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FINAL AUDIT REPORT	CB Registration No.PA-PGFS-15455-2	**PrimusGFS Version 3.2**
Operation Type:Processing Audit Report Summary	PrimusGFS ID #321125 - Cert:5 Audited by Primus Auditing Operations	Ver en Español

Organization:	**Family Fresh Food Services, Inc.** Contact(s): Sam Cimowsky Vicki Gilbert Address: 16 Forest Parkway Building H 30297 Location: Forest Park, Georgia, United States Phone Number: 404-366-7410
Operation:	**Family Fresh Food Service** Contact(s): Sam Cimowsky Location: 16 Forest Pkwy, Bldg H Forest Park, Georgia 30297, United States
Operation Type:	**Processing**
Audit Type:	**Announced Audit**
Audit Executive Summary:	Review of a fruit/vegetable processing facility of approximately 35,000 sq ft (25,000 cooled) operating with approximately 50 workers and four lines (with various available operations) in one shift year-round for the operations. The products are stored at refrigerated temperatures until processing, and shipping. Product is received from suppliers, trimmed/prepped, chopped/sliced/shredded, rinsed with batch/recirculated PAA solution 60-80 ppm, dewatered, packaged, weighed/vacuum packed/heat sealed, boxed, metal-detected, palletized, and stored. Two separate production areas are used. High-care areas #1/2 includes most of the automated production operations; high-care #3/#4 is primarily manual peeling/cutting with some automation (apple and orange slicing). Processing of green cabbage into slaw mix, onion dicing, carrot and celery sticks were observed in HC1/2. Processing of honeydew melon chunks, broccoli florets, mango chunks, and orange slices were observed in HC3/4 during the audit. Organic products are not handled. No allergens observed/indicated. PAA levels in fresh cut flume/vats/wash tanks and metal detection are indicated as CCP's.
Date Documentation Review Started:	17 Jan 2024 10:15
Date Documentation Review Finished:	17 Jan 2024 16:45
Total Amount of Time on the Documentation Review:	6.50 Hours
Date Visual Inspection Started:	17 Jan 2024 07:45
Date Visual Inspection Finished:	17 Jan 2024 10:15
Total Amount of Time on Visual Inspection:	2.50 Hours
Addendum(s) included in the audit:	Not Applicable
Product(s) observed during audit:	Broccoli, Celery, Cabbages, Carrots, Onions, Honeydew, Mangoes, Oranges
Similar product(s)/process(es) not observed:	Tomatoes, Bell Peppers, Cucumbers, Summer Squash, Kale, Cauliflower, Radishes, Apples, Asparagus, Bok Choy, Chard, Peas, Cranberries, Garlic, Grapefruit, Green Bean, Jicama, Lemons, Melons, Turnips, Napa Cabbage, Pineapples, Winter Squash, Watermelons, Collard Greens, Cantaloupe Melons, Citrus, Sweet Potatoes, Fruits & Vegetables (Fresh cut), Cilantro, Sweetcorn, Kiwis, Snow Peas, Brussels Sprouts, Brassica Vegetables, Squashes, Zucchini, Turnips Tops, Beetroots, Rutabagas / Swedes, Potatoes, Tangerines, Jalapeno Pepper, Grapes, Poblano, Green Bell Pepper, Red Bell Pepper, Yellow Bell Pepper, Grape Tomatoes , Red Cabbages, Orange Bell Pepper, Watermelon Radish
Product(s) applied for but not observed:	Fruits
Auditor:	John McKinney (Primus Auditing Operations)
Preliminary Audit Score:	**98%**
Final Audit Score:	**99%**
Certificate Valid From:	21 Feb 2024 To 20 Feb 2025

	Latitude	Longitude	
GPS Coordinates:	33° 37' 11"	84° 23' 23"	[Click here to see map](#)

FSMA Summary Report   View Certificate   Corrective Action Activity

Information related to the audited operation

Total number of workers for the operation:	50	**Maximum worker number during peak season:**	60
Number of lines in normal production:	4	**Number of lines running during the audit:**	3
Facility Size:	35000 Square feet	**Facility Environment Conditions:**	Wet- Recycled Water Use with Product Contact
Allergens:	No		
Temperature Controlled Storage:	Yes	**Was an anti-microbial used in the water/ice?**	Yes
Water Source:	Municipal/District	**Antimicrobial Used:**	Peroxyacetic acid
Is cooling equipment used?	Yes	**Cooling Equipment:**	Evaporator/Condensing Unit **Other:** chilled water
Are production areas completely enclosed?	Yes	**Production Area:**	
Are storage areas completely enclosed?	Yes	**Storage Areas:**	

Product information for each product

Product Group/Product Name	Observed Product	Seasonality	Country of destination for product
Apples	Not observed but of a similar risk type to what was observed*	Year round	United States
Asparagus	Not observed but of a similar risk type to what was observed*	Year round	United States
Beetroots	Not observed but of a similar risk type to what was observed*	Year round	United States
Bell Peppers	Not observed but of a similar risk type to what was observed*	Year round	United States
Bok Choy	Not observed but of a similar risk type to what was observed*	Year round	United States
Brassica Vegetables	Not observed but of a similar risk type to what was observed*	Year round	United States
Broccoli	Observed on the day of audit	Year round	United States
Brussels Sprouts	Not observed but of a similar risk type to what was observed*	Year round	United States
Cabbages	Observed on the day of audit	Year round	United States
Napa Cabbage	Not observed but of a similar risk type to what was observed*	Year round	United States
Cantaloupe Melons	Not observed but of a similar risk type to what was observed*	Year round	United States

Carrots	Observed on the day of audit	Year round	United States
Cauliflower	Not observed but of a similar risk type to what was observed*	Year round	United States
Celery	Observed on the day of audit	Year round	United States
Chard	Not observed but of a similar risk type to what was observed*	Year round	United States
Citrus	Not observed but of a similar risk type to what was observed*	Year round	United States
Collard Greens	Not observed but of a similar risk type to what was observed*	Year round	United States
Cilantro	Not observed but of a similar risk type to what was observed*	Year round	United States
Cranberries	Not observed but of a similar risk type to what was observed*	Year round	United States
Cucumbers	Not observed but of a similar risk type to what was observed*	Year round	United States
Fruits	Not observed and not of a similar risk type to what was observed	Year round	United States
Garlic	Not observed but of a similar risk type to what was observed*	Year round	United States
Grape Tomatoes	Not observed but of a similar risk type to what was observed*	Year round	United States
Grapefruit	Not observed but of a similar risk type to what was observed*	Year round	United States
Grapes	Not observed but of a similar risk type to what was observed*	Year round	United States
Green Bean	Not observed but of a similar risk type to what was observed*	Year round	United States
Green Bell Pepper	Not observed but of a similar risk type to what was observed*	Year round	United States
Honeydew	Observed on the day of audit	Year round	United States
Jalapeno Pepper	Not observed but of a similar risk type to what was observed*	Year round	United States
Jicama	Not observed but of a similar risk type to what was observed*	Year round	United States
Kale	Not observed but of a similar risk type to what was observed*	Year round	United States
Kiwis	Not observed but of a similar risk type to what was observed*	Year round	United States
Lemons	Not observed but of a similar risk type to what was observed*	Year round	United States
Mangoes	Observed on the day of audit	Year round	United States
Melons	Not observed but of a similar risk type to what was observed*	Year round	United States
Onions	Observed on the day of audit	Year round	United States
Orange Bell Pepper	Not observed but of a similar risk type to what was observed*	Year round	United States
Oranges	Observed on the day of audit	Year round	United States
Peas	Not observed but of a similar risk type to what was observed*	Year round	United States
Pineapples	Not observed but of a similar risk type to what was observed*	Year round	United States
Poblano	Not observed but of a similar risk type to what was observed*	Year round	United States
Potatoes	Not observed but of a similar risk type to what was observed*	Year round	United States
Radishes	Not observed but of a similar risk type to what was observed*	Year round	United States
Red Bell Pepper	Not observed but of a similar risk type to what was observed*	Year round	United States
Red Cabbages	Not observed but of a similar risk type to what was observed*	Year round	United States
Rutabagas / Swedes	Not observed but of a similar risk type to what was observed*	Year round	United States

Snow Peas	Not observed but of a similar risk type to what was observed*	Year round	United States
Summer Squash	Not observed but of a similar risk type to what was observed*	Year round	United States
Squashes	Not observed but of a similar risk type to what was observed*	Year round	United States
Sweetcorn	Not observed but of a similar risk type to what was observed*	Year round	United States
Sweet Potatoes	Not observed but of a similar risk type to what was observed*	Year round	United States
Tangerines	Not observed but of a similar risk type to what was observed*	Year round	United States
Tomatoes	Not observed but of a similar risk type to what was observed*	Year round	United States
Turnips Tops	Not observed but of a similar risk type to what was observed*	Year round	United States
Turnips	Not observed but of a similar risk type to what was observed*	Year round	United States
Fruits & Vegetables (Fresh cut)	Not observed but of a similar risk type to what was observed*	Year round	United States
Watermelon Radish	Not observed but of a similar risk type to what was observed*	Year round	United States
Watermelons	Not observed but of a similar risk type to what was observed*	Year round	United States
Winter Squash	Not observed but of a similar risk type to what was observed*	Year round	United States
Yellow Bell Pepper	Not observed but of a similar risk type to what was observed*	Year round	United States
Zucchini	Not observed but of a similar risk type to what was observed*	Year round	United States

AUDIT SCORING SUMMARY	Pre-Corrective Action Review		Post-Corrective Action Review	
Food Safety Management System Requirements	Score: Possible Points: Percent Score:	253 253 **100%**	Score: Possible Points: Percent Score:	253 253 **100%**
Module 5 - Good Manufacturing Practices Requirements	Score: Possible Points: Percent Score:	1221 1239 **98%**	Score: Possible Points: Percent Score:	1239 1239 **100%**
Module 6 - HACCP System Requirements	Score: Possible Points: Percent Score:	240 250 **96%**	Score: Possible Points: Percent Score:	245 250 **98%**
TOTAL	Score: Possible Points: Percent Score:	1714 1742 **98%**	Score: Possible Points: Percent Score:	1737 1742 **99%**

