# Audit Report

**Global Standard for Food Safety Issue 7: July 2015**

| 1.Audit Summary | | | |
|---|---|---|---|
| Company name | ConAg Packing & Storage, LLC | BRC Site Code | 1978209 |
| Site name | ConAg Packing & Storage, LLC | | |
| Scope of audit | Washing, sorting, cooling, packing of fresh cherries in pouches and clamshells . | | |
| Exclusions from scope | none. | | |
| Justification for exclusion | n/a | | |
| Audit Finish Date | 2016-06-23 | | |
| Re-audit due date | 2017-06-26 | | |

| Voluntary modules included | | |
|---|---|---|
| Modules | Result | Details |

| 2. Audit Results | | | | | |
|---|---|---|---|---|---|
| Audit result | Certificated | Audit grade | A | Audit type | Announced |
| Previous audit grade | A | Previous audit date | 2015-06-25 | | |

| | | |
|---|---|---|
| Number of non-conformities | Fundamental | 0 |
| | Critical | 0 |
| | Major | 0 |
| | Minor | 7 |

## 3.Company Details

| | | | |
|---|---|---|---|
| Address | 6130 Yakima Valley Highway, Wapato, Washington | | |
| Country | United States | Site Telephone Number | 5099457914 |
| Commercial representative Name | Dani Young | Email | dyoung@congdonorchards.com |
| Technical representative Name | Dani Young | Email | dyoung@congdonorchards.com |

## 4.Company Profile

| | | | | | |
|---|---|---|---|---|---|
| Plant size (metres square) | <10k sq.m | No. of employees | 51-500 | No. of HACCP plans | 1-3 |

| | |
|---|---|
| Subcontracted processes | No |
| Other certificates held | Organic |
| Regions exported to | Asia<br>North America Canada, Mexico |
| Company registration number | XXXX |
| Major changes since last BRC audit | None |

Company Description

ConAg Packing and Storage LLC is a wholly owned subsidiary of Congdon Orchards. Only fresh cherries for domestic and export sales are packed in the facility. The leased building is more than 50 years old. Approximately 275 employees operate two production lines - one for dark sweet cherries and one for Rainier cherries. Both lines can run conventional and organic fruit. Only a single production shift and a cleaning and sanitation shift have operated this season. The production season typically lasts 6-8 weeks, depending upon raw material supply. The controlled atmosphere storage units located on the grounds adjacent to theprocessing building are excluded from the scope of this audit.

## 5.Product Characteristics

| | | | | | |
|---|---|---|---|---|---|
| Product categories | 05 - Fruits, vegetables and nuts | | | | |
| Finished product safety rationale | Peracetic acid wash, cold storage, and short shelf life. | | | | |
| High care | No | High risk | No | Ambient high care | No |
| Justification for area | BRC Decision tree | | | | |
| Allergens handled on site | None | | | | |
| Product claims made e.g. IP, organic | Organic | | | | |
| Product recalls in last 12 Months | No | | | | |
| Products in production at the time of the audit | Premium sweet Cherries and Bing Cherries | | | | |

## 6. Audit Duration Details

| | | | |
|---|---|---|---|
| On-site duration | 16 man hours | Duration of production facility inspection | 7 man hours |
| Reasons for deviation from typical or expected audit duration | Facility had 2 identical packaging line, one line was operational at the time of audit and very simple process, only few equipment involved. | | |
| Next audit type selected | Announced | | |

## Audit Duration per day

| Audit Days | Audit Dates | Audit Start Time | Audit Finish Time |
|---|---|---|---|
| 1 | 2016-06-22 | 08:00 | 4:45 |
| 2 | 2016-06-23 | 7:30 | 3:30 |

| | Auditor(s) number(s) | Names and roles of others |
|---|---|---|
| Auditor Number | 233062 | Parmjit Dhillon |
| Second Auditor Number | N/A | |

## Present at audit

| Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.9)<br>Name / Job Title | Opening Meeting | Site Inspection | Procedure Review | Closing Meeting |
|---|---|---|---|---|
| Mark Blore/General Manager | x | | | x |
| Scott Rosencrance/Operations Manager | x | | | x |
| Dani Young/Technical Manager | x | | x | x |
| Edgar Pacheco/Assistant Technical Manager | x | x | x | x |
| Roberto Sanchez/Production Manager | x | | | x |

# Non-Conformity Summary Sheet

| Critical or Major Non Conformities Against Fundamental Requirements | | | | |
|---|---|---|---|---|
| **No.** | **Clause** | **Details of non-conformity** | **Critical or Major?** | **Anticipated re-audit date** |

| Critical | | | |
|---|---|---|---|
| **No.** | **Clause** | **Details of non-conformity** | **Anticipated re-audit date** |

| Major | | | | | | | |
|---|---|---|---|---|---|---|---|
| **No.** | **Clause** | **Details of non-conformity** | **Correction** | **Proposed preventive action plan (based on root cause analysis)** | **Evidence provided document, photograph, visit/other** | **Date reviewed** | **Reviewed by** |

| Minor | | | | | | | |
|---|---|---|---|---|---|---|---|
| **No.** | **Clause** | **Details of non-conformity** | **Correction** | **Proposed preventive action plan (based on root cause analysis)** | **Evidence provided document, photograph, visit/other** | **Date reviewed** | **Reviewed by** |
| 1 | 2.5.1 | Empty lugs before returned are washed on the line. Lug washing step 4A and 4B was not marked on the HACCP flow diagram, even hazard analysis was performed for these steps. | 1. The Hazard Analysis Worksheet- Process Steps QP-2.7.1CA was revised on 6/27/16 to update the changes made to the flow chart and match the steps in the risk assessment. | 1. During the yearly HACCP workshop, the Process Flow Chart QP-2.5.1CA was revised to reflect any changes made to the process flow chart 2. After the Flow Chart revision the Hazard Analysis Worksheet QP-2.7.1 was not updated to reflect the changes made to the flow chart 3. Lack of follow through the update the Hazard Analysis Worksheet | Copy of the revision to the Process Flow Chart- Dark Sweet.;Copy of the IA stating to ensure this is verified.;Copy of the update the Hazard Analysis Worksheet. | 2016-07-06 | CELLERBECK |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | after flow chart revision.<br><br>1. The yearly Internal Audit, QP-3.4.1CA was revised on 6/28/16 to include the assurance to verify that the steps in the Hazard Analysis are updated after each flow chart revision. | | | |
| 2 | 4.1.2 | Facility had only designated smoking area on North Side of the building in front of the office. Lots of cigarette butts were spotted on the south side of the building by employee lunch room along the ledge of the shed. | 1. The South side of the building was cleaned 2. A clearly labeled designated smoking area has been established on the South side of the building 3. No smoking signs have been post throughout the shipping dock area to restrict any smoking from truck drivers 4. Refresher training was given to all of our employees to ensure that they understand the procedure of smoking only in designated smoking areas and following proper procedures | 1. Excess of cigarette butts observed on the South side of the building without a designated smoking area. 2. Employees were smoking and there was no way to put the ashes and cigarette trash. 3. Lack of employee training. 4. Truck drivers smoking in non-designated smoking areas in the shipping dock. 5. Not providing clearly designated and labeled smoking areas.<br><br>1. The monthly Preventative Maintenance | Completed monthly inspection on 6/29/16. Refer to page 6.;Refresher training given to all of our employees about smoking procedure.;Revised inspection sheet conducted on 7/1/16. Refer to page 1. ;These are the pictures of the premises and designated smoking area. | 2016-07-06 | CELLERBECK |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | Exterior/Interior Checklist, F4.7.1CA was revised on 6/28/16 to include a visual inspection of the employee parking lot and shipping dock. 2. During the monthly facility inspections of the exterior and the premises and important attention will be paid to ensure that employees are using designated smoking areas and that they are placing the garbage in the ash trays | | | |
| 3 | 4.3.2 | Facility had site map which covers most of the routes and access points to the facility. It does not show access point and routes of raw material and packaging material. | 1. On 6/23/16 the Building Specifications map was revised to include the travel routes for packaging and raw material. | 1. All of the maps were on file including employee travel routes, waste, water, and production process flow but no travel route for packaging. 2. Missed that flow chart thinking that it would be covered under the process flow chart.<br>1. A copy of this map will be made available and put in our file. | Copy of map to reflect Raw Material/Packaging Travel Routes.;Copy of the internal audit to ensure verification of map available. | 2016-07-06 | CELLERBECK |

