


**CORRECTIVE ACTION REPORT**

PrimusGFS Version 2.1-2

Operation Type: Packinghouse  
Audit Report Summary

CB Registration No. PA-PGFS-2482-2  
PrimusGFS ID #119680 - Cert:6  
Audited by Primus Auditing Operations

[Ver en Español](#)

<b>Organization:</b>	<b>Nickey Gregory Company LLC</b> Contact(s): <a href="#">Vicki Gilbert</a> Address: 16 Forest Pkwy. Bldg.N 30297 Location: Forest Park, Georgia, United States Phone Number: 404-366-7410				
<b>Operation:</b>	<b>Nickey Gregory Company LLC</b> Contact(s): <a href="#">Vicki Gilbert</a> Location: 16 Forest Pkwy, Bldg N, Forest Park, GA Forest Park, Georgia 30297, United States				
<b>Shipper:</b>	Nickey Gregory Company LLC				
<b>Operation Type:</b>	<b>Packinghouse</b>				
<b>Audit Type:</b>	<b>Announced Audit</b>				
<b>Audit Scope:</b>	Review of a conventional multi-product dry-repack packinghouse operation not operating under organic principles which operates year round. This operation consists of about 51,362 square feet including about 33,272 square feet of refrigerated packing area, loading dock, cooler space and banana ripening rooms. Water source is municipal supply. Ice is applied to broccoli, corn and other produce. Most commodities are handled box-in, box-out. Incoming product is inspected, tagged and placed in a cooler or staging area. Products are sorted, graded and re-packed into new poly bags and/or boxes appropriate to customer specifications. Individual boxes are tagged, palletized and placed in a cooler or shipped to customers in refrigerated trucks. The bagging machine was not operating during the audit. Manual re-packing observed during the audit included Jalapeno peppers packed in 5-pound boxes and Green Bell Peppers packed in 5-pound boxes and in 1 1/9 bushel boxes. No allergens are stored in this facility. Twenty-four workers were present during the audit.				
<b>Date FSMS started:</b>	14 Jul 2017 08:15				
<b>Date FSMS finished:</b>	14 Jul 2017 09:30				
<b>Date Operation Started:</b>	14 Jul 2017 09:30				
<b>Date Operation Finished:</b>	14 Jul 2017 16:15				
<b>Product(s) observed during audit:</b>	Alfalfa Sprouts, Apples, Apricots, Asparagus, Avocados, Bananas, Bean Sprouts, Beans, Beets / Beetroot, Bell Peppers, Berries, Bok Choy, Broccoli, Brussels Sprouts, Cabbage, Carrots, Cauliflower, Celery, Cherries, Chili Pepper, Cilantro, Collard Greens, Cucumbers, Culinary Herbs, Daikon / Lo Bok Mooli / White Radish, Fennel, Garlic, Ginger, Grapefruit, Greens, Jerusalem Artichoke, Jicama, Kale, Kiwi Fruit, Lemon Grass, Lemons, Lettuce, Limes, Mangoes, Melons, Microgreens, Mushrooms, Mustard Greens, Nectarines, Okra, Onions, Oranges, Papayas, Parsley, Parsnips, Peaches, Pears, Peas, Peppers, Pineapples, Plums, Pluot (Aprium), Pomegranate, Potatoes, Radish, Roots, Rutabagas / Swedes, Spinach, Squash, Sweet Corn, Table Grapes, Tangerines, Turnip Greens / Turnip Tops, Turnips				
<b>Similar product(s)/process(es) not observed:</b>	Tomatoes				
<b>Product(s) applied for but not observed:</b>	None				
<b>Auditor:</b>	<a href="#">Warren Smith</a> (Primus Auditing Operations)				
<b>Preliminary Audit Score:</b>	<b>96%</b>				
<b>Final Audit Score:</b>	<b>99%</b>				
<b>Certificate Valid From:</b>	25 Aug 2017 To 24 Aug 2018				
<b>GPS Coordinates:</b>	<table border="1"> <thead> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>33° 37' 23"</td> <td>84° 23' 52"</td> </tr> </tbody> </table>  <a href="#">Click here to see map</a>	Latitude	Longitude	33° 37' 23"	84° 23' 52"
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AUDIT SCORING SUMMARY	Pre-Corrective Action Review		Post-Corrective Action Review	
Food Safety Management System Requirements	Score:	194	Score:	209
	Possible Points:	209	Possible Points:	209
	Percent Score:	92	Percent Score:	100
Good Manufacturing Practices Requirements	Score:	1018	Score:	1045
	Possible Points:	1046	Possible Points:	1046
	Percent Score:	97	Percent Score:	99
HACCP System Requirements	Score:	60	Score:	60
	Possible Points:	60	Possible Points:	60
	Percent Score:	100	Percent Score:	100
TOTAL	Score:	1272	Score:	1314
	Possible Points:	1315	Possible Points:	1315
	Percent Score:	96	Percent Score:	99