Non-Conformance Summary By Count	Pre-Corrective Action Non-Conformances	Post-Corrective Action Non-Conformances
Food Safety Management System Requirements	0	0
Module 5 - Good Manufacturing Practices Requirements	5	0
Module 6 - HACCP System Requirements	1	1
TOTAL	**6**	**1**

Food Safety Management System Requirements	Module 5 - Good Manufacturing Practices Requirements	Module 6 - HACCP System Requirements
Management System	General GMP	Preliminary Steps
Control of Documents and Records	Pest Control	Development of the HACCP Plan
Procedures and Corrective Actions	Storage Areas & Packaging Materials	Execution of the HACCP Plan on the Plant Floor
Internal and External Inspections	Operational Practices	
Release of Items/Product	Worker Practices	
Supplier Monitoring/Control	Equipment	
Traceability and Recall	Equipment Cleaning	
Food Defense	General Cleaning	
	Buildings and Grounds	
	Site	
	Chemical Files	
	Pest Control Documentation	
	Operation Monitoring Records	
	Maintenance & Sanitation Files	
	Worker Documentation	
	Testing	
	Temperature Controlled Storage & Distribution Logs	
	Allergen Control	

FSMS — Management System

1.01.01	**Question:** Is there a documented food safety policy detailing the company's commitment to food safety?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. The food safety policy statement was dated 12/20/23, was signed by top management, and was posted in the break areas and entry to the operation in English and Spanish.	

1.01.02	**Question:** Is there an organizational chart showing all management and workers who are involved in food safety related activities and documentation (job descriptions) detailing their food safety responsibilities?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. The Family Fresh Food Service Food Safety Organizational Chart, dated 12/12/23, as well as alternates and job descriptions/team member functions, were available.	

1.01.03	**Question:** Is there a food safety committee and are there logs of food safety meetings with topics covered and attendees?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. The food safety committee is made up of Sam Cimowsky, Johnathan Gregory, Todd Phillips, Curtis Estes, Kristy Wright, and Victor Salazar. The most recent meeting was held 10/23/23 covering HACCP. Meetings are generally at least quarterly (7/24/23, 4/25/23, 1/26/23).	

1.01.04	**Question:** Is there a training management system in place that shows what types of training are required for various job roles of specific workers, including who has been trained, when they were trained, which trainings they still need to take, and a training schedule?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. An Employee Training SOP and training matrix (4/10/19) was available showing planned and fulfilled trainings for all workers, including hygiene and GMP's, sanitation, and HACCP.	

1.01.05	**Question:** Is there documented management verification review of the entire food safety management system at least every 12 months, including an evaluation of resources, and are there records of changes made?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: Yes. This is recorded on the Management Verification of the Food Safety Management System dated 11/22/23 signed by Johnathan Gregory. The review covered previous audits, recall and complaints, incidents, HACCP, sanitation, and resource analysis.	

1.01.06	**Question:** Where specific industry guidelines or best practices exist for the crop and/or product, does the operation have a current copy of the document?	**Possible Points:** 3 **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: TC. FSMA guidelines were available, as was the GDA Manufactured Food Guidelines and FDA Guidance for Industry for Cut Fruits and Vegetables, Melons, and Fresh Tomatoes.	

FSMS — Control of Documents and Records

1.02.01	**Question:** Is there a written document control procedure (including document control register/record) describing how documents will be maintained, updated and replaced?	**Possible Points:** 3 **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: Yes. This is described in Document Maintenance and Control SOP with a Document Register available. Sam Cimowsky is responsible for the document control process for the operation.	

1.02.02	**Question:** Is there a documented and implemented procedure that requires all records to be stored for a minimum period of 24 months (or greater if legally required) or for at least the shelf life of the product if it is greater than 24 months?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. The record retention period is indicated in Document Maintenance and Control to be 24 months and is implemented.	

1.02.03	**Question:** Are both paper and electronic food safety related documents and records created, edited, stored and handled in a secure manner?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. SOP's are maintained in electronic and paper formats, with records kept primarily on paper. Documents are securely handled and kept in locked facility, with electronic records in documents password protected. No issues with document control were observed.	

1.02.04	**Question:** Are records maintained in an organized and retrievable manner?	**Possible Points:** 3 **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: Yes. Records for the food safety system are kept in various files and binders. All documents were available as requested for the purposes of conducting the audit.	

1.02.05	**Question:** Are all records and test results that can have an impact on the food safety program verified by a qualified person independent of the individual(s) completing the records?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. All records are signed off as applicable by the proper food safety designee. Sam Cimowsky has primary responsibility for review of CCP records.	

FSMS — Procedures and Corrective Actions

1.03.01	**Question:** Is there a written and standardized procedure for creating Standard Operating Procedures (SOPs) and their content?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. This is described in Instructions for Creating a Standard Operating Procedure.	
1.03.02	**Question:** Are the written procedures available to relevant users and is a master copy maintained in a central file?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. The binder of SOP'S is maintained. SOP's are available as needed.	
1.03.03	**Question:** Is there a documented corrective action procedure that describes the basic requirements for handling all non-conformances affecting food safety?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. This is described in Corrective Action Procedure. This includes root cause analysis.	
1.03.04	**Question:** Is there an incident reporting system, also known as a Notice(s) of Unusual Occurrence and Corrective Actions Log (NUOCA) ?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. A NUOCA Log is used to record unusual occurrences. The latest issue was a stolen pest control traps on 7/17/23. Other issues have been boil orders and broken equipment found by a metal detector.	

FSMS	Internal and External Inspections

1.04.01	**Question:** Is there a documented procedure for how internal audits are to be performed at the operations, including frequency and covering all processes impacting food safety and the related documents and records?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. This is described in SOP Internal Audits. Internal audits are scheduled monthly for the facility.	
1.04.02	**Question:** Are there written procedures for handling regulatory inspections?	**Possible Points:** 3 **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: Yes. This is described in Food Safety Regulatory Inspections SOP.	
1.04.03	**Question:** Are there records of regulatory inspections and/or contracted inspections, company responses and corrective actions, if any?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. Records were available for the prior Primus GFS audit conducted on 12/21/22 by Juan Muniz of Primus A7/5/23 and 2/1/23. No other recent inspections were noted.	
1.04.04	**Question:** Are there documented calibration and/or accuracy verification procedures for measuring and monitoring devices used in the operations that are related to the safety of the product?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. These are described in Calibration SOP. ATP Calibration, thermometers, and metal detectors are covered. Thermometers are scheduled at a monthly frequency using the ice bath method. ATP monthly. Metal detector test pieces are run routinely during operation with annual calibration from outside supplier.	
1.04.05	**Question:** Are calibration and/or accuracy verification records maintained and are they consistent with the requirements outlined in the SOP(s) for instruments and measuring devices requiring calibration?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. Records for calibration were available as described (most items monthly). Last calibration for ATP was 12/14/23. Thermometers last 12/14/23. Metal detectors by Loma Systems on 9/28/23.	

FSMS	Release of Items/Product

1.05.01	**Question:** Is there a documented product release procedure available?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: Yes. This is described in the Product Release SOP.	
1.05.02	**Question:** Are there records of product releases kept on file?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: Yes. Release of product is indicated on the Daily Product Release Log and the Shipping Trailer Inspection Record.	
1.05.03	**Question:** Is there a documented procedure for handling on hold and rejected items?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: Yes. This is described in Material On Hold and Rejected SOP.	
1.05.04	**Question:** Are there records of the handling of on hold and rejected items kept on file?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: TC. A On Hold and Rejected Disposition Log was available. The latest issue was disposal of affected product after a boil order for the facility water supply (12/26/22).	
1.05.05	**Question:** Is there a documented procedure for dealing with customer and buyer food safety complaints/feedback along with records and company responses, including corrective actions?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. This is describing in Buyer and Consumer Complaints and Feedback. Records are kept (most recent on 8/8/23 - plastic piece stated to be in chopped kale - investigation performed and retraining done - not able to identify source in the facility).	

FSMS	Supplier Monitoring/Control	
1.06.01	**Question:** Is there a written procedure detailing how suppliers and service providers are evaluated, approved, and include the ongoing verification activities including monitoring? Note that supply chain preventive controls and supply-chain-applied controls are also mentioned in Module 7.	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. This is described in Supplier Approval and Monitoring SOP.	
1.06.02	**Question:** Is there a list of approved suppliers and service providers including justification for use of any emergency (temporary) suppliers or providers?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. This is maintained on an Approved Supplier List. Approved suppliers include Imperial Dade and CryoVac/Sealed Air for packaging materials, Algonquin for process and sanitation chemicals, Proger Pest Control, and multiple suppliers for product.	
1.06.03	**Question:** Are there current written food safety related specifications for all incoming products, ingredients, materials (including primary packaging), services provided on-site, and outsourced services?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. This is described in Produce, Primary Packaging, Processing Chemicals Specifications and Service Specifications (11/21/23) and Supplier Approval and Monitoring SOP.	
1.06.04	**Question:** Does the organization have documented evidence to ensure that all incoming products, ingredients, materials, services provided on-site and outsourced service suppliers comply with the approval requirements and that all supplier verification activities (including monitoring) are being followed, as defined in the supplier approval procedure?	**Possible Points: 15** **Points Scored: 15** **Score:** Total Compliance
	Auditor Comments: TC. Applicable documentation, including third party audit information was available for other suppliers sampled.	

1.06.05	**Question:** Where food safety related testing is being performed by laboratory service providers, are these licensed and/or accredited laboratories (e.g., ISO 17025 or equivalent, national and local regulations, etc.)?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. Primus Labs is accredited by A2LA for the microbiological testing performed. Accreditation expires 5/31/25.	