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|---|---|---|---|---|---|---|---|
| | | | | During the Internal Audit the map will be reviewed and reflected to ensure that no changes have been made. | | | |
| 4 | 4.7.2 | There was orange guard by motor on the elevator conveyor with paint is chipping, also in packaging storage area paint is flaking from the gear box assembly. | 1. Guards on the conveyor elevator were removed at the end of the production day on 6/28/16 and were repainted. 2. Maintenance monthly inspection revised to include all guards throughout the production area and inspect condition of each guard. 3. Our building landlord, DelMonte removed the equipment that was observed to be with paint flaking inside of the packaging material area. | 1. The orange guard on the motor elevator with paint chipped was not being monitored 2. It was an oversight of the inspection and monitoring of these areas. 3. These motor guards were not on a routinely scheduled inspection and monitoring log.<br>1. The monthly Preventative Maintenance Exterior/Interior Checklist, F-4.7.1CA was revised on 6/28/16 to update a visual inspection of gearboxes guards to ensure no paint flaking. | Copy of maintenance inspection conducted on 7/1/16. Refer to page 3.;Copy of maintenance inspection conducted on 7/1/16. Refer to page 3.;Pictures of the before and after on the guards and flaking paint. | 2016-07-06 | CELLERBECK |
| 5 | 4.7.3 | A temporary repair is made to the wire of thermostat from Hydrocooler 1 and 2 which was supported and held in | 1. Temporary repairs observed during the audit were removed from the Hydro cooler. 2. Refresher training was given to | 1. The use of twine, string and an orange flag type was used as a temporary repair in | A copy of the pictures of the removal of the temporary repairs. | 2016-07-06 | CELLERBECK |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | place at couple of spots with orange tape like material. Facility had temporary repair policy this was not logged on temporary repair log. | the Maintenance Personnel and Refrigeration personnel to understand that temporary repairs are not allowed. | the hydrocooler to hold a temperature probe 2. Employees use the temporary repair without ensuring the proper removal of the temporary repair 3. Lack of employee training on assurance that no temporary repairs are used in production area.<br><br>1. Monitor temporary repairs very closely during the monthly inspections to ensure that employees are following procedure. | ;A copy of the monthly inspection conducted on 6/29/16. Refer to page 4.;A copy of the Training Attendance Refresher for Maintenance personnel. | | |
| 6 | 4.8.6 | Even after running tap for 2 minutes only cold water was available at the hand washing sink in processing area and at main employee entrance hand washing sink. | 1. Water heater was installed for both of the hand wash stations to have temperature suitable for hand wash. | 1. Not having warm water available at the employee hand wash stations. 2. Water heater not big enough to supply enough warm water for our employees to wash hands. 3. We had evidence to show that according to FDA it is the hand friction that is more effective than the actual water temperature 4. It is a BRC and Costco | Copy of the maintenance inspections conducted on 7/1/16. Refer to page 1 and 2.;Pictures of the water temperature at both of the hand wash basins. | 2016-07-06 | CELLERBECK |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | Addendum requirement that water be a suitable temperature.<br><br>1. The monthly Preventative Maintenance Exterior/Interior Checklist, F-4.7.1CA was revised on 6/28/16 to include that water temperature at all hand wash basins are monitored. | | | |
| 7 | 4.11.2 | Cobwebs were observed on line 1 above the sizer and elevator conveyor, also a black string like material was hanging from the ceiling in same area. | 1. Area was cleaned, the cobwebs and all of the debris hanging from the ceiling has been removed. 2. Maintenance monthly inspection form was updated to reflect an inspection to ensure that ceiling and walls are free of cobwebs, debris, etc. | 1. Cobwebs observed on the debris hanging from the ceiling 2. Facility was not kept cleaned and periodically monitored to observe for any cobwebs build up 3. It was not part of a routine schedule to ensure that these areas were monitored.<br><br>1. The monthly Preventative Maintenance Exterior/Interior Checklist, F4.7.1CA was revised on 6/28/16 to include a | Please refer to pg. 3 for the revision made to inspect ceiling and walls. ;These are the pictures of the areas where the cobweb was identified.;Revised monthly Facility Inspection to reflect ceiling and walls done on 6/29/16 | 2016-07-06 | CELLERBECK |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | visual inspection for cobwebs and dirt hanging from the ceiling. | | | |

| Comments on non-conformities |
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| N/A |

# Voluntary Modules Non-Conformity Summary Sheet

# Detailed Audit Report

## 1 Senior management commitment

### 1.1 Senior Management Commitment and continual improvement

The site has a senior management team led by the General Manager, which is fully committed to the implementation of the requirements of the standard and continual improvement of food safety and quality.

The documented policy was signed by the General Manager on May 05, 2016. The policy is communicated to all staff by being displayed in common areas such as employee notice board and in the office. Additional communication is done during orientation and refresher training.

Clear objectives were set by site senior management on an annual basis and are monitored monthly, quarterly, twice a year. Objectives for year include:
1. Achieve BRC audit score A
2. Employee safety 50% reduction from previous year
3. Customer Complaints 50% reduction than previous year.

Senior manager chaired the quarterly management review meeting, which includes:
• previous management review action plans and timeframes
• results of internal, second-party and/or third-party audits
• customer complaints and results of any customer feedback
• incidents, corrective actions, out-of-specification results and non-conforming materials
• review of the management of the systems for HACCP, food defense and authenticity
• resource requirements.

Records of the meeting dated June 16, 2016 documented the review of the site performance. Decisions and actions agreed were communicated to staff responsible for implementation and actions were implemented within agreed timescales, as observed in CAR Log Training dated June 20, 2016.
Food safety, legality, and quality issues are discussed during monthly meetings. Minutes of the management review meetings dated April 07, 2016, April 27, 2016 and June 16, 2016 were reviewed.

The site has a designated organizational structure to provide human and financial resources to ensure compliance with requirements of the standard.

The site is kept informed of new risk to authenticity, scientific and technical developments, industry codes of practice, and regulatory issues through
• membership of trade organization, such as North West Horticulture and Horticulture convention
• information from government agencies, such as Recalls, Market Withdrawals and Safety Alerts for U.S. Food & Drug Administration (FDA), the Rapid Alert System for Food and Feed (RASFF)
• regular review of identified websites covering legislation and standards, such as FDA Guidance Documents for U.S. Food & Drug Administration (FDA), WSDA, Washigton State L & I

Test results for Cherries G903S Bing dated June 06, 2016 from an accredited third party testing laboratory showed that products are in compliance to the Federal Regulations.
A genuine hard copy or electronic version of the current Standard is available on site and there is awareness of the change to the standard.

The audit due date was June 27, 2016 and was conducted on June 22, 2016.

The most senior production manager or operations manager on site attended the opening and closing meetings.

All non-conformances from the previous audit were effectively addressed and have not recurred at this audit.

## 1.2 Organisational structure, responsibilities and management authority

The company have clear organizational structure and lines of communication.
The organizational chart dated May 20, 2016 showed the management structure of the company and the site. Job functions and deputies for key staff with responsibility for product safety, legality, and quality are defined in Position Emergency Backups QP-1.2.1CA Rev 9 dated May 20, 2016. Documentation indicated that the General manager was deputised to replace the Technical Manager during an absence. Documentation indicated that the position was responsible to Job descriptions for Technical Manager and Packing Line Supervisor were reviewed.
Employees (QC, Maintenance, shipper and operators) interviewed during the plant walkthrough were aware of their responsibilities. Work instructions were located on the line and in office and were accessible to relevant staff through their supervisor. Those reviewed include Customer Specification Manual is present on the line for QC.

