and documented before loading of product. This was observed during the audit. The drivers work for this warehouse. The reefers are able to maintain the temperature throughout transport. The trucks are leased from a vendor and they are responsible for washing the straight trucks on Sundays every week if the weather allows. The contract was reviewed dated 2/2/2022 showing that this vendor is responsible for washing the straight trucks. The maintenance records for the straight trucks also included the trailer wash records and these were reviewed for 1/1/2023-11/30/2023. The warehouse also had a third party vendor wash the trailers on 11/29/2023.

**12.7.1 High-Risk Processes Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.7.1.1	The process flow shall be designed to prevent cross-contamination and organized so there is a continuous flow of product through the process. The flow of personnel shall be managed such that the potential for contamination is minimized.	Compliant	

**SS 12.7.1 High-Risk Processes Summary**

The process flow was observed to be logical, with a continuous flow, and designed to prevent cross contamination. It was observed during audit tours that the flow of employees is such that any cross contamination is minimal. Repack is done in a separate building and employees wash their hands, wear hair nets and gloves, and wear a lab coat.

**12.7.2 Control of Foreign Matter Contamination Module 12 Good Storage and Distribution Practices**

Element	Description	Primary Response	Evidence
12.7.2.1	The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff.	Compliant	
12.7.2.2	Inspections shall be performed to ensure plant and equipment remains in good	Compliant	

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	condition and potential contaminants have not been detached or become damaged or deteriorated.		
12.7.2.3	Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or other like material (except where product is contained in packaging made from these materials, or measurement instruments with glass dial covers, or MIG thermometers required under regulation) shall not be permitted in food processing/contact zones.	Compliant	
12.7.2.4	Where glass objects or similar material are required to be used by the site in storage and handling areas, they shall be listed in a glass inventory including details of their location.	Compliant	
12.7.2.5	Product that is in glass or similar material that is for distribution purposes shall be stored and handled in a manner that prevents contamination.	Compliant	
12.7.2.6	Regular inspections of storage and handling zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass inventory.	Compliant	
12.7.2.7	Glass instrument dial covers on equipment and MIG thermometers shall be inspected at regular intervals.	Not Applicable	There are not any glass instrument dial covers nor mercury in glass thermometers.
12.7.2.8	Pallets used in food storage shall be made of a suitable material, dedicated for that purpose, clean, maintained in good order, and their condition subject to regular inspection.	Compliant	
12.7.2.9	Wooden pallets and other wooden utensils used in food handling areas shall be dedicated for that purpose, clean, and maintained in good order. Their condition shall be subject to regular inspection.	Compliant	
12.7.2.10	Loose metal objects on equipment, equipment covers, and overhead structures shall be removed or tightly affixed so as not to present a hazard.	Compliant	

**SS 12.7.2 Control of Foreign Matter Contamination Summary**

There is a "Foreign Material and Glass Control" policy dated 11/20/16. A foreign material hazard analysis was done. Monthly self-inspections and daily pre-operational inspections look for the presence of foreign materials. A glass register has been documented with glass, brittle plastic, and ceramic sources included in all areas of the plant. The glass register is current. Glass audits are done monthly on a "Monthly Glass and Brittle Plastic Inspection" form. These were reviewed for 10/11/2023, 11/7/2023 and were complete. The monthly self-inspections also include a check for glass and brittle plastic and were reviewed for 1/18/2023, 2/16/2023, 3/8/2023, 4/19/2023, 5/18/2023, 6/14/2023, 7/12/2023, 8/16/2023, 9/13/2023, 10/11/2023, and 11/7/2023 and included findings and corrective actions. Wood pallets were clean and in good condition. There are not any glass instrument dial covers nor mercury in glass thermometers.

**12.7.3 Managing Foreign Matter Contamination Incidents Module 12 Good Storage and Distribution Practices**

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Element	Description	Primary Response	Evidence
12.7.3.1	In all cases of foreign matter contamination the affected food product shall be isolated, inspected, reworked, or disposed of.	Compliant	
12.7.3.2	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 cleared by a suitably responsible person.	Compliant	
<b>SS 12.7.3 Managing Foreign Matter Contamination Incidents Summary</b>			
The site's policy requires that any product affected by foreign material contamination be isolated, inspected, reworked or disposed of. The glass policy requires that a thorough cleanup and inspection (including of cleaning equipment and footwear) occur if a glass breakage were to occur. A responsible person, the Plant Manager/SQF Practitioner, is required to inspect the affected area before the restarting of production.			

### 12.8.1 Waste Disposal Module 12 Good Storage and Distribution Practices

Element	Description	Primary Response	Evidence
12.8.1.1	The responsibility and methods used to collect and handle dry, wet, and liquid waste and store it prior to removal from the premises shall be documented and implemented.	Compliant	
12.8.1.2	Waste shall be removed on a regular basis and not allowed to build up in food handling or storage areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until external waste collection is undertaken.	Compliant	
12.8.1.3	Trolleys, vehicles, waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so as not to attract pests and other vermin.	Compliant	
12.8.1.4	Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.	Compliant	
12.8.1.5	Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health.	Not Applicable	No waste goes to animal feed.

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12.8.1.6	Reviews of the effectiveness of waste management will form part of regular hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports (refer to 2.5.4.3).	Compliant	
12.8.1.7	A procedure shall be in place to ensure drainage wastewater is effectively removed from the storage areas (refer to 12.1.2.2). If stored and/or treated on the premises, it shall be stored in a separate storage facility and suitably contained. Inspections of the drainage system and wastewater storage shall be included in the regular site inspections (refer to 2.5.4.3).	Compliant	
<b>SS 12.8.1 Waste Disposal Summary</b>			
<p>An "Inedible Waste" policy dated 11/20/16 defines the methods and responsibilities for handling dry, wet, and liquid waste has been documented and implemented. Waste was observed to be removed on a scheduled basis and is documented on pre-operational inspections and internal audits conducted by the plant. Waste containers, hoppers, bins and storage areas on the interior and exterior of the facility were observed to be well-maintained and clean. Solid waste from processing was observed to be properly disposed of. No waste goes to animal feed.</p>			