Non-Conformance Summary By Count	Pre-Corrective Action Non-Conformances	Post-Corrective Action Non-Conformances
Food Safety Management System Requirements	3	0
Good Manufacturing Practices Requirements	8	1
HACCP System Requirements	0	0
TOTAL	11	1

FSMS	Supplier Control	Approved
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1.06.03	<p><b>Question:</b> Is there a list of approved suppliers?</p> <p><b>Auditor Comments:</b> Minor. Pemco, the supplier of net bags, is not on the current list of approved suppliers titled Approved Supplier List dated 7-12-17 which was available for review.</p>	<p><b>Possible Points:</b> 5  <b>Points Scored:</b> 3  <b>Score:</b> Minor Deficiency</p>			
<p><i>Auditee Comments:</i> PEMCO has been added to the Approved Supplier List as a primary vendor for packaging and service. Please see attached file</p> <p style="text-align: right;"><a href="#">View Files</a></p>					
<p><i>CB/Auditor Review Comments:</i></p>		<table border="1"> <tr> <td style="width: 100px;">Accept CA?</td> <td style="width: 100px;">Yes</td> <td style="width: 100px;"> <p><b>Possible Points:</b> 5  <b>Points Scored:</b> 5  <b>New Score:</b> Total Compliance</p> </td> </tr> </table>	Accept CA?	Yes	<p><b>Possible Points:</b> 5  <b>Points Scored:</b> 5  <b>New Score:</b> Total Compliance</p>
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FSMS		Supplier Control	Approved
1.06.04	<p><b>Question:</b> Does the organization have documented evidence to ensure that all products, ingredients or materials and services suppliers comply with the approval requirements and that they are being monitored as defined in the procedure?</p>	<p><b>Possible Points:</b> 15  <b>Points Scored:</b> 5  <b>Score:</b> Major Deficiency</p>	
	<p><b>Auditor Comments:</b> Major. Third party audit Certificates of Conformance were not available for the facility that manufactures poly bags for NNZ, Inc., for the facility that manufactures corrugated boxes for American Paper &amp; Twine and for the facility that manufactures net bags for Pemco. The company has binders with relevant documentation including letters of guarantee that ensure that most suppliers of materials and services purchased are meeting specification requirements.</p>		
	<p><i>Auditee Comments:</i> Third party audits are now on file for approved packaging suppliers: NNZ, PEMCO and American Paper &amp; Twine (the 3rd party audits are from the manufacturers of the packaging supplies). Please see attached files</p> <p style="text-align: right;"><a href="#">View Files</a></p>		
<p><b>CB/Auditor Review Comments:</b></p>		<p style="text-align: center;"><b>Accept CA?</b></p> <p style="text-align: center; font-size: 1.2em;"><b>Yes</b></p>	<p><b>Possible Points:</b> 15  <b>Points Scored:</b> 15  <b>New Score:</b> Total Compliance</p>

FSMS		Traceability and Recall	Approved
1.07.03	<p><b>Question:</b> Is testing of recall procedures (including trace back) performed and documented at least every six months? Can the company identify where affected product was sent?</p>	<p><b>Possible Points:</b> 10  <b>Points Scored:</b> 7  <b>Score:</b> Minor Deficiency</p>	
	<p><b>Auditor Comments:</b> Minor. The statement "Mock Recall" did not appear at the top of each key page. The company has successfully completed two recent mock recalls. Both mock recalls had the documentation needed including Lessons Learned and located all product. On 3-13-17 a Class I mock recall was completed in 36 minutes. On 9-30-16 a Class II mock recall was completed in 40 minutes.</p>		
	<p><i>Auditee Comments:</i> We now have 2 sets of recall/traceback forms: 1 set for mock recalls and 1 set for actual recalls/traceback. Please see attached files for the forms that are in place for mock recalls/traceback and actual recall/tracebacks. These are the forms that are being used going forward. It is my responsibility in conducting and completing the mock and actual recalls/tracebacks. Therefore, I will be the only one to use the forms but I will present them at the next HACCP/FOOD SAFETY meeting &amp; MANAGEMENT REVIEW</p> <p style="text-align: right;"><a href="#">View Files</a></p>		
<p><b>CB/Auditor Review Comments:</b></p>		<p style="text-align: center;"><b>Accept CA?</b></p> <p style="text-align: center; font-size: 1.2em;"><b>Yes</b></p>	<p><b>Possible Points:</b> 10  <b>Points Scored:</b> 10  <b>New Score:</b> Total Compliance</p>