FSMS	**Traceability and Recall**

1.07.01	**Question:** Is there is a document that indicates how the company product tracking system works, thereby enabling trace back and trace forward to occur in the event of a potential recall issue?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. This is described in Lot Number Explanation in Recall Plan. The system includes Product and Date/lot Codes. Finished goods are labeled with production/use by date and lot code number. Produce Pro software is used. Live traceability exercise was performed for Lot #00107576 50- 1/2 cup orange slices snack pack shipped 1/16/24 and 1/17/24 to three customers (5/13/7 cases). Product (oranges) was received from G. W. Palmer & Co. (lot #00974403) on 12/29/23 and processed on 1/16/24.	
1.07.02	**Question:** Does the organization have a documented recall program including procedures, recall team roles and contact details, external contact listings, requirement for recall effectiveness checks, explanation of different recall classes and handling of recalled product?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: Yes. This is described in Recall Plan dated 11/12/23.	
1.07.03	**Question:** Is testing of recall procedures (including traceback) performed and documented at least every six months, and the company can demonstrate the ability to trace materials (one step forward, one step back) effectively?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. The latest mock recall was conducted for product on 10/31/23 (from 4:30 to 5:35) for 210 ctn 20 lb golden pineapple received 10/29/23 from Del Monte Fresh (lot #00931801), processed on 10/29/23 in 4 pack types, and sent to 7 customers from 10/29 to 11/3/23. 100 % of product was identified and lessons learned were recorded. Previous mock recalls done 4/26/23 (packaging - onion boxes). No actual recalls indicated.	

FSMS	**Food Defense**

1.08.01	**Question:** Is there a written food fraud vulnerability assessment (FFVA) and protection plan for all types of fraud, including all incoming and outgoing products?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. A written food fraud vulnerability assessment dated 1/15/24 was available during the audit.	
1.08.02	**Question:** Is there a written food defense vulnerability assessment and food defense plan based on the risks associated with the operation?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. This is described in SOP Food Defense (11/28/23) and Food Defense Vulnerability Assessment (12/13/23).	
1.08.03	**Question:** Are records associated with the food defense plan and its procedures being maintained, including monitoring, corrective action and verification records (where appropriate)?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. This is recorded in Visitor Log, Training Log, and Chemical Inventory Log.	
1.08.04	**Question:** Is there a current list of emergency contact phone numbers for management, law enforcement and appropriate regulatory agencies?	**Possible Points:** 3 **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: Yes. This is recorded in Emergency Contact List and is posted in multiple areas.	

1.08.05	**Question:** Are visitors and contractors to the company operations required to adhere to food defense procedures?	**Possible Points: 3** **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: Yes. A log was signed at arrival and a visitor badge was issued. Visitor policy was posted.	

GMP	General GMP

5.01.01	**Question:** Are all cleaning and maintenance chemicals (pesticides, sanitizers, detergents, lubricants, etc.) stored securely, safely and are they labeled correctly?	**Possible Points: 15** **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: Yes. Cleaning and other chemicals were stored in dedicated rooms away from the production area with proper containment. Containers were properly labeled.	

5.01.02	**Question:** Are "food grade" and "non-food grade" chemicals used appropriately, according to the label and not commingled?	**Possible Points: 10** **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: TC. No issues were observed with storage of food grade or non food grade chemicals. Separate cabinets are maintained in the maintenance area for food grade grease and lubricants.	

5.01.03	**Question:** Are signs supporting GMPs posted appropriately?	**Possible Points: 10** **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. Signs were posted at the entry area / hand washing area regarding eating, drinking, smoking, hand wash reminder, and hair restraint reminder, among other reminders posted in English and Spanish.	

5.01.04	**Question:** Are the necessary food defense controls implemented in the operation?	**Possible Points: 10** **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. Visitors and contractors are required to sign in and where identification. Doors are kept locked with key/code access required. Materials are kept within the secure facility.	

GMP	Pest Control

5.02.01	**Question:** Are products or ingredients free of pests (e.g. insects, rodents, birds, reptiles, mammals) or any evidence of them? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	**Possible Points: 15** **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: Yes. No evidence of animal activity was observed in product or ingredients.	

5.02.02	**Question:** Are packaging supplies free of pests (e.g., insects, rodents,birds,reptiles,mammals) or any evidence of them? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	**Possible Points: 15** **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: Yes. No evidence of animal activity was observed in packaging materials or supplies.	

5.02.03	**Question:** Are plant and storage areas free of pests (e.g., insects, rodents, birds, reptiles, mammals) or any evidence of them?	**Possible Points: 15** **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: Yes. No evidence of animal activity was observed in plant in storage areas.	

5.02.04	**Question:** Is the area outside the facility free of evidence of pest activity?	**Possible Points: 10** **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. No evidence of pest activity was observed in the area outside the facility.	

5.02.05	**Question:** Is there an effective pest control program in place? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	**Possible Points: 15** **Points Scored: 15** **Score:** Total Compliance
	Auditor Comments: Yes. Services is contracted to Proger Pest Solutions. No issues were observed.	
5.02.06	**Question:** Are pest control devices located away from exposed raw materials, work-in-progress, ingredients (including water and ice), finished goods and packaging, and poisonous bait stations are not used within the facility?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. Pest control devices were kept away from product and packaging materials along walls and at sides of doors. No baits observed in use within the facility. Tin cat devices are used on the interior. Enclosed bait stations are used on the exterior.	
5.02.07	**Question:** Are pest control devices maintained in a clean and intact condition and marked as monitored (or bar code scanned) on a regular basis?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: TC. Devices were observed to be maintained clean and intact with a bar code used for recording monitoring weekly.	
5.02.08	**Question:** Are interior and exterior building perimeter pest control devices adequate in number and location?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: TC. 168 interior traps, 43 bait stations, and 4 ILT's were in use.	
5.02.09	**Question:** Are all pest control devices identified by a number or other code (e.g. barcode) ?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: Yes. The devices are marked with a number and wall sign.	
5.02.10	**Question:** Are all pest control devices effective and bait stations secured?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: Yes. Traps are maintained against the interior walls. Bait stations were weighted.	

GMP	Storage Areas & Packaging Materials	
5.03.01	**Question:** Does the facility layout ensure separation of ingredients (including ice), products, and packaging stored to prevent cross contamination (this includes iced product pallets stored above pallets of product without adequate protection as well as any allergen cross contamination issues)?	**Possible Points: 15** **Points Scored: 15** **Score:** Total Compliance
	Auditor Comments: TC. No issues with potential cross contamination were observed in the facility. No allergens are handled/stored. No issues observed with iced product (kale) available for observation.	
5.03.02	**Question:** Is the facility's use restricted to the storage of food products?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: TC. No non-food storage use was observed.	
5.03.03	**Question:** Are rejected or on hold materials clearly identified and separated from other materials?	**Possible Points: 0** **Points Scored: 0** **Score:** N/A
	Auditor Comments: N/A. No held items observed.	
5.03.04	**Question:** Are raw products, work in progress, ingredients (including water and ice), finished goods and food contact packaging within accepted tolerances for spoilage and free from adulteration? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	**Possible Points: 15** **Points Scored: 15** **Score:** Total Compliance
	Auditor Comments: TC. No issues were observed with spoilage or adulteration of product or packaging.	

| 5.03.05 | **Question:** Are all storage areas clean, especially the racking structures, lights, ceilings, floor areas by the walls and other hard to reach areas? | **Possible Points: 10**
 Points Scored: 10
 Score: Total Compliance |
| | **Auditor Comments:** TC. Storage areas were observed to be clean. | |

| 5.03.06 | **Question:** Are materials (commodities, packaging, ingredients, processing aids, work in progress, etc.) properly marked with rotation codes (receipt dates, manufacture dates, etc.)? | **Possible Points: 5**
 Points Scored: 5
 Score: Total Compliance |
| | **Auditor Comments:** TC. Products are marked with pallet tags or receipt dates. | |

| 5.03.07 | **Question:** Are materials (commodities, packaging, ingredients, processing aids, work in progress, etc.) rotated using FIFO policy? | **Possible Points: 5**
 Points Scored: 5
 Score: Total Compliance |
| | **Auditor Comments:** Yes. The FIFO process is used. | |

| 5.03.08 | **Question:** Are storage areas at the appropriate temperatures for the specific products being stored? | **Possible Points: 10**
 Points Scored: 10
 Score: Total Compliance |
| | **Auditor Comments:** Yes. The storage area is maintained at approximately 35° F. | |

| 5.03.09 | **Question:** Is any packaging being stored outside, being stored protected? | **Possible Points: 0**
 Points Scored: 0
 Score: N/A |
| | **Auditor Comments:** N/A. No packaging observed stored outside. | |

| GMP | Operational Practices | |

| 5.04.01 | **Question:** Does the process flow, facility layout, worker control, utensil control, internal vehicle use, etc. ensure that finished (processed) products are not contaminated by raw (unprocessed) products? | **Possible Points: 15**
 Points Scored: 15
 Score: Total Compliance |
| | **Auditor Comments:** Yes. The production flow through the operation generally moves in a one-way or loop pattern from the receiving door through the various packing and processing operations and storage to a separate shipping. | |

| 5.04.02 | **Question:** Are all exposed materials (product, packaging, etc.) protected from overhead contamination (e.g. ladders, motors, condensation, lubricants, walkways, loose panels, degrading insulation, etc.)? | **Possible Points: 15**
 Points Scored: 15
 Score: Total Compliance |
| | **Auditor Comments:** TC. No issues with potential or observed overhead contamination were present. | |

| 5.04.03 | **Question:** Are production areas clean and well maintained; especially lights, ducts, fans, floor areas by the walls and equipment, and other hard to reach areas? | **Possible Points: 15**
 Points Scored: 15
 Score: Total Compliance |
| | **Auditor Comments:** Yes. The production area was adequately cleaned and maintained. | |

| 5.04.04 | **Question:** Where facilities are not completely enclosed, are there measures in place to mitigate potential hazards? | **Possible Points: 0**
 Points Scored: 0
 Score: N/A |
| | **Auditor Comments:** N/A. The production areas were completely enclosed. The areas used for processing radishes are completely enclosed from the packing areas. | |

| 5.04.05 | **Question:** Is all re-work / re-packaging handled correctly? | **Possible Points: 0**
 Points Scored: 0
 Score: N/A |
| | **Auditor Comments:** N/A. No rework/ repack observed. | |

5.04.06	**Question:** Are raw ingredients examined before use?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. Product is visually inspected prior to use.	

