SQF Food Safety Audit Edition 9

Growers Co-op Grape Juice Co - 6946

Summary

Audit Decision
Certified

Decision Date
August 4, 2025

Recertification Date
July 10, 2026

Expiration Date
September 23, 2026

Issue Date
August 5, 2025

Certificate Number
6946

Audit Type
Recertification

On-Site Audit Dates
June 24, 2025 - June 25, 2025

ICT Dates
-

Audit Rating

Good

Facility and Scope

Growers Co-op Grape Juice Co - 6946

112 N Portage St
Westfield, NY 14787 United States

Products
Fruit Juice, Fruit Juice Concentrate

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

Scope of Certification
Category 14. Fruit, Vegetable, and Nut Processing, and Fruit Juices: Fruit Juice, Fruit Juice Concentrate

Certification Body and Audit Team

Intertek SAI Global

45 Clarence Street
Suite 7.01, Level 7
Sydney, NSW 2000 Australia

CB#: 41736
Accreditation Body: JASANZ
Accreditation Number: Z1440295AS

Lead Auditor: Joshua Porbeni (C-368423)
Technical Reviewer: Agnieszka Glodek (C-374702)

Hours Spent on Site: 16
Hours of ICT Activities:
Hours Spent Writing Report: 5

Section Responses

Audit Statement - Audit

SQF Practitioner Name - Name the designated SQF Practitioner

Response: Jessica Hawkins

SQF Practitioner Email - Email of the designated SQF Practitioner

Response: jessica.hawkins@concordgrapejuice.com

Opening Meeting - People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas)

Response: Steve Cockram: Technical Director: Jessica Hawkins: Quality Manager/SQF Practitioner: Tyler Gorton: General Manager, Jason Howell: Operations Manager, James Breads: Technical Adviser, Joshua Porbeni: SQF Food Safety Auditor

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 located in a mix industrial and residential area of Westfield, NY. Growers Co-op is a producer of fruit juices and fruit juice concentrates. The site has three buildings of 60,000 square feet in total combined. The facility employs 34 employees and operates 24 hours per day (7:00 am to 7:00 pm) on two shifts and 4 days per week (Monday to Thursday). Cherries are harvested in July; Grapes are harvested from September to October. Refrigerated concentrated fruit juices are sold in the US, Canada and Asia. Growers Co-op is regulated and inspected by the State of New York on behalf of the FDA.

Closing Meeting - People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas)

Response: Steve Cockram: Technical Director: Jessica Hawkins: Quality Manager/SQF Practitioner: Tyler Gorton: General Manager, Jason Howell: Operations Manager, James Breads: Technical Adviser, Joshua Porbeni: SQF Food Safety Auditor

Auditor Recommendation - Auditor Recommendation

Response: Issue certificate after all non-conformances have been corrected and accepted.

2.1.1 - Management Responsibility (Mandatory)

2.1.1.1 - Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to: i. Supply safe food; ii. Establish and maintain a food safety culture within the site; iii. Establish and continually improve the site's food safety management system; and iv. Comply with customer and regulatory requirements to supply safe food. The policy statement shall be: v. Signed by the senior site manager and displayed in prominent positions; and vi. Effectively communicated to all site personnel in the language(s) understood by all site personnel

Response: Compliant

2.1.1.2 - Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures; ii. Adequate resources are available to meet food safety objectives; iii. Food safety

practices and all applicable requirements of the SQF System are adopted and maintained; iv. Employees are informed and held accountable for their food safety and regulatory responsibilities; v. Employees are positively encouraged and required to notify management about actual or potential food safety issues; and vi. Employees are empowered to act to resolve food safety issues within their scope of work.

Response: Compliant

2.1.1.3 - The reporting structure shall identify and describe site personnel with specific responsibilities for tasks within the food safety management system and identify a backup for the absence of key personnel. Job descriptions for the key personnel shall be documented. Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.

Response: Compliant

2.1.1.4 - Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review, and maintenance of the SQF System; ii. Take appropriate action to ensure the integrity of the SQF System; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.

Response: Compliant

2.1.1.5 - The primary and substitute SQF practitioner shall: i. Be employed by the site; ii. Hold a position of responsibility related 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: Food Manufacturing and the requirements to implement and maintain an SQF System relevant to the site's scope of certification

Response: Compliant

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

Response: Compliant

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

Response: Compliant

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

Response: Compliant

Summary -

Response: The documented management commitment statement that includes the methods and objectives has a provision to "Have a Food Safety Culture throughout Grower CO-OP". There is a documented Quality Policy with effective dated 5/9/25 in place that includes The Food Safety Culture statement, Employee training, System to report issues, Management role/interaction with employees, food safety culture goals, and tracking and trend. The site Management Commitment Statement is signed by the President and dated 1/8/25. The policy includes the Mission and Vision Statements, Core Values. Methods and Objectives that includes

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compliance to Customers' specifications, GFSI/SQF and regulatory requirements and have a Food Safety Culture throughout Growers Co-Op. The policy is also communicated to employees during training and posted in language understood by the employees at the time clock station. The current 2025 organizational chart was reviewed on and showed the reporting structure for staff responsible for Food Safety. The job description of the QA Manager, Operations Manager and General Manager was in place and the Job Description had provision for cover in the absence of that position (key personnel). There is provision for QA and Food Safety in the budget and a budget for all other supporting functions. HACCP certificate training for the primary SQFP is July 16. 2024 and that of the substitute SQFP is dated December 3-5, 1996. This was an announced audit.

