SQF Food Safety Audit Edition 8.1
Fraser Valley Packers Inc. - Fraser Valley Packers Inc.

Summary

AUDIT DECISION
CERTIFIED (FULLY REMOTE)

CERTIFICATION NUMBER
9848 | 120036

AUDIT RATING
100
Excellent

DECISION DATE
03/30/2021

AUDIT TYPE
RECERTIFICATION

RECERTIFICATION DATE
08/15/2021

AUDIT DATES
02/04/2021 - 02/05/2021

EXPIRATION DATE
10/29/2021

ISSUE DATE
03/30/2021

Facility & Scope

Fraser Valley Packers Inc. (45585)
Fraser Valley Packers Inc.
260 Short Road
Abbotsford, BC V2S8A7
Canada

Web Site: http://fraservalleypackers.com/

Food Sector Categories:
14. Fruit, Vegetable and Nut Processing, and Fruit Juices
ICT Addendum

Products:
4. Fresh Blueberries 14. Frozen IQF Blueberries

Scope of Certification:
4. Receiving- washing- packing-storage and dispatch 14. Receiving –preparation –freezing –packing-storage and dispatch

Certification Body & Audit Team

SGS Systems & Services Certification Pty Ltd

10/585 Blackburn Road
Notting Hill, Victoria, 3168
Australia

CB#: CB-1-SGS
Accreditation Body: JAS-ANZ
Accreditation Number: Z2630103AS

Lead Auditor: Meloche, Robert (10209)
Technical Reviewer: Mato, Roy (200391)

Hours Spent on Site: 0
Hours of ICT Activities: 16
Hours Spent Writing Report: 6

Audit Statements

SQF Practitioner Name	Name the designated SQF Practitioner **RESPONSE:** Pam Randhawa
SQF Practitioner Email	Email of the designated SQF Practitioner **RESPONSE:** Pam@fraservalleypackers.com
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** Robert Meloche: Lead Auditor, Pam Randwaha: SQF Practitioner/QA Manager.
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details **RESPONSE:** The facility is 15,000 sq. ft located in rural Abbotsford surrounded by blueberry fields, etc. It produces both fresh and frozen blueberries, with 35 full time staff and an additional ~200 seasonal staff during peak fresh pack season, operating on two 8-hour shifts. The facility produces fresh retail pack blueberries as well as bulk IQF blueberries that are distributed in 30lb bulk-pack boxes only. The fresh and frozen operations are segregated, and there is onsite freezer storage. Fresh product is packed into clamshells for retail clients, and there are no retail products with Fraser Valley Packers labels.
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** Robert Meloche: Lead Auditor, Pam Randwaha: SQF Practitioner/QA Manager.
Auditor Recommendation	Auditor Recommendation **RESPONSE:** The auditor recommends continued certification to the SQF Standard v8.1 based on the results of this audit.
A	Does this audit include the use of ICT? **RESPONSE:** Yes - MS Teams audio/video meetings, email, video inspection tour and photos
B.1	ICT Start date **RESPONSE:** Feb 4/2021
B.2	ICT End date **RESPONSE:** Feb 5/2021
C	Were there any issues with the use of ICT? If yes, please specify what issues were encountered. **RESPONSE:** Weak wireless signals in certain areas of the plant significantly interfered with the quality of the video (i.e. inside freezers) and photographs were used to supplement the process.

Section Responses

2.1.1 Food Safety Policy (Mandatory)

The food safety policy is developed and updated annually. The policy is posted in the lunchroom, employee entrance, and is updated January 15/20.

2.1.1.1	Senior site management shall prepare and implement a policy statement that outlines as a minimum the: i. The site's commitment to supply safe food; ii. Methods used to comply with its customer and regulatory requirements and continually improve its food safety management system; and iii. The site's commitment to establish and review food safety objectives. **RESPONSE:** COMPLIANT
2.1.1.2	The policy statement shall be: i. Signed by senior site management; ii. Made available in language understood by all staff; iii. Displayed in a prominent position; and iv. Effectively communicated to all staff. **RESPONSE:** COMPLIANT

2.1.2 Management Responsibility (Mandatory)

Governed by Food Safety Manual - 2.1.2 Management Responsibility (includes organization chart), P210 - Management Commitment, as well as P-210-6 - Job responsibilities; etc. There are no blackout dates assigned to the production period that falls in the audit window, as unannounced audits are suspended during the pandemic period. THE SQFP is a full time staff (Pam) and there is also a back-up SQFP-trained staff (Jessica). Both are HACCP trained. Management is committed to provide resources for the implementation and support of the food safety program, and effective implementation is the primary safety objective established for the organization as per the policy manual The organization chart describes the interaction of staff and responsibilities, and indicates the SQFP and back-up. Job descriptions are documented for all staff and were verified for: QA Manager/SQFP; Assistant QA Manager; Production Supervisor, etc. Back-up roles are included in the descriptions.

2.1.2.1 The reporting structure describing those who have responsibility for food safety shall be identified and communicated within the site.

RESPONSE: COMPLIANT

2.1.2.2 The senior site management shall make provision to ensure food safety practices and all applicable requirements of the SQF System are adopted and maintained.

RESPONSE: COMPLIANT

2.1.2.3 The senior site management shall ensure adequate resources are available to achieve food safety objectives and support the development, implementation, maintenance and ongoing improvement of the SQF System.

RESPONSE: COMPLIANT

2.1.2.4 Senior site management shall designate an SQF practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review and maintenance of the SQF System, including good manufacturing practices outlined in 2.4.2, and the food safety plan outlined in 2.4.3. ii. Take appropriate action to ensure the integrity of the SQF System; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.

RESPONSE: COMPLIANT

2.1.2.5 The SQF practitioner shall: i. Be employed by the site as a company employee on a full-time basis; ii. Hold a position of responsibility in relation to the management of the site's SQF System; iii. Have completed a HACCP training course; iv. Be competent to implement and maintain HACCP based food safety plans; and v. Have an understanding of the SQF Food Safety Code for Manufacturing and the requirements to implement and maintain an SQF System relevant to the site's scope of certification.

RESPONSE: COMPLIANT

2.1.2.6 Senior site management shall ensure the training needs of the site are resourced, implemented and meet the requirements outlined in system elements 2.9, and that site personnel have met the required competencies to carry out those functions affecting the legality and safety of food products.

RESPONSE: COMPLIANT

2.1.2.7 Senior site management shall ensure that all staff are informed of their food safety and regulatory responsibilities, are aware of their role in meeting the requirements of the SQF Food Safety Code for Manufacturing, and are informed of their responsibility to report food safety problems to personnel with authority to initiate action.

RESPONSE: COMPLIANT

2.1.2.8 Job descriptions for those responsible for food safety shall be documented and include a provision to cover for the absence of key personnel.

RESPONSE: COMPLIANT

2.1.2.9 Senior site management shall establish processes to improve the effectiveness of the SQF System to demonstrate continuous improvement.

RESPONSE: COMPLIANT

2.1.2.10 Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.

RESPONSE: COMPLIANT

2.1.2.11 Senior site management shall designate defined blackout periods that prevent unannounced re-certification audits from occurring out of season or when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed upon unannounced audit.

RESPONSE: NOT APPLICABLE

EVIDENCE: Unannounced audit requirements are suspended for the current pandemic period.

2.1.3 Management Review (Mandatory)

Comprehensive management review was conducted January 17/20 and included the President and other key staff. Monthly meetings are conducted with the same senior team and meetings were verified for January 17/20 thru Nov 10/20. The meetings are consistently attended by senior management and operations staff including: President and CFO, Quality Assurance Manager/SQF Practitioner, Accounting/ Logistics/Office Manager, Maintenance Manager/Back-up SQFP, QA Supervisor, Production Manager, and Farm Manager. The meetings of June 5/20 and Aug 20/20 were observed to have much more content and were longer than standard meetings in preparation for the upcoming fresh blueberry season.

2.1.3.1 The senior site management shall be responsible for reviewing the SQF System and documenting the review procedure. Reviews shall include: i. The policy manual; ii. Internal and external audit findings; iii. Corrective actions and their investigations and resolution; iv. Customer complaints and their resolution and investigation; v. Hazard and risk management system; and vi. Follow-up action items from previous management review.

RESPONSE: COMPLIANT

2.1.3.2 The SQF practitioner (s) shall update senior site management on a (minimum) monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented. The SQF System in its entirety shall be reviewed at least annually.

RESPONSE: COMPLIANT

2.1.3.3 Food safety plans, Good Manufacturing Practices and other aspects of the SQF System shall be reviewed and updated as needed when any potential changes implemented have an impact on the site's ability to deliver safe food.

RESPONSE: COMPLIANT

2.1.3.4 Records of all management reviews and updates shall be maintained.

RESPONSE: COMPLIANT

2.1.4 Complaint Management (Mandatory)

Governed by P-210 Management Commitment, section 4.11 Customer Complaints. 6 customer complaints reported and investigated in 2020 - 4 quality-related foreign material i.e. excess stems; 1 security complaint for missing seal on delivery trailer; and, 1 old/conflicting label left intact on bulk tote delivered to customer. Detailed investigations documented for each incident. Good corrective action documented (i.e. implementation of higher-security bolt seals, additional de-stemming equipment), and evidence packages attached to the investigations. Good customer service evident.

2.1.4.1 The methods and responsibility for handling and investigating the cause and resolution of complaints from customers and authorities, arising from products manufactured or handled on site, shall be documented and implemented.

RESPONSE: COMPLIANT

2.1.4.2 Trends of customer complaint data shall be investigated and analyzed by personnel knowledgeable about the incidents.

RESPONSE: COMPLIANT

2.1.4.3 Corrective action shall be implemented based on the seriousness of the incident and as outlined in 2.5.3.

RESPONSE: COMPLIANT

2.1.4.4 Records of customer complaints and their investigations shall be maintained.

RESPONSE: COMPLIANT

2.1.5 Crisis Management Planning

Governed by Food Safety Manual (FSM) 2.1.5 Crisis Management Planning as well as F-210-002 Business Continuity Plan Emergency Response and Mock Crisis Record, which is also used for record keeping. Also topical in the food safety policy manual as well as P-210 Management Commitment. Potential issues identified are relevant to the facility. The mock scenario tested March 2020 was based on the actual COVID-19 pandemic implications for the facility. Good records of actions maintained correlate with signage, barriers and other precautions actually implemented as a result of the pandemic. Composition of the crisis management team is detailed in F-210-002 including training records for the team, responsible trainer, etc.

2.1.5.1 A crisis management plan that is based on the understanding of known potential dangers (e.g. flood, drought, fire, tsunami, or other severe weather or regional events such as warfare or civil unrest) that can impact the site's ability to deliver safe food, shall be documented by senior management outlining the methods and responsibility the site shall implement to cope with such a business crisis.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.1.5.3 The crisis management plan shall be reviewed, tested and verified at least annually.

RESPONSE: COMPLIANT

2.1.5.4 Records of reviews of the crisis management plan shall be maintained.

RESPONSE: COMPLIANT

2.2.1 Food Safety Management System (Mandatory)

The food safety management system FSMS is comprehensively documented in the food safety manual, PRPs/GMPs, etc. and the food safety plan is developed and determined in the HACCP method. The documentation is managed by the SQFP and changes are tracked in a change log, etc. The entire documentation of the FSP was forwarded to the auditor in numerous email/attachments to facilitate remote audit of the organization.

2.2.1.1 A food safety management system shall be documented and maintained in either electronic and/or hard copy form. It shall outline the methods the site will use to meet the requirements of the SQF Food Safety Code for Manufacturing, be made available to relevant staff and include: i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard; ii. The food safety policy statement and organization chart; iii. The scope of certification; iv. A list of the products covered under the scope of certification; v. Food safety procedures, pre-requisite programs, food safety plans; and vi. Other documentation necessary to support the development and the implementation, maintenance and control of the SQF System.

RESPONSE: COMPLIANT

2.2.1.2 All changes made to food safety plans, Good Manufacturing Practices and other aspects of the SQF System shall be validated or justified.

RESPONSE: COMPLIANT

2.2.2 Document Control (Mandatory)

Document control is described in the FSM as well as P-220 Document Control and Records. The register of documents is maintained by the SQFP, in various categories of documents, and is well organized and current to requirements, as evidenced by documentation received electronically by the auditor.

2.2.2.1 The methods and responsibility for maintaining document control and ensuring staff have access to current documents shall be documented and implemented.