5.04.07	**Question:** Are finished products coded (carton and unit packaging) for the day of production?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. All cartons, bags, etc. are coded with a lot code for the day of production.	

5.04.08	**Question:** Are foreign material control methods (e.g. metal detectors, metal traps, magnets, visual inspection, x-ray machines, etc.) in place and regularly tested (where relevant) to ensure proper operation?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: TC. Five metal detectors are in place for processing line operations under Critical Control Point / CCP SOP. The metal detectors are challenged with 3 types of test pieces (2.0 mm ferrous, 2.5 mm non ferrous, and 3.5 mm stainless steel) with each product change or at least every hour. Check of the metal detectors was observed during the inspection, with the test pieces resulting in an alarm and belt stopping.	

5.04.09	**Question:** Does the facility use the appropriate test strips, test kits or test probes for verifying the concentrations of anti-microbial chemicals (product contact water, terminal sanitizers, dip stations, etc.) being used, are they in operational condition and are they being used correctly?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: TC. Test solutions for verifying PAA levels and test strips for QAC levels are maintained in proper condition (stored in manufactures vials) and were within the expiration date. Test during operation indicated process wash water at appropriate levels PAA (75 ppm).	

5.04.10	**Question:** Are hand washing stations adequate in number and appropriately located for worker access and monitoring usage?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: Yes. Five hand wash stations (for up to 60 workers at a time) is present at the entrances to the production area. Additional (four) hand wash stations are present in the break area restrooms.	

5.04.11	**Question:** Are hand washing stations in working order, have water of suitable temperature and pressure, adequately stocked (e.g. disposable towels,unscented soap, etc.) and restricted to hand washing purposes only?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: Yes. The hand washing stations were adequately stocked with warm water, unscented soap, and paper towels, and are restricted for hand washing.	

5.04.12	**Question:** Are toilet facilities adequate in number and location and are they adequately stocked (e.g. toilet paper, disposable towels, unscented soap, etc.)?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: Yes. Adequate toilet facilities (four total) were available, with four additional hand sinks present.	

5.04.13	**Question:** Are secondary hand sanitation stations adequate in number and location, and are the stations maintained properly?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. Secondary hand sanitizer stations were present at the hand wash area and through the operation with an alcohol-based sanitizer in use.	

5.04.14	**Question:** Are foot baths, foamers or dry powdered sanitizing stations adequate in number and location, and are the stations maintained properly?	**Possible Points:** 3 **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: Yes. Foot dip powder (Guardian) was present at the entrance to the processing operation.	

5.04.15	**Question:** Are single service containers used for their intended purpose only so that potential cross contamination is prevented?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. No issues were observed with improper use/potential cross-contamination issues with single-use containers.	

5.04.16	**Question:** Are re-usable containers cleanable and clearly designated for the specific purpose (trash, raw product, finished product, re-work, ice, etc.) such that cross contamination is prevented?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. The bins/barrels used were labeled and of distinctive type for edible and inedible materials.	

5.04.17	**Question:** Are devices used to measure, regulate or control temperature, pH, acidity, water activity, and other conditions that affect food safety, working properly and adequately maintained?	**Possible Points:** 3 **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: Yes. Thermometers (wall thermometer probes, pulp thermometers) were in proper condition and adequately calibrated.	

GMP	Worker Practices	

5.05.01	**Question:** Are workers washing and sanitizing their hands before starting work each day, after using the restroom, after breaks, before putting on gloves and whenever hands may be contaminated?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: TC. Workers were observed washing their hands after breaks and restroom use, as well as before donning gloves.	

5.05.02	**Question:** Are workers' fingernails clean, short and free of nail polish?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. No issues with workers' fingernails were observed.	

5.05.03	**Question:** Are workers who are working directly or indirectly with food, free from signs of boils, sores, open wounds and are not exhibiting signs of foodborne illness?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. No issues were observed concerning workers with lesions or illnesses.	

5.05.04	**Question:** Are workers wearing effective hair restraints that contain all hair?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. Workers were observed to properly wear hairnets and beard nets as applicable to contain hair.	

5.05.05	**Question:** Is jewelry confined to a plain wedding band and watches, studs, false eyelashes, etc., are not worn?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. No issues with jewelry were observed in the operation.	

5.05.06	**Question:** Are all workers wearing protective outer garments suitable for the operation (e.g., appropriate clean clothes, smocks, aprons, sleeves, non-latex gloves)?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. Workers in the operation wore smocks and/or aprons, using nitrile gloves, disposable sleeves as applicable.	

5.05.07	**Question:** Do workers remove protective outer garments (e.g., smocks, aprons, sleeves, and gloves) when on break, before using the toilets and when going home at the end of their shift?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. Items are hung on hooks in the entrance areas or discarded as applicable.	

5.05.08	**Question:** Is there a designated area for workers to leave protective outer garments (e.g., smocks, aprons, sleeves, and gloves) when on break and before using the toilets?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. Hooks in the gowning area are available for reusable garments.	

5.05.09	**Question:** Are worker personal items being stored appropriately (i.e. not in the production or material storage area)?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. A break area with lockers was available.	

5.05.10	**Question:** Is smoking, eating, chewing and drinking confined to designated areas, and spitting is prohibited in all areas?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. No issues of eating. drinking, chewing, smoking, or spitting were observed.	

5.05.11	**Question:** Is fresh potable drinking water readily accessible to workers?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. Water from the municipal source was available to workers for drinking (filtered).	

5.05.12	**Question:** Are all items removed from garment (shirt, blouse, etc.) top pockets, and unsecured items are not worn (e.g., pens, glasses on top of the head, Bluetooth devices, etc.)?	**Possible Points:** 3 **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: Yes. No issues with unsecured items were observed.	

5.05.13	**Question:** Are first aid kits adequately stocked and readily available in the facility, and are blue band aids used?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. A first aid kit is available in the production office for worker needs, and included blue metal detectable bandages, antiseptics, etc. with no expired items found.	

GMP	Equipment	

5.06.01	**Question:** Are food contact equipment surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g., tape, string, cardboard, etc.)?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: Yes. No issues were observed with food contact equipment surfaces. Surfaces are generally stainless steel or food grade plastic.	

5.06.02	**Question:** Are non-food contact equipment surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g., tape, string, cardboard, etc.)?	**Possible Points: 10** **Points Scored:** 7 **Score:** Minor Deficiency
	Auditor Comments: Minor. Corrosion was observed on a metal box (no longer in use) at the door near trap #28. No other issues were observed with non-food contact equipment surfaces.	

Auditee Comments: Metal box was no longer in use, so it was removed from the facility. See before and after pictures.		View Files
	CA Accepted?	
CB/Auditor Review Comments: TC.	**Yes**	*Possible Points: 10* *Points Scored: 10* *New Score: Total Compliance*

5.06.03	**Question:** Does food contact equipment design, placement, and condition (e.g., smooth surfaces, smooth weld seams, non-toxic materials, corrosion-resistant, no wood or other absorbent materials) facilitate effective cleaning and maintenance?	**Possible Points: 15** **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: TC. No issues with design/condition/materials were observed on food contact equipment.	

5.06.04	**Question:** Are thermometers (independent of thermostat probes) present in all coolers and freezers?	**Possible Points: 5** **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. Independent thermometers were in place in the production/storage area (separate processing rooms and cooler rooms).	

5.06.05	**Question:** Are all thermometers non-glass and non-mercury?	**Possible Points: 10** **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. Digital thermometers/automated probe systems were in use.	

GMP	Equipment Cleaning	

5.07.01	**Question:** Are food contact equipment surfaces clean?	**Possible Points: 15** **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: TC. Food contact surfaces were observed to be adequately clean for the stage of production.	

5.07.02	**Question:** Are non-food contact equipment surfaces clean?	**Possible Points: 10** **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: TC. Non-food contact surfaces were observed to be adequately clean for the stage of production.	

5.07.03	**Question:** Are items (totes, bins, etc.) that are used to hold or store product clean?	**Possible Points: 10** **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: TC. The bins used to hold intermediate product were observed to be clean.	

5.07.04	**Question:** During cleaning, are food products and packaging materials protected from contamination?	**Possible Points: 15** **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: TC. No issues observed with cleaning performed during the inspection.	

5.07.05	**Question:** Are cooling units, including coils in coolers and freezers, clean and free of aged, dirty ice?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. No issues were observed with aged dirty ice with the cooling units.	

5.07.06	**Question:** Are all fan guards dust-free and the ceiling in front of the fans free of excessive black deposits?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. No issues were observed with dust/ceiling deposits.	

5.07.07	**Question:** Is stored equipment that is not used on a daily basis stored in a clean condition with food-contact surfaces protected and/or are they retained on cleaning schedules in some manner, even though they are not in use?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. Equipment not in use is maintained on the cleaning schedule or cleaned prior to use.	

5.07.08	**Question:** Are all utensils, hoses, and other items not being used, stored clean and in a manner to prevent contamination?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. Hoses are hung to reduce floor contact.	

5.07.09	**Question:** Are maintenance tools that are used in the production and storage areas of the facility clean, sanitary and corrosion free?	**Possible Points:** 3 **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: Yes. No issues were observed with tools in the production area.	