2.1.2 - Management Review (Mandatory)

2.1.2.1 - The SQF System shall be reviewed by senior site management at least annually and include: i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan); ii. Food safety culture performance; iii. Food safety objectives and performance measures; iv. Corrective and preventative actions and trends in findings from internal and external audits, customer complaints, and verification and validation activities; v. Hazard and risk management system; and vi. Follow-up action items from previous management reviews. Records of all management reviews and updates shall be maintained.

Response: Compliant

2.1.2.2 - The SQF practitioner(s) shall update senior site management on at least a monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented.

Response: Compliant

Summary -

Response: The SQF System was reviewed on 1/30/25. The review covers the different components of the SQF system. The procedure includes review topics i.e. Internal and External audit findings, corrective actions, customer complaints. The stated goals are but not limited to: No FDA reportable recalls, no customer complaints due to unsafe foods and passing grades on Federal, State and industry audits. There is a documented management review schedule in place that includes items to be reviewed, date completed, findings, corrective action and responsibility. Records of the review were in place. The SQF practitioner updates senior management during Monthly HACCP management staff meeting. The auditor reviewed monthly records from Jan. to May 2025 that were maintained by the Quality Assurance Manager

2.1.3 - Complaint Management (Mandatory)

2.1.3.1 - The methods and responsibility for handling, investigating, and resolving food safety complaints from commercial customers, consumers, and authorities, arising from products manufactured or handled on-site or co-manufactured, shall be documented and implemented.

Response: Compliant

2.1.3.2 - Adverse trends of customer complaint data shall be investigated and analyzed and the root cause established by personnel knowledgeable about the incidents.

Response: Compliant

2.1.3.3 - Corrective and preventative action shall be implemented based on the seriousness of the incident and the root cause analysis as outlined in 2.5.3. Records of customer complaints, their investigation, and resolution shall be

maintained.

Response: Compliant

Summary -

Response: The facility has a Customer Service Procedure with effective date of 5/27/25 that outlines the methods and responsibility for complaints management. There is a complaint log that includes but not limited to Date of initiation, customer, complaint issue, lot#, root cause, corrective action and resolution. All complaints records are maintained on the S shared drive. Trend charts are created on annually. There were 6 recorded complaints in 2024. There are 7 complaints YTD 2025. The investigation and the root cause was adequately documented.

2.2.1 - Food Safety Management (Mandatory)

2.2.1.1 - The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Food Manufacturing shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard; ii. The food safety policy statement and organization chart; iii. The processes and products included in the scope of certification; iv. Food safety regulations that apply to the manufacturing site and the country(ies) of sale (if known); v. Raw material, ingredient, packaging, and finished product specifications; vi. Food safety procedures, prerequisite programs, food safety plans; vii. Process controls that impact product safety; and viii. Other documentation necessary to support the development, implementation, maintenance, and control of the SQF System.

Response: Compliant

2.2.1.2 - Food safety plans, Good Manufacturing Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any changes implemented have an impact on the site's ability to deliver safe food. All changes to food safety plans, Good Manufacturing Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the change shall be documented.

Response: Compliant

Summary -

Response: The food safety management system is adequately documented and maintained in both hard copy or electronic format. The scope of certification is Food Sector Category 14: Fruit, Vegetable and Nut Processing, and Fruit Juices. The Food Safety Plan, GMP and all aspects of the SQF systems were observed to be adequately documented, reviewed and updated as required. No has not been any changes to Food Safety Management System since the last audit.

2.2.2 Document Control (Mandatory)

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

Response: Compliant

Summary -

Response: There is a documented Document Control and Numbering procedures (Effective date 5/28/25) that describes who can assign document numbers to new documents and how it is done. It includes the methods and responsibility of maintaining the program and has a provision for revision. The program includes a register that includes the Category, Document Number, revision date, review date and the author. The observed documents were properly documented. Each documents has a revision record. Documents are stored electronically and hard copy and were readily available.

2.2.3 - Records (Mandatory)

2.2.3.1 - The methods, frequency, and responsibility for verifying, maintaining, and retaining records shall be documented and implemented.

Response: Compliant

2.2.3.2 - All records shall be legible and confirmed by those undertaking monitoring activities that demonstrate inspections, analyses, and other essential activities that have been completed.

Response: Compliant

2.2.3.3 - Records shall be readily accessible, retrievable, and securely stored to prevent unauthorized access, loss, damage, and deterioration. Retention periods shall be in accordance with customer, legal, and regulatory requirements, at minimum the product shelf-life or established by the site if no shelf-life exists.

Response: Compliant

Summary -

Response: There is a documented Record Retention Procedure. The QA Manager is responsible for the monitoring activities. Records are maintained in file folders and were readily accessible and retrievable. Records are retained for a minimum of 4 years. Batch Records of CCP #3- Foreign object check from 2/20/2025, 3/5/2025, 4/9/2025, 5/28/2025 and 6/2/2025 were legible and included the required verification sign off.

2.3.1 - Specification, Formulation, and Realization

2.3.1.1 - The methods and responsibility for designing and developing new product formulations and converting product concepts to commercial realization shall be documented and implemented.

Response: N/A

Evidence: • The facility does not currently do product development however there is a documented Product and Specification Development procedure (effective date 5/28/25) in place that includes the key processing steps/ paraments and shelf-life trials

2.3.1.2 - New product formulations, manufacturing processes, and the fulfillment of product requirements shall be established, validated, and verified by site trials and product testing as required to ensure product safety. Product formulations shall be developed by authorized persons to ensure that they meet the intended use. Where necessary, shelf life trials shall be conducted to validate and verify a new product's: i. Pre-consumer handling and storage requirements, including the establishment of "use by," "best before dates," or equivalent terminology; ii. Microbiological criteria, where applicable; and iii. Consumer preparation, where applicable, and storage and handling requirements.