RESPONSE: COMPLIANT

2.2.2.2 A register of current SQF System documents and amendments to documents shall be maintained.

RESPONSE: COMPLIANT

2.2.2.3	Documents shall be safely stored and readily accessible. **RESPONSE:** COMPLIANT
2.2.3	**Records (Mandatory)** Records control is described in the FSM as well as P-220 Document Control and Records. Records sampled for the audit were found to be well organized, effectively completed, legible and easily retrievable. Records are suitably verified with reviewer initials.
2.2.3.1	The methods and responsibility for undertaking monitoring activities, verifying, maintaining and retaining records shall be documented and implemented. **RESPONSE:** COMPLIANT
2.2.3.2	All records shall be legible and suitably authorized by those undertaking monitoring activities that demonstrate inspections, analyses and other essential activities have been completed. **RESPONSE:** COMPLIANT
2.2.3.3	Records shall be readily accessible, retrievable, securely stored to prevent damage and deterioration and shall be retained in accordance with periods specified by a customer or regulations. **RESPONSE:** COMPLIANT
2.3.1	**Product Development and Realization** The concept of product development is covered in the food safety manual, but there is no application for product development for the site.
2.3.1.1	The methods and responsibility for designing, developing and converting product concepts to commercial realization shall be documented and implemented. **RESPONSE:** COMPLIANT
2.3.1.2	Product formulation, manufacturing processes and the fulfillment of product requirements shall be validated by site trials, shelf life trials and product testing. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No new products have been developed for the site.
2.3.1.3	Shelf life trials where necessary shall be conducted to establish and validate a product's: i. Handling and storage requirements including the establishment of "use by" or "best before dates"; ii. Microbiological criteria; and iii. Consumer preparation, storage and handling requirements. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No new products have been developed for the site.
2.3.1.4	A food safety plan shall be validated and verified for each new product and its associated process through conversion to commercial production and distribution, or where a change to ingredients, process, or packaging occurs that may impact food safety. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No new products have been developed for the site.
2.3.1.5	Records of all product design, process development, shelf life trials and approvals shall be maintained. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No new products have been developed for the site.

2.3.2 Raw and Packaging Materials

Blueberry suppliers are food safety certified, all to the CanadaGAP Option C certification, which is annual assessment, GFSI benchmarked. A list of 50+ blueberry suppliers is maintained current, and copies of certificates are provided for all i.e. HESI FARMS #7-8-9, EAGLE MOUNT FARMS, JC Berry, T.S.MANKATALA, MEHAR BLUEBERRY FARM, SEKHON BLUEBERRY FARM LTD, BACHAN FARM. All customers provide packaging specifications, as well as approved labels for all retail-packed fresh products. There is no application for in-house retail labels. Packaging approval for food use is documented: Packaging approval for food use is documented i.e. Unitrend Plastics poly box liners (30lb primary packaging, letter of CFIA conformance June 4/19, including 21CFR 177.1520); Pactiv (clamshells, primary retail packaging Feb 27/2018, 2018, FDA 21CFR177); Norampac/Cascades paper/corrugated products (FDA 21CFR 176.260, January 3/20). The register of raw material specifications is maintained current.

2.3.2.1 Specifications for all raw and packaging materials, including, but not limited to ingredients, additives, hazardous chemicals and processing aids that impact on finished product safety shall be documented and kept current.

RESPONSE: COMPLIANT

2.3.2.2 All raw and packaging materials and ingredients shall comply with the relevant legislation in the country of manufacture and country of destination, if known.

RESPONSE: COMPLIANT

2.3.2.3 The methods and responsibility for developing and approving detailed raw material, ingredient, and packaging specifications shall be documented.

RESPONSE: COMPLIANT

2.3.2.4 Raw and packaging materials and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose. Verification of raw materials and ingredients shall include certificates of conformance, certificate of analysis, or sampling and testing.

RESPONSE: COMPLIANT

2.3.2.5 Verification of packaging materials shall include: i. Certification that all packaging that comes into direct contact with food meets either regulatory acceptance or approval criteria. Documentation shall either be in the form of a declaration of continued guarantee of compliance, a certificate of conformance, or a certificate from the applicable regulatory agency. ii. In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, tests and analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.

RESPONSE: COMPLIANT

2.3.2.6 Finished product labels shall be accurate, comply with the relevant legislation and be approved by qualified company personnel.

RESPONSE: COMPLIANT

2.3.2.7 A register of raw and packaging material specifications and labels shall be maintained and kept current.

RESPONSE: COMPLIANT

2.3.3 Contract Service Providers

A full range of specifications are developed for contract service providers and is accompanied by a signed copy of the Service Provider GMP Policy (P-210-007) i.e. Pest Control (copy signed by Avon Pest Control), packaging equipment services (signed by AgriTeks Industries), construction contractor (Bob Gray), supplier services for handsoaps, sanitizers, gloves, etc. (HTT Safety), sanitation chemical services (Ecolab), sanitation equipment services and supplies (Cintas), refrigeration services (Fraser Valley Refrigeration). Signed acknowledgements are updated annually were current to 2020 signing dates (variable by contract service provider). The register of contract service provider specifications is maintained current.

2.3.3.1 Specifications for contract services that have an impact on product safety shall be documented, current, include a full description of the service to be provided and detail relevant training requirements of all contract personnel.

RESPONSE: COMPLIANT

2.3.3.2 A register of all contract service specifications shall be maintained.

RESPONSE: COMPLIANT

2.3.4 Contract Manufacturers

No application for contract manufacturing.

2.3.4.1 The methods and responsibility for ensuring all agreements relating to food safety and customer product requirements and its realization and delivery are specified and agreed shall be documented and implemented.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for contract manufacturing.

2.3.4.2 The site shall: i. Verify compliance with the SQF Food Safety Code for Manufacturing and that all customer requirements are being met at all times. Products and/or processes of co-manufacturers that are considered high risk shall be required to undergo an audit by the site or other third-party agency to confirm compliance to the SQF Food Safety Code for Manufacturing and agreed arrangements; and ii. Ensure changes to contractual agreements are approved by both parties and communicated to relevant personnel.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for contract manufacturing.

2.3.4.3 Records of all contract reviews and changes to contractual agreements and their approvals shall be maintained.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for contract manufacturing.

2.3.5 Finished Product Specifications

Finished product specifications are included directly in the QC inspection records (direct computer entry in the plant). Each customer has it's own sheet, with the custom specifications included in the template. Various dates were sampled for 2020 season including Oct 6/7, 2020. The specifications are based on the customer-provided specifications, which are received from all customers. The finished product specifications are maintained current in the spreadsheets and the register is maintained current.

2.3.5.1 Finished product specifications shall be documented, current, approved by the site and their customer, accessible to relevant staff and may include: i. Microbiological and chemical limits; and ii. Labeling and packaging requirements.

RESPONSE: COMPLIANT

2.3.5.2 A register of finished product specifications shall be maintained.

RESPONSE: COMPLIANT

2.4.1 Food Legislation (Mandatory)

Documented in the FSM 2.4.1 Food Legislation, as well as P-241 Food Legislation. The SQFP subscribes to CFIA email news/updates, has taken FDA-FSMA training and is the designated PCQI for the facility and subscribes to FDA updates as well.

2.4.1.1 The site shall ensure that, at the time of delivery to its customer, the food supplied shall comply with the legislation that applies to the food and its production in the country of use or sale. This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, net weights, nutritional, allergen and additive labeling, labeling of identity preserved foods, any other criteria listed under food legislation, and to relevant established industry codes of practice.

RESPONSE: COMPLIANT

2.4.1.2 The methods and responsibility for ensuring the site is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.

RESPONSE: COMPLIANT

2.4.1.3 SQFI and the certification body shall be notified in writing within twenty-four (24) hours in the event of a regulatory warning. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

2.4.2 Good Manufacturing Practices (Mandatory)

GMP's are comprehensively included in the documented food safety program of the site (including FSM/GMR/PRP), and effectiveness of implementation is reflected in the score of this audit. The Employee GMP Policy (P-210-007) summarizes key GMP requirements for staff, all staff are trained to the document, and sign the document to indicate understanding.

2.4.2.1 The site shall ensure the Good Manufacturing Practices described in modules 3, 4, 9, 10 or 11 (as applicable) of this Food Safety Code are applied, or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised.

RESPONSE: COMPLIANT

2.4.2.2 The Good Manufacturing Practices applicable to the scope of certification that outline how food safety is controlled and assured shall be documented and implemented.

RESPONSE: COMPLIANT

2.4.3 Food Safety Plan (Mandatory)

Documentation for the FSP is well developed in Doc #2.4.3 Food Safety Plan (August 20/2020). The FSP is developed in the HACCP method and the document addresses fresh blueberries and IQF blueberries separately. The HACCP forms 1-10 are integrated into the document. Flow charts, personnel flow maps, product descriptions, etc. all address the two different products separately. The FSP is maintained current. 1 CCP is identified for each product (metal detection). The metal detector verification records are incorporated into the daily pre-op inspection form (the detector is challenged with Fe - 1.5mm, NonFe - 1.5 mm, SS - 2.0mm, which mirror the critical limits established and documented for the CCP). The metal detector was challenged live via video during the remote inspection tour of production (packing 30lb poly-bag-in-box IQF blueberries). Records of metal detector verification were sampled for January 29/21. Monitoring procedures are documented in P-107-51 Detection of Foreign Objects. The facility is also compliant with FDA FSMA requirements and has identified 1 Preventive Control in the integrated Food Safety Plan (chlorinated wash water receiving raw blueberries). The FSP is determined effective for the facility.

2.4.3.1 A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. Feed manufacturers may utilize a HACCP-based reference food safety plan developed by a responsible authority.

RESPONSE: COMPLIANT

2.4.3.2 The food safety plan shall be effectively implemented, maintained and outline the means by which the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

RESPONSE: COMPLIANT

2.4.3.3 The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant products and associated processes. Where the relevant expertise is not available on site, advice may be obtained from other sources to assist the food safety team.

RESPONSE: COMPLIANT

2.4.3.4 The scope of each food safety plan shall be developed and documented including the start and end-point of the processes under consideration and all relevant inputs and outputs.

RESPONSE: COMPLIANT

2.4.3.5 Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. This shall reference the finished product specifications (refer to 2.3.5.1) plus any additional information relevant to product safety, such as pH, water activity, and/or composition.

RESPONSE: COMPLIANT

2.4.3.6 The intended use of each product shall be determined and documented by the food safety team. This shall include target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative use of the product.

RESPONSE: COMPLIANT

2.4.3.7	The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process, all raw material, packaging material, service inputs (e.g. water, steam, gasses as appropriate), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team during all stages and hours of operation. **RESPONSE:** COMPLIANT
2.4.3.8	The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs. **RESPONSE:** COMPLIANT
2.4.3.9	The food safety team shall conduct a hazard analysis for every identified hazard to identify which hazards are significant, i.e. their elimination or reduction to an acceptable level is necessary to ensure food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards. **RESPONSE:** COMPLIANT
2.4.3.10	The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure. **RESPONSE:** COMPLIANT
2.4.3.11	Based on the results of the hazard analysis (refer to 2.4.3.9), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (i.e. a critical control point, or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure. **RESPONSE:** COMPLIANT
2.4.3.12	For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product. The food safety team shall validate the critical limits to ensure the designated level of control of the identified food safety hazard (s); and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.2.1). **RESPONSE:** COMPLIANT
2.4.3.13	The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.12). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the test frequency. **RESPONSE:** COMPLIANT
2.4.3.14	The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure. **RESPONSE:** COMPLIANT
2.4.3.15	The documented and approved food safety plan (s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs or other changes affecting product safety occur. **RESPONSE:** COMPLIANT
2.4.3.16	Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5). **RESPONSE:** COMPLIANT
2.4.3.17	Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements. **RESPONSE:** COMPLIANT

2.4.4 Approved Supplier Program (Mandatory)

Governed by P-245 Incoming Goods & Services. The F-225-001 Register of Approved Suppliers is maintained current (verified electronically). Blueberry suppliers are food safety certified, all to the CanadaGAP Option C certification, which is annual assessment, GFSI benchmarked. A list of 50 blueberry suppliers is maintained current, and copies of certificates are maintained current for all i.e. HESI FARMS #7-8-9, EAGLE MOUNT FARMS, JC Berry, T.S.MANKATALA, MEHAR BLUEBERRY FARM, SEKHON BLUEBERRY FARM LTD, BACHAN FARM. All customers provide packaging specifications, as well as approved labels for all retail-packed fresh products. Packaging suppliers are also approved and are evident in the register. Packaging approval for food use is documented i.e. Unitrend Plastics poly box liners (30lb primary packaging, letter of CFIA conformance June 4/19, including 21CFR 177.1520); Pactiv (clamshells, primary retail packaging Feb 27/2018, 2018, FDA 21CFR177); Norampac/Cascades paper/corrugated products (FDA 21CFR 176.260, January 3/20).

2.4.4.1 Raw materials, ingredients, packaging materials, and services that impact on finished product safety shall meet the agreed specification (refer to 2.3.2) and be supplied by an approved supplier.

RESPONSE: COMPLIANT

2.4.4.2 The receipt of raw materials, ingredients, and packaging materials received from non-approved suppliers shall be acceptable only in an emergency situation, and provided they are inspected or analyzed before use.