5.07.10	**Question:** Are excess lubricants and grease removed from the equipment and are lubricant catch pans fitted where needed?	**Possible Points:** 5 **Points Scored:** 3 **Score:** Minor Deficiency
	Auditor Comments: Minor. Lack of drip protection observed on gearmotors over food contact surfaces on the cabbage shredding in-fed belt and Yamato Scale #1. No other issues were observed with excess lubricant or drip protection.	

Auditee Comments: Manufacturer of the equipment was contacted to design and build drip pans for both the bearing side and gearbox side for the In-Feed Belt, Yamato Scale #1, and Yamato Scale #2. FFF maintenance to install pans upon completion. A workorder was written, to be completed upon completion of the project. Order acknowledgement from TSD was also received.   [View Files]

	CA Accepted?	
CB/Auditor Review Comments: TC based on plan.	**Yes**	*Possible Points:* 5 *Points Scored:* 5 *New Score:* *Total Compliance*

GMP	General Cleaning

5.08.01	**Question:** Are spills cleaned up immediately?	**Possible Points:** 0 **Points Scored:** 0 **Score:** N/A
	Auditor Comments: N/A. No spills were observed.	

5.08.02	**Question:** Are waste and garbage frequently removed from production and storage areas?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. No issues were observed with waste build-up in the operation.	

5.08.03	**Question:** Are floor drains covered, do they appear clean, free from odors, in good repair, and flow in a manner that prevents contamination (e.g., from high to low risk areas, from high risk directly to drain system)?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. No issues were observed with floor drains (clean, covered, no odors).	
5.08.04	**Question:** Do high level areas, including overhead pipes, ducts, fans, etc., appear clean?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. High level areas appeared clean.	
5.08.05	**Question:** Are plastic strip curtains maintained in good condition, kept clean and mounted so that the tips are not touching the floor?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: Yes. No issues were observed with the plastic strip curtains in use.	
5.08.06	**Question:** Is personal protection equipment (PPE) for the sanitation crew in good condition and stored to prevent cross contamination to raw products, work in progress, ingredients, finished goods or packaging?	**Possible Points: 3** **Points Scored: 3** **Score:** Total Compliance
	Auditor Comments: Yes. Goggles and gloves were available at the chemical storage area as specified.	
5.08.07	**Question:** Is cleaning equipment maintained clean and stored properly?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: TC. Brooms, etc. were observed stored head down. No issues with cleaning equipment storage were observed.	
5.08.08	**Question:** Is cleaning equipment identified in order to prevent potential cross contamination issues (e.g., production, maintenance, outside, restroom equipment)?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. A color coding system is used to identify area of use for the cleaning equipment.	
5.08.09	**Question:** Are all items used for sanitation appropriate for their designated purpose (e.g., no steel wool, metal bristles, etc.)?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: Yes. No issues were observed with sanitation items.	
5.08.10	**Question:** Are toilet facilities and hand washing stations clean?	**Possible Points: 15** **Points Scored: 15** **Score:** Total Compliance
	Auditor Comments: Yes. The toilet facilities and hand wash sinks appeared clean.	
5.08.11	**Question:** Are worker break facilities clean, including microwaves and refrigerators, and no rotting or out of date foodstuffs?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: Yes. The break area was adequately clean. No issues were observed.	
5.08.12	**Question:** Is the maintenance shop organized, with equipment and spares stored in a neat and tidy fashion?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: TC. No issues with maintenance area observed in operation.	
5.08.13	**Question:** Are internal transport vehicles (e.g., forklifts, bobcats, pallet jacks, carts, floor cleaners, etc.), clean, do not emit toxic fumes and are being used in a sanitary manner?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: Yes. No issues were observed with the pallet jacks, floor cleaner, etc. used in the operation.	

5.08.14	**Question:** Are shipping trucks clean and in good condition?	**Possible Points:** 0 **Points Scored:** 0 **Score:** N/A
	Auditor Comments: N/A. No shipping trucks available for inspection.	

GMP	Buildings and Grounds	
5.09.01	**Question:** Are all lights in the facility that could potentially contaminate raw materials, work in progress, ingredients (including ice), finished goods, equipment or packaging shielded, coated or otherwise shatter resistant to protect product from contamination in the event of breakage?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: TC. Lights in the facility were observed to be shielded to prevent and contain breakage.	
5.09.02	**Question:** Has the operation eliminated or adequately controlled any potential metal, glass or brittle plastic contamination issues?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. No issues with potential physical contamination issues were observed.	
5.09.03	**Question:** Has the facility eliminated the use of wooden items or surfaces?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. No use of wood items or surfaces were observed.	
5.09.04	**Question:** Is there adequate lighting in the production and storage areas?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. Adequate lighting was observed in the operation.	
5.09.05	**Question:** Is ventilation adequate to control dust, condensation, odors and vapors?	**Possible Points:** 10 **Points Scored:** 7 **Score:** Minor Deficiency
	Auditor Comments: Minor. Instance of condensation observed on cooling unit over the worker entrance to High-Care #3. No other ventilation issues were observed.	

Auditee Comments: No product or food contact equipment is stored underneath the units. Unit was found in good working order, but drain line was blocked due to ice build-up from freezing temperatures outside. Drain line was thawed to allow proper drainage. After drain lines were cleared, condensation under the cooling unit was eliminated. To prevent future freezing of the line, drainage lines were wrapped with insulation. Employees were retrained on the importance of contacting supervisors if condensation is identified.

[View Files]

CB/Auditor Review Comments: TC.	**CA Accepted?** **Yes**	*Possible Points:* 10 *Points Scored:* 10 *New Score:* Total Compliance

5.09.06	**Question:** Are floor surfaces in good condition, with no standing water, no debris trapping cracks and are they easy to clean?	**Possible Points: 10** **Points Scored:** 7 **Score:** Minor Deficiency

Auditor Comments: Minor. Areas of exposed aggregate were observed in dock area/storage room #6 floors. The concrete floor in the production and storage areas was smooth and in good condition, with no issues observed.

> **Auditee Comments:** *Tufco, who performed resurfacing of many of FFF's coolers, was contacted about resurfacing the floor in Room #6. A quotation was completed on 2-7-24. Project is scheduled for July 2024 due to Tufco scheduling restrictions. A workorder was written, to be completed upon completion of the project. A risk analysis was performed to determine the risks associated with utilizing the cooler before the floor is resurfaced. It was determined that the risk was low, and the storage space could still be used until the resurfacing was completed.*   [View Files]

CB/Auditor Review Comments: *TC.*	**CA Accepted?** **Yes**	**Possible Points:** *10* **Points Scored:** *10* **New Score:** *Total Compliance*

5.09.07	**Question:** Are the floor drains where they are needed for drainage and cleanup?	**Possible Points: 5** **Points Scored:** 5 **Score:** Total Compliance

Auditor Comments: Yes. Adequate drainage is present in the production area.

5.09.08	**Question:** Are closed doors and windows to the outside pest-proof?	**Possible Points: 10** **Points Scored:** 10 **Score:** Total Compliance

Auditor Comments: Yes. No potential pest entry points were observed.

5.09.09	**Question:** In temperature controlled environments, are docks enclosed and dock doors fitted with buffers/shelters to seal against trucks?	**Possible Points: 5** **Points Scored:** 5 **Score:** Total Compliance

Auditor Comments: TC. No issues observed with dock doors in operation.

5.09.10	**Question:** Are dock load levelers and buffers/shelters maintained in good condition, pest proof and debris free?	**Possible Points: 3** **Points Scored:** 3 **Score:** Total Compliance

Auditor Comments: TC. No issues with docks/shelters in use.

5.09.11	**Question:** Are exterior walls free of holes to exclude pests, and are pipes, vents, and air ducts designed and protected in order to prevent pest entry (e.g., by using fine mesh)?	**Possible Points: 5** **Points Scored:** 5 **Score:** Total Compliance

Auditor Comments: Yes. No issues were observed with exterior walls.

5.09.12	**Question:** Are interior walls and ceilings free of cracks and crevices to prevent pest harborage and allow proper sanitation?	**Possible Points: 5** **Points Scored:** 5 **Score:** Total Compliance

Auditor Comments: TC. No issues were observed with interior walls/ceilings.

5.09.13	**Question:** Is an 18" (46 cm) internal wall perimeter being maintained within the facility, with adequate access to these wall perimeters, thereby allowing inspection and cleaning?	**Possible Points: 5** **Points Scored:** 5 **Score:** Total Compliance

Auditor Comments: Yes. An 18" perimeter was observed to be maintained in the storage and production areas.

5.09.14	**Question:** Is the exterior area immediately outside the facility, including roads, yards and parking areas, free of litter, weeds and standing water?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. No issues were observed with the condition of the exterior area.	

5.09.15	**Question:** Are control measures being implemented for the outside storage of equipment, pallets, tires, etc. (i.e. out of the mud, pipe ends capped, stacked to prevent pest harborage, away from the building perimeter)?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. Items are kept away from the structure.	

5.09.16	**Question:** Are pallets inspected to separate and replace dirty or broken pallets, and broken or dirty pallets are not in use?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. Pallets are evaluated and separated for return to supplier or discard.	

5.09.17	**Question:** Is the area around the dumpster/cull truck/trash area clean?	**Possible Points:** 3 **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: Yes. The area around the dumpster was clean.	

5.09.18	**Question:** Are outside garbage receptacles and dumpsters kept covered or closed?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. The dumpsters/trucks were closed when not in use.	

5.09.19	**Question:** Are all water lines protected against back siphonage?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. The main water supply to the building, as well as the hoses used are fitted with backflow prevention devices.	

5.09.20	**Question:** Where there is an on-site laboratory, is it completely enclosed and separated from production and storage areas?	**Possible Points:** 0 **Points Scored:** 0 **Score:** N/A
	Auditor Comments: N/A. No onsite laboratory.	