## Details of non-applicable clauses with justification

| Clause reference | Justification |
|---|---|

| 2 The Food Safety Plan – HACCP |
|---|
| HACCP Team:<br>The company has developed and implemented 1 food safety HACCP plan<br>There is a multidisciplinary HACCP team led by the Technical Manager that completed HACCP training provided by Washington State university on April 19-21, 2010 and Assistant Technical Manager Feb 14-15, 2012. The other members of the team completed HACCP training on May 06, 2016. |
| Product Description:<br>A full description for Cherries includes:<br>composition<br>origin of ingredients,<br>physical properties and chemical properties,<br>treatment and processing,<br>packaging system,<br>storage and distribution conditions,<br>target safe shelf life,<br>and instructions of use.<br>Where the product will be sold<br>How the product will be used<br>Intended use<br>Know alternate use<br>No allergens present in the facility.<br>Relevant information referenced within the HACCP study includes scientific literature, known hazards, codes of practice, guidelines, regulation, customer requirements.<br>Examples: WSDA, NW Horticulture, FDA |
| Process Flow Steps:<br>Process flow diagrams were comprehensive and available for HACCP plan Dark Sweets reviewed.<br>Flow diagrams are verified minimum annually by site inspection (challenge by number HACCP team members); the most recent being May 24, 2016. Flow diagrams for the HACCP Plan Dark Cherries , processes were verified during the site inspection and included all required elements. |
| Hazards:<br>All potential hazards, reasonably expected to occur at each step in relation to product, process, and facilities were identified and recorded.<br>The hazard analysis, dated April 25, 2016 for the HACCP plan was reviewed and included all the hazards, which needs to be prevented, eliminated, or reduced to acceptable levels.<br>Suitable control measures for each hazard are documented in the Hazard Analysis. When their control is achievable through existing prerequisite programs, their adequacy to control specific hazards are validated.<br>Examples of the validation of the sanitation program included environmental swabs, ATP swabs, Knife Policy and Training program, etc. |
| CCPs and Critical Limits:<br>Based on the hazard analysis, 1 CCP were defined for the HACCP plan: Concentration of Peracetic Acid<br>Establish critical limits for each CCP – Codex Alimentarius Step 8, Principle 3<br>The corresponding critical limits were for<br>CCP 1: <45 to >80PPM |
| Validation Method of CCPs:<br>Validation of CCP is based in regulatory guidelines.<br>The documented evidence and validation supporting the control measures selected and the critical limits |

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|---|
| identified were for CCP 1 – document WSDA research document. |
| Monitoring and Corrective Actions:<br>Offline measurement monitoring systems are able to detect loss of control of CCP in time for corrective action to be taken.<br>CCP Operators for CCP 1 were interviewed. The Operator were aware of the critical limits and monitored the CCP per written plan. They were aware of procedures when the CCP critical limit was exceeded |

| **Details of non-applicable clauses with justification** | |
|---|---|
| **Clause reference** | **Justification** |

## 3 Food safety and quality management system

### 3.1 Food safety and quality manual

The Food safety & Quality management system dated June 20, 2016 covers the scope of the Global Standard for Food Safety and contains the appropriate process and procedures.

Policies, procedures and work instructions, and other relevant document are assembled in the Food Safety & Quality management System, Product Control and Process Control Manual which is available in the plant as printed copy.

The food safety and quality manual indexes documents required for the food safety system, quality and operating procedures, the site infrastructure, product control, process control, and personnel. The food safety and quality manual is available as a hard copy to appropriate managers.

All procedures and work instructions are clearly legible, in required language and sufficiently detailed. Photographs, diagrams and other pictorial instructions are used where required.

### 3.2 Documentation control

The company operates a computer based document control system in the Technical Manager`s computer to ensure only the correct versions of documents are available and in use.
The company has a document control procedure Document and Data Control QP-3.2.1CA, April 10, 2016, which includes a list of all controlled documents issued indicating the latest version number, code identification, person responsible for authorization, reasons for any change or amendment. The Technical Manager is the only person responsible for document approval and release.
The Food Safety department is responsible for replacement of obsolete documents held in hard copy.

### 3.3 Record completion and maintenance

Records, which demonstrate the effective control of product safety, legality and quality, are maintained.
Documentation procedure Document and Data Control QP-3.2.1CA, April 10, 2016 defined method for corrections to hand written errors as use of a single line through the item, initials, and rewriting the information and this was verified during audit. Exact times were required when documenting information.
The product shelf life is 7-14 days for cherries, The record retention period is 2 years.

### 3.4 Internal audit

There is a program of internal audits of the food safety plan and the implementation of the requirements of the Global Standard for Food Safety to verify their effective application.
A program of internal audits is scheduled once a year. The scope and frequency of the audits documented in document are established in relation to the risks associated with the activity and previous audit performance. Audits are carried out enabling the whole system to be covered in a year.
2 auditors who are independent from the audited department carry out internal audits. An example of the Internal auditor receiving training on course: Internal Auditor Training Course conducted by NCS dated Mar 18-19, 2014.
There were Internal audits throughout the year. The internal audit report for sanitation program, food defense and GMP`s completed on April 24, 2016 was reviewed. The report contained details of conformity and non-conformity with requirements. A report contained details of corrective action, assigned responsibility, time scales and verification of effective action was reviewed.
There is a program of monthly documented inspections to ensure that the factory environment, processing equipment, and tools, are maintained in a suitable condition for food production. Records of inspections of Facility inspection Monitoring Report dated May 29, 201 were reviewed. Inspections are conducted by Maintenance.

## 3.5.1 Management of suppliers of raw materials and packaging

The supplier approval and monitoring system ensures that any potential risks from raw materials and packaging to the safety, authenticity, legality, and quality of the final product are understood and managed.
Suppliers of cherries were identified as as low risk.
Risk assessments of raw materials and packaging materials to identify potential risk to product safety, authenticity, legality, and quality were reviewed on April 10, 2016. The hazard analysis, the risk or substitution of fraud, and the business impact form the basis for raw materials acceptance and testing and for supplier approval and monitoring.
The supplier approval procedure Supplier Evaluation and Management, dated April 10, 2016 is on site.
All suppliers are required a third party audit certificate to ensure suppliers effectively manage safety and quality risks of raw materials, and are operating effective traceability process.
Reviewed growers were Global GAP, SQF and WSDA certified
The approved supplier list was updated on May 03, 2016. All suppliers are accounted for and approved.
A Receiver was interviewed regarding knowledge of approved suppliers at receipt and was able to demonstrate access to the current list.
According to the supplier approval procedures exceptions are subject to same criteria as the regular suppliers.

## 3.5.2 Raw material and packaging acceptance and monitoring procedures

Controls on the acceptance of raw materials do not compromise the safety legality or quality of products
The documented procedure for the acceptance of raw materials and packaging "Receiving QP-3.5.2.1CA" Rev 4 is on site. Raw material acceptance and its release are based on one or a combination of:
• product sampling and testing.
• visual inspection on receipt
• certificates of conformance
• certificates of analysis – specific to each purchase order
The parameters for acceptance and frequency of testing are defined on procedure "Receiving QP-3.5.2.1 CA" for raw materials and packaging.
Records for acceptance of a batch of raw material and packaging reviewed during the plant walkthrough were "Firm Tech Record" dated June 22, 2016.

## 3.5.3 Management of suppliers of services

There is an effective program in place to manage Suppliers of Services.
A documented procedure for the approval and monitoring of suppliers of services Contractor Approval QP 3.5.3.1 dated June 06, 2016 was reviewed and has been applied to
• pest control
• laundry services
• laboratory testing
• waste management.
Calibration services
Supervision of maintenance contractors is completed by maintenance manager.
• pest control
• laundry services
• laboratory testing
• waste management.
Calibration services
Supervision of maintenance contractors is completed by maintenance manager
Contracts or formal agreements exist with the suppliers of services that clearly define service expectations and ensure potential food safety risks associated with the service have been addressed.
Examples of contracts reviewed were Pest Control and Cintas.

## 3.5.4 Management of outsourced processing

There is no outsourced production.

## 3.6 Specifications

Specifications for raw materials, packaging materials, finished products that could affect the integrity of the finished product are available.
Specifications for raw materials and packaging materials ensure compliance with relevant safety and legislative requirement; and include defined limits for relevant attributes that may affect the quality or safety of the final products (chemical  microbiological, or physical standards).
Example of a packaging material randomly selected for review were Clam shells, 4 lb boxes. Specifications are available for all finished products in register. They include key data to meet legal requirements and assist customer in the safe usage of product. Finished product specification for 2566 Cherries Sweet dated May 23, 2016 was reviewed and successfully compared with process specifications and customer requirements.
Finished product specification reviewed and approved by customer was Rainier Cherries Cherry April 12, 2016.
Specifications are reviewed whenever products change (e.g. ingredients, processing method) or at least every three years. Rainier Cherries, Red Sweet Cherry April 2014, and Dark Cherries Mar 15, 2015 reviewed included the date of the review and the date of approved changes.

## 3.7 Corrective action

The site is able to demonstrate the use of information from identified failures in the food safety and quality management system to make necessary corrections and prevent recurrence.
The procedure for the management of corrective action is Corrective and Preventive Action QP-3.7.1CA dated Mar 30, 2015.
Identified non-conformities that place the safety, legality, or quality of product at risk could arise from customer complaints, process analysis, internal and external audits, senior manager revisions, organizational issues, process measurements and auto-assessment. CCP failures, out of specification product, unsatisfactory pre-operational inspections, unsatisfactory environmental test results, coding errors. Corrective actions include:
• clear documentation of the non-conformity
• assessment of consequences by a suitably competent and authorized person
• identification of the corrective action to address the immediate issue
• identification of an appropriate timescale for correction
• the person responsible for corrective action
• verification that the corrective action has been implemented and is effective
• identification of the root cause of the non-conformity and implementation of any necessary preventative action.
Records of Positive results of EMP and 2 unmarked bins used for garbage dated June 15, 2016 and  June 18, 2016 were reviewed. Corrective and Preventative Action procedure was followed.