RESPONSE: COMPLIANT

2.4.4.3 The responsibility and procedure for selecting, evaluating, approving and monitoring an approved supplier shall be documented and implemented.

RESPONSE: COMPLIANT

2.4.4.4 The site's food defense plan (refer to 2.7.1.1) shall include measures to secure incoming materials and ingredients and protect them from deliberate act of sabotage or terrorist-like incidents.

RESPONSE: COMPLIANT

2.4.4.5 The site's food fraud vulnerability assessment (refer to 2.7.2.1) shall include the site's susceptibility to raw material or ingredient substitution, mislabeling, dilution or counterfeiting which may adversely impact food safety.

RESPONSE: COMPLIANT

2.4.4.6 The food fraud mitigation plan (refer to 2.7.2.2) shall include methods by which the identified food safety vulnerabilities from ingredients and materials shall be controlled.

RESPONSE: COMPLIANT

2.4.4.7 Raw materials, ingredients, and packaging materials received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2) and approved supplier requirements as all other material providers.

RESPONSE: COMPLIANT

2.4.4.8 The approved supplier program shall be based on the prior performance of a supplier and the risk level of the raw materials ingredients, packaging materials, and services supplied, and shall contain as a minimum: i. Agreed specifications (refer to 2.3.2); ii. Reference to the rating of the level of risk applied to a raw material, ingredients, packaging materials and services and the approved supplier; iii. A summary of the food safety controls implemented by the approved supplier; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers; vi. Details of the certificates of conformance if required; and vii. Methods and frequency of reviewing approved supplier performance and status.

RESPONSE: COMPLIANT

2.4.4.9 Supplier audits shall be based on risk and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques.

RESPONSE: COMPLIANT

2.4.4.10 A register of approved supplier and records of inspections and audits of approved suppliers shall be maintained.

RESPONSE: COMPLIANT

2.4.5 Non-conforming Product or Equipment

Governed by P-246 Nonconforming Product or Equipment. A nonconforming product log is maintained. Several incidents of machine repair (broken belt) resulted in totes of product being segregated for re-inspection for potential foreign material and then released. One incident of product put on hold for excessive shrivel, and then downgraded to 'B'-grade and released. There is no product on hold/quarantine at time of audit.

2.4.5.1 The responsibility and methods outlining how non-conforming product, raw material, ingredient, work-in-progress, packaging or equipment detected during receipt, storage, processing, handling or delivery is handled shall be documented and implemented. The methods applied shall ensure: i. Non-conforming product is quarantined, identified, handled and disposed of in a manner that minimizes the risk of inadvertent use, improper use or risk to the integrity of finished product; ii. Non-conforming equipment is effectively repaired or disposed of in a manner that minimizes the risk of inadvertent use, improper use or risk to the integrity of finished product; and iii. All relevant staff are aware of the organization's quarantine and release requirements applicable to equipment or product placed under quarantine status.

RESPONSE: COMPLIANT

2.4.5.2 Quarantine records, and records of the handling, corrective action, or disposal of non-conforming product or equipment shall be maintained.

RESPONSE: COMPLIANT

2.4.6 Product Rework

Governed by P-247 Rework. Contingency for creating a new lot number which is connected to the previous production lot number and raw material lot number is very clearly established in the SOP. There has been no application for product rework.

2.4.6.1 The responsibility and methods outlining how ingredients, packaging materials, or products are reworked shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are supervised by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Each batch of reworked product is inspected or analyzed as required before release; iv. Inspections and analyses shall conform to the requirements outlined in element 2.5.4.1; and v. Release of reworked product shall conform to element 2.4.7.

RESPONSE: COMPLIANT

2.4.6.2 Records of all reworking operations shall be maintained.

RESPONSE: NOT APPLICABLE

2.4.7 Product Release (Mandatory)

Governed by P-248 Finished Product Release and Stock Rotation. All products are sampled during the daily production. QC staff perform product evaluations and maintain records on the score sheet for grade, etc. at time of production. A retention sample is taken from every pallet or skid of finished product. Retention samples are stored in freezer conditions for shelf life of the product. A composite sample is created for each production lot from the retention samples for that lot. The composite is sent to an accredited lab for microbiological evaluation (Maxxam Lab). Standards are established for: yeast and mold; total coliform; E.coli; as well as pathogenic E.coli 0157:h7; listeria; salmonella. each production lot of product is microbiologically evaluated. Product is not released for distribution until lab results indicate conformance to micro specifications. A certificate of analysis is created for every lot of product and functions as the positive release of the product. CofA were sampled for the audit: lot #20-080 (for customer BRECON), #20-188 (BRECON); #20-644 (RELIANCE FOODS INTERNATIONAL); #20-004 (DOLE PACKAGED FOODS, LLC); #20-045 (YOMA INTERNATIONAL LTD.).

2.4.7.1 The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released: i. By authorized personnel; and ii. Once all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met.

RESPONSE: COMPLIANT

2.4.7.2 Records of all product release shall be maintained.

RESPONSE: COMPLIANT

2.4.8 Environmental Monitoring

The process is governed by P-248-N Environmental Monitoring & Sampling. The facility is entirely mapped out, zones 1 thru 4 are colour-coded and samplings for zones 1 thru four are indicated. The trend report for the records of sampling and results were verified for the period Jan 7/20 thru Dec 16/20. External accredited lab is used for the evaluation of the 3M sponge swabs (Maxxam - Burnaby, BC). No history of positive results for pathogenic listeria in the lab results. No positive results for listeria sp. or salmonella sp. for the trend data sampled (440 swab data results analyzed for the 2020 period).

2.4.8.1 A risk-based environmental monitoring program shall be in place for all food and pet food manufacturing processes.

RESPONSE: COMPLIANT

2.4.8.2 The responsibility and methods for the environmental monitoring program shall be documented and implemented.

RESPONSE: COMPLIANT

2.4.8.3 An environmental sampling and testing schedule shall be prepared, detailing the applicable pathogens or indicator organisms to test for that industry, the number of samples to be taken and the frequency of sampling.

RESPONSE: COMPLIANT

2.4.8.4 Environmental testing results shall be monitored and corrective actions (refer to 2.5.3.1) implemented where unsatisfactory trends are observed.

RESPONSE: COMPLIANT

2.5.1 Validation and Effectiveness (Mandatory)

Governed by P-250 Validation and Verification. Validation is documented in the F-210-003 KPI and Annual Trend Report for PRPs (June 1, 2020). The validation schedule is reviewed annually and updated as required (June 20, 2020). Trend tables are developed for each of the KPIs. Validations include: equipment failure; sanitation failure (as per ATP data); customer complaints; CCP (metal detector validated with 10 consecutive successful rejections of the three certified test strips, review of customer complaints for metal issues); pest control; internal audit results; external audit results; recall activity (no history of recall); glass and brittle plastic incidents; employee practices/GMP nonconforming incidents. The Food Safety Plan is reviewed at least annually and results arriving from the review are recorded and maintained on the Food Safety Plan Validation Review Form (verified for 2020).

2.5.1.1 The methods, responsibility and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall ensure that: i. Good Manufacturing Practices are confirmed to ensure they achieve the required result; ii. Critical food safety limits are validated, and re-validated annually; iii. Changes to the processes or procedures are assessed to ensure controls are still effective; and iv. All applicable elements of the SQF Program are implemented and effective.

RESPONSE: COMPLIANT

2.5.1.2 Records of all validation activities shall be maintained.

RESPONSE: COMPLIANT

2.5.2 Verification Activities (Mandatory)

Governed by P-250 Validation and Verification. The verification process is summarily documented in the comprehensive A-243-003 Verification (and Validation) of Food Safety Fundamentals, completed Jan 17/20. Verifications include internal audits, daily records review, recall activities, customer complaints, pre-op inspections, ATP swabbing, environmental evaluations, KPI reviews as per above, finished products are all verified for microbiological conformance with independent lab evaluation; shelf life is verified for every lot of product; a verification log is maintained (current) with record review activities monthly, and was verified for Jan 17 thru Nov 30/2020 verification activities.

2.5.2.1 A verification schedule outlining the verification activities, their frequency of completion and the person responsible for each activity shall be prepared and implemented.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.5.2.3 Records of the verification of monitoring activities shall be maintained.

RESPONSE: COMPLIANT

2.5.3 Corrective and Preventative Action (Mandatory)

As per P-255 Corrections and Corrective Actions. Corrective actions were reviewed as applicable to the 6 customer complaints received in 2020. Effective root cause and corrective action documented, any applicable updates to process or methods.

2.5.3.1 The responsibility and methods outlining how corrections and corrective actions are determined, implemented and verified, including the identification of the root cause and resolution of non-compliance of critical food safety limits and deviations from food safety requirements, shall be documented and implemented.

RESPONSE: COMPLIANT

2.5.3.2 Records of all investigation and resolution of non-conformities including their corrections and corrective action shall be maintained.

RESPONSE: COMPLIANT

2.5.4 Product Sampling, Inspection and Analysis

P-256 Product Sampling Inspection Analysis. A QC staff is assigned to each packaging line, for each shift and performs all basic product food safety and quality inspections. Product sampling, grading and evaluation records are directly entered to the database. A composite product sample is created for every lot of product produced, and sent for external lab microbiological evaluation. A certificate of analysis is created for every lot of product, which is the basis for positive release of all products. CofA were sampled for the audit: lot #20-080 (for customer BRECON), #20-188 (BRECON); #20-644 (RELIANCE FOODS INTERNATIONAL); #20-004 (DOLE PACKAGED FOODS, LLC); #20-045 (YOMA INTERNATIONAL LTD.).

2.5.4.1 The methods, responsibility and criteria for sampling, inspecting and/or analyzing raw materials, finished product and work-in-progress shall be documented and implemented. The methods applied shall ensure: i. Inspections and analyses are completed at regular intervals as required and to agreed specification and legal requirements; ii. Inspections are conducted to ensure raw materials, work in process and finished products comply with the relevant specification, regulatory requirements and are true to label; and iii. All analyses are conducted to nationally recognized methods or alternative methods which are validated as equivalent to the nationally recognized methods.

RESPONSE: COMPLIANT

2.5.4.2 On-site personnel that conduct environmental or product testing shall participate in an applicable proficiency testing program at least annually to ensure accuracy of results.

RESPONSE: COMPLIANT

2.5.4.3 Where external laboratories are utilized to conduct input or product analysis, the laboratories shall be accredited to ISO 17025 or an equivalent national standard and shall be included on the site's contract service specifications register (refer to 2.3.3.1).

RESPONSE: COMPLIANT

2.5.4.4 Records of all inspections and analyses shall be maintained.

RESPONSE: COMPLIANT

2.5.5 Internal Audits and Inspections (Mandatory)

Internal audits are conducted by trained staff. Pam (trained by SQF Level 2 Auditor April 6/2014 web-based, also SQFI Chicago-based SQF Auditor certificate #20959, completed August 26, 2016, as well as 2 other auditor training certificates to the CanadaGAP Food Safety Standard) is lead auditor for the site and trains other assistant auditors with a standard training package (i.e. Jessie Dhesi - Maintenance Manager, Gurpreet Brar - QA Supervisor, who have also participated or are participating currently, in externally provided training). The audit package of audit #2020-01, conducted Jan 23-25, 2020 was sampled for the audit. Auditing to drive compliance and continual improvement is evident in the documented package.

2.5.5.1 The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code for Manufacturing are audited as per the SQF audit checklist or similar tool; ii. Correction and corrective action of deficiencies identified during the internal audits are undertaken; and iii. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective actions.

RESPONSE: COMPLIANT

2.5.5.2 Staff conducting internal audits shall be trained and competent in internal audit procedures.

RESPONSE: COMPLIANT

2.5.5.3 Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and building/equipment maintenance is compliant to the SQF Food Safety Code for Manufacturing. The site shall: i. Take corrections or corrective and preventative action; and ii. Maintain records of inspections and any corrective action taken.

RESPONSE: COMPLIANT

2.5.5.4 Where practical staff conducting internal audits shall be independent of the function being audited.

RESPONSE: COMPLIANT

2.5.5.5 Records of internal audits and inspections and any corrections and corrective action taken as a result of internal audits shall be maintained.

RESPONSE: COMPLIANT

2.6.1 Product Identification (Mandatory)

As per P-270 Product Identification Trace Withdrawal and Recall Procedure. The electronic records of QC product evaluation include product identification and lot code traceability for raw blueberries and packaging materials. Packing dates and lot #'s are evident on all retail packaging for fresh berries. Photo evidence for current day production provided to the audit as well as for product stored in the freezer warehouses. Full traceability to pack date, lot #, etc. is evident on the tags printed for IQF bulk products as well (also photographs provided).

2.6.1.1 The methods and responsibility for identifying raw materials, ingredients, packaging materials, work-in -progress, process inputs and finished products during all stages of production and storage shall be documented and implemented. The product identification system shall be implemented to ensure: i. Raw materials, ingredients, packaging materials, work-in progress, process inputs and finished products are clearly identified during all stages of receipt, production, storage and dispatch; and ii. Finished product is labeled to the customer specification and/or regulatory requirements.