GMP	**Site**	

5.10.01	**Question:** Is there a site plan showing the facility location, adjacent sites, roads, water sources, storm water, wastewater and other relevant features?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. A site plan was available showing roads, adjacent operations, etc.	

5.10.02	**Question:** Is there a facility floor plan showing the layout of the building, production areas, storage areas, water sources and fixtures, layout of equipment and traffic flow patterns?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. A floor plan was available showing general layout, water sources, drains, storage areas, equipment location and work/traffic flow patterns.	

5.10.03	**Question:** Has a documented risk assessment been performed to ensure that any food safety hazards relevant to facility location and adjacent land use are identified and controlled?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. This is described in Family Fresh Food Service Risk Analysis and Adjacent Land Use dated 12/12/23 and includes descriptions of operations in all directions (land use, water sources, adjacent land, water systems), as well as potential hazards and mitigation/control steps.	

5.10.04	**Question:** Is there a current certificate of inspection (or similar record) for backflow prevention assemblies on water lines into the facility?	**Possible Points: 3** **Points Scored: 3** **Score:** Total Compliance
	Auditor Comments: Yes. A current inspection (one device) was performed by Robert Akins on 8/28/23.	

5.10.05	**Question:** Is there a designated person responsible for the operation's food safety program?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. Sam Cimowsky (PCHF training on 3/6/20) serves as the PCQI.	

GMP	Chemical Files

5.11.01	**Question:** Are there copies of specimen labels for chemicals used, where the full label is not immediately accessible (e.g., rodent chemicals, product sanitizers)?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: Yes. Labels are available as applicable.	

5.11.02	**Question:** Are there chemical inventory logs for chemicals, including pesticides, fertilizers and cleaning and sanitizing chemicals?	**Possible Points: 3** **Points Scored: 3** **Score:** Total Compliance
	Auditor Comments: Yes. This is recorded on the Family Fresh Food Service Chemical Inventory Log monthly (last on 12/14/23).	

5.11.03	**Question:** Are there specific Standard Operating Procedures (SOPs) for the monitoring of anti-microbial parameters in single pass and/or recirculated/batch water systems, changing of recirculated/batch water systems (e.g., dump tanks, flumes, hydro vacuums, hydro coolers, etc.) and for monitoring pH and water temperature (if applicable)?	**Possible Points: 10** **Points Scored: 3** **Score:** Major Deficiency
	Auditor Comments: Major. Lack of justification/support for the antimicrobial range used in batch/circulated water systems. This is defined in Chemical Monitoring SOP and Flume, Wash Tank, Batch Wash, and Vat Water Changing and PAA Testing SOP. A use range of 60-80 ppm ppm in tanks. Levels are checked every 30 minutes in processing. Tanks are emptied at least daily.	

Auditee Comments: Guidance was found to justify the use of 60 – 80 ppm peroxyacetic acid (PAA) use as a CCP. CFR 173.315 and guidance by the Clemson Cooperative Extension note an upper allowance of 80 ppm PAA use for washing fruits and vegetables. Guidance from the University of Tennessee notes that a wide range of 25 – 85 ppm for PAA can be used. Cornell Cooperative Extension recommends use of a 60 ppm PAA solution be used. Considering these resources, operational limits for FFF are set at 60 – 80 ppm PAA.   [View Files]

CB/Auditor Review Comments: TC.	*CA Accepted?* **Yes**	*Possible Points:* 10 *Points Scored:* 10 *New Score:* Total Compliance

GMP	Pest Control Documentation

5.12.01	**Question:** Is the pest control program properly documented, detailing the scope of the program, target pests and frequency of checks, including a copy of the contract with the extermination company (if used), Pest Control Operator license(s)/training (if baits are used), and insurance documents?	**Possible Points: 15** **Points Scored: 15** **Score:** Total Compliance
	Auditor Comments: TC. Pest control services are conducted by Proger Solutions Pest Control under current service agreement. Program description (rodent service weekly) was available. Current business license (exp 6/30/25), technician license (including primary technician Roger A. Rafuls SP31337 expiration 6/30/25) and insurance (exp 8/7/24) were available.	

5.12.02	**Question:** Is there a schematic drawing/plan of the facility showing numbered locations of all pest monitoring devices (e.g., rodent traps, bait stations, insect light traps, etc.) both inside and outside the facility?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. A map showing 43 exterior stations, 168 interior traps and 4 ILT's was provided. Placement locations were observed to match.	

5.12.03	**Question:** Are service reports created for pest control checks detailing inspection records, application records, and corrective actions of issues noted (in-house and/or contract)?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. Inspection reports are completed weekly (1/16/24, 1/8/24, 1/2/24, 12/26/23, 12/18/23, 12/11/23, 12/4/23, 11/27/23, 11/20/23, 11/13/23, 11/8/23, 10/31/23...) for internal traps, external bait stations and light traps. The service reports include trap-by-trap activity and bait applications, as well as applications, trends and corrective actions.	

GMP	Operation Monitoring Records	

5.13.01	**Question:** Are there inspection records for incoming goods (e.g., raw materials, ingredients and packing materials)?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. This is recorded in Produce Pro for produce and packaging materials.	

5.13.02	**Question:** Are there inspection logs on incoming trailers (and other forms of transport) for rodents and insects, cleanliness, holes and temperature control of the trailer (for food requiring temperature control for safety and/or as required per buyer specifications)?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: TC. This is recorded in Produce Pro for produce and packaging materials.	

5.13.03	**Question:** Are there records for the necessary process monitoring activities (e.g., pH, water temperature vs. product temperature, metal detection, X-ray, labeling, heating processes, reduction/kill step processes, postharvest pesticides (e.g. fungicides), control of water activity, drying, etc.), showing, for example, monitoring frequencies, results and where necessary the corrective actions?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. Metal detector checks (5 total devices) are recorded on the Metal Detector Check log. These are performed using three standards (2.0 mm Fe, 2.5 mm non-Fe, and 3.5 mm SS) minimally hourly, but usually at least every thirty minutes with corrective actions recorded.	

5.13.04	**Question:** Are there records (with corrective actions) that show anti-microbial (e.g., free chlorine, peroxyacetic acid) strength testing of product contact water and ice solutions prior to start up and throughout the production runs?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: TC. The antimicrobial levels of the wash water systems are checked approx. every 30 minutes for the processing area per parameters in 5.11.04. These are recorded on the PAA Peroxy Acetic Acid Solution Testing and Turbidity Wash Water Clarity Monitoring Log. No deviations indicated in the current cycle.	

5.13.05	**Question:** Are there records of monitoring for build-up of organic material (turbidity) and changing of recirculated and batch water systems (e.g., dump tanks, flumes, hydro vacuums, hydro coolers, etc.)?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. This is recorded on the PAA Peroxy Acetic Acid Solution Testing and Turbidity Wash Water Clarity Monitoring Log for the flume/tank systems with a visual color guide.	

5.13.06	**Question:** Are there records (with corrective actions) that show anti-microbial strength testing of hand/foot/tool dip stations, and are there stock check and replenishment records for gel and spray stations?	**Possible Points:** 3 **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: Yes. Hand sanitizer stations, knife dips and foot powder are included the Daily Pre-Operation Inspection and the Quat Tool Dip Station and Knife Box Check at the beginning and end of work and mid-shift.	

5.13.07	**Question:** Is there a tool accountability program for knives and similar cutting hand tools used in the production area?	**Possible Points:** 3 **Points Scored:** 3 **Score:** Total Compliance
	Auditor Comments: Yes. This is described in Chemical Monitoring SOP and Tool Accountability Program SOP and Daily Blade Inspection for Equipment. The Knife Log indicates the number out and number in for knives. Tool dips (200 to 400 ppm QAC) are checked. Check during the inspection was 200 ppm for the knife storage dip.	

5.13.08	Question: Is there a pre-operation inspection log?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: TC. This is recorded on the Daily Pre-Operation Check (Processing #1 and Processing #2). These cover the facility (general housekeeping), equipment, restrooms/breakrooms and workers for all areas.	
5.13.09	Question: Is there documented evidence of the internal audits performed, detailing findings and corrective actions?	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. Records of internal audit and corrective actions (with monthly GMP inspections - last on 12/29/23) were available for review. Last internal audit done by Sam Cimowsky - nonconformances and corrective actions noted). Prior self-audit done 11/28/23, 10/30/23, 9/29/23, 8/31/23, 7/28/23, 6/23/23, 5/30/23, 4/28/23, 3/29/23, 2/27/23, 1/30/23...	

GMP	Maintenance & Sanitation Files	
5.14.01	Question: Does the facility have a preventative maintenance program that includes a schedule and completion records?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. This is described Preventive Maintenance SOP with semi-annual, monthly, bi-weekly, and weekly items.	
5.14.02	Question: Are there a logs of maintenance work and repairs and are they signed off when work is completed?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. This is recorded by equipment type on Preventive Maintenance Log, Maintenance Log, and invoices with signoff.	
5.14.03	Question: Are there logs showing that equipment is properly cleaned and sanitized after maintenance and repair work has been completed?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. This is indicated on the Maintenance Log/work orders (Cleaned? Sanitized?) last on 12/14/23 realigned infeed belt to translicer (completed 12/16/23).	
5.14.04	Question: Is there a written cleaning schedule (Master Sanitation Schedule) that shows what and where is to be cleaned and how often?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. The Master Sanitation Schedule was available. It includes the items/areas and frequency.	
5.14.05	Question: Are there written cleaning and sanitation procedures (Sanitation Standard Operating Procedures) for the facility and all equipment?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. SSOP's are available for all areas include the chemicals, equipment and frequency for cleaning. In general, Algonquin Chlorfoam cleaner and QAC sanitizer are used.	
5.14.06	Question: Are cleaning and sanitation logs on file that show what was done, when and by who?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. Sanitation logs (Daily Sanitation Checklist - Processing, Floor and Drain Daily Sanitation Log, Floor Scrubber Sanitation Log, Breakroom/Kitchen Checklist, and Restroom Cleaning Checklist) are maintained and available for review. Logs are initialed by the cleaner.	
5.14.07	Question: Are there records showing verification of cleaning and sanitizing chemical concentrations?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: TC. This is indicated on the Quaternary Ammonia Sanitation Spray Testing Log (200 to 400 ppm).	