## 3.8 Control of non-conforming product

The site has a system in place to effectively prevent the release of any out-of-specification product.
The procedure for the management of nonconforming product is Non-conforming Product and Equipment QP-3.8Y Rev 5, dated July 15, 2016. The procedure includes the requirement for staff to identify and report potentially nonconforming product; direct labeling of packed product, defined responsibilities for decision making; personnel have been trained; activities are registered; nonconforming product is effectively managed to control release. Reviewed records of non-conforming product management and Hold For Disposition dated Jun 15, 2015.

## 3.9 Traceability

The plant has a system that enables the traceability of raw materials and in process and final product packaging from source through processes and distribution and vice versa.
During the audit a vertical traceability challenge was set involving Bing Cherries 8/2.25, manufactured on Jun 11, 2016 batch code 1680300, and 1080 cases manufactured. Dispatch details of the product manufactured were that 1080 cases were shipped on June 12, 2016 to C & S Wholesale, Boucherville Canada. Exercise performed in 24 minutes, achieved a number 100 % forward traceability and a satisfactory mass balance check,
Production, quality and CCP records; raw material, packaging, and finished product specification were reviewed. Raw material and packaging material inspection records, manufacturing specifications, dispatch records, and relevant records of prerequisite programs were also reviewed.
When materials arrive at the site, they are identified with manufacturer lot code.

Traceability of raw materials and packaging used is achieved using physical labeling of materials to production.
Finished goods are stored on pallets identified by pallet tag number that is also detailed in dispatch information to enable traceability when product leaves the site.
Identification of part-used packs in production and storage areas is by pallet tag.
Identification of finished product and materials pending investigations is by pallet tag.
Traceability is supported with “Famous” inventory management system.
Traceability undertaken by the site for finished product back to raw materials was conducted on date using finished product Cherry, G47S300, manufactured on Jun 06, 16. Full traceability was achieved on11 minutes, including a satisfactory mass balance check.
All the suppliers had third party certificates
Traceability is maintained for rework. Example where seen where cherries had .6% decay discovered and re run through system and traceability was maintained during the process.

## 3.10 Complaint handling

A procedure Trouble Report is on site to handle customer and consumer complaints effectively and information is used to reduce recurring complaints.

Complaints are addressed by Technical Manager and are received by third party marketing company via telephone and e-mail.

Complaints are recorded and records are made of investigation in database where sufficient information is provided. Appropriate action is carried out promptly and effectively.
Example of complaint that demonstrated adequate investigation, resolution and corrective action is dated May 29, 2016, fruit looked very tired, scald and sunburn present.

Complaint data and trends are reviewed at the quarterly management meetings. Complaint trend of 2015 was reviewed. Records of complaints included a root cause analysis and corrective actions to improve complaint level and prevent recurrence were reviewed.

## 3.11 Management of incidents, product withdrawal and product recall

The company has a plan and system in place to manage incidents and a product withdrawal and recall procedure that includes requirements of the Standard.

The company has a documented procedure Incident Management QP-3.11.1CA, dated April 10, 2016 on site to report and manage incidents and potential emergencies to maintain product safety, quality, and legality included are the withdraw and product recall, if needed.

The company has developed a product withdrawal and recall procedure named “Trace, Withdrawal, and Recall procedure” dated May 29, 2016. The procedure includes identification of the recall management team and written guidance provided to key staff. A list of key contacts is available, maintained and updated; a communication plan; details of external agencies; and the accountability for all stock, recovery, storage, and disposal.

The recall procedure is scheduled to be tested twice annually and the most recent test was carried out on Jun 06, 2016. Results included records of the timings of key activities, which were used to review the procedure and implement improvements as necessary.

Requirement to notify the certification body in event of a product recall is detailed in the product withdrawal and recall procedure.

## 3.12 Customer Focus and Communication

Customer specific policies and requirements are understood and implemented.
Customer specific requirements, codes of practice, working methods have been incorporated into daily packout schedule, raw material specifications and product specifications.
Records of communications of specific customer requirement to suppliers of Bing Cherries dated May 29, 2016

| |
|---|
| were reviewed. |

| Details of non-applicable clauses with justification | |
|---|---|
| **Clause reference** | **Justification** |
| 3.5.1.3 | 3.5.1.3. N/A – Raw material is not purchased from an agent or broker. |
| 3.5.4 | N/A – 3.5.4 There is no outsourced production. |
| 3.5.4.1 | N/A – 3.5.4.1 There is no outsourced production. |
| 3.5.4.2 | N/A – 3.5.4.2 There is no outsourced production. |
| 3.5.4.3 | N/A – 3.5.4.3 There is no outsourced production. |
| 3.5.4.4 | N/A – 3.5.4.4 There is no outsourced production. |

## 4 Site standards

### 4.1 External standards

The site is of suitable size, location, and construction to allow the production of safe and legal products. The buildings are in good repair and maintained.
An assessment was completed and there are no local activities that could affect production by introducing contaminants to products.
Neighboring business and activities include. Del Monte CA warehouse and orchards.
The perimeter of the site is in good order except cigarettes in a section outside.
Planted areas are kept to a minimum and are well maintained.
External traffic routes in the premises are maintained in good repair to avoid contamination of product.
The building fabric was noted to be in a good condition and the factory was well proofed. GMP audits and planned maintenance inspections monitor the building.
Minor: Facility had only designated smoking area on North Side of the building in front of the office. Lots of cigarette butts were spotted on the south side of the building by employee lunch room along the ledge of the shed.

### 4.2 Security

Security systems in place to protect products from theft or malicious product contamination while on site.
A security program is documented in Food Defense and Security Policy QP-4.2.1CA Rev 7 dated April 06, 2016. Areas have been assessed according to risk; sensitive or restricted areas are defined, clearly marked, monitored and controlled.
There are measures in place to maintain site security and prevent entry to production areas:
• All visitors and contractors report and sign a log recording their arrival, read and sign agreement to comply with site personal hygiene rules and other GMP.
• Plant personnel are trained in security procedures during their orientation training.
• Plant personnel are responsible for challenging unaccompanied and unauthorized people.
• Visitor, driver and contractor reporting system
• Secure fences and locked gates
• Locked external doors
• CCTV are located in sensible points
• Access to production areas is restricted to staff authorized to work in those areas
• All materials are stored within their designated storage areas inside the buildings.
• Finished goods are stored in a secure area.
• The secure storage of.
• Vehicle trailers are locked and sealed before leaving the site
Intake pipes with external opening were observed locked during the exterior walk.
The site is a registered food business. Ref 14849978156.

### 4.3 Layout, Product Flow and Segregation

Factory layout, flow of process, and movements of personnel is sufficient to prevent the risk of product contamination and to comply with all relevant legislation.
A site plan dated Jun 22, 2016 showing the processing and handling areas depicts closed area, low risk areas, enclosed product areas, and non-product areas, was verified on site.
The site map dated May 29, 2016 defines access points for personnel, routes for personnel, removal of waste, movement, and movement of rework, location of staff facilities and production process flow, which were verified on site.
Contractors and visitors are all required to review a medical screening questionnaire as well as reading and signing to comply with the site's GMP and personal hygiene rules prior to entering production areas.
Contractors involved in maintenance are supervised by maintenance whilst on site.
Records were requested and reviewed for a contractor during the audit.
Movement of personnel, raw materials, packaging, rework, and waste do not compromise the safety of products. Process flow and procedures implemented do not com
Sufficient working space and storage capacity are provided for all operations.

Minor: Facility had site map which covers most of the routes and access points to the facility. It does not show access point and routes of raw material and packaging.

## 4.4 Building fabric Raw material handling, preparation, processing, packing and storage areas

The site, building and facilities are suitable for the intended purpose.
Walls are constructed of Concrete and were in a satisfactory condition.
Floors are constructed of Concrete and were noted to be in good repair and facilitate cleaning.
Suitable drainage was noted in all factory areas and no evidence was seen of water pooling.
Drains flow from the highest risk towards lower risk areas and are trapped.
All machinery was positively ducted to the drain.
When this was not possible, floors were able to cope with the flow of water to the drains and dedicated sanitation staff is in charge of squeegeeing remaining water.
The plant drainage is on a separate system that drainage from common areas.
Ceilings are constructed from structural steel sandwich panels with Fescoe membrane and are appropriately maintained. All ceilings were seen to be clean.
Glass windows were protected against breakage.
All doors seen during the visit were found to be in a good condition and were easy to clean.
External doors and dock levelers are suitably proofed to prevent pest ingress, door discipline was observed to be satisfactory during the assessment.
Lighting provides suitable and sufficient lighting levels.
Light intensity is monitored annually at production areas identified for evaluation.
Bulbs, ELTs and strip lights are suitably protected.
During the site inspection it was noted that the factory storage and process areas were satisfactorily ventilated and there were no signs of condensation or excessive dust.