RESPONSE: COMPLIANT

2.6.1.2 Product identification records shall be maintained.

RESPONSE: COMPLIANT

2.6.1.3 Product start up and changeover procedures during packing shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label, and that the changeover is inspected and approved by an authorized person.

RESPONSE: COMPLIANT

2.6.2 Product Trace (Mandatory)

As per P-270 Product Identification Trace Withdrawal and Recall Procedure. The Excel spreadsheets populated by QC staff during production for all products include full traceability for all products to the source blueberry producer as well as the packaging material traceability for the line item. Records are complete and were sampled for both fresh and IQF products. Live trace was conducted for current day production (Feb 4/21) for both raw blueberries and primary packaging of both IQF product totes and 30 lb finished boxes. The requested traceability was accomplished in 42 minutes during the audit. Raw blueberries from grower #7832, produced into IQF Aug 30/20, with matching tote #s evidenced in both days records.

2.6.2.1 The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable to the customer (one up) and provides traceability through the process to the manufacturing supplier and date of receipt of raw materials, food contact packaging and materials and other inputs (one back); ii. Traceability is maintained where product is reworked; and iii. The effectiveness of the product trace system shall be reviewed at least annually as part of the product recall and withdrawal review (refer to 2.6.3.3).

RESPONSE: COMPLIANT

2.6.2.2 Records of raw and packaging material receipt and use, and finished product dispatch and destination shall be maintained.

RESPONSE: COMPLIANT

2.6.3 Product Withdrawal and Recall (Mandatory)

Governed by P-260 Product Identification, Traceability and Recall. There is no application for actual recalls or withdrawals to-date and no application for public notification of any issues. 3 mock recalls conducted in 2020 were sampled: July 14/2020: 2255 lbs raw packed into 288 cases Driscols fresh, Shipped in full July 12/20, 100% recovery, 54 min. Also, performed July 14, produced July 11-2/20, Driscoll's fresh, 1692 lbs raw packed into 144 crates, shipped in full July 12/20, BoL #ITRN00364557, 100% accounted for in 50 minutes. Also, performed Nov 25/20 for 1750 cases IQF blueberries produced Oct 6-7/20, from 5994 lbs raw (grower #430), 92.2% shipped Oct 29/20 (to Japan), container #CRXU1183719, 7.8% in IQF freezer inventory, 100% accounted for in 55 minutes.

2.6.3.1 The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall: i. Identify those responsible for initiating, managing and investigating a product withdrawal or recall; ii. Describe the management procedures to be implemented including sources of legal, regulatory and expert advice and essential traceability information; and iii. Outline a communication plan to inform customers, consumers, authorities and other essential bodies in a timely manner appropriate to the nature of the incident; iv. SQFI, the certification body, and the appropriate regulatory authority shall be listed as an essential body and notified in instances of a food safety incident of a public nature, or product recall for any reason.

RESPONSE: COMPLIANT

2.6.3.2 Investigation shall be undertaken to determine the root cause of a withdrawal, mock recall or recall and details of investigations and any action taken shall be documented.

RESPONSE: COMPLIANT

2.6.3.3 The product withdrawal and recall system shall be reviewed, tested and verified as effective at least annually. Testing shall include incoming materials (one back) and finished product (one up).

RESPONSE: COMPLIANT

2.6.3.4 SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

2.6.3.5 Records of all product withdrawals, recalls and mock recalls shall be maintained.

RESPONSE: COMPLIANT

2.7.1 Food Defense Plan (Mandatory)

Governed by P-270-A Food Defense and Food Fraud. The General Manager (Joe Gill) is the senior responsible person for food defense. The food defense plan is challenged annually using the Food Defense Self Assessment Checklist, which was completed June 27/20. Food defense has been significantly enhanced by the installation of full security fence enclosure around the entire site, and new, relocated main gate for vehicle access to the facility, observed during the virtual tour of the premises for the audit. There is no significant risk of any pedestrian traffic where the facility is located, towards the end of a rural road that is not a thru-way.

2.7.1.1 The methods, responsibility and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident shall be documented, implemented and maintained.

RESPONSE: COMPLIANT

2.7.1.2 A food defense plan shall include: i. The name of the senior site management person responsible for food defense; ii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing and storage areas through designated access points; iii. The methods implemented to protect sensitive processing points from intentional adulteration; iv. The measures taken to ensure the secure receipt and storage of raw materials, packaging, equipment and hazardous chemicals; v. The measures implemented to ensure raw materials, ingredients, packaging materials, work-in progress, process inputs and finished products are held under secure storage and transportation conditions; and vi. The methods implemented to record and control access to the premises by employees, contractors, and visitors.

RESPONSE: COMPLIANT

2.7.1.3 The food defense plan shall be reviewed and challenged at least annually.

RESPONSE: COMPLIANT

2.7.1.4 Records of reviews of the food defense plan shall be maintained.

RESPONSE: COMPLIANT

2.7.2 Food Fraud

Governed by P-270-A Food Defense and Food Fraud. Food Fraud Vulnerability Assessment (updated/completed July 10/20). Low risk determined. No special claims product, no product source from outside Canada (all locally grown), etc.

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

RESPONSE: COMPLIANT

2.7.2.2 A food fraud mitigation plan shall be developed and implemented which specifies the methods by which the identified food fraud vulnerabilities shall be controlled.

RESPONSE: COMPLIANT

2.7.2.3 The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually.

RESPONSE: COMPLIANT

2.7.2.4 Records of reviews of the food fraud vulnerability assessment and mitigation plan shall be maintained.

RESPONSE: COMPLIANT

2.8.1 Allergen Management for Food Manufacturing (Mandatory)

P-282 Allergen Management. There are no allergen products for the site. Training of staff for potential allergens that could originate from personal food in the lunch room is included in the annual refresher training.

2.8.1.1 The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A risk analysis of those raw materials, ingredients and processing aids, including food grade lubricants, that contain food allergens; ii. An assessment of workplace-related food allergens from locker rooms, vending machines, lunch-rooms, and visitors; iii. A register of allergens which is applicable in the country of manufacture and the country (ies) of destination if known; iv. A list of allergens which is accessible by relevant staff. v. The hazards associated with allergens and their control incorporated into the food safety plan. vi. A management plan for control of identified allergens. The allergen management program shall include the identification, management, and labelling of products containing gluten, where applicable.

RESPONSE: COMPLIANT

2.8.1.2 Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials, work-in progress, rework or finished product on how to identify, handle, store and segregate raw materials containing allergens.

RESPONSE: COMPLIANT

2.8.1.3 Provision shall be made to clearly identify and segregate foods that contain allergens. Segregation procedures shall be implemented and continually monitored.

RESPONSE: COMPLIANT

2.8.1.4 Where allergenic material may be intentionally or unintentionally present, cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces, including aerosols as appropriate, to prevent cross-contact. Separate handling and production equipment shall be provided where satisfactory line hygiene and clean-up or segregation is not possible.

RESPONSE: COMPLIANT

2.8.1.5 Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be effectively implemented.

RESPONSE: COMPLIANT

2.8.1.6 Where allergenic material may be present, product changeover procedures shall be documented and implemented to eliminate the risk of cross-contact.

RESPONSE: COMPLIANT

2.8.1.7	The product identification system shall make provision for clear identification and labeling in accordance with regulatory requirements of those products produced on production lines and equipment on which foods containing allergens were manufactured. **RESPONSE:** COMPLIANT
2.8.1.8	The site shall document and implement methods to control the accuracy of finished product labels (or consumer information where applicable) and assure work-in-progress and finished product is true to label with regard to allergens. Such measures may include label approvals at receipt, label reconciliations during production, destruction of obsolete labels, verification of labels on finished product as appropriate, and product change over procedures. **RESPONSE:** COMPLIANT
2.8.1.9	The product trace system shall take into consideration the conditions under which allergen containing foods are manufactured and ensure full trace back of all ingredients and processing aids used. **RESPONSE:** COMPLIANT
2.8.1.10	Re-working of product containing food allergens shall be conducted under conditions that ensure product safety and integrity is maintained. Re-worked product containing allergens shall be clearly identified and traceable. **RESPONSE:** COMPLIANT
2.8.1.11	Sites that do not handle allergenic materials or produce allergenic products shall document, implement and maintain an allergen management program addressing at a minimum the mitigation of introducing unintended allergens through supplier, contract manufacturer, employee and visitor activities. **RESPONSE:** COMPLIANT

2.8.2 Allergen Management for Pet Food Manufacturing

No application for pet food or allergens.

2.8.2.1	The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A risk analysis of those inputs and processing aids, including food grade lubricants, that contain food allergens; ii. An assessment of workplace-related food allergens from locker rooms, vending machines, lunch-rooms, and visitors; iii. A list of allergens which is accessible by relevant staff; and iv. The hazards associated with allergens and their control incorporated into the food safety plan. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No application for pet food or allergens.
2.8.2.2	Product labeling, in accordance with regulatory requirements, shall include allergens where risks from cross-contact have been identified. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No application for pet food or allergens.

2.8.3 Allergen Management for Manufacturers of Animal Feed

No application for animal feed or allergens.

2.8.3.1	Sites that exclusively manufacture animal feed and do not manufacture, handle or store food or pet food products are not required to implement an allergen management plan unless required by regulation or customer requirement. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No application for animal feed or allergens.
2.8.3.2	Where an allergen management plan is required by regulation or customer specification, the requirements of 2.8.2 shall apply. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No application for animal feed or allergens.

2.9.1 Training Requirements

Governed by the FSM and P-290 Training.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.9.2 Training Program (Mandatory)

Governed by P-290 Training. The training program is managed by the SQFP. All staff are covered in the training records.

2.9.2.1 An employee training program shall be documented and implemented. It shall outline the necessary competencies for specific duties and the training methods to be applied for those staff carrying out tasks associated with: i. Developing and applying Good Manufacturing Practices; ii. Applying food regulatory requirements; iii. Steps identified by the hazard analysis and/or other instructions as critical to effective implementation of the food safety plan and the maintenance of food safety; and iv. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF System.

RESPONSE: COMPLIANT

2.9.3 Instructions

Instructions are made available as a required, and include posting for handwash and personnel practices, and are sometime incorporated in a WI section of records templates (i.e. DQC-001A Lug Washer Log).

2.9.3.1 Instructions shall be available in the languages relevant to the staff, explaining how all tasks critical to meeting regulatory compliance, the maintenance of food safety, and process efficiency are to be performed.

RESPONSE: COMPLIANT

2.9.4 HACCP Training Requirements

Pam (SQFP) HACCP (March 21-22/16 – SCS Global Service), Hong Phan HACCP (same date). Joe Gill (GM) HACCP (March 19, 2017).

2.9.4.1 HACCP training shall be provided for staff involved in developing and maintaining food safety plans.

RESPONSE: COMPLIANT

2.9.5 Language

Training is provided in English and Punjabi. Communication postings to support training are observed posted in both languages during the virtual tour of i.e. the lunchroom and other common areas.

2.9.5.1 Training materials and the delivery of training shall be provided in language understood by staff.

RESPONSE: COMPLIANT

2.9.6 Refresher Training

All staff receive refresher training annually. All trainees sign the DQC-001 Training Record to indicate their understanding of the material. Records of Personal Hygiene & Health Requirements/GMP/COVID-19 were sampled (July 6/20 - day & night shift, 24 staff; July 7/20 - 11 support staff). Also, training records of Aug 20, Sept 15 & 21, and Oct 22/20.The Employee Training Validation Quiz is also completed and reviewed as part of the sessions (i.e. 3 completed samples from the July 6 training event).

2.9.6.1 The training program shall include provision for identifying and implementing the refresher training needs of the organization.

RESPONSE: COMPLIANT

2.9.7 Training Skills Register

The Training Skills Register is maintained current and was verified to include the sampled trainings.

2.9.7.1 A training skills register describing who has been trained in relevant skills shall be maintained. The register shall indicate the: i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Supervisor's verification that the training was completed, and that the trainee is competent to complete the required tasks.

RESPONSE: COMPLIANT

11.1.1 Premises Location and Approval

No adjacent activities that could be hazardous to the facility. All surrounding acreage is owned and controlled by the facility. CFIA Safe Foods for Canadians Act license #9N4XLN9G exp Oct 21/2021. City of Abbotsford business license #2019-105549, exp Mar 31, 2021. FDA facility registration #17099574690.

11.1.1.1 The location of the premises shall be such that adjacent and adjoining buildings, operations and land use do not interfere with safe and hygienic operations.

RESPONSE: COMPLIANT

11.1.1.2 The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

RESPONSE: COMPLIANT

11.2.1 Materials and Surfaces

Facility is well designed and constructed, purpose-built for food handling and storage, and maintained in good condition. Food contact surfaces are inert SS or poly, and adjacent surfaces are of similar materials. No risks of product contamination were observed in the virtual tour, or in previous in-person audit inspections of the facility.