5.14.08	**Question:** Are there documented procedures and completion records for clean-in-place (CIP) activities (e.g., cleaning re-circulating water systems such as washing flumes, ice injectors, hydrocoolers, chilled water systems, ice makers, etc.), where applicable?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: TC. This is indicated in the CIP SOP each day of use for flume, batch wash, and apple wedger.	

5.14.09	**Question:** Are there sanitation logs on file indicating that floor drains are cleaned on a regular basis (minimum daily in wet and fresh-cut production areas)?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: TC. This is recorded on the Floor and Drain Daily Sanitation Log.	

5.14.10	**Question:** Are there records showing filters in air conditioning, evaporative coolers, ventilation and air filtration units are regularly cleaned and replaced?	**Possible Points: 0** **Points Scored: 0** **Score:** N/A
	Auditor Comments: N/A. No air filter systems.	

5.14.11	**Question:** Are there records showing cooling units are maintenance serviced and cleaned at least every 12 months or more frequently as required?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. This is performed quarterly by Multemp Services last on 12/2/23 and 12/9/23.	

5.14.12	**Question:** Is there a routine program and written procedure to verify sanitation effectiveness using rapid post sanitation checks (e.g., ATP measurements, allergen specific proteins)?	**Possible Points: 15** **Points Scored: 15** **Score:** Total Compliance
	Auditor Comments: TC. This is described in Adenosine Tri-Phosphate (ATP) Testing SOP with 23 areas checked daily during use using a Hygiena System Sure Plus system with a threshold of 30 RLU to initiate recleaning/retesting.	

5.14.13	**Question:** Is there a documented glass and brittle plastic management procedure (including company glass and brittle plastic policy, glass breakage procedure and where necessary a glass register)?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. This is described in Glass Control SOP. GlassRegister Form is checked monthly (last on 12/29/23, 11/28/23, 10/30/23, 9/29/23...). No glass containers are allowed.	

GMP	Worker Documentation	

5.15.01	**Question:** Are there records of new worker food safety (GMP) orientation training (with topics covered and attendees) and are all workers required to sign the company's food safety hygiene and health policy?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. Training on GMP's, HACCP, safety, chemicals, food security, etc. is provided for new and returning employees on the Personnel Food Safety and Hygiene form at hire.	

5.15.02	**Question:** Are there logs of ongoing worker food safety education training, including topics covered, attendees, etc.?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. Refresher training is performed at least quarterly to review GMP's and train on system changes (latest on 12/6/23, 11/22/23, 10/25/23).	

5.15.03	**Question:** Are there training logs for the sanitation workers, including best practices and chemical use details?	**Possible Points: 5** **Points Scored: 5** **Score:** Total Compliance
	Auditor Comments: Yes. Sanitation training was performed 10/25/23.	

| 5.15.04 | **Question:** Are there written and communicated procedures in place that require food handlers to report any cuts or grazes and/or if they are suffering any illnesses that might be a contamination risk to the products being produced, and include return to work requirements? (In countries with health privacy/confidentiality laws, e.g. USA, auditors should check procedure/policy but not the actual records). | **Possible Points: 10**
 Points Scored: 10
 Score: Total Compliance |
| | **Auditor Comments:** Yes. This is stated on the Personnel Food Safety Hygiene form signed by each worker. | |

| 5.15.05 | **Question:** Are there worker food safety non-conformance records and associated corrective actions (including retraining records)? | **Possible Points: 3**
 Points Scored: 3
 Score: Total Compliance |
| | **Auditor Comments:** Yes. This is recorded on the Corrective Action Log. | |

| 5.15.06 | **Question:** Are visitors and contractors required to sign a log stating that they will comply with the operations' personal hygiene and health requirements? | **Possible Points: 3**
 Points Scored: 3
 Score: Total Compliance |
| | **Auditor Comments:** Yes. This was observed at arrival/sign-in. | |

| **GMP** | **Testing** | |

| 5.16.01 | **Question:** Is there a written risk-based, scientifically valid microbiological testing program that may include pathogen testing, and details program design (zonal approach, food contact/non-food contact surfaces, spent sprout irrigation water, test & hold, water, ice, etc.), rationale for organisms tested for, procedures for sampling and testing (surfaces, water, product, ingredients, etc.), timing and frequency of testing, the testing methodology, the lab that performs the tests, and acceptable results/threshold levels for each organism? | **Possible Points: 15**
 Points Scored: 15
 Score: Total Compliance |
| | **Auditor Comments:** TC. A written program with scientific justification for the frequency of testing/organisms tested/methodology, etc. was available during the audit. A general testing program is described in Environmental Monitoring SOP. At least ten items/areas are sampled in-house weekly in the process area and tested for Listeria spp. (zones 1 to 4), E. coli (zones 2 and 3), and Salmonella (zone 2). Samples are pulled weekly and sent to Primus Labs. Any detection for Listeria/E. coli/Salmonella requires corrective action. Two water samples are tested monthly. | |

| 5.16.02 | **Question:** Are there written risk-based corrective action procedures for when unacceptable test results are received, that describe the steps to be taken, assign responsibility for taking those steps, and steps to ensure the cause is identified (e.g., root cause analysis) and corrected to minimize the potential for product contamination? | **Possible Points: 10**
 Points Scored: 10
 Score: Total Compliance |
| | **Auditor Comments:** TC. The current procedures were included in the Steps to Take for Presumed Positive Test Results. | |

| 5.16.03 | **Question:** Are there records of environmental microbiological test results and does testing meet the program requirements? | **Possible Points: 15**
 Points Scored: 15
 Score: Total Compliance |
| | **Auditor Comments:** TC. Samples are tested for weekly for E. coli, Listeria, and Salmonella. Unsuitable results have been reported in the current audit cycle. | |

| 5.16.04 | **Question:** Are there records of microbiological tests on water used in the facility (sampled from within the facility) and does the testing meet the program requirements? | **Possible Points: 15**
 Points Scored: 15
 Score: Total Compliance |
| | **Auditor Comments:** Yes. Municipal water is used. Water testing is performed by P:rimus Labs done for each source monthly (12/28/23, 11/29/23, 10/25/23, 9/29/23, 8/31/23, 7/26/23...) with results of no detection for coliforms/E. coli for all samples.) | |

| 5.16.05 | **Question:** Are there records of microbiological tests on ice used in the facility (either produced in-house or purchased) and does testing meet the program requirements? | **Possible Points: 0**
 Points Scored: 0
 Score: N/A |
| | **Auditor Comments:** N/A. No ice used at the facility currently. | |

| 5.16.06 | **Question:** Are there records of tests performed on compressed air or other mechanically introduced gases that are used directly on food and food contact surfaces and does testing meet the program requirements? | **Possible Points: 5**
 Points Scored: 5
 Score: Total Compliance |
| | **Auditor Comments:** TC. Compressed air testing by Primus Labs was completed for two samples on 12/27/23 (negative for Listeria/Salmonella/E. coli). | |

5.16.07	**Question:** Are there records of other tests (e.g., spent sprout irrigation water, product, raw ingredients, etc.) that are performed for any reason (e.g., customer requirements, best practice, regulatory requirements) and does testing meet program requirements?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: TC. No issues observed with finished product testing reviewed. Testing done every two weeks for Listeria/Salmonella/E. coli.	

5.16.08	**Question:** Are there records of corrective actions taken after unsuitable testing results that describe the steps taken, responsibility for taking those steps, and actions taken to ensure that the cause of contamination has been identified and corrected?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: TC. Presumptive positive for E. coli. 4/6/23 pallet jack forks. Area cleaned and retested - negative) for 3 consecutive months.	

5.16.09	**Question:** Is there a documented training program with training records for the sampling personnel, including aseptic sampling collection techniques, sampling protocols and sample handling?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: TC. Sampling is conducted by the in-hose staff trained on 12/13/23 (4 workers).	

5.16.10	**Question:** Where food safety related testing is being done in-house, is there a laboratory quality assurance manual with protocols and validated testing methods, evidence of training on testing protocols and methods, and relevant supporting documentation?	**Possible Points:** 0 **Points Scored:** 0 **Score:** N/A
	Auditor Comments: N/A. No in-house testing.	

GMP   Temperature Controlled Storage & Distribution Logs

5.17.01	**Question:** Are there records of final product temperature checks for temperature sensitive product?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. This is recorded on the Finished Product Temperature Check.	

5.17.02	**Question:** Are there temperature logs for the production area (if refrigerated)?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. This is recorded on the Cooler Temperature Log (35-40F) for each processing room.	

5.17.03	**Question:** Are there temperature logs for storage rooms?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: Yes. This is recorded on the Cooler Temperature Log (35-40F) for the coolers.	

5.17.04	**Question:** Is there a documented procedure for checking truck trailer temperature and reviewing sanitary condition of truck trailers prior to loading?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: TC. This is described in Shipping Trailer Sanitation, Temperature and Security Check SOP.	

5.17.05	**Question:** Are there records of shipping truck trailer (or other transportation systems) temperature checks, indicating the truck trailer temperature settings and that the truck trailer was pre-cooled prior to loading?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. This is recorded on the Shipping Trailer Inspection Record.	

5.17.06	**Question:** Are there sanitary condition logs for shipping truck trailers (or other transportation systems)?	**Possible Points:** 5 **Points Scored:** 5 **Score:** Total Compliance
	Auditor Comments: TC. This is recorded on the Shipping Trailer Inspection Record.	