Response: N/A

Evidence: • The facility does not currently do product development however there is a documented Product

and Specification Development procedure (effective date 5/28/25) in place that includes the key processing steps/ paraments and shelf-life trials

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2.3.1.3 - A food safety plan shall be validated and verified by the site food safety team 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: N/A

Evidence: • The facility does not currently do product development however there is a documented Product and Specification Development procedure (effective date 5/28/25) in place that includes the key processing steps/ paraments and shelf-life trials

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2.3.1.4 - Product formulations and manufacturing processes for products included in the scope of certification shall be reviewed when there are changes in materials, ingredients, or equipment.

Response: N/A

Evidence: • The facility does not currently do product development however there is a documented Product and Specification Development procedure (effective date 5/28/25) in place that includes the key processing steps/ paraments and shelf-life trials

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2.3.1.5 - The process flows for all new and existing manufacturing processes shall be designed to ensure that product is manufactured according to approved product formulations and to prevent cross-contamination.

Response: N/A

Evidence: • The facility does not currently do product development however there is a documented Product and Specification Development procedure (effective date 5/28/25) in place that includes the key processing steps/ paraments and shelf-life trials

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2.3.1.6 - Records of product design, formulations, label compliance, process flows, shelf life trials, and approvals for all new and existing products shall be maintained.

Response: N/A

Evidence: • The facility does not currently do product development however there is a documented Product and Specification Development procedure (effective date 5/28/25) in place that includes the key processing steps/ paraments and shelf-life trials

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Summary -

Response: The facility does not currently do product development however there is a documented Product and Specification Development procedure (effective date 5/28/25) in place that includes the key processing steps/ paraments and shelf-life trials

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2.3.2 - Specifications (Raw Material, Packaging, Finished Product, and Services)

2.3.2.1 - The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented.

Response: Compliant

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

Response: Compliant

2.3.2.3 - All raw materials, packaging, and ingredients, including those received from other sites under the same corporate ownership, shall comply with specifications and with the relevant legislation in the country of manufacture and country(ies) of destination if known.

Response: Compliant

2.3.2.4 - Raw materials, packaging, and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose.

Response: Compliant

2.3.2.5 - Site management shall require approved raw materials suppliers to notify the site of changes in product composition that could have an impact on product formulation (e.g., protein content, moisture, amino acid profiles, contaminant levels, allergens, and/or other parameters that may vary by crop or by season).

Response: Compliant

2.3.2.6 - Verification of packaging shall include a certification of 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. In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.

Response: Compliant

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

Response: Compliant

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

Response: Compliant

2.3.2.9 - Finished product specifications shall be documented, current, approved by the site and its customer, accessible to relevant staff, and shall include, where applicable: i. Microbiological, chemical, and physical limits; ii. Composition to meet label claims; iii. Labeling and packaging requirements; and iv. Storage conditions.

Response: Compliant

2.3.2.10 - Specifications for raw materials and packaging, chemicals, processing aids, contract services, and finished products shall be reviewed as changes occur that impact product safety. Records of reviews shall be maintained. A list of all the above specifications shall be maintained and kept current.

Response: Compliant

Summary -

Response: Section F of the Product and Specification Development document # TSPPR005 covers the requirements for specification development. There is a Raw and Packing Material log/register that include but not limited to Item, product detail and supplier spec date. The purpose is to ensure all purchased materials conform to agreed specifications in order that safety and quality is not compromised. The COAs and Letter of

Continuing guaranty under the FDA Cosmetic Act (21 CFR177.1520) were in place as applicable. The auditor reviewed the Raw Material Spec for Catawba Grape Juice, Not from Concentrate that included the Product and Process Description, Product Specification, Packaging requirements, Shelf Life and Storage requirements. The packaging specification for 55-gal Drum Liner included the Product Description, Product Specifications, Packaging, storage and shelf life. The Specifications for the drum liners reviewed have the same requirements. The Finished Product register (ADCH106) that is maintained electronically includes, the Chemical, Physical, Microbiological, Organoleptic, Packaging, Shelf life and Storage requirements. Specifications are reviewed as applicable. The auditor reviewed the specification for Blueberry Juice Concentrate, 65 Brix that included the Product and Process Descriptions, Product Specifications, Packaging, Shelf life and Storage. The finished product label that includes the product and production information is custom printed per customer requirement. Label includes Lot# " Manufacture date", Weight Information, Growers Co-op Grape Juice. Westfield, NY 14787. Product of USA Description of services for contract service providers that have an impact on product safety shall is documented

2.3.3 - Contract Manufacturers

2.3.3.1 - The methods and responsibility for ensuring all agreements with contract manufacturers relating to food safety, customer product requirements, their realization, and delivery shall be documented and implemented.

Response: N/A

Evidence: • The facility does not use Contract Manufacturers.

2.3.3.2 - The site shall establish a method to determine the food safety risk level of contract manufactured product and shall document the risk. The site shall ensure that: i. Products and processes of co-manufacturers that are considered high-risk have undergone an audit by the site or third-party agency to confirm compliance with the SQF Food Safety Code: Food Manufacturing and regulatory and customer requirements; ii. Products and processes of co-manufacturers that are considered low-risk meet the requirements of the SQF Food Safety Code: Food Manufacturing, or other GFSI benchmarked certification programs, and regulatory and customer requirements; and iii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel.

Response: N/A

Evidence: • The facility does not use Contract Manufacturers.

2.3.3.3 - Contractual agreements with third party storage and distribution businesses shall include requirements relating to customer product requirements and compliance with clause 2.3.3.2 of the SQF Food Safety Code: Food Manufacturing. Contractual agreements shall be approved by both parties and communicated to relevantpersonnel. The site shall verify compliance with the SQF Code and ensure that customer and regulatory requirements are being met at all times.