GMP		Operational Practices	Approved
2.19.10	<p><b>Question:</b> Are hand washing stations adequate in number, appropriate in location, in working order, have warm water and adequately stocked (e.g. disposable towels, soap, etc.)?</p>	<p><b>Possible Points:</b> 15  <b>Points Scored:</b> 10  <b>Score:</b> Minor Deficiency</p>	
	<p><b>Auditor Comments:</b> Minor. Two hand washing stations (one in the women's restroom and one in the men's restroom) did not have water available. There were nine hand washing stations for the 24 workers present during the audit. One was visible to supervisors in the re-pack room. They were adequate in number and adequately stocked.</p>		
	<p><i>Auditee Comments:</i> The women's and men's bathrooms are equipped with 3 sinks for washing hands. The 1st sink in the women's bathroom and the 1st sink in the men's bathroom have been repaired and are now working. Please see attached files. This software would not allow me to attach a video so I hope the pictures work</p> <p style="text-align: right;"><a href="#">View Files</a></p>		
<p><b>CB/Auditor Review Comments:</b></p>		<p style="text-align: center;"><b>Accept CA?</b></p> <p style="text-align: center; font-size: 1.2em;"><b>Yes</b></p>	<p><b>Possible Points:</b> 15  <b>Points Scored:</b> 15  <b>New Score:</b> Total Compliance</p>

<b>GMP</b>	<b>Operational Practices</b>	<b>Approved</b>						
2.19.11	<p><b>Question:</b> Are toilet facilities adequate in number and location and are they adequately stocked (e.g. toilet paper, disposable towels, soap, etc.)?</p> <p><b>Auditor Comments:</b> Minor. All six stalls (4 in the women's restroom and 2 in the men's restroom) have inoperable toilet paper dispensers and loose toilet paper rolls were not sanitary. There were six toilet facilities for the 24 workers present during the audit. Two toilets were for the 17 men and four toilets were for the 7 women present during the audit. They were adequate in number, appropriate in location and in working order.</p>	<p><b>Possible Points:</b> 15  <b>Points Scored:</b> 10  <b>Score:</b> Minor Deficiency</p>						
<p><i>Auditee Comments:</i>All bathroom stalls are now equipped with new toilet paper dispensers. Please see attached files <span style="float: right;"><a href="#">View Files</a></span></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;"></td> <td style="width: 10%; text-align: center;"><b>Accept CA?</b></td> <td style="width: 30%;"></td> </tr> <tr> <td style="height: 40px; vertical-align: bottom;"><i>CB/Auditor Review Comments:</i></td> <td style="text-align: center; vertical-align: middle;"><b>Yes</b></td> <td style="vertical-align: middle;"> <p><b>Possible Points:</b> 15  <b>Points Scored:</b> 15  <b>New Score:</b> Total Compliance</p> </td> </tr> </table>				<b>Accept CA?</b>		<i>CB/Auditor Review Comments:</i>	<b>Yes</b>	<p><b>Possible Points:</b> 15  <b>Points Scored:</b> 15  <b>New Score:</b> Total Compliance</p>
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<i>CB/Auditor Review Comments:</i>	<b>Yes</b>	<p><b>Possible Points:</b> 15  <b>Points Scored:</b> 15  <b>New Score:</b> Total Compliance</p>						