## 4.5 Utilities – water, ice, air and other gases

All utilities to and within the production and storage areas are designed, constructed, maintained and monitored to control the risk of contamination.
Water used within the operation is potable and drawn from approved well source.
Water is used for washing cherries, for sanitation, and for employee use.
Annual certificates from the water supplier are held on file confirming potability.
Certificates of analysis from process water sampled at closest place to use in contact with food dated June 17, 2016 and June 10, 2016 are held on file confirming potability.
An up-to-date diagram dated April 28, 2016 is available of the water distribution system on site, including holding tanks, water treatment and back-flow prevention valves in every line to main processing areas.

## 4.6 Equipment

Equipment is suitably designed for the intended purpose and is utilized to minimize the risk of product contamination.
Equipment observed was constructed of stainless steel and food grade materials that can be effectively cleaned.
Equipment in production areas is located to allow suitable access for cleaning and maintenance. Some equipment requires that safety guarding and panels have to be removed for effective cleaning. This takes place after production has finished.
Replacement parts, such as conveyor belts, are certified as being approved for food contact. The equipment direct contact with food is manufactured from stainless steel or food grade plastic and meets legal requirements.

## 4.7 Maintenance

An effective maintenance program is in operation for plant and equipment. The maintenance program addresses preventive, corrective, requested, and emergency repair tasks.
Planned maintenance is documented in Maintenance Schedule daily, weekly, monthly and annually. Planned maintenance through the manual system is scheduled and followed to ensure timely completion. Planned

maintenance is based on equipment manufacturer's recommendations and in the light of experience and planned corrective actions.
Daily and weekly start-up checks are carried out to prevent any risk of product contamination from equipment damage. Results are recorded reviewed records for May 23, 2016.
The maintenance procedure includes processes to minimize the risk of compromising product safety and legality during maintenance and cleaning. Following maintenance work a sign off acceptance procedure is in place to ensure that all foreign bodies and other contamination have been removed and the plant has been cleaned satisfactorily.
Lubricants and other engineering materials used on site are food grade and of know allergen status, with specifications being held with proof of suitability for use in food production.
The maintenance workshop and storage areas are tidy and well maintained. The maintenance workshop is remote from production areas.
A suitable swarf mat is present at the exit from the maintenance workshop into production areas.
Minor: There was orange guard by motor on the elevator conveyor with paint is chipping, also in packaging storage area paint is flaking from the gear box assembly.
Minor: A temporary repair is made to the wire of thermostat from Hydrocooler 1 and 2 which was supported and held in place at couple of spots with orange tape like material. Facility had temporary repair policy this was not logged on temporary repair log.

## 4.8 Staff facilities

Staff facilities are suitably designed and operated to ensure the minimum of risk of product contamination. Male and female facilities include lockers, toilets and hand washing facilities.
Changing facilities are provided for staff and visitors. The changing facilities allow direct access to the production areas.
Lockers were of a suitable size to accommodate all personal items.
There was no crossover of outdoor clothing and factory work wear noted during the visit. Each employee has a suitable locker.
There are hand-washing facilities at the entrance of all production areas and as required within production areas. Appropriate “wash hands” signs were available in appropriate locations.
Adequate toilets are provided that do not open directly into production, packing or storage areas and at provided with hand wash facilities supplied with hot water, liquid soap and disposable towels / adequate air dryers. Appropriate “Wash hands” signs were present within the restroom areas.
Smoking is only permitted in the designated area outside the factory building. Containers for smokers waste are provided. Signs are present to remind smokers to wash their hands prior to re-entering the production facility.
A working fridge available for staff to store their own food was inspected during the site tour and was found to be in a satisfactory condition. Eating and drinking are restricted to the break-room or designated offices and meeting rooms.
Minor: Even after running tap for 2 minutes only cold water was available at the hand washing sink in processing area and at main employee entrance hand washing sink. .

## 4.9 Chemical and physical product contamination conRaw material handling, preparation, processing, packing and storage areas

Procedures are in place to cover the potential risk of chemical or physical contamination identified in HACCP plan.

### 4.9.1 Chemical control

An approved list of chemicals for purchase, product specifications, and SDS safety data sheets were available and verified for chemicals Shield Bright PAA-5.0, All purpose Cleaner with Citrus and Food Grade Silicone. Specifications confirmed the chemicals were suitable for use in food production premises.
Cleaning chemicals were stored in bulk containers and dosed into appropriate clean containers at the time of use by trained staff.
All containers were suitably labeled.
Chemicals were segregated and securely stored with restricted access to trained personnel.

No strongly scented or taint-forming materials were observed during the on site audit.

### 4.9.2 Metal control

There is a documented Knife Policy QP-4.9.2.1CA Rev 5 dated May 01, 2016, which is controlled by a documented register and records of inspection reviewed for Jun 20 , 2016 and Jun 22, 2016.

Ingredients and packaging that use staples are avoided. Staples and paperclip are not permitted within the production areas and none were observed during the site inspection.

### 4.9.3 Glass, brittle plastic, ceramics and similar materials

No risk of product contamination from glass or brittle materials was identified
Documented procedure for handling glass and brittle materials Foreign Matter, Glass and Hard Plastic dated QP-4.9.3.1CA dated May 12, 2016 includes the list of all glass, brittle and similar materials detailing location, number and type and cleaning and replacing methods. Checks of glass, brittle, and similar materials are conducted on a weekly basis, frequency was based on risk of product contamination. Records of the last glass and hard plastic audit dated June 13, 2016 and June 06, 2016 were reviewed during the assessment.
There is a documented and detailed glass breakage procedure on site Foreign Matter, Glass and Hard Plastic dated QP-4.9.3.1CA dated May 12, 2016, which requires that production stops, product and area is isolated, cleaned and inspected. Authorization is required before production can recommence, work wear is changed, footwear inspected, and records completed.

### 4.9.4 Products packed into glass or other brittle containers

N/A - 4.9.4. Glass or brittle containers are not stored in the facility.

### 4.9.5 Wood

Wood pallets used in process are continuously monitored and discarded when damaged or splinters are observed, which could contaminate products.

### 4.10.1 Foreign body detection and removal equipment

The Hazard Analysis Worksheet Metals in Packing Process dated May 12, 2016 has not identified any potential foreign body risks that require the need for foreign body detection or removal systems.

### 4.10.2 Filters and sieves

Filters or sieves are not appropriate for the production process.

### 4.10.3 Metal detectors and X-ray equipment

N/A: The HACCP hazard analysis has justified the absence of metal detection systems.

### 4.10.4 Magnets

Magnets are not suitable to remove magnetic material from food product.

### 4.10.5 Optical sorting equipment

N/A - 4.10.5.1. Optical sorting equipment is not used in the facility.

### 4.10.6 Container cleanliness – glass jars, cans and other rigid containers

N/A -4.10.6. There is no packaging with rigid containers on site.

### 4.11 Housekeeping and hygiene

Housekeeping and cleaning systems are in place, which ensure appropriate standards of hygiene are maintained at all times and that risk of contamination is minimized. The site operates a ‘clean as you go’ policy during production hours with a full clean at the end of production.
Satisfactory standards of hygiene were seen on premises and equipment throughout the site inspection.
Documented cleaning procedures are available for building, plant, and equipment and they have been

implemented.
The cleaning methods for processing equipment, food contact surface and environmental cleaning in high care/high risk areas include
responsibility,
areas to be cleaned,
cleaning frequency,
cleaning methods,
cleaning chemicals,
chemical concentration
temperature
materials to be used,
records and verification system.
Records of cleaning performance dated June 11, 2016 were on file.
For processing equipment, food contact surface and environmental cleaning, limits of acceptable and unacceptable cleaning performance are defined by:
• visual appearance,
• ATP bioluminescence techniques,
Cleaning is appropriately scheduled and planned for non production period. All cleaning personnel have received suitable training in the use of chemicals as well as the site's cleaning procedures and examples of sanitation training records seen June 11, 2016.
The effectiveness of cleaning is assessed visually during the pre production start up checks. Production supervisors and QC inspectors conduct visual checks on the effectiveness of cleaning. Records were reviewed during the preoperational inspection of May 23, 2016, May 24, 2016, May 26 , 2016 and June 11, 2016 and were found to be satisfactory.
Areas requiring corrective action are re-cleaned.
Verification of cleaning effectiveness is by ATP swabbing.
Environmental Listeria swab testing is conducted on a programmed random basis.
Swabbing results reviewed during the visit from June 09 to June 18, 2016 were found to be satisfactory.
Cleaning equipment is fit and suitable identified for the intended use (floors and glass), cleaned and stored in a hygienic manner to prevent contamination.
All containers were suitably labeled.
Minor: Cobwebs were observed on line 1 above the sizer and elevator conveyor, also a black string like material was hanging from the ceiling in same area.