Response: N/A

Evidence: • The facility does not use Contract Manufacturers.

2.3.3.4 - Records of audits, contracts, and changes to contractual agreements and their approvals shall be maintained.

Response: N/A

Evidence: • The facility does not use Contract Manufacturers.

Summary -

Response: The facility does not use Contract Manufacturers.

2.3.4 - Approved Supplier Program (Mandatory)

2.3.4.1 - The responsibility and procedure for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented. A current record of approved suppliers, receiving inspections, and supplier audits shall be maintained. Code Amendment #2 Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered.

Response: Compliant

2.3.4.2 - The approved supplier program shall be based on the past performance of a supplier and the risk level of the raw materials, ingredients, processing aids, packaging, and services supplied, and shall contain at a minimum: i. Agreed specifications (refer to 2.3.2); ii. Reference to the level of risk applied to raw materials, ingredients, packaging, and services from 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

2.3.4.3 - Verification of raw materials shall include certificates of conformance, certificates of analysis, or sampling, and testing. The verification frequency shall be identified by the site.

Response: Compliant

2.3.4.4 - The receipt of raw materials, ingredients, processing aids, and packaging from nonapproved suppliers shall be acceptable only in an emergency situation and provided a receiving inspection or analysis is conducted and recorded before use.

Response: Compliant

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

Response: Compliant

2.3.4.6 - Supplier audits shall be based on risk (as determined in 2.3.4.2) and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques.

Response: Compliant

Summary -

Response: There is a documented vendor Approval procedure (ADP PR100, effective date 5/27/25) that outlines the process and includes the list of required documents as applicable from potential supplier (Section 4). Item I of the procedure - covers the requirements for emergency supplies. The process and list for emergency supplier is in place. Item G of the procedure covers the ongoing monitoring (typically annually) of all suppliers. Raw materials are generally received from members of the CO-OP. The register for approved suppliers including supplier details and required documents were available for review.

2.4.1 - Food Legislation (Mandatory)

2.4.1.1 - The site shall ensure that at the time of delivery to customers finished products shall comply with food safety legislation applicable in the country of manufacture and 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 as a result of a regulatory warning or event. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

Response: Compliant

Summary -

Response: The documented procedure Regulations Affecting Grower Co-Op effective date 5/27/25 includes methods and responsibility for compliance. There is also a documented online support/resources that include the FDA and other food safety resources to ensure that the site is kept informed of change in relevant legislation and emerging industry issues. The General Manager, Technical Reviewer and Management Team are responsible to ensure compliance. Notification to SQFI and the certification Body in writing within 24 hours in the event of regulatory warning is included in the Crisis Management Contact list

2.4.2 - Good Production Practices (Mandatory)

2.4.2.1 - The site shall ensure the applicable Good Manufacturing Practices described in Module 11 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 that ensure food safety is not compromised.

Response: Compliant

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

Response: Compliant

Summary -

Response: The site adequately complies to the requirement of the Good Manufacturing Practices. There is a documented cGMP communicated to employees via display in different areas of the facility and during training. Prohibitions in English are listed in the policy. There are no exemptions to the code.

2.4.3 - Food Safety Plan (Mandatory)

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. The food safety plan shall be effectively implemented and maintained and shall outline how 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

2.4.3.2 - The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant raw materials, packaging, processing aids, 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

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

Response: Compliant

2.4.3.4 - Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. The descriptions shall reference the finished product specifications (refer to 2.3.2.9) plus any additional information relevant to product safety, such as pH, water activity, composition, and/or storage conditions.

Response: Compliant

2.4.3.5 - 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 uses of the product.

Response: Compliant

2.4.3.6 - 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 materials, packaging, service inputs (e.g., water, steam, gasses as applicable), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation.

Response: Compliant

2.4.3.7 - 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

2.4.3.8 - The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

Response: Compliant

2.4.3.9 - 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

2.4.3.10 - Based on the results of the hazard analysis (refer to 2.4.3.8), 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

2.4.3.11 - For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product (critical limits). The food safety team shall validate all of the critical limits to ensure the 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

2.4.3.12 - The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct monitoring, the sampling and test methods, and the test frequency.

Response: Compliant

2.4.3.13 - 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

2.4.3.14 - 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

2.4.3.15 - Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5).

Response: Compliant

2.4.3.16 - Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used.

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

Summary -

Response: There are two documented HACCP plans in place, one for Grape concentrate and the other for Apple Products. There is a 7-member multifunctional team with the QA Manager as the team leader. The documented hazard analysis and flow chart is in the HACCP plan. There are 5 Critical Control Points, CCP1-Thermal Process to kill pathogen (pasteurization) > 160 F for 6 sec., CCP2-Inbound transport, CCP3- Foreign Objects, CCP4- Outbound Transport, and CCP5 - Foreign object Finisher Screen. There is a documented monitoring procedure that includes the list of the CCPs, Critical limits, how, frequency, person responsible for monitoring and the corrective action in the event of out of spec reading and Verification. The plans were reviewed on 4/14/25. Records of CCP #1(Thermal process >160 for 6 seconds) from 2/17/25, 3/5/25, 4/9/25,

6/15/25 and 6/1/25 were observed to be properly completed with the required operator and verification sign off

2.4.4 - Product Sampling, Inspection, and Analysis

2.4.4.1 - The methods, responsibility, and criteria for sampling, inspecting, and/or analyzing raw materials, work-in-progress, and finished product shall be documented and implemented. The methods applied shall ensure that inspections and analyses are completed at regular intervals as required and to agreed specifications and legal requirements. Sampling and testing shall be representative of the process batch and ensure that process controls are maintained to meet specification and formulation.