<b>GMP</b>	<b>Equipment</b>	<b>Approved</b>						
2.21.01	<p><b>Question:</b> Are food contact equipment surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g. tape, string, cardboard, etc.)?</p> <p><b>Auditor Comments:</b> Minor. Damaged foam padding was observed at the transfer point at the rear of the bagging machine. Most food contact equipment surfaces are free of flaking paint, corrosion, rust and other unhygienic materials.</p>	<p><b>Possible Points:</b> 15  <b>Points Scored:</b> 10  <b>Score:</b> Minor Deficiency</p>						
<p><i>Auditee Comments:</i>The damaged foam padding on the bagging machine has been replaced and covered by PEMCO. Please see attached file. <span style="float: right;"><a href="#">View Files</a></span></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;"></td> <td style="width: 10%; text-align: center;"><b>Accept CA?</b></td> <td style="width: 30%;"></td> </tr> <tr> <td style="height: 40px; vertical-align: bottom;"><i>CB/Auditor Review Comments:</i></td> <td style="text-align: center; vertical-align: middle;"><b>Yes</b></td> <td style="vertical-align: middle;"> <p><b>Possible Points:</b> 15  <b>Points Scored:</b> 15  <b>New Score:</b> Total Compliance</p> </td> </tr> </table>				<b>Accept CA?</b>		<i>CB/Auditor Review Comments:</i>	<b>Yes</b>	<p><b>Possible Points:</b> 15  <b>Points Scored:</b> 15  <b>New Score:</b> Total Compliance</p>
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<i>CB/Auditor Review Comments:</i>	<b>Yes</b>	<p><b>Possible Points:</b> 15  <b>Points Scored:</b> 15  <b>New Score:</b> Total Compliance</p>						

<b>GMP</b>	<b>General Cleaning</b>	<b>Approved</b>						
2.23.08	<p><b>Question:</b> Is cleaning equipment identified in order to prevent potential cross contamination issues e.g. production, maintenance, outside, restroom equipment?</p> <p><b>Auditor Comments:</b> Minor. A warehouse push broom was hanging on the rack in the re-pack room. Cleaning equipment was identified properly to prevent potential cross contamination.</p>	<p><b>Possible Points:</b> 10  <b>Points Scored:</b> 7  <b>Score:</b> Minor Deficiency</p>						
<p><i>Auditee Comments:</i>The broom was taken out of repack immediately. Repack employees have been retrained on the color coded equipment and that RED is repack. Please see attached file <span style="float: right;"><a href="#">View Files</a></span></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;"></td> <td style="width: 10%; text-align: center;"><b>Accept CA?</b></td> <td style="width: 30%;"></td> </tr> <tr> <td style="height: 40px; vertical-align: bottom;"><i>CB/Auditor Review Comments:</i></td> <td style="text-align: center; vertical-align: middle;"><b>Yes</b></td> <td style="vertical-align: middle;"> <p><b>Possible Points:</b> 10  <b>Points Scored:</b> 10  <b>New Score:</b> Total Compliance</p> </td> </tr> </table>				<b>Accept CA?</b>		<i>CB/Auditor Review Comments:</i>	<b>Yes</b>	<p><b>Possible Points:</b> 10  <b>Points Scored:</b> 10  <b>New Score:</b> Total Compliance</p>
	<b>Accept CA?</b>							
<i>CB/Auditor Review Comments:</i>	<b>Yes</b>	<p><b>Possible Points:</b> 10  <b>Points Scored:</b> 10  <b>New Score:</b> Total Compliance</p>						

<b>GMP</b>	<b>General Cleaning</b>	<b>Approved</b>
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2.23.11	<b>Question:</b> Are worker break facilities clean, including microwaves and refrigerators? No rotting or out of date foodstuffs?	<b>Possible Points:</b> 5 <b>Points Scored:</b> 3 <b>Score:</b> Minor Deficiency				
	<b>Auditor Comments:</b> Minor. Two microwaves in the worker break area were not clean.					
<p><i>Auditee Comments:</i> Employees have been trained to clean any messes/spills that may occur when using the microwave and refrigerators. Usually repack employees assist in keeping the breakroom tidy for extra hours of pay. I have also met with MaryAnn's Cleaning Service regarding the two dirty microwaves and reviewed her service specifications. Please see attached pictures and meeting forms</p> <p style="text-align: right;"><a href="#">View Files</a></p>						
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Yes	<b>Possible Points:</b> 5 <b>Points Scored:</b> 5 <b>New Score:</b> Total Compliance					