## 4.11.7 Cleaning in place (CIP)

N/A - 4.11.7.1. There are no CIP operations on site.

## 4.12 Waste/waste disposal

Waste disposal is managed in to prevent accumulation, risk of contamination and the attraction of pests.
Waste Management Systems of Yakima waste company removes waste from site.
Waste areas seen during the visit were in a suitable condition with external waste collectors suitably covered.
Containers for regular garbage bins, cardboard and metal waste were properly closed.
They are designed for ease of use and effective cleaning and they were maintained clean.
Waste containers are removed on minimum weekly or more frequent based on demand.
Procedures are in place for the handling of unsafe product or substandard trademarked materials to prevent them finding their way on to the market.

## 4.13 Management of Surplus Food and Products for Animal Feed

N/A - 4.13. There are no surplus customer branded products in the facility.

## 4.14 Pest control

The site has minimized the risk of pest infestation by contracting a competent pest control organization, who is servicing the site every day to rapidly respond to any issue.
Measures have been taken to control any pest activity identified through regular inspections to prevent it present a risk to products, raw materials or packaging.
The site has a pest control contract with Eco Lab pest control company (PCO).

The contractor makes interior biweekly and exterior monthly routine inspections.
A service contract is held at the front of the pest control manual detailing the frequency of visits, call outs and other details of the pest control program.
The contract includes rodents, flying insects and both internal and external traps and pesticide applications.
The contract includes insect light traps (ILT) units, mechanical traps / glue boards and bait stations.
A trap map dated June 14, 2016 was verified during the plant walkthrough and exterior inspection.
Bait stations and monitoring devices are identified by labels on each unit and on the wall above the location.
Procedures identify responsibilities and details pest control products used and methods of use.
SDS sheets are available for all materials used on site. The ones examined were for Tera D3 blox.
Records of monitoring activities and pest control applications dated June 12, 2016 and May 25, 2016 respectively were on file.
All external bait stations were robust and found to be of a tamper resistant construction and were suitably secured. No spill baits were used. Toxic rodent baits were not used within production areas or storage areas where open product is present except when treating an active infestation.
None of the ILT traps were noted in areas where they could potentially cause contamination.
The pest control contractor is contracted to conduct follow up visits in the event of an infestation until the problem is eradicated.
Potentially affected product is identified, evaluated and released or destroyed by the management.
The site and the pest control contractor have addressed all documented recommendations. Records of pest control inspections and action taken to address PCO recommendations dated June 14, 2016 were reviewed.
In-depth, documented pest control survey is undertaken annually by a pest control expert to review the pest control measures in place. A risk assessment justifying frequency has been completed.
The survey provided an in-depth inspection of the facility for pest activity, review the existing pest control measures in place, and make recommendations to improve the program.
The timing of the survey allows access to equipment for inspection where a risk of stored product insect infestation exists.
Records from inspections are assessed for trends on a regular basis. Fly catch trend analysis and rodent activity are conducted on a monthly basis.
Pest activity is reported to the Food Safety Personnel as reviewed in records dated June 12, 2016.

## 4.15 Storage facilities

Storage areas on site for the storage of ingredients, in-process product, and finished products were noted to be suitable and in a satisfactory condition.
A documented procedure Storage Assessment QP-4.14.1CA, dated May 12, 2016 is in place to maintain product safety and quality during storage. The procedure details, as appropriate:

• managing chilled product transfer between temperature controlled areas
• segregation of products where necessary to avoid cross-contamination (physical, microbiological) or taint uptake
• storing materials off the floor and away from walls
• specific handling or stacking requirements to prevent product damage.

Packaging materials are stored away from finished product and raw materials.
Returned packaging materials are rewrapped or covered when replaced in the storage area and clearly identified to maintain traceability.
Storage areas are within specification range of 29 ºF – 34 ºF.
Conditions are verified by temperature recording equipment with suitable temperature alarms or recorded manual temperature checks. Records of temperature monitoring are on file, e.g. records dated June 4, 2016 were reviewed and found to be satisfactory
Controlled atmosphere storage areas are effectively controlled; records dated June 23, 2016 and June 12, 2016 were reviewed and found to be satisfactory under required conditions.
Stock rotation is managed by a FIFO system. Incoming materials are labeled with site codes, which provide the basis for tracing materials through the system.

## 4.16 Dispatch and transport

Management of dispatch and of the vehicles and containers used for transporting products from the site do not present a risk to the safety or quality of the products.

Procedures Transport and Delivery QP-4.16.1CA dated May 12, 2016 are in place to maintain product safety and quality during loading and transportation.
Loading areas are temperature controlled. Vehicles are loaded and unloaded in covered loading bays
Loads on pallets are secured to prevent movement during distribution.
Loads are inspected before dispatch.
Loading was observed during the facility inspection and procedures were observed as being followed.
All vehicle or containers are inspected for cleanliness and suitability, to ensure they are free from strong odors, and equipped to maintain any temperature requirement. Records of truck inspections dated June 12, 2016 and June 09, 2016 were reviewed.
A shipping employee was interviewed regarding carrier inspection and answered per the documented procedure.
Procedures and devices are in place to ensure temperature requirements are met, which includes using data logging devices or system to verify and record the correct operation of refrigeration equipment. Records of transportation of Dark Cherries dated June 14, 2016 were reviewed.
Procedures are in place and records of vehicle and equipment hygiene and maintenance measures were verified during the plant walk through and the traceability exercise.
Procedures are in place that includes any restriction on the use of mixed loads, security of products during transit, and notifying the company of any issues including equipment breakdown, accidents, or failure of refrigeration systems. Records of vehicle and equipment incidents are documented.
Third party marketing company arrange transportation is GFSI certified.

**Details of non-applicable clauses with justification**

| Clause reference | Justification |
|---|---|
| 4.3.5 | N/A -4.3.5. There are no high-risk operations on site. |
| 4.3.6 | NA - 4.3.6. There are no high care operations on site. |
| 4.3.7 | NA - 4.3.7. There are no ambient high-care operations on site. |
| 4.3.9 | N/A - 4.3.9. There were no temporary structures on site |
| 4.4.4 | N/A - 4.4.4. There are no high-care or high-risk areas in the facility. |
| 4.4.6 | N/A - 4.4.6. There are no suspended ceilings or roof voids. |
| 4.4.7 | N/A - 4.4.7. There are no windows in production and storage areas. |
| 4.4.13 | N/A - 4.4.13. There are no high risk areas in the facility. |
| 4.5.3 | N/A – 4.5.3. Water used within the operation is potable and non-potable water is not required. |
| 4.5.4 | N/A - 4.5.4 There is no air, gases or steam in direct contact with product. |
| 4.7.5 | N/A – 4.7.5. There are no high-risk or high-care areas on site. |
| 4.8.4 | N/A - 4.8.4. There is no high-risk product produced. |
| 4.8.5 | N/A - 4.8.5. There is no high care product produced. |
| 4.8.10 | N/A - 4.8.10. Catering facilities are not provided. |
| 4.9.4.1 | N/A - 4.9.4.1. Glass or brittle containers are not stored in the facility. |
| 4.9.4.2 | N/A - 4.9.4.2. Product is not packed into glass or other brittle containers. |
| 4.9.4.3 | N/A - 4.9.4.3. Product is not packed into glass or other brittle containers. |
| 4.10.1.2 | N/A-4.10.1.2: The Hazard Analysis Worksheet Metals in Packing Process dated May 12, 2016 has not identified any potential foreign body risks that require the need for foreign body detection or removal systems.10.1.2: The Hazard Analysis Worksheet Metals in Packing Process dated May 12, 2016 has not identified any potential foreign body risks that require the need for foreign body detection or removal systems. |