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

RESPONSE: COMPLIANT

11.2.2 Floors, Drains, and Waste Traps

Floors are smooth concrete, maintained in good condition and epoxy coated in food processing and packaging areas as well as in most other areas. Floors are suitably sloped to eliminate standing water, etc. Drains are covered and accessible for cleaning. No standing water was observed. No application for waste traps.

11.2.2.1 Floors shall be constructed of smooth, dense impact resistant material that can be effectively graded, drained, impervious to liquid and easily cleaned.

RESPONSE: COMPLIANT

11.2.2.2 Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions.

RESPONSE: COMPLIANT

11.2.2.3 Drains shall be constructed and located so they can be easily cleaned and not present a hazard.

RESPONSE: COMPLIANT

11.2.2.4 Waste trap system shall be located away from any food handling area or entrance to the premises.

RESPONSE: COMPLIANT

11.2.3 Walls, Partitions, Doors and Ceilings

Walls, partitions ceilings and doors are well constructed and light-coloured surfaces are evident. The wall to wall and wall to floor junctions are suitably sealed to prevent harbourage for pests or accumulation of waste, etc.. No application for ducting. Conduit and pipes are neatly arranged overhead, and accessible for cleaning. They were observed maintained in a clean condition. No application for windows in the packing areas. Doors are solidly constructed, and seal appropriately. All areas are fitted with a ceiling. No application for drop ceilings.

11.2.3.1 Walls, partitions, ceilings and doors shall be of durable construction. Internal surfaces shall be smooth and impervious with a light-colored finish and shall be kept clean (refer to 11.2.13.1).

RESPONSE: COMPLIANT

11.2.3.2 Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

RESPONSE: COMPLIANT

11.2.3.3 Ducting, conduit and pipes that convey services such as steam or water shall be designed and constructed to prevent the contamination of food, ingredients and food contact surfaces and allow ease of cleaning.

RESPONSE: COMPLIANT

11.2.3.4 Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients and food contact surfaces, and shall allow ease of cleaning.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for any piping over product or product storage areas.

11.2.3.5 Doors, hatches and windows and their frames in food processing, handing or storage areas shall be of a material and construction which meets the same functional requirements as for internal walls and partitions. Doors and hatches shall be of solid construction and windows shall be made of shatterproof glass or similar material.

RESPONSE: COMPLIANT

EVIDENCE: No application for windows in product areas.

11.2.3.6 Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products.

RESPONSE: COMPLIANT

11.2.3.7 Drop ceilings shall be constructed to enable monitoring for pest activity, facilitate cleaning and provide access to utilities.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for drop ceilings in the facility.

11.2.4 Stairs, Catwalks and Platforms

No catwalks located over product. Work platforms at production inspection and sorting stations, etc. are well constructed for cleanability, and maintained in a clean condition. No use of wood for any such construction.

11.2.4.1 Stairs, catwalks and platforms in food processing and handling areas shall be designed and constructed so as not to present a product contamination risk, and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 11.2.13.1).

RESPONSE: COMPLIANT

11.2.5 Lightings and Light Fittings

All areas of the facility are equipped with lights of suitable intensity for the tasks performed. Light intensity verifications are conducted monthly (sampled all months for 2020, Jan 19/20 thru Dec 2/20). Lights in the facility are shatter protected in all areas, and light fixtures were observed during the virtual tour for the audit.

11.2.5.1 Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.

RESPONSE: COMPLIANT

11.2.5.2 Light fittings in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers and recessed into or fitted flush with the ceiling. Where fittings cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials and addressed in the cleaning and sanitation program.

RESPONSE: COMPLIANT

11.2.5.3 Light fittings in warehouses and other areas where the product is protected shall be designed such as to prevent breakage and product contamination.

RESPONSE: COMPLIANT

11.2.6 Inspection / Quality Control Area

QC inspection areas are provided in the packaging areas, and are observed maintained in a clean condition. They are located away from the packing lines, and are not a potential source for contamination of product. All areas of the facility are readily accessible to handwash.

11.2.6.1 A suitable area shall be provided for the inspection of the product if required.

RESPONSE: COMPLIANT

11.2.6.2 The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/processed. The inspection area shall: i. Have easy access to hand washing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination.

RESPONSE: COMPLIANT

11.2.7 Dust, Insect, and Pest Proofing

Exterior doors were observed closed and appeared to seal effectively when closed. Personnel access doors are provided and used effectively, and are self closing. Insect proofing of overhead doors is redundant with air curtain and plastic curtains. No insectocuters located anywhere near product or packaging and are not a significant risk of contamination.

11.2.7.1 All external windows, ventilation openings, doors and other openings shall be effectively sealed when closed and proofed against dust, vermin and other pests.

RESPONSE: COMPLIANT

11.2.7.2 External personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against ingress of dust, vermin and other pests.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.2.7.4 Electric insect control devices, pheromone or other traps and baits shall be located so as not to present a contamination risk to the product, packaging, containers or processing equipment. Poison rodenticide bait shall not be used inside ingredient or product storage areas or processing areas.

RESPONSE: COMPLIANT

11.2.8 Ventilation

No application for extractor fans and canopies. No source of steam/water vapour in the facility. No processing was occurring in the IQF production room since no fresh raw blueberries are available in the off-season during which time the audit occurred. Plant fixtures are included in the facility sanitation program.

11.2.8.1 Adequate ventilation shall be provided in enclosed processing and food handling areas.

RESPONSE: COMPLIANT

11.2.8.2	All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 11.2.12, to prevent unsanitary conditions. **RESPONSE:** COMPLIANT
11.2.8.3	Extractor fans and canopies shall be provided in areas where cooking operations are carried out or a large amount of steam is generated and shall have the following features: i. Capture velocities shall be sufficient to prevent condensation build up and to evacuate all heat, fumes and other aerosols to the exterior via an exhaust hood positioned over the cooker(s); ii. Fans and exhaust vents shall be insect-proofed and located so as not to pose a contamination risk; and iii. Where appropriate, positive air-pressure system shall be installed to prevent airborne contamination. **RESPONSE:** COMPLIANT

11.2.9 Equipment, Utensils, and Protective Clothing

Specifications are developed and documented for key equipment and utensils i.e. Policy - 245 - 001 Equipment/PPE/Utensils Specifications (reviewed/updated Jan 14/20), and includes SS equipment, plastic equipment, color/laser sorter, PPE. Protective clothing is suitable for food use, and maintained in good clean serviceable condition. Racks for clothing are evident at access points to processing/packing areas. All observed utensils and clothing were observed maintained in good clean condition. All food handling equipment for the packing lines is designed specifically for food plant use and not a source of potential contamination by design. The equipment contact surfaces and adjacent surfaces are inert SS or poly in good clean condition. Product wash water is directed to drain. Utensils are colour-coded to designate approved applications/uses of each piece, and the colour code charts are conspicuously posted in the facility as observed during the virtual tour (i.e. lunchroom, product packaging area).

11.2.9.1	Specifications for equipment, utensils and protective clothing, and procedures for purchasing equipment shall be documented and implemented. **RESPONSE:** COMPLIANT
11.2.9.2	Equipment and utensils shall be designed, constructed, installed, operated and maintained to meet any applicable regulatory requirements and not to pose a contamination threat to products. **RESPONSE:** COMPLIANT
11.2.9.3	Benches, tables, conveyors, mixers, mincers, graders and other mechanical processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious and free from cracks or crevices. **RESPONSE:** COMPLIANT
11.2.9.4	Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious and readily cleaned as per 11.2.13. Bins used for inedible material shall be clearly identified. **RESPONSE:** COMPLIANT
11.2.9.5	Waste and overflow water from tubs, tanks and other equipment shall be discharged direct to the floor drainage system, and to meet local regulatory requirements. **RESPONSE:** COMPLIANT
11.2.9.6	Protective clothing shall be manufactured from material that will not contaminate food and is easily cleaned. **RESPONSE:** COMPLIANT
11.2.9.7	Racks shall be provided for the temporary storage of protective clothing when staff leave the processing area and shall be provided in close proximity or adjacent to the personnel access doorways and hand washing facilities. **RESPONSE:** COMPLIANT
11.2.9.8	All equipment, utensils and protective clothing shall be cleaned after use or at a frequency to control contamination and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination. **RESPONSE:** COMPLIANT

11.2.10 Premises and Equipment Maintenance

No maintenance activities observed performed during the audit. No evidence of temporary repairs observed. Governed by P-102-91 Premise and Equipment Preventive Maintenance (Jan 15/20), which includes the detailed PM plan for the facility. preventive maintenance activities recorded in the DQC-004 & 002 Equipment and Machinery Service Record (monthly PM record, sampled Jan 13/20 thru Dec 23/20). Unplanned maintenance recorded in the DQC-002 Work Order Log (unscheduled maintenance and repair, sampled Jan 31/20 thru Dec 16/20), which includes hygiene clearance/sign-off for each line item recorded. Tools controlled with records using the DQC-007-01 Production Tool Log which tracks utensils, knives, tape guns, pens, markers, scissors and other items (sampled records of July 24, Aug 6,8,9,15, Sept 8,9,18, Oct 2,6/2020). No application for paint in food contact areas. Equipment failures are tracked in the facility KPI data, and an annual target of 10 or less failure incidents is established. Use of JAX F/G grease is verified in all equipment in the facility as applicable, and there is no application for use or storage of non-F/G grease.

11.2.10.1 The methods and responsibility for the maintenance and repair of plant, equipment and buildings shall be documented, planned and implemented in a manner that minimizes the risk of product, packaging or equipment contamination.

RESPONSE: COMPLIANT

11.2.10.2 Routine maintenance of plant and equipment in any food processing, handling or storage area shall be performed according to a maintenance-control schedule and recorded. The maintenance schedule shall be prepared to cover building, equipment and other areas of the premises critical to the maintenance of product safety and quality.

RESPONSE: COMPLIANT

11.2.10.3 Failures of plant and equipment in any food processing, handling or storage area shall be documented, reviewed and their repair incorporated into the maintenance control schedule.

RESPONSE: COMPLIANT

11.2.10.4 Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 11.3.1, 11.3.2, 11.3.3, 11.3.4).

RESPONSE: COMPLIANT

11.2.10.5 All maintenance and other engineering contractors required to work on site shall be trained in the site's food safety and hygiene procedures, or shall be escorted at all times, until their work is completed.

RESPONSE: COMPLIANT

11.2.10.6 Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling or storage area.

RESPONSE: COMPLIANT

11.2.10.7 The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance pose a potential threat to product safety (i.e. pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside processing times.

RESPONSE: COMPLIANT

11.2.10.8 Temporary repairs, where required shall not pose a food safety risk and shall be included in the cleaning program. There shall be a plan in place to address completion of temporary repairs to ensure they do not become permanent solutions.

RESPONSE: NOT APPLICABLE

EVIDENCE: No evidence of any temporary repairs in the facility.

11.2.10.9 Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so appropriate hygiene and sanitation can be completed and a pre-operational inspection conducted prior to the commencement of site operations.

RESPONSE: COMPLIANT

11.2.10.10 Equipment located over product or product conveyors shall be lubricated with food grade lubricants and their use controlled to minimize the contamination of the product.

RESPONSE: COMPLIANT

11.2.10.11 Paint used in a food handling or contact zone shall be suitable for use, in good condition and shall not be used on any product contact surface.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for paint in any food contact zones.

11.2.11 Calibration

Metal detector - annual, Nov 17/20 (Fortress Technology, NIST). Master thermometer July 17/20, NIST (Scigiene). Floor scale - June 25/20, NIST/Measurement Canada (BC Scale). 100% conformance to documented plan as per the facility KPI data for 2019.

11.2.11.1 The methods and responsibility for the calibration and re-calibration of measuring, test and inspection equipment used for monitoring activities outlined in pre-requisite programs and food safety plans, or to demonstrate compliance with customer specifications shall be documented and implemented. Software used for such activities shall be validated as appropriate.

RESPONSE: COMPLIANT

11.2.11.2 Procedures shall be documented and implemented to address the disposition of potentially affected products should measuring, test and inspection equipment be found to be out of calibration state.

RESPONSE: COMPLIANT

11.2.11.3 Calibrated measuring, test and inspected equipment shall be protected from damage and unauthorized adjustment.

RESPONSE: COMPLIANT

11.2.11.4 Equipment shall be calibrated against national or international reference standards and methods or to accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

RESPONSE: COMPLIANT

11.2.11.5 Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers recommended schedule.