Response: Compliant

2.4.4.2 - Product analyses shall be conducted to nationally recognized methods or company requirements, or alternative methods that are validated as equivalent to the nationally recognized methods. Where internal laboratories are used to conduct input, environmental, or product analyses, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses. External laboratories shall be accredited to ISO/IEC 17025, or an equivalent international standard, and included on the site's contract service specifications list (refer to 2.3.2.11).

Response: Compliant

2.4.4.3 - On-site laboratories conducting chemical and microbiological analyses 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. Signage shall be displayed identifying the laboratory area as a restricted area, accessible only by authorized personnel.

Response: Compliant

2.4.4.4 - Provisions shall be made to isolate and contain all hazardous laboratory waste held on the premises and manage it separately from food waste. Laboratory waste outlets shall at a minimum be downstream of drains that service food processing and handling areas.

Response: Compliant

2.4.4.5 - Retention samples, if required by customers or regulations, shall be stored according to the typical storage conditions for the product and maintained for the stated shelf-life of the product.

Response: Compliant

2.4.4.6 - Records of all inspections and analyses shall be maintained.

Response: Compliant

Summary -

Response: All methods for sampling and testing products is adequately documented in the Product Inspection, Testing, Release Procedure (Doc # TSPR023) with effective date 5/28/25. Tests include Brix, Acid, pH, Sediments, Color (Red & Brown), Clarity, Spin Solids, micro (ATP, Yeast & Mold and any customer required test). Inspections and tests are completed per the documented frequency for each test parameter to ensure compliance to specification. Signage is prominently posted on the door of the lab identifying the lab is a restricted area. Retention samples are retained for a minimum of one year from the date of sampling. There is an onsite lab for the physical, chemical and generic micro testing. Microbiological environmental pathogen tests are sent to a 3rd party lab (OMIC USA). OMIC ISO 17025 certificate expires 26 April 2026. Records of tests

and the annual proficiency for the 2 lab technician is dated 5/20/24.

2.4.5 - Non-conforming Materials and Product

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

Response: Compliant

2.4.5.2 - Quarantine records and records of the handling, corrective action, or disposal of nonconforming materials or product shall be maintained.

Response: Compliant

Summary -

Response: Responsibility and the methods for managing non-conforming products/materials or equipment is adequately documented in the Hold procedure (Doc # TSPR024) with effective date 5/28/25, it outlines the responsibility (Operations and Quality Dept) for the final disposition of the non-conforming item. Record is available in the HOLD log that includes the date, hold #, product, quantity, lot #, reason for hold and disposition. There was only one item with hold # H25-03 (from 6/18/25) recorded in the log during the audit.

2.4.6 - Product Rework

2.4.6.1 - The responsibility and methods outlining how ingredients, packaging, or products are reworked shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are overseen by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Reworked product is processed in accordance with the site's food safety plan; iv. Each batch of reworked product is inspected or analyzed as required before release; v. Inspections and analyses conform to the requirements outlined in element 2.4.4.1; vi. Release of reworked product conforms to element 2.4.7; and vii. Reworked product does not affect the safety or integrity of the finished product. Records of all reworking operations shall be maintained.

Response: Compliant

Summary -

Response: The responsibility and methods for rework is outlined in the Product Recovery Policy and includes recovered /reworked products going into only like products amongst other requirements. The total quantity of recovery shall be limited to 10 % of the total batch unless otherwise approved by the QA Team. Rework records were properly documented. All records included the attached orange recovery tag/label. Reviewed records were from 6/4/25 and 5/27/25.

2.4.7 - Product Release (Mandatory)

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 by authorized personnel, and only after all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met. Records of all product releases shall be maintained.

Response: Compliant

2.4.7.2 - Product release shall include a procedure to confirm that product labels comply with the food legislation that applies in the country of manufacture and the country(ies) of use or sale if known (refer to 2.4.1.1). If product is packaged and distributed in bulk or unlabeled, product information shall be made available to inform customers and/or consumers of the requirements for its safe use.

Response: Compliant

2.4.7.3 - In the event that the site uses positive release based on product pathogen or chemical testing, a procedure shall be in place to ensure that product is not released until acceptable results have been received. In the event that off-site or contract warehouses are used, these requirements shall be effectively communicated and verified as being followed.

Response: Compliant

Summary -

Response: The responsibility and methods of releasing products in documented in the Product Inspection, Testing and Release procedure. Only the Quality and Operations departments may release product on hold. An electronic hold log is in place and was reviewed. Dispositions and release information is documented. The site does not use the positive release procedure because the thermal process (190 deg. F) used to kill yeast and mold is greater that the 5 log reduction to kill pathogens

2.4.8 - Environmental Monitoring

2.4.8.1 - A risk-based environmental monitoring program shall be in place for all food manufacturing processes and immediate surrounding areas, which impact manufacturing processes. The responsibility and methods for the environmental monitoring program shall be documented and implemented.

Response: Compliant

2.4.8.2 - An environmental sampling and testing schedule shall be prepared. It shall at a minimum: i. Detail the applicable pathogens or indicator organisms to test for in that industry; ii. List the number of samples to be taken and the frequency of sampling; iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and iv. Describe the methods to handle elevated or undesirable results.

Response: Compliant

2.4.8.3 - Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) shall be implemented where unsatisfactory results or trends are observed.