GMP	Allergen Control	

| 5.18.01 | **Question:** Are production and storage areas free of allergen risks (i.e. allergens are not stored or handled)?? | **Possible Points:** 0
Points Scored: 0
Score: Yes |
| | **Auditor Comments:** Yes. No allergens are handled. | |

| 5.18.02 | **Question:** Has a documented allergen management plan been developed? | **Possible Points:** 0
Points Scored: 0
Score: N/A |
| | **Auditor Comments:** N/A. Refer to 5.18.01. Score not affected. | |

| 5.18.03 | **Question:** Are there adequate storage controls (e.g., separation, identification, etc.) that ensure that allergens are not contaminating other materials? | **Possible Points:** 0
Points Scored: 0
Score: N/A |
| | **Auditor Comments:** N/A. Refer to 5.18.01. Score not affected. | |

| 5.18.04 | **Question:** Is there a dedicated allergen production line or adequate clean down and production procedures that prevent allergen cross contamination? | **Possible Points:** 0
Points Scored: 0
Score: N/A |
| | **Auditor Comments:** N/A. Refer to 5.18.01. Score not affected. | |

| 5.18.05 | **Question:** Are utensils and work in progress storage containers identified in order to prevent allergen cross contamination? | **Possible Points:** 0
Points Scored: 0
Score: N/A |
| | **Auditor Comments:** N/A. Refer to 5.18.01. Score not affected. | |

| 5.18.06 | **Question:** Does re-work handling take into account the issues associated with allergen containing products? | **Possible Points:** 0
Points Scored: 0
Score: N/A |
| | **Auditor Comments:** N/A. Refer to 5.18.01. Score not affected. | |

| 5.18.07 | **Question:** Are workers trained with respect to allergen risks and the facility allergen cross contamination controls (including hand washing between production runs) and are there records of this allergen training? | **Possible Points:** 0
Points Scored: 0
Score: N/A |
| | **Auditor Comments:** N/A. Refer to 5.18.01. Score not affected. | |

| 5.18.08 | **Question:** Are worker practices adequate and being followed to protect against allergen cross-contact and against contamination of food? | **Possible Points:** 0
Points Scored: 0
Score: N/A |
| | **Auditor Comments:** N/A. Refer to 5.18.01. Score not affected. | |

| 5.18.09 | **Question:** Are all products manufactured on site labeled correctly with respect to allergens? | **Possible Points:** 0
Points Scored: 0
Score: N/A |
| | **Auditor Comments:** N/A. Refer to 5.18.01. Score not affected. | |

HACCP	Preliminary Steps	

| 6.01.01 | **Question:** Is there a team responsible for the HACCP program at the operation, with an assigned leader for the development, implementation and on-going maintenance of the HACCP system? | **Possible Points:** 10
Points Scored: 10
Score: Total Compliance |
| | **Auditor Comments:** Yes. The HACCP team is made up of Sam Cimowsky, Johnathan Gregory, Todd Phillips, Curtis Estes, Kristy Wright, and Victor Salazar. | |

6.01.02	**Question:** Is there documented evidence that the HACCP team members have been trained on HACCP principles?	**Possible Points: 15** **Points Scored: 15** **Score:** Total Compliance
	Auditor Comments: Yes. Sam Cimowsky (coordinator) completed HACCP training by UGA on 10/8/20. All others on the team have records of certification or internal training on HACCP on 10/26/23.	
6.01.03	**Question:** Does a product description exist for the products produced?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. A product description for all products includes shelf life, distribution temperature, labeling, and intended customers.	
6.01.04	**Question:** Has the process(es) been flow charted in sufficient detail to completely describe the process or product handling/processing steps?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. Flow diagram from receiving to shipping for product and packaging materials has been prepared for the types of processes used, including water, antimicrobial sources, packaging supplies, and process steps from receiving to shipping.	
6.01.05	**Question:** Is there documented evidence that the flow chart(s) has been verified on-site?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. The charts were marked as verified by Sam Cimowsky on various dates in November and December 2023 for the 22 identified products.	

HACCP	Development of the HACCP Plan	
6.02.01	**Question:** Has a documented hazard analysis for the processes been conducted, showing the various types of hazards, their likelihood of occurrence, their associated severity and their control measures? A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.	**Possible Points: 15** **Points Scored: 15** **Score:** Total Compliance
	Auditor Comments: Yes. A hazard analysis has been completed for all process steps indicating the potential hazards, severity and likelihood, control measures, significance of hazards, and justification of significance.	
6.02.02	**Question:** Have CCP decisions been made with logical, documented justification and where CCPs are implemented in a specific processing step, have they been developed to control the identified hazard(s)?	**Possible Points: 15** **Points Scored: 15** **Score:** Total Compliance
	Auditor Comments: Yes. CCP's have been identified through the hazard analysis, risk matrix and decision tree.	
6.02.03	**Question:** Is the HACCP system reviewed when significant changes are made and at least once every 12 months?	**Possible Points: 10** **Points Scored: 10** **Score:** Total Compliance
	Auditor Comments: Yes. This is covered in HACCP Plan Re-assessment Checklist (last done 10/26/23).	
6.02.04	**Question:** Have critical control point (CCP) processing steps been identified that eliminate or reduce food safety hazards to an acceptable level? Informational gathering. If answer is YES, continue with next question. If answer is NO, the rest of "Module 6 HACCP" is not applicable.	**Possible Points: 0** **Points Scored: 0** **Score:** Yes
	Auditor Comments: Yes. The CCP's are based on significance of risk. These are antimicrobial levels in batch/recirculated wash water and metal detection.	

6.02.05	**Question:** Have CCP critical control limits been established and are they supported by relevant validation documentation?	**Possible Points:** 15 **Points Scored:** 5 **Score:** Major Deficiency

Auditor Comments: Major. Lack of justification/support for the antimicrobial range used. A use range of 60-80 ppm PAA set for flumes/tanks every 30 minutes in processing, and hourly in packing. Tanks are emptied at least daily. Metal detection limits of 2.0 mm ferrous, 2.5 mm nonferrous, and 3.5 mm stainless steel.

		View Files
Auditee Comments: Guidance was found to justify the use of 60 – 80 ppm peroxyacetic acid (PAA) use as a CCP. CFR 173.315 and guidance by the Clemson Cooperative Extension note an upper allowance of 80 ppm PAA use for washing fruits and vegetables. Guidance from the University of Tennessee notes that a wide range of 25 – 85 ppm for PAA can be used. Cornell Cooperative Extension recommends use of a 60 ppm PAA solution be used. Considering these resources, operational limits for FFF are set at 60 – 80 ppm PAA.		

CB/Auditor Review Comments: Minor. Response only considers operating range rather than addressing critical range for the process.	**CA Accepted?** **Yes**	*Possible Points:* 15 *Points Scored:* 10 *New Score:* *Minor Deficiency*

6.02.06	**Question:** Have monitoring requirements and frequencies been determined and documented for the CCPs?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance

Auditor Comments: Yes. The antimicrobial level is to be checked prior to startup and at least every half hour during operation in processing and hourly for packing. The metal detector is to be checked with three types of test pieces at least hourly or with product change.

6.02.07	**Question:** Have specific responsibilities been assigned for the monitoring, recording and corrective action implementation of each CCP?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance

Auditor Comments: Yes. Responsibilities have been assigned to the QA staff.

6.02.08	**Question:** Have standard operating procedures (SOPs) been created for the monitoring process(es) of the CCPs, which would include how to carry out the monitoring activities?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance

Auditor Comments: TC. This is defined in Chemical Monitoring SOP and Flume, Wash Tank, Batch Wash, and Vat Water Changing and PAA Testing SOP and Critical Control Point / CCP SOP.

6.02.09	**Question:** Have corrective action procedures been established for the CCPs, including a detailed action plan for operators to follow if the critical control limits are not met (loss of control/deviation) and plans to adjust the process back into control?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance

Auditor Comments: TC. These are indicated on the Critical Control Point Summary and are in the SOP's. Product since the prior good metal check is retested. Deviations of PAA level result in product disposal.

6.02.10	**Question:** Have recording forms been developed for monitoring the CCPs?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance

Auditor Comments: TC. Water antimicrobial records are recorded on the PAA Peroxy Acetic Acid Solution Testing and Turbidity Wash Water Clarity Monitoring Log. Metal detector checks (5 total devices) are recorded on the Metal Detection Check log.

6.02.11	**Question:** Have verification plans and schedules been developed for each CCP?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance

Auditor Comments: Yes. Daily signoff by a a second authorized person (supervisor) is specified.

HACCP	Execution of the HACCP Plan on the Plant Floor

6.03.01	**Question:** Is there documented evidence that all plant workers have attended a HACCP training, including specific training for CCP operators?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. All workers are indicated to receive basic HACCP training as part of regular training. Last done on 10/25/23.	
6.03.02	**Question:** Do CCP operators understand basic HACCP principles and their role in monitoring CCPs?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. The interviews with applicable workers (Esmerelda Carrio/Reina Castillo) indicated understanding of the purpose of the CCP's.	
6.03.03	**Question:** Are the CCP monitoring activities and frequencies in compliance with the HACCP Plan and CCP SOPs?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: Yes. Records indicate activities are performed in accordance with the plan.	
6.03.04	**Question:** Are CCP monitoring records signed off (or initialed) by the operator(s) who are carrying out and recording the CCP check?	**Possible Points:** 15 **Points Scored:** 15 **Score:** Total Compliance
	Auditor Comments: Yes. The records are initialed off by the person performing the test.	
6.03.05	**Question:** Are the CCP records reviewed and signed off by the quality control supervisor and/or management (second signatory)?	**Possible Points:** 10 **Points Scored:** 10 **Score:** Total Compliance
	Auditor Comments: Yes. A second person (supervisor) signs off daily.	
6.03.06	**Question:** Is there a deviation record detailing documented corrective actions when a deviation/loss of control of a CCP occurs (a critical control limit is exceeded)?	**Possible Points:** 0 **Points Scored:** 0 **Score:** N/A
	Auditor Comments: N/A. No failure of antimicrobial level or metal detection indicated.	