RESPONSE: COMPLIANT

11.2.11.6 Calibration records shall be maintained.

RESPONSE: COMPLIANT

11.2.12 Pest Prevention

Governed by P-102-11 Management of Pests and Vermin, as well as the service provider operating manual. Pest control services are contracted to Avon Pest Control (license #13102 (BC Ministry of the Environment). Operator license for technician G. Mann verified (#187542, BC-MOE). Monthly inspections are performed and trend analysis is evident (sampled monthly reports for Jan 23/20 thru Dec 18/20). Trend analysis provided by the service provider indicates no rodents were caught or observed inside the facility for all of 2020. Significant activity reported in bait stations throughout the year, indicating likely effective bait station placement. Mechanical trap placement was observed to effectively cover both sides of all exterior doors of the facility. Inspection of the facility indicated no evidence of pest harbourage adjacent to the facility, interior or exterior. No application for pest control chemical handling by the site as this is Avon PCO responsibility. No disposal of product or containers occurs on site.

11.2.12.1 The methods and responsibility for pest prevention shall be documented and effectively implemented. The premises, its surrounding areas, storage facilities, machinery and equipment shall be kept free of waste or accumulated debris so as not to attract pests and vermin.

RESPONSE: COMPLIANT

11.2.12.2 Identified pest activity shall not present a risk of contamination to food products, raw materials or packaging.

RESPONSE: COMPLIANT

11.2.12.3 Food products, raw materials or packaging that are found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

RESPONSE: COMPLIANT

11.2.12.4 The pest prevention program shall: i. Describe the methods and responsibility for the development, implementation and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods; v. Outline the frequency with which pest status is to be checked; vi. Include on a site map the identification, location, number and type of bait stations set; vii. List the chemicals used (they are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available); viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station; ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests.

RESPONSE: COMPLIANT

11.2.12.5 Inspections for pest activity shall be undertaken on a regular basis by trained personnel and the appropriate action taken if pests are present.

RESPONSE: COMPLIANT

11.2.12.6 Records of all pest control applications shall be maintained.

RESPONSE: COMPLIANT

11.2.12.7 Pesticides and other toxic chemicals shall be clearly labeled and stored as described in element 11.6.4 and handled and applied by properly trained personnel. They shall be used by or under the direct supervision of trained personnel with a thorough understanding of the hazards involved, including the potential for the contamination of food and food contact surfaces.

RESPONSE: NOT APPLICABLE

EVIDENCE: No storage of pesticides on site.

11.2.12.8 Pest contractors shall be: i. Licensed and approved by the local relevant authority; ii. Use only trained and qualified operators who comply with regulatory requirements; iii. Use only approved chemicals; iv. Provide a pest prevention plan (refer to 2.3.3) which will include and maintain a site map indicating the location of bait stations traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; and vi. Provide a written report of their findings and the inspections and treatments applied.

RESPONSE: COMPLIANT

11.2.12.9 The site shall dispose of unused pest control chemicals and empty containers in accordance with regulatory requirements and ensure that: i. Empty chemical containers are not reused; ii. Empty containers are labeled, isolated and securely stored while awaiting collection; and iii. Unused and obsolete chemicals are stored under secure conditions while waiting authorized disposal by an approved vendor.

RESPONSE: NOT APPLICABLE

EVIDENCE: No disposal of pesticides applicable. Off-site responsibility of contractor.

11.2.13 Cleaning and Sanitation

Governed by P-102-131 Cleaning and Sanitation. All areas of the program are covered in the sanitation and cleaning plans in P-102-131 - 1 thru -8. Plans are detailed, documented in table-format with columns for: equipment/area, etc. to be cleaned - i.e. food contact surfaces, utensils, inside cooler walls, inside IQF tunnel, etc.); methods to clean, including chemicals and dilution rates, etc.; responsibility, frequency, records, verification methods. Pre-Op inspections are conducted daily, and pre-day-shift sanitation verifications are conducted with ATP swabs, the results of which are clean-to-pass. Pre-Op inspections (form DQC-001) were sampled for Sept 17& 30/20, Oct 13/20, Nov 6 &17/20. Food grade cleaning chemicals were verified: CS-424 Low Foam Alkaline Detergent (lug washing); Foam Force (product contact surfaces in fresh and frozen processing equipment); Whisper 400. The F-102-131 Bi-Weekly Cleaning and Sanitation Checklist was verified (Sept -Oct 2020); and the F-102-131 Monthly Cleaning and Sanitation Checklist was verified (Jan - Aug 2020). Fresh Daily Equipment Sanitation Checklist (DQC-109) verified for Sept 2020, as was the DQC-020 Frozen Daily Equipment Sanitation Checklist verified for the same dates. Chemical dispensing for the lug washer was verified (hourly testing - Aug 12/20 while in use). Pre-Op inspections are recorded on a multi-page checklist, and include itemized visual inspections of all product handling equipment for fresh and frozen, as well as ATP swab results for both fresh and frozen equipment. No application for knives or similar cutting equipment for product. No application for CIP.

11.2.13.1 The methods and responsibility for the cleaning of the food handling and processing equipment and environment, storage areas, staff amenities and toilet facilities shall be documented and implemented. Consideration shall be given to: i. What is to be cleaned; ii. How it is to be cleaned; iii. When it is to be cleaned; iv. Who is responsible for the cleaning; v. Methods used to confirm the correct concentrations of detergents and sanitizers, and vi. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

RESPONSE: COMPLIANT

11.2.13.2 Provision shall be made for the effective cleaning of processing equipment, utensils and protective clothing.

RESPONSE: COMPLIANT

11.2.13.3 Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards and other utensils and for cleaning of protective clothing used by staff. These cleaning operations shall be controlled so as not to interfere with manufacturing operations, equipment or product. Racks and containers for storing cleaned utensils shall be provided as required.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for knives or similar cutting equipment for product.

11.2.13.4 Cleaning in place (CIP) systems where used shall not pose a chemical contamination risk to raw materials, ingredients or product. CIP parameters critical to assuring effective cleaning shall be defined, monitored and recorded (e.g., chemical and concentration used, contact time and temperature). CIP equipment including spray balls shall be maintained and modifications to CIP equipment shall be validated. Personnel engaged in CIP activities shall be effectively trained.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for CIP.

11.2.13.5 Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food processing areas, product contact surfaces, equipment, staff amenities and sanitary facilities and other essential areas are clean before the commencement of production. Pre-operational inspections shall be conducted by qualified personnel.

RESPONSE: COMPLIANT

11.2.13.6 Staff amenities, sanitary facilities and other essential areas shall be inspected by qualified personnel to ensure the areas are clean, at a defined frequency.

RESPONSE: COMPLIANT

11.2.13.7 The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared.

RESPONSE: COMPLIANT

11.2.13.8 Detergents and sanitizers shall be suitable for use in a food manufacturing environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i. The site maintains a list of chemicals approved for use; ii. An inventory of all chemicals purchased and used shall be maintained; iii. Detergents and sanitizers are stored as outlined in element 11.6.4; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained staff handles sanitizers and detergents.

RESPONSE: COMPLIANT

11.2.13.9 Detergents and sanitizers that have been mixed for use shall be correctly mixed according to manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.

RESPONSE: COMPLIANT

11.2.13.10 The site shall dispose of unused detergents and sanitizers and empty containers in accordance with regulatory requirements and ensure that: i. Empty detergent and sanitizer containers are appropriately cleaned, treated and labeled before use; ii. Empty detergent and sanitizer containers are labeled, isolated and securely stored while awaiting collection; and iii. Unused and obsolete detergents and sanitizers are stored under secure conditions while waiting authorized disposal by an approved vendor.

RESPONSE: COMPLIANT

11.2.13.11 A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

RESPONSE: COMPLIANT

11.3.1 Personnel

Governed by the Food Safety Policy Manual, P-290 Training and the PRP Manual. Significant monitoring protocols for COVID-19 prevention. Daily health checks for all staff, with records to track temperature, contact with other COVID positive individuals, etc. Also, segregated work stations (poly screens, distancing), mandatory mask requirements, etc.

11.3.1.1 Personnel who are carriers or are known to have been carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in the processing or packing of food or enter storage areas where food is exposed.

RESPONSE: COMPLIANT

11.3.1.2 The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids from open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury which causes spillage of bodily fluid, a properly trained employee shall ensure that all affected areas including handling and processing areas have been adequately cleaned and that all materials and products have been quarantined and disposed of.

RESPONSE: COMPLIANT

11.3.1.3 Personnel with exposed cuts, sores or lesions shall not engage in handling or processing products or handling primary packaging materials or food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored bandage containing a metal strip or an alternative suitable waterproof and colored dressing.

RESPONSE: COMPLIANT

11.3.1.4 Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed. Drinking of water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers in production and storage areas shall be stored in clear, covered containers, and in designated areas away from raw materials, packaging or equipment.

RESPONSE: COMPLIANT

11.3.2 Hand Washing

Handwash is mandatory for all staff entering the plant. Handwash facilities are also located inside washrooms. Good signage in all areas in both English and Punjabi. Observed properly stocked with soap, hot water, paper towels, garbage receptacle. Gloves are worn by all food handlers. Good cleanable construction (SS) of handwash equipment. No application for high risk but faucets/fixtures are hands-free.

11.3.2.1 Hand wash basins shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.

RESPONSE: COMPLIANT

11.3.2.2 Hand wash basins shall be constructed of stainless steel or similar non-corrosive material and as a minimum supplied with: i. A potable water supply at an appropriate temperature; ii. Liquid soap contained within a fixed dispenser; iii. Paper towels in a hands-free cleanable dispenser; and iv. A means of containing used paper towels.

RESPONSE: COMPLIANT

11.3.2.3 The following additional facilities shall be provided in high risk areas: i. Hands free operated taps; and ii. Hand sanitizers.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for high risk handwashing. Hands-free operated taps and soap dispensers evident in many areas.

11.3.2.4 A sign instructing people to wash their hands, and in appropriate languages, shall be provided in a prominent position.

RESPONSE: COMPLIANT

11.3.2.5 Personnel shall have clean hands and hands shall be washed by all personnel, including staff, contractors and visitors: i. On entering food handling or processing areas; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating or drinking; and v. After handling wash down hoses, dropped product or contaminated material.

RESPONSE: COMPLIANT

11.3.2.6 When gloves are used, personnel shall maintain the hand washing practices outlined above.

RESPONSE: COMPLIANT

11.3.3 Clothing

Risk assessment documented in P-001 Protective Clothing Risk Assessment (Jan 14/2020). The assessment is detailed and comprehensive. No application for disposable aprons. As per the risk assessment, "All Protective clothing is provided by Unifirst and hygiene certificate in place provided by Unifirst. During use of protective clothing, employees are monitored to wear hair net/ beard net, face mask, covering all hair, washing hands, wearing gloves, smock, sleeves thus minimizing the risk of cross contamination." No infractions were observed in any area during the virtual tour. Staff provided daily uniform changes with laundry service (Unifirst). Clothing in good condition, not frayed, etc. Disposable gloves changed at high frequency (at breaks and when leaving the line).

11.3.3.1 The site shall undertake a risk analysis to ensure that the clothing and hair policy protects materials, food and food contact surfaces from unintentional microbiological or physical contamination.

RESPONSE: COMPLIANT

11.3.3.2 Clothing worn by staff engaged in handling food shall be maintained, stored, laundered and worn so as not to present a contamination risk to products.

RESPONSE: COMPLIANT

11.3.3.3 Clothing, including shoes, shall be clean at the commencement of each shift and maintained in a serviceable condition.

RESPONSE: COMPLIANT

11.3.3.4 Excessively soiled uniforms shall be changed or replaced where they present a product contamination risk.

RESPONSE: COMPLIANT

11.3.3.5 Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and when not in use stored on racks provided in the processing area or designated sealed containers in personnel lockers and not on packaging, ingredients, product or equipment.

RESPONSE: COMPLIANT

11.3.4 Jewelry and Personal Effects

Governed by policy for all staff and visitors, etc. and no infractions observed in any area. Included in Pre-Op inspections.

11.3.4.1 Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or any area where food is exposed. The wearing of plain bands with no stones and prescribed medical alert bracelets can be permitted, however the site will need to consider their customer requirements and the applicable food legislation.

RESPONSE: COMPLIANT

11.3.5 Visitors

Visitors are currently extremely restricted as per the COVID-19 pandemic requirements. Visitors sign-in and are escorted at all times in the facility. Visitors comply with al applicable PRP policy requirements including PPE, handwashing, remove jewelry, suitable footwear, face mask, etc.

11.3.5.1 All visitors, including management and maintenance staff, shall wear suitable clothing and footwear when entering any food processing or handling area.

RESPONSE: COMPLIANT

11.3.5.2 All visitors shall be required to remove jewelry and other loose objects.

RESPONSE: COMPLIANT

11.3.5.3 Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled or processed.

RESPONSE: COMPLIANT

11.3.5.4 Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all hand washing and personnel practice requirements.

RESPONSE: COMPLIANT

11.3.5.5 All visitors shall be trained in the site's food safety and hygiene procedures before entering any food processing or handling areas or shall be escorted at all times in food processing, handling and storage areas.

RESPONSE: COMPLIANT

11.3.6 Staff Amenities

Staff amenities well lighted and ventilated. No issues observed.