Response: Compliant

Summary -

Response: Environmental Monitoring is documented in the Cleaning Verification & Environmental Sampling Procedure (Doc # MFPR2028) dated 2/10/2025 and includes the responsibility and scope. Based on the product and processing environment the risk is near zero for any environmental pathogen on the fruit or introduced into the process. Swab samples are from Zone 1 (food contact), Zone 2 (nonfood contact adjacent to product contact) , and Zone 3 (nonfood contact further from product contact surfaces). Zone 1 is tested for ATP to verify effectiveness of cleaning after production, zone 2 is tested for APC, Listeria and Salmonella quarterly and Zone 3 swabbed for Listeria Sp and Salmonella quarterly. The procedure includes the list of areas to be swabbed, the test limits and corrective action in the event of a positive result/ out of spec result. In the event

of undesirable results, the facility reclean and reswab until a negative result occurs. Records of results are in place and documented as the Environmental Sampling Trend Analysis. Last report from Microbac was on 6/22/2025

2.5.1 - Validation and Effectiveness (Mandatory)

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 validate that: i. Good Manufacturing Practices are confirmed to ensure they achieve the required results; ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and iii. Changes to the processes or procedures are assessed to ensure the controls are still effective. Records of all validation activities shall be maintained.

Response: Compliant

Evidence: • There is a documented Management Systems Review - Verification /Validation & Internal audits program doc# ADPR003 with effective date 5/27/2025 that outlines the validation process. The food safety system is validated via scientific literature: Heat Resistance of Juice Spoilage Microorganisms: Journal of Food protection, Vol. 65 no 8, 2002 Pages 1271-1275, , 160 F for 6 sec and the pH of fruit juice 3.2. Validation of Cider Pasteurization Treatments against E.coli O157:H7, Salmonella and Listeria Monoctytogenes. There is a documented procedure that outlines the Validation and Effectiveness process. Records of all validation are maintained electronically and in a binder. The SQF Program is also validated annually via internal and 3rd party audits.

Summary -

Response: There is a documented Management Systems Review - Verification /Validation & Internal audits program doc# ADPR003 with effective date 6/14/2023 that outlines the validation process. The food safety system is validated via scientific literature: Heat Resistance of Juice Spoilage Microorganisms: Journal of Food protection, Vol. 65 no 8, 2002 Pages 1271-1275, 160 F for 6 sec and the pH of fruit juice 3.2. Journal of Food Protection: Vol. 64, No. 11 pp. 1679-1689. Validation of Apple Cider Pasteurization Treatments against E. coli O157:H5, Salmonella and Listeria monocytogenes There is a documented procedure that outlines the Validation and Effectiveness process. Records of all validation are maintained electronically and in a binder. The SQF Program is also validated annually via internal and 3rd party audits.

2.5.2 - Verification Activities (Mandatory)

2.5.2.1 - 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

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

Response: Compliant

Summary -

Response: There is a documented Verification Activities schedule with updated date of 5/19/25 that outlines the Element, Item, responsibility and frequency. Records of verification activities including the GMP inspections are maintained both electronically and manually

2.5.3 - Corrective and Preventative Action (Mandatory)

2.5.3.1 - The responsibility and methods outlining how corrective and preventative 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. Deviations from food safety requirements may include customer complaints, nonconformances raised at internal or external audits and inspections, non-conforming product and equipment, withdrawals and recalls, as appropriate.

Response: Compliant

2.5.3.2 - Records of all investigation, root cause analysis, and resolution of non-conformities, their corrections, and the implementation of preventative actions shall be maintained.

Response: Compliant

Summary -

Response: There is a documented corrective and preventative action procedure (Doc. # ADPR009 effective date 5/27/25) that outlines the procedure, including responsibility, issue identification, corrective action plan, conducting a root cause analysis and initiating the required preventative action. Records are on the CAPA log in the Root Cause analysis and Corrective / Preventative Action Plan form. Records are in place.

2.5.4 - Internal Audits and Inspections (Mandatory)

2.5.4.1 - The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code: Food Manufacturing are audited per the SQF audit checklist or a similar tool; ii. Objective evidence is recorded to verify compliance and/or non-compliance; iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.

Response: Compliant

2.5.4.2 - Staff conducting internal audits shall be trained and competent in internal audit procedures. Where practical, staff conducting internal audits shall be independent of the function being audited.

Response: Compliant

2.5.4.3 - Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and facility and equipment maintenance are compliant to the SQF Food Safety Code: Food Manufacturing. The site shall: i. Take corrections or corrective and preventative action; and ii. Maintain records of inspections and any corrective actions taken.

Response: Compliant

2.5.4.4 - Records of internal audits and inspections and any corrective and preventative actions taken as a result of internal audits shall be recorded as per 2.5.3.Changes implemented from internal audits that have an impact on

the site's ability to deliver safe food shall require a review of applicable aspects of the SQF System (refer to 2.3.1.3).

Response: Compliant

Summary -

Response: There is a documented internal audit program (Verification/Validation & Internal Audits) with effective date 5/27/2025 that includes the scope, procedure, responsibility, areas to be covered that includes the SQF program (annually) and monthly GMP audits. Records of GMP inspections are maintained on the Red Zone platform The internal audit training certificate from ASQ is dated April 19, 2024.

2.6.1 - Product Identification (Mandatory)

2.6.1.1 - The methods and responsibility for identifying raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products during all stages of production and storage shall be documented and implemented to ensure: i. Raw materials, ingredients, packaging, 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 start-up, product changeover, and packaging changeover (including label changes) procedures 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. Procedures shall be implemented to ensure that label use is reconciled, and any inconsistencies investigated and resolved. Product changeover and label reconciliation records shall be maintained.