| | |
|---|---|
| 4.10.1.3 | N/A-4.10.1.3: The Hazard Analysis Worksheet Metals in Packing Process dated May 12, 2016 has not identified any potential foreign body risks that require the need for foreign body detection or removal systems.10.1.2: The Hazard Analysis Worksheet Metals in Packing Process dated May 12, 2016 has not identified any potential foreign body risks that require the need for foreign body detection or removal systems. |
| 4.10.1.4 | N/A-4.10.1.4: The Hazard Analysis Worksheet Metals in Packing Process dated May 12, 2016 has not identified any potential foreign body risks that require the need for foreign body detection or removal systems.10.1.2: The Hazard Analysis Worksheet Metals in Packing Process dated May 12, 2016 has not identified any potential foreign body risks that require the need for foreign body detection or removal systems. |
| 4.10.2.1 | N/A - 4.10.2.1. Filters or sieves are not appropriate for the production process. |
| 4.10.2.2 | N/A - 4.10.2.2. Filters or sieves are not appropriate for the production process. |
| 4.10.3.1 | N/A-4.10.3.1 - The HACCP hazard analysis has justified the absence of metal detection systems. |
| 4.10.3.2 | N/A-4.10.3.2 - The HACCP hazard analysis has justified the absence of metal detection systems. |
| 4.10.3.3 | N/A-4.10.3.3 - The HACCP hazard analysis has justified the absence of metal detection systems. |
| 4.10.3.4 | N/A-4.10.3.4 - The HACCP hazard analysis has justified the absence of metal detection systems. |
| 4.10.3.5 | N/A-4.10.3.5 - The HACCP hazard analysis has justified the absence of metal detection systems. |
| 4.10.4.1 | N/A - 4.10.4.1. Magnets are not suitable to remove magnetic material from food product. |
| 4.10.5.1 | N/A - 4.10.5.1. Optical sorting equipment is not used in the facility. |
| 4.10.6.1 | N/A -4.10.6.1 There is no packaging with rigid containers on site. |
| 4.10.6.2 | N/A - 4.10.6.2. There is no packaging with rigid containers on site. |
| 4.11.7.1 | N/A - 4.11.7.1. There are no CIP operations on site. |
| 4.11.7.2 | N/A - 4.11.7.2. There are no CIP operations on site. |
| 4.11.7.3 | N/A - 4.11.7.3. There are no CIP operations on site. |
| 4.13 | N/A - 4.13.1. There are no surplus customer branded products in the facility. |
| 4.13.1 | N/A - 4.13. There are no surplus customer branded products in the facility. |
| 4.13.2 | N/A - 4.13.2. There are no nonconforming branded products sold to staff or passed on to charities. |
| 4.13.3 | No product was given out for animal feed. |
| 4.14.3 | N/A - 4.13.3. Preventative pest control on site is managed by a contracted third party. |
| 4.15.5 | N/A - 4.15.5 No materials, packaging or process equipment are stored outside. |

## 5 Product control

### 5.1 Product design/development

Product development is not performed in this facility.

### 5.2 Product Labelling

Product labeling seems to comply with regulations and contain information to enable the safe handling, display, storage, and preparation of products.

The procedure Labelling of Product QP-6.2.1CA dated April 10, 2016, is in place to verify the technical contents of labels comply with specifications and legal requirements for the designated country of use; include information to enable the safe handling, display, storage, and preparation of products; and include a process to verify that ingredient and allergen labeling is correct. Label of Premium Sweet Cherries was reviewed and it seemed to comply with requirements.

The procedure also describe the process undertaken whenever changes occur to the product recipe, raw materials, the supplier of raw materials, the country of origin of raw materials, and legislation. Label of product, where change in change occurred, was reviewed and it complies with the requirements.

Procedure is in place to transfer initial information to the nominated third party(First Fruit) to ensure initial information and any change is communicated in a timely manner to design / modify product label.

### 5.3 Management of allergens

N/A – 5.3 There are no allergens handled on this site.

### 5.4 Product Authenticity, claims and chain of custody

System are in place to assess the supply chain for vulnerability to food fraud, to control fraudulent or adulterated raw materials, to substantiate claims and chain of custody.

The process to access information on new or existing threats to the supply chain on adulteration or substitution of raw materials is in place. It is supported with information provided by trade association, government source, or private resource center.

The documented vulnerability assessment on Cherries, dated April 10 and Jun 01, 2016. Cherries are not identified as high risk. The assessment was complete, accurate and contained sufficient detail. And covers all possible hazards.

Assurance controls implemented for cherries
included:
• Letter of guarantee
• supply chain audits
• enhanced supplier approval checks

Records of assurance controls was reviewed, e.g Record SCS Global GAP from supplier dated Sept 19, 2015.

The status of Organic is supported by the corresponding certificate issued by certification body on June 10, 2015. Facility had just completed organic audit in June and did not received new organic certificate yet.

### 5.5 Product Packaging

Finished products are packed in clamshells and pouches.
Certificates of conformity available for all packaging materials in direct contact with food confirm they conform to FDA / CFIA legislation or there is chemical migration testing completed with accompanying letter of guarantee. The packaging is suitable for the intended use. Certificate of conformity Jan 07, 2008 for clamshells issued by H.R. Spinner on Jan 06, 2009 was reviewed.
Product contact liners appeared suitable for use.

### 5.6.1 Product inspection and testing

There is a scheduled program of testing covering products and the processing environment, which include microbiological, chemical, physical, and sensory testing according to risk. Test methods, frequencies, and specified limits are defined in In Process and Final Inspections QP-5.6.1CA, dated April 12, 2016.

Risk assessment has determined that environmental monitoring is tested every weekly.

Tests are carried out for raw materials and finished product for sensory attributes, chemical properties, microbial indicators, pathogen, according to product specification.

The processing environment is tested for microbial indicators according to risk, in conformance with criteria set in ConAg Packing and Storage MRVP Program dated June 2016.
Testing and inspection records are reviewed by quality and production management and appropriate actions are implemented. Third party marketing company validate the shelf life.

### 5.6.2 Laboratory testing

The company's pathogen testing laboratory is located remotely from the manufacturing site.
The laboratory has gained recognized laboratory accreditation in accordance with the requirements and principles of ISO 17025 by: ilac-MRA for the schedule of E coli, Listeria and other microbes, environmental and chemicals tests required by the company. accreditation no: L15-275 valid starting May 14, 2013 and valid until Aug 12, 2017 was reviewed.

### 5.7 Product release

Positive Release is not required.

### Details of non-applicable clauses with justification

| Clause reference | Justification |
|---|---|
| 5.1 | N/A-5.1: Product development is not performed in this facility. |
| 5.1.1 | N/A-5.1.1: Product development is not performed in this facility. |
| 5.1.2 | N/A-5.1.2: Product development is not performed in this facility. |
| 5.1.3 | N/A-5.1.3: Product development is not performed in this facility. |
| 5.1.4 | N/A-5.14: Shelf life trials are not performed in this facility. |
| 5.2.3 | N/A - 5.2.3. There are no product claims made. |
| 5.3 | N/A – 5.3 There are no allergens handled on this site. |
| 5.3.1 | N/A – 5.3.1. There are no allergens handled on this site. his site. |
| 5.3.2 | N/A – 5.3.2. No allergens have been identified. |
| 5.3.3 | N/A – 5.3.3. There are no allergens handled on this site. |
| 5.3.4 | N/A – 5.3.4. There are no allergens handled on this site. |
| 5.3.5 | N/A – 5.3.5.There is no rework containing allergens used on this site. |

| | |
|---|---|
| 5.3.6 | N/A – 5.3.6. There are no allergens handled on this site. |
| 5.3.7 | N/A - 5.3.7. There are no free from allergen claims made by the site. |
| 5.3.8 | N/A - 5.3.8. There are no allergens handled on this |
| 5.4.4 | N/A - 5.4.4. There is no provenance or identity preserved claims made. |
| 5.4.6 | N/A - 5.4.6. There are no identity preserved claims made. |
| 5.6.2.2 | N/A – 5.6.2.2. There is no laboratory on site. |
| 5.6.2.4 | N/A – 5.6.2.4. An accredited laboratory is used and there is no laboratory on site. |
| 5.7 | N/A – 5.7.1. Positive release is not required. |
| 5.7.1 | N/A – 5.7.1. Positive release is not required. |

## 6 Process control

### 6.1 Controls of operations

Production specifications are available for all products, which include any equipment settings. The company has procedures that verify that the processes and equipment are capable of producing consistently safe and legal products with the desired quality characteristics.
Documented process specifications and work instructions for:
• Equipment Startup checklist
• Daily Packout schedule.
• mixing instructions, speed, time
• equipment process settings
• labeling instructions
• coding and shelf life marking
• any additional critical control points identified in the HACCP plan are incorporated into the daily production control records.
Process monitoring includes, visual checks, firm tech, storage and process temperatures, weight checks, label checks and lot code checks.
Critical chemical controls are monitored and recorded though the process.
Manual documentation of all records is made continuously, records of testing of June 22, 2016 were reviewed.
Examples of documented controls seen on site and by record: PAA 12.0 Chemical Log- Hydrocoolers
Interview of Operators confirmed understanding of process controls and critical limits in the process, reviewed records for June 22, 2016 and June 12, 2016
Corrective action and non-conforming product procedures are in place in the event of process failure.