11.3.6.1 Staff amenities supplied with appropriate lighting and ventilation shall be made available for the use of all persons engaged in the handling and processing of product.

RESPONSE: COMPLIANT

11.3.7 Change Rooms

No requirement for change rooms or showers. Personal belongings are stored in lunchroom or personal vehicle. No improper storage of personal belongings observed in the facility.

11.3.7.1 Facilities shall be provided to enable staff and visitors to change into and out of protective clothing as required.

RESPONSE: NOT APPLICABLE

EVIDENCE: No requirement for change rooms or showers.

11.3.7.2 Change rooms shall be provided for staff engaged in the processing of high risk foods or processing operations in which clothing can be soiled.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for high risk processes. No requirement for change rooms or showers.

11.3.7.3 Provision shall be made for staff to store their street clothing and personal items separate from food contact zones and food and packaging storage areas.

RESPONSE: COMPLIANT

EVIDENCE: No requirement for change rooms or showers.

11.3.7.4 Where required, a sufficient number of showers shall be provided for use by staff.

RESPONSE: NOT APPLICABLE

EVIDENCE: No requirement for change rooms or showers.

11.3.8 Laundry

Uniform laundry service provided (Unifirst).

11.3.8.1 Provision shall be made for the laundering and storage of clothing worn by staff engaged in high risk processes and for staff engaged in processing operations in which clothing can be heavily soiled.

RESPONSE: COMPLIANT

11.3.9 Sanitary Facilities

Satisfactory toilet ratios for staff: exceed 1 toilet per 10 staff. Handwash stations inside the washrooms. Well stocked with supplies and good signage. Cleanable rooms and surfaces, and observed well maintained. All drain to sanitary septic system with no plant interconnections.

11.3.9.1 Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations; ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; v. Include an area inside or nearby, for storing protective clothing, outer garments and other items while using the facilities; and vi. Kept clean and tidy.

RESPONSE: COMPLIANT

11.3.9.2 Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system in accordance in regulations.

RESPONSE: COMPLIANT

11.3.9.3 Hand wash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.2.

RESPONSE: COMPLIANT

11.3.10 Lunch Rooms

Lunchroom is segregated from production areas and easily accommodates all staff. Handwash station provided inside lunchroom and handwash requirements posted in English and Punjabi. Wash sinks available for dishes and utensils, etc. Comfortable environment. Outside eating area is well maintained with clean seating/tables, garbage collection receptacles and effective waste management. Handwash provided inside building prior to entering the product handling areas. To maintain proper social distancing during the pandemic, 3 additional portable lunchroom shelters were installed exterior to the facility for fresh pack season. The structures were observed during the tour but are not in service at this time due to inclement seasonal weather and reduced staff requirements in the off season.

11.3.10.1 Separate lunch-room facilities shall be provided away from a food contact/handling zone.

RESPONSE: COMPLIANT

11.3.10.2 Lunch-room facilities shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to cater for the maximum number of staff at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with refrigeration and heating facilities enabling them to store or heat food and to prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests.

RESPONSE: COMPLIANT

11.3.10.3 Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential for introduction of contamination including pests to the site.

RESPONSE: COMPLIANT

11.3.10.4 Signage in appropriate languages instructing people to wash their hands before entering the food processing areas shall be provided in a prominent position in lunch-rooms, at lunch-room exits and in outside eating areas if applicable.

RESPONSE: COMPLIANT

11.4.1 Staff Engaged in Food Handling and Processing Operations

Good personnel practices evident by all staff – proper gloves, sleeves, uniforms, hair nets and beard nets, face masks, etc. Good housekeeping. No jewelry or other violations, etc. No product or packaging on floor. Doors are closed. All staff wear gloves. No evidence of fingernail polish or false fingernails, etc. No application for sensory evaluations. Hoses stored on racks and off the floor. Staff use proper personnel doors when moving throughout the facility.

11.4.1.1 All personnel engaged in any food handling, preparation or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices: i. Personnel entry to processing areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be left open for extended periods when access for waste removal or receiving of product/ingredient/packaging is required; iii. Packaging material, product, and ingredients shall be kept in appropriate containers as required and off the floor; iv. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; v. Staff shall not eat or taste any product being processed in the food handling/contact zone, except as noted in element 11.4.1.2; vi. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails or fingernail polish is not permitted when handling exposed food; and vii. Hair restraints are used where product is exposed.

RESPONSE: COMPLIANT

11.4.1.2 In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone the site shall implement proper controls and procedures to ensure: i. Food safety is not compromised; ii. Sensory evaluations are conducted by authorized personnel only; iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations; iv. Sensory evaluations are conducted in areas equipped for the purpose; and v. Equipment used for sensory evaluations is sanitized, maintained and stored separate from processing equipment.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for sensory evaluations.

11.4.1.3 All wash down hoses shall be stored on hose racks after use and not left on the floor.

RESPONSE: COMPLIANT

11.5.1 Water Supply

Good supply of fresh potable municipal water. No application for use of non-potable water or for storage of water. Good infrastructure – not a risk of contamination of the water. No potential for interconnection with non-potable water (i.e. wash water, etc.).

11.5.1.1 Adequate supplies of potable water drawn from a known clean source shall be provided for use during processing operations, as an ingredient and for cleaning the premises and equipment.

RESPONSE: COMPLIANT

11.5.1.2 Supplies of hot and cold water shall be provided as required to enable the effective cleaning of the premises and equipment.

RESPONSE: COMPLIANT

11.5.1.3 The delivery of water within the premises shall ensure potable water is not contaminated.

RESPONSE: COMPLIANT

11.5.1.4 The use of non-potable water shall be controlled such that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; and iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent back flow or back siphonage.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for the use of nonpotable water.

11.5.1.5 Where water is stored on site, storage facilities shall be adequately designed, constructed and maintained to prevent contamination.

RESPONSE: NOT APPLICABLE

EVIDENCE: No storage of potable water.

11.5.2 Water Treatment

No application for treatment of water to render it potable. Water is sampled and tested annually.

11.5.2.1 Water treatment methods, equipment and materials, if required, shall be designed, installed and operated to ensure water receives an effective treatment.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for treatment of water to render it potable.

11.5.2.2 Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for treatment of water to render it potable.

11.5.2.3 Treated water shall be regularly monitored to ensure it meets the indicators specified.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for treatment of water to render it potable.

11.5.2.4 Water used in as an ingredient in processing, or in cleaning and sanitizing equipment, shall be tested, and if required, treated to maintain potability (refer to 11.5.2.1).

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for treatment of water to render it potable.

11.5.3 Ice Supply

No application for ice.

11.5.3.1 Ice provided for use during processing operations or as a processing aid or an ingredient shall comply with 11.5.4.1.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for ice.

11.5.3.2 Ice rooms and receptacles shall be constructed of materials as outlined in elements 11.2.1, 11.2.2 and 11.2.3 and designed to minimize contamination of the ice during storage and distribution.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for ice.

11.5.4 Water Quality

Water is sampled annually and evaluated for potability by an accredited lab (Bureau Veritas, sampled Oct. 13/20, verified potable).

11.5.4.1 Water shall comply with local, national or internationally recognized potable water microbiological and quality standards as required when used for: i. washing, thawing and treating food; ii. handwashing iii. to convey food; iv. as an ingredient or food processing aid; v. cleaning food contact surfaces and equipment; vi. the manufacture of ice; or vii. the manufacture of steam that will come into contact with food or used to heat water that will come in contact with food.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.5.4.3 Water and ice shall be analyzed using reference standards and methods.

RESPONSE: COMPLIANT

11.5.5 The Quality of Air and Other Gasses

There is no application for the use of compressed air to contact product, packaging or product contact surfaces. However the facility does perform air testing annually as a precautionary measure only. Evaluated to standards for SCBA (self-contained breathing apparatus). July 20/20 (Bureau Veritas).

11.5.5.1 Compressed air or other gases (e.g. nitrogen, carbon dioxide) that contacts food or food contact surfaces shall be clean and present no risk to food safety.

RESPONSE: NOT APPLICABLE

EVIDENCE: There is no application for the use of compressed air to contact product, packaging or product contact surfaces.

11.5.5.2 Compressed air systems, and systems used to store or dispense other gases used in the manufacturing process that come into contact with food or food contact surfaces shall be maintained and regularly monitored for quality and applicable food safety hazards.

RESPONSE: NOT APPLICABLE

EVIDENCE: There is no application for the use of compressed air to contact product, packaging or product contact surfaces.

11.6.1 Storage and Handling of Goods

Governed by P-106-61 Loading Transportation and Unloading. Products are rotated FIFO. All storage areas observed to be neat and well organized. Packaging materials are stored in clean dry areas without exposure to significant risk of contamination (i.e. mezzanine in fresh blueberry packing room). No application for overflow storage.

11.6.1.1 The site shall document and implement an effective storage plan that allows for the safe, hygienic storage of raw materials (i.e. frozen, chilled, and ambient), ingredients, packaging materials, equipment, and chemicals.

RESPONSE: COMPLIANT

11.6.1.2 The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented.

RESPONSE: COMPLIANT

11.6.1.3 Procedures shall be in place to ensure that all ingredients, materials, work-in-progress, rework, and finished product are utilized within their designated shelf-life.

RESPONSE: COMPLIANT

11.6.1.4 Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers.

RESPONSE: COMPLIANT

11.6.1.5 Where goods described in 11.6.2 to 11.6.4 are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there is no risk to the integrity of those goods or contamination or adverse effect on food safety.

RESPONSE: NOT APPLICABLE

EVIDENCE: No requirement for overflow storage contingency.

11.6.1.6 Records shall be available to validate alternate or temporary control measures for the storage of raw materials, ingredients, packaging materials, equipment, chemicals, or finished products.

RESPONSE: NOT APPLICABLE

EVIDENCE: No requirement for overflow storage contingency.

11.6.2 Cold Storage, Freezing and Chilling of Foods

Capacity of freezers verified in hot weather records (Sept), and ample capacity observed. Condensate lines hard piped direct to drainage as per virtual tour and photo evidence provided. Monitoring thermometers readily accessible and verified at least daily. Good power doors for access to freezers. Loading docks well protected inside the building and truck seals are effective. The coolers/freezers are monitored daily in the Pre-Op inspection record (DQC-001), including multiple checks for each unit throughout the shift, as well as a monitoring log. Records for Sept 17& 30/20, Oct 13/20, Nov 6 &17/20. No deviations observed.

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

RESPONSE: COMPLIANT

11.6.2.2 Sufficient refrigeration capacity shall be available to chill, freeze, store chilled or store frozen the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.

RESPONSE: COMPLIANT

11.6.2.3 Discharge from defrost and condensate lines shall be controlled and discharged to the drainage system.

RESPONSE: COMPLIANT

11.6.2.4 Freezing, chilling and cold storage rooms shall be fitted with temperature monitoring equipment and located to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible.

RESPONSE: COMPLIANT

11.6.2.5 Loading and unloading docks shall be designed to protect the product during loading and unloading.

RESPONSE: COMPLIANT

11.6.3 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods

Packaging materials are stored in clean dry areas without exposure to significant risk of contamination (i.e. mezzanine in fresh blueberry packing room). No application for overflow storage. Zero emission electric vehicles observed in product handling areas.

11.6.3.1 Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration.

RESPONSE: COMPLIANT

11.6.3.2 Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room. Storage areas shall be constructed to prevent packaging from becoming a harborage for pests or vermin.

RESPONSE: COMPLIANT

11.6.3.3 Vehicles used in food contact, handling or processing zones or in cold storage rooms shall be designed and operated so as not to present a food safety hazard.

RESPONSE: COMPLIANT

11.6.4 Storage of Hazardous Chemicals and Toxic Substances

Chemical storage areas are secure with controlled, limited access. No non-food-plant-application-rated hazardous chemicals are stored in the facility. Daily supplies of cleaners are attached directly to the foaming stations and dispensers and not a source of contamination of the product. A food grade chemical inventory log is maintained monthly (verified current) and includes products such as Foam Force, Whisper 400, JAX F/G grease. No application for a non-food-grade-chemical log.

11.6.4.1 Hazardous chemicals and toxic substances with the potential for food contamination shall be stored so as not to present a hazard to staff, product, packaging, product handling equipment or areas in which the product is handled, stored or transported.

RESPONSE: COMPLIANT

11.6.4.2 Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances.

RESPONSE: COMPLIANT

11.6.4.3 Daily supplies of chemicals used for continuous sanitizing of water or as a processing aid, or for emergency cleaning of food processing equipment or surfaces in food contact zones, may be stored within or in close proximity to a processing area provided that access to the chemical storage facility is restricted to authorized personnel.

RESPONSE: COMPLIANT

11.6.4.4 Pesticides, rodenticides, fumigants and insecticides shall be stored separate from sanitizers and detergents. All chemicals shall be stored in their original containers, or in clearly labelled and suitable secondary containers if allowed by applicable legislation.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for storage of such products.