Response: Compliant

Summary -

Response: Product identification is via the lot numbering System and Tank Identification procedure (effective date 5/28/25)) that outlines the process for raw and packaging material and finished products. Finished Products are identified by lot #, Seal #, Product Description, Production Date and other product information. All bulk single strength juice and bulk concentrates are identified by the tank the juice is stored in. The format is TxRy which refers to Tank #x (Tx) residing in Room #y (Ry). The raw and packaging material and processing aids use the manufacturers product name and coding for identification. Product identification records are maintained. Product labels are verified by the QA Manager or the GM and records are maintained manually.

2.6.2 - Product Trace (Mandatory)

2.6.2.1 - The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable at least one step forward to the customer and at least one step back from the process to the manufacturing supplier; ii. The receipt dates of raw materials, ingredients, food contact packaging and materials, and other inputs are recorded (refer to 2.8.1.8 for traceback of allergen containing food products.); iii. Traceability is maintained where product is reworked (refer to 2.4.6); and iv. The effectiveness of the product trace system is reviewed at least annually, as part of the product recall and withdrawal review (refer to 2.6.3.2). Records of raw and packaging material receipt and use and finished product dispatch and destination shall be maintained.

Response: Compliant

Summary -

Response: There is a documented product traceability procedure that requires the trace system to be tested at least annually with 98-102 % recovery within 4 hours. The facility conducts trace exercise per the procedure. Last exercise on Concord Grape and Niagra Grape was on 5/5/25 and there was 100 % in 2 hours 5mins

2.6.3 - Product Withdrawal and Recall (Mandatory)

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; iii. Outline a communication plan to inform site personnel, customers, consumers, authorities, and other essential bodies in a timely manner appropriate about the nature of the incident; and iv. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and notified in instances of a food safety incident of a public nature or product recall for any reason.

Response: Compliant

2.6.3.2 - The product withdrawal and recall system shall be reviewed, tested, and verified as effective at least annually. Testing shall include incoming materials (minimum traceability one step back) and finished product (minimum traceability one step forward). Testing shall be carried out on products from different shifts and for materials (including bulk materials) that are used across a range of products and/or products that are shipped to a wide range of customers.

Response: Compliant

2.6.3.3 - Records shall be maintained of withdrawal and recall tests, root cause investigations into actual withdrawals and recalls, and corrective and preventative actions applied.

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

Summary -

Response: The facility have a documented recall program that includes a team with responsibilities for each team members. There is provision to contact customers, SQFI and the certification body within 24 hours. The withdrawal and recall procedure was tested on 6/23/2025

2.6.4 - Crisis Management Planning

2.6.4.1 - A crisis management plan based on the understanding of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather events, warfare or civil unrest, computer outage, pandemic, loss of electricity or refrigeration, ammonia leak, labor strike) that can impact the site's ability to deliver safe food shall be documented by senior management, outlining the methods and responsibility the site shall implement to cope with such a business crisis. The crisis management plan shall include at a minimum: i. A senior manager responsible for decision making, oversight, and initiating actions arising from a crisis management incident; ii. The nomination and training of a crisis management team; iii. The controls implemented to ensure any responses do 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

2.6.4.2 - The crisis management plan shall be reviewed, tested, and verified at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained.

Response: Compliant

Summary -

Response: A crisis management plan is in place (ADPR005 effective 5/19/25). The plan includes but not limited to known potential dangers (e.g. Food Safety, Fire/Explosion, floor, power failure, ammonia, severe weather, Pandemic) the Emergency Response Team, Contact information for the team, source of legal advice and regulatory contact information. The GM is the designated Spokesperson. There is a documented contact list that includes of service company i.e. the fire dept, Police etc. The last review and test was 5/30/2025. The scenario was a BNSF train derailed off the tracks between Welch's and Growers. Rail cars were strewn everywhere due to train derailment. The facility is located between 2 rail lines

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2.7.1 - Food Defense Plan (Mandatory)

2.7.1.1 - A food defense threat assessment shall be conducted to identify potential threats that can be caused by a deliberate act of sabotage or terrorist-like incident.

Response: Compliant

2.7.1.2 - A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum: i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident; ii. The name of the senior site management person responsible for food defense; iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points; iv. The methods implemented to protect sensitive processing points from intentional adulteration; v. The measures taken to ensure the secure receipt and storage of raw materials, ingredients, packaging, equipment, and hazardous chemicals to protect them from deliberate acts of sabotage or terrorist-like incidents; vi. The measures implemented to ensure raw materials, ingredients, packaging (including labels), work-in-progress, process inputs, and finished products are held under secure storage and transportation conditions; and vii. The methods implemented to record and control access to the premises by site personnel, contractors, and visitors.

Response: Compliant

2.7.1.3 - Instruction shall be provided to all relevant staff on the effective implementation of the food defense plan (refer to 2.9.2.1).

Response: Compliant

2.7.1.4 - The food defense threat assessment and prevention plan shall be reviewed and tested at least annually or when the threat level, as defined in the threat assessment, changes. Records of reviews and tests of the food defense plan shall be maintained.

Response: Compliant

Summary -

Response: There is a documented Security Procedure with effective date 5/27/25. It outlines the methods, responsibilities and criteria for the program. The plan includes but not limited to the Physical Security, Employee Practices, Transportation Practices and Tampering response plan. Additionally, the facility has in place a Weekend & Holiday Status, Security, and Utility checks that includes provision for action steps in the event of non-compliance. Records are in place and the observed records were observed to be properly completed. The plan was tested on 05/11/2025

2.7.2 - Food Fraud (Mandatory)

2.7.2.1 - The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud, including susceptibility to raw material or ingredient substitution, finished product mislabeling, dilution, or counterfeiting, shall be documented, implemented, and maintained.