### 6.2 Labelling and Pack Control

Controls are in place ensure products are correctly labeled and coded.
Only the packaging material for immediate use is available to the packaging machines. Its control is governed by procedure. Methods and responsibilities were observed during the plant inspection at packaging line1.

Checks to ensure that only the correctly printed materials are available in packaging lines are documented in QC Final Packaging Inspection and observed implemented at packaging line.

Documented checks at line start-up, following product changeover, and changes in batches or packaging are performed, as observed during site walk through.

This was reviewed during the site walk through/ or change over.
Documented checks of the packaging lines are carried out at the start of packaging, during the packaging run, when changing batches of packaging material, and at the end of each production run to ensure products are packed into correct packaging and correctly label

Checks include
• Lot coding
• quantity indication
• bar coding
• country of origin.

Records, e.g. Net Weight Check and QC Final Packaging dated June 08, 2016 are maintained.

### 6.3 Quantity-weight, volume and number control

The plant operates a quantity control system, which conforms to legal requirements in the country where the product is sold and customer requirements.
Products are packed to minimum weight.
Checks are made on Rainer Cherries every 30 minutes. Results are recorded and verified by by production

supervisor.
Weight control reviewed during the site inspection and the traceability study were found to be satisfactory.
Checkweighers are situated on packing lines, and these are set to reject below net weight.

## 6.4 Calibration and control of measuring and monitoring devices

The company has identified measuring equipment used to monitor critical control points, product safety and legality. The identified measuring equipment is calibrated to a recognized national standard.
A list of identified measuring equipment used to monitor CCPs, product safety and legality is in place.
Equipment is identified and marked with a reference number and calibration due dates.
Procedures and records to control only authorized staff adjust equipment.
Records of all calibration checks and associated actions are maintained. Examples of equipment calibrated reviewed at audit: L & M Pump is calibrated by pace chemicals reviewed documents for June 16, June 9 & 2016. Scale calibration dated June 17, 2016.
Calibration is performed by the on-site Laboratory using weight traceable to National Standards. Records were reviewed.
The procedure to record actions taken when the prescribed measuring and monitoring devices are found not to be operating within specified limits is in place.

## Details of non-applicable clauses with justification

| Clause reference | Justification |
|---|---|
| 6.1.4 | N/A – 6.1.4. The processing conditions do not require regular validation. |
| 6.2.4 | N/A - 6.2.4. There is no vision equipment to check product label and printing. |
| 6.3.2 | N/A - 6.3.2. Bulk product is not handled in the facility. |

## 7 Personnel

### 7.1 Training: raw material handling, preparation, processing, packing and storage areas

Personnel interviewed during the plant walk through were able to demonstrate competency to conduct their activities. Training procedures are in place.
Personnel interviewed during the plant walkthrough (Operator, Shipper, QC and production supervisor employee) were knowledgeable of their responsibility and properly supervised.
Staff have receive induction training, covering basic sickness reporting together with health and safety, personal hygiene rules, quality requirements, basic HACCP, cleaning, machine operation, quality inspections, and sampling, as appropriate.
Contractors have receive the same orientation training as permanent staff. Orientation training records were reviewed during the visit for:
Pest Control dated June 14, 2016
Temporary workers are not used
The procedure for training and monitoring staff engaged in CCP activities is in place. Records for operators are maintained in files and are updated.
CCP training records were reviewed during the visit for
QC dated May 31, 2016 & May 26, 2016.
The training program Training Needs QP-7.1.1CA, updated on June 01, 2016 includes provisions for identifying refresh training needs and implementation of training courses accordingly. A job training matrix is maintained detailing the site role, skill description, and work instructions required for each role. Training courses scheduled in the training program of 2016 were:
• Good Manufacturing Practices.
• HACCP
• CP and CCP;
• Tasks identified as critical to meeting the effective implementation and maintenance of the BRC System.
• Food defense,
• Allergens,
• Quality,
• Sanitation
Review of effectiveness of training is implemented by testing the knowledge after training or on-the-job assessment.
All training is delivered in English & Spanish and understood by trainees.
All relevant personnel have received allergen awareness training during orientation as observed in training records dated May 30, 2015 and refresh training on the site's allergen handling procedures used by the company as observed in training records dated May 31, 2016 and May 26, 2016.
Training courses reviewed were:
HACCP Training, GMP Training, Food Defense and sanitation training
The effectiveness of the training is monitored by one-to-one appraisals, team performance monitoring by line managers, review of the results of internal audits, or review of records.

### 7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

There are documented standards for personal hygiene for employees, visitors and contractors. No evidence of non compliance observed during the factory inspection.
Requirements for personnel hygiene are documented in Personal Hygiene Requirements QP-7.2.1CA, dated June 01, 2016. The site personal hygiene rules are communicated to staff by means of orientation training, refresher training and bulletin boards posted in the main entrance.
Daily inspections are used to monitor compliance with requirements. Records Personnel Hygiene Monitoring Log dated dated June 12, 2016 were reviewed.
Hand cleaning is documented within the hygiene policy. All personnel are required to wash their hands when entering the factory, after using the toilets, eating, smoking, blowing noses or sneezing or handling shoes. No evidence of non-compliance observed during the factory inspection.
Hands are cleaned at an appropriate frequency in production areas where there are additional hand washing facilities.

Cuts and grazes on exposed skin are covered by detectable blue metal strip bandages that are issued and monitored. In addition to this protection, colored gloves are used in the food processing area.
The procedure for the control of personal medicines is included in the Personal hygiene Requirement rules, dated June 01, 2016. Personal medicines are not permitted in production areas and are stored in personal lockers. No evidence of non-compliance observed during the factory inspection.

## 7.3 Medical screening

The plant's personal hygiene standards and medical screening procedures are documented, and adopted by all personnel, including contractors and visitors to the production facility.
The procedure Personal hygiene Requirement rules, dated June 01, 2016 to report infection, disease, or condition when returning to work or which they have in contact is on site. The site has made employees aware of the symptoms of infection, disease or condition, which would prevent them working with open food through the new employee training and refresh good hygiene practices course. Training material was reviewed.
Visitors and contractors review a medical /health questionnaire, which is checked by an appropriate manager, or confirm that they are not suffering from any symptoms, which may put product safety at risk before entering the raw material preparation, processing, packing, and storage areas.
The procedure that document actions to be taken where employees, contractors, or visitors declare they are suffering from or have been in contact with an infectious disease is included in Personal hygiene Requirement rules, dated June 01, 2016, which include relocation to a role where they are not in contact with open products or limited access to open product areas, among others.

## 7.4 Protective clothing: employees or visitors to production areas

Protective clothing provided for staff includes hairnet, bead net, apron, sleeves, gloves, apron, as appropriate. Visitors / contractors are provided with a hairnet, beard.
The company has documented and communicated to all employees, contractors and visitors the rules regarding the wearing of protective clothing in specified work areas (closed product, low risk). This includes policies relating to the wearing of protective clothing away from the production environment (e.g. removal before entering toilets, lunchroom, and smoking area). The rules are included in orientation training and are posted in main personnel entrances. No evidence of noncompliance observed during the factory inspection.
All employees are issued with sleeve, apron and gloves. Work wear was seen to be of suitable design to prevent contamination of the product.
Plant personnel are required to wear disposable hairnet, which fully contains scalp hair.
Beard nets are provided as needed for beards and moustaches.
No evidence of noncompliance observed during the plant inspection.
Home laundering is performed for protective clothing worn in enclosed product and low-risk areas.
Hairnets and beard nets are changed daily as needed, Colored disposable gloves, suitable for food use, are available. These are worn for a maximum of 2 hours or every time they get contaminated i.e. staff touch their noses, cough, pick up waste, at every break or when visiting the toilets.
Aprons, and sleeves are replaced as needed and new one given every morning.

## Details of non-applicable clauses with justification

| Clause reference | Justification |
|---|---|
| 7.2.4 | N/A – 7.2.4 Colored plaster that contains a metal detectable strip is not used in the facility |
| 7.4.4 | N/A - 7.4.4. This is not a high risk or a high care facility. |