11.6.4.5 Hazardous chemical and toxic substance storage facilities shall: i. Be compliant with national and local legislation and designed such that there is no cross-contamination between chemicals; ii. Be adequately ventilated; iii. Be provided with appropriate signage indicating the area is a hazardous storage area; iv. Be secure and lockable to restrict access only to those personnel with formal training in the handling and use of hazardous chemicals and toxic substances; v. Have instructions on the safe handling of hazardous chemicals and toxic substances readily accessible to staff; vi. Be equipped with a detailed and up-to-date inventory of all chemicals contained in the storage facility; vii. Have suitable first aid equipment and protective clothing available close to the storage area; viii. In the event of a hazardous spill, be designed such that spillage and drainage from the area is contained; and ix. Be equipped with spillage kits and cleaning equipment.

RESPONSE: COMPLIANT

11.6.5 Loading, Transport, and Unloading Practices

Loading practices are governed by P-106-61 Loading Transportation and Unloading. The loading area is slightly segregated from the packing room, yet fully accessible and well designed to protect the product from contamination, etc. No significant risks of product contamination were observed.

11.6.5.1 The practices applied during loading, transport and unloading of food shall be documented, implemented and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported and unloaded under conditions suitable to prevent cross-contamination.

RESPONSE: COMPLIANT

11.6.6 Loading

Trucks, trailers and shipping containers are inspected using the F-106-61 Unloading/Loading Transportation Checklist and security seals are used for all loads. Records sampled included: Dec 29/20, BoL #FVP14593, shipping container MNBU-0554881, security seal # 7798487, temperature trackers # 81080002 & 86797145; Dec 4/20, BoL #FVP, trailer #53110, security seal # 7798469, temperature trackers # 87532675; Dec 2/20, BoL #FVP14634, shipping container TCLU1394709, security seal # 7798498, temperature tracker # 86797141; Nov 16/20, BoL #FVP14519, trailer #88111, security seal # 7813650; Dec 18/20, BoL #FVP14575, shipping container EMCU5310557, security seal # 7798471, temperature tracker # 86797118.

11.6.6.1 Vehicles (e.g. trucks/vans/containers) used for transporting food shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose and free from odors or other conditions that may impact negatively on the product.

RESPONSE: COMPLIANT

11.6.6.2 Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining the product and package integrity during loading and transport.

RESPONSE: COMPLIANT

11.6.6.3 Vehicles (e.g. trucks/vans/containers) shall be secured from tampering using a seal or other agreed upon and acceptable device or system.

RESPONSE: COMPLIANT

11.6.7 Transport

Temperature monitoring/recording devices are placed in each load of product Records sampled included: Dec 29/20, BoL #FVP14593, temperature trackers # 81080002 & 86797145; Dec 4/20, BoL #FVP, temperature trackers # 87532675; Dec 2/20, BoL #FVP14634, temperature tracker # 86797141; Dec 18/20, BoL #FVP14575, temperature tracker # 86797118.

11.6.7.1 Refrigerated units shall maintain the food at required temperatures and the unit's temperature settings shall be set, checked and recorded before loading and product temperatures recorded at regular intervals during loading as appropriate.

RESPONSE: COMPLIANT

11.6.7.2 The refrigeration unit shall be operational at all times and checks completed of the unit's operation, the door seals and the storage temperature at regular intervals during transit.

RESPONSE: COMPLIANT

11.6.8 Unloading

No application for receiving refrigerated goods. Receiving records maintained using DQC-009 Incoming Material Record, which includes comments on truck condition. Records sampled for June 11/20 thru Dec 24/20. Copies of all packing slips are retained with the inspection records. No risks observed in the receiving/unloading process.

11.6.8.1 Prior to opening the doors, the refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently and product temperatures shall be recorded at the commencement of unloading and at regular intervals during unloading.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for receiving refrigerated or frozen goods.

11.6.8.2 Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining the product and package integrity.

RESPONSE: COMPLIANT

11.7.1 Process Flow

Process flow is generally linear in the IQF & packaging process, with no risk of cross contamination of product.

11.7.1.1 The process flow shall be designed to prevent cross-contamination and organized so there is a continuous flow of product through the process. The flow of personnel shall be managed such that the potential for contamination is minimized.

RESPONSE: COMPLIANT

11.7.2 Receipt of Raw and Packaging Materials and Ingredients

Separate receiving docks/areas are used for packaging vs. raw blueberries and there is no risk of cross contamination. No application for any ingredients (including dry ingredients).

11.7.2.1 Dry ingredients and packaging shall be received and stored separately from frozen and chilled raw materials to ensure there is no cross-contamination. Unprocessed raw materials shall be received and segregated to ensure there is no cross-contamination.

RESPONSE: COMPLIANT

11.7.3 Thawing of Food

No application for thawing of food.

11.7.3.1 Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for thawing of food.

11.7.3.2 Equipment for water thawing shall be continuous flow to ensure the water exchange rate and temperature do not contribute to product deterioration or contamination. Water overflow shall be directed into the floor drainage system and not onto the floor.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for thawing of food.

11.7.3.3 Air thawing facilities shall be designed to thaw food under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for thawing of food.

11.7.3.4 Provision is to be made for the containment and regular disposal of used cartons and packaging from thawed product so that there is no risk to the product.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for thawing of food.

11.7.4 High Risk Processes

No application for high risk processes.

11.7.4.1 The processing of high risk food shall be conducted under controlled conditions such that sensitive areas in which high risk food has undergone a “kill” step, a “food safety intervention” or is subject to post process handling, are protected/segregated from other processes, raw materials or staff who handle raw materials to ensure cross-contamination is minimized.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for high risk processes for the facility.

11.7.4.2 Areas in which high risk processes are conducted shall only be serviced by staff dedicated to that function.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for high risk processes for the facility.

11.7.4.3 Staff access points shall be located, designed and equipped to enable staff to don distinctive protective clothing and to practice a high standard of personal hygiene to prevent product contamination.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for high risk processes for the facility.

11.7.4.4 Staff engaged in high risk areas shall change into clean clothing or temporary protective outerwear when entering high risk areas.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for high risk processes for the facility.

11.7.4.5 Product transfer points shall be located and designed so as not to compromise high risk segregation and to minimize the risk of cross-contamination.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for high risk processes for the facility.

11.7.5 Control of Foreign Matter Contamination

Governed by P-107-51 Detection of Foreign Objects. No application for knives/cutting instruments except knives used to open packaging, etc. Detailed glass logs are maintained and updated monthly and include maps of all areas of the facility with the glass locations in the area. No observation of loose metal objects or temporary fasteners. No history of glass breakage in the facility.

11.7.5.1 The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented and communicated to all staff.

RESPONSE: COMPLIANT

11.7.5.2 Inspections shall be performed to ensure plant and equipment remain in good condition, equipment has not become detached or deteriorated and is free from potential contaminants.

RESPONSE: COMPLIANT

11.7.5.3 All glass objects or similar material in food handling/contact zones shall be listed in a glass register including details of their location.

RESPONSE: COMPLIANT

11.7.5.4 Containers, equipment and other utensils made of glass, porcelain, ceramics, laboratory glassware or other like material (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers or MIG thermometers required under regulation) shall not be permitted in food processing /contact zones.

RESPONSE: COMPLIANT

11.7.5.5 Regular inspections of food handling/contact zones shall be conducted to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass register.

RESPONSE: COMPLIANT

11.7.5.6 Glass instrument dial covers on processing equipment and MIG thermometers shall be inspected at the start of each shift to confirm they have not been damaged.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for glass instrument dials or MIG thermometers.

11.7.5.7 Wooden pallets and other wooden utensils used in food handling/contact zones shall be dedicated for that purpose, clean, maintained in good order. Their condition shall be subject to regular inspection.11.7.5.8 Loose metal objects on equipment, equipment covers and overhead structures shall be removed or tightly fixed so as not to present a hazard.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for wood pallets or wooden utensils.

11.7.5.8 Loose metal objects on equipment, equipment covers and overhead structures shall be removed or tightly fixed so as not to present a hazard.

RESPONSE: COMPLIANT

11.7.5.9 Knives and cutting instruments used in processing and packaging operations shall be controlled and kept clean and well maintained. Snap-off blades shall not be used in manufacturing or storage areas.

RESPONSE: COMPLIANT

11.7.6 Detection of Foreign Objects

Governed by P-107-51 Detection of Foreign Objects. Metal detectors are used to monitor IQF product and are verified with certified test pieces multiple times per shift, records on the Pre-Op Inspection record (demonstrated performance against test pieces live during the virtual inspection of the packaging area). The metal detector is calibrated annually (Nov 17/20, Fortress Technology, NIST traceable).

11.7.6.1 The responsibility, methods and frequency for monitoring, maintaining, calibrating and using screens, sieves, filters or other technologies to remove or detect foreign matter shall be documented and implemented.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.7.6.3 Records shall be maintained of the inspection of foreign object detection devices and of any products rejected or removed by them. Records shall include any corrective actions resulting from the inspections.

RESPONSE: COMPLIANT

11.7.7 Managing Foreign Matter Contamination Incidents

Process is documented but no application to-date for such contamination of product.

11.7.7.1 In all cases of foreign matter contamination the affected batch or item shall be isolated, inspected, reworked or disposed.

RESPONSE: COMPLIANT

11.7.7.2 In circumstances where glass or similar material breakage occurs, the affected area is to be isolated, cleaned and thoroughly inspected (including cleaning equipment and footwear) and cleared by a suitably responsible person prior to the commencement of operations.

RESPONSE: NOT APPLICABLE

EVIDENCE: No history of glass (or similar) breakage for the facility.

11.8.1 Location

No application for on-site lab.

11.8.1.1 On site laboratories conducting chemical and microbiological analysis that may pose a risk to product safety, shall be located separate from any food processing or handling activity and designed to limit access only to authorized personnel.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for on-site lab.

11.8.1.2 Provisions shall be made to isolate and contain all laboratory waste held on the premises and manage it separately from food waste. Laboratory wastewater outlet shall as a minimum be down stream of drains that service food processing and handling areas.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for on-site lab.

11.8.1.3 Signage shall be displayed identifying the laboratory area as a restricted area accessible only by authorized personnel.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for on-site lab.

11.9.1 Dry and Liquid Waste Disposal

No application for disposal of trademarked materials. Plant waste water is sand-filtered and collected in underground storage tanks are removed from the site periodically by truck. No risks of product contamination from this process as it is well away from the plant under a section of the paved area. Waste removal verification is included in the daily pre-op inspections. Bins are removed on a regular basis to prevent buildup of waste. No evidence of unmanaged waste build up for the facility.

11.9.1.1 The responsibility and methods used to collect and handle dry, wet and liquid waste and store prior to removal from the premises shall be documented and implemented.

RESPONSE: COMPLIANT

11.9.1.2 Waste shall be removed on a regular basis and not build up in food handling or processing areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until external waste collection is undertaken.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

11.9.1.4 Adequate provision shall be made for the disposal of all solid processing waste including trimmings, inedible material and used packaging.

RESPONSE: COMPLIANT

11.9.1.5 Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for trademarked material disposal.

11.9.1.6 Inedible waste designated for animal feed shall be stored and handled so as to not cause a risk to the animal or to further processing.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for diversion to animal feed.

11.9.1.7 Waste held on site prior to disposal shall be stored in a separate storage facility and suitably insect proofed and contained so as not to present a hazard.

RESPONSE: NOT APPLICABLE

EVIDENCE: No application for holding waste on site.

11.9.1.8 Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall be either removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal so as not to present a hazard.

RESPONSE: COMPLIANT

11.9.1.9 Reviews of the effectiveness of waste management will form part of daily hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports.

RESPONSE: COMPLIANT

11.10.1 Grounds and Roadways

The facility is surrounded by paved surface, including vehicle parking and roadways. The exterior is very well maintained and no concerns/issues of pest harbourage were observed. No standing water was observed in any outside area. Exterior inspections are conducted at least monthly.

11.10.1.1 Measures shall be established to maintain a suitable external environment, and the effectiveness of the established measures shall be monitored and periodically reviewed.

RESPONSE: COMPLIANT

11.10.1.2 The grounds and area surrounding the premises shall be maintained to minimize dust and kept free of waste, accumulated debris or standing water so as not to attract pests and vermin.

RESPONSE: COMPLIANT

11.10.1.3 Paths, roadways and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operation of the premises.

RESPONSE: COMPLIANT

11.10.1.4 Paths, roadways, loading and unloading areas shall be adequately drained to prevent ponding of water. Drains shall be separate from the site drainage system and regularly cleared of debris.

RESPONSE: COMPLIANT

11.10.1.5 Surroundings shall be kept neat and tidy and not present a hazard to the hygienic and sanitary operation of the premises.

RESPONSE: COMPLIANT

11.10.1.6	Paths from amenities leading to site entrances are required to be effectively sealed. **RESPONSE:** COMPLIANT