<b>GMP</b>	<b>Buildings and Grounds</b>	<b>Approved</b>
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2.24.11	<b>Question:</b> Are exterior walls free of holes to exclude pests? Are pipes, vents, air ducts designed and protected in order to prevent pest entry e.g. by using fine mesh?	<b>Possible Points:</b> 5 <b>Points Scored:</b> 3 <b>Score:</b> Minor Deficiency				
	<b>Auditor Comments:</b> Minor. The north exterior wall has six holes which may provide pest entry.					
<p><i>Auditee Comments:</i> The holes on the north exterior wall have been repaired. Robert, our maintenance director, filled them with foam then covered them with a steel plate. Please see attached files</p> <p style="text-align: right;"><a href="#">View Files</a></p>						
<b>CB/Auditor Review Comments:</b>		<table border="1"> <tr> <td style="text-align: center;">Accept CA?</td> <td></td> </tr> <tr> <td style="text-align: center;">Yes</td> <td> <b>Possible Points:</b> 5  <b>Points Scored:</b> 5  <b>New Score:</b> Total Compliance           </td> </tr> </table>	Accept CA?		Yes	<b>Possible Points:</b> 5 <b>Points Scored:</b> 5 <b>New Score:</b> Total Compliance
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<b>GMP</b>	<b>Operation Monitoring Records</b>	<b>Approved</b>
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2.27.06	<b>Question:</b> Is there a tool accountability program for knives and similar cutting hand tools used in the production area?	<b>Possible Points:</b> 3 <b>Points Scored:</b> 0 <b>Score:</b> Non-Compliance				
	<b>Auditor Comments:</b> Non-Compliance. There was no tool accountability program available or in use.					
<p><i>Auditee Comments:</i> Tool Accountability SOP and log has been developed for the scissors used in the repack room to cut the netting when changing it on the bagging machine. Repack employees have been trained and the procedure is now in effect. Checking the scissors each morning has been added to the REPACK PRE-OPERATION CHECKLIST. Please see attached files</p> <p style="text-align: right;"><a href="#">View Files</a></p>						
<b>CB/Auditor Review Comments:</b> We commend you for revising your SOP to include Tool Accountability. You have less than three months of records so that only partial credit can be given. The observation has been upgraded to a Minor Deficiency.		<table border="1"> <tr> <td style="text-align: center;">Accept CA?</td> <td></td> </tr> <tr> <td style="text-align: center;">Yes</td> <td> <b>Possible Points:</b> 3  <b>Points Scored:</b> 2  <b>New Score:</b> Minor Deficiency           </td> </tr> </table>	Accept CA?		Yes	<b>Possible Points:</b> 3 <b>Points Scored:</b> 2 <b>New Score:</b> Minor Deficiency
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Yes	<b>Possible Points:</b> 3 <b>Points Scored:</b> 2 <b>New Score:</b> Minor Deficiency					

<b>GMP</b>	<b>Maintenance &amp; Sanitation Files</b>	<b>Approved</b>
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2.28.05	<p><b>Question:</b> Are there written cleaning procedures (Sanitation Standard Operating Procedures) for the facility and all equipment?</p>	<p><b>Possible Points:</b> 10  <b>Points Scored:</b> 7  <b>Score:</b> Minor Deficiency</p>					
	<p><b>Auditor Comments:</b> Minor. The five brushes of the bagging machine are not included in Document 264 F dated 6-30-17 titled Re-Pack Sanitation SOP. There are seven written cleaning procedures (Sanitation Standard Operating Procedures) for all of the packinghouse areas and all equipment. These procedures are in the Food Safety Manual and were available for review.</p>						
	<div style="border: 1px solid black; padding: 5px;"> <p><i><b>Auditee Comments:</b> The Bagging Machine is already listed on the Master Sanitation Schedule. However, the procedure for sanitizing the brushes ON the bagging machine have been added to the REPACK SANITATION SOP and the FACILITY SANITATION SOP. Employees have been trained on the sanitation of the brushes ON the bagging machine. Please see attached files</i></p> <div style="text-align: right; margin-bottom: 5px;"><a href="#">View Files</a></div> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%;"></th> <th style="width: 10%; text-align: center;">Accept CA?</th> <th style="width: 30%;"></th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top; padding: 5px;"><b>CB/Auditor Review Comments:</b></td> <td style="text-align: center; vertical-align: middle; font-size: 1.2em;"><b>Yes</b></td> <td style="padding: 5px;"> <p><b>Possible Points:</b> 10  <b>Points Scored:</b> 10  <b>New Score:</b> Total Compliance</p> </td> </tr> </tbody> </table> </div>			Accept CA?		<b>CB/Auditor Review Comments:</b>	<b>Yes</b>
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