Response: Compliant

2.7.2.2 - A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled, including identified food safety vulnerabilities of ingredients and materials.

Response: Compliant

2.7.2.3 - Instruction shall be provided to all relevant staff on the effective implementation of the food fraud mitigation plan (refer to 2.9.2.1).

Response: Compliant

2.7.2.4 - The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually with gaps and corrective actions documented. Records of reviews shall be maintained.

Response: Compliant

Summary -

Response: The food fraud procedure is documented in Section E of the Security Procedure. It covers, Product substitution, Mislabeling, Dilution, Weight Fraud, and Counterfeiting. The procedure includes responsibilities and a Vulnerability Assessment (in the Food Defense Plan) of possible areas of vulnerability and procedures to mitigate the fraud/ vulnerability. The procedure is reviewed as part of the Security Policy annually. The last review was 5/22/2025.

2.8.1 - Allergen Management (Mandatory)

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 that may originate from locker rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of manufacture and the country(ies) of destination, if known; iv. A list of allergens that is accessible to relevant staff; v. The control of hazards associated with allergens and incorporated into the food safety plan; and vi. Management plans for control of the identified allergens.

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 and products containing allergens.

Response: Compliant

2.8.1.3 - Provisions 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 are 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 documented and 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 (refer to 2.6.1.1) shall make provision for clear identification and labeling, in accordance with the regulatory requirements of those products produced on production lines and equipment on which foods containing allergens are manufactured.

Response: Compliant

2.8.1.8 - The product trace system (refer to 2.6.2) shall take into consideration the conditions under which allergen-containing foods are manufactured and ensure full traceback of all ingredients and processing aids used.

Response: Compliant

2.8.1.9 - 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 are true to label with regard to allergens. 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

2.8.1.10 - Re-working of product (refer to 2.4.6) containing food allergens shall be conducted under conditions that ensure product safety and integrity are 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 introduced or

unintended allergens through supplier, contract manufacturer, site personnel, and visitor activities.

Response: Compliant

Summary -

Response: There is a documented Allergen Control Procedure Doc# ADPRO022 with effective date 05/27/25 that outlines the procedure. The allergen procedure applies to all areas of the facility. The facility does not use the 9 major allergens. Sulfites as the only allergen in the processing area. The procedure includes customer certification letter regarding allergen, that none of the nine Major Allergens are used in the facility. Incoming goods containing allergen are segregated in storage and labelled with the allergen. The procedure covers cleaning procedures that equipment that runs sulfite containing products are cleaned before running non-allergen products. There is a Sulfite Removal Validation Report in place. The GMP policy include provision for employees to consume allergen containing products on the employee (non-processing) side of the yellow line.

2.9.1 - Training Requirements

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 (refer to 2.1.1.6).

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

Summary -

Response: The responsibility for establishing training is documented in the training policy (Doc. # MFP0100) with effective date of 6/6/2025. The purpose is the need for all employees to be trained before working. It covers the requirements for training including the effective implementation of the SQF system

2.9.2 - Training Program (Mandatory)

2.9.2.1 - A training program shall be documented and implemented that at a minimum outlines the necessary competencies for specific duties and the training methods to be applied to personnel carrying out tasks associated with: i. Implementing HACCP for staff involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs); iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces; iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment; v. Sampling and test methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products; vi. Environmental monitoring for relevant staff; vii. Allergen management, food defense, and food fraud for all relevant staff; and viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code. The training program shall include provisions for identifying and implementing the refresher training needs of the organization.

Response: Compliant

2.9.2.2 - Training materials, the delivery of training, and procedures on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in language(s) understood by staff.

Response: Compliant

2.9.2.3 - Training records shall be maintained and include: i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Verification that the trainee is competent to complete the required tasks.

Response: Compliant

Summary -

Response: The program was observed to be well documented and implemented to include the competencies (quizzes) requirements for all functions. Areas covered by the training program include Plant Orientation, HACCP/ Food Safety topics, Sanitation, Allergens, GMPs, Food and plant Security/Defense, Crisis management, Ammonia/Chemical safety. Training is in a classroom format with hand outs and video and include measures of effectiveness quiz. The training program has provision for Refresher training to be given annually or during preseason orientation. There is a training Sign in sheet that has the names of the employees, topic of training, date of training, and name of the trainer. Records of 5/22/25 (GMP, HACCP, Utensil, SQF and Redzone) reviewed in the training binder including record of the employee interviewed were properly completed.

11.1.1 - Premises Location and Approval

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

Response: Compliant

Summary -

Response: The facility is located in mix a residential / light industrial area of Westfield, NY and the adjacent and adjoining buildings do not interfere with the safe and hygienic operations of the facility. The local activities assessment was in July 2025. The New York State Food Processing License expires 5/14/2026. The FDA registration expires 2026-12-31.

11.1.2 - Building Materials

11.1.2.1 - Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, impervious to liquid, and easily cleaned. Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions. Where floor drainage is not available, plumbed options to handle overflow or wastewater shall be in place.

Response: Minor

Evidence: • Areas of the floor is damaged/not smooth by the pasteurizer towards the ammonia room.

Root Cause: Old building that has been slowly being repaired. Area is prone to water and low pH juice on the floor which has damaged the concrete over time.

Corrective Action: The floor will be patched and repaired using Loctite Concrete Repair.

Verification Of Closeout: The facility submitted a work order to fix the damaged floor area.

Completion Date: August 29, 2025 **Closeout Date:** July 10, 2025

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

Response: Compliant

11.1.2.3 - Waste trap system shall be located away from any food handling areas or entrances to the premises.

Response: N/A

Evidence: • There is no waste trap system

11.1.2.4 - Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 11.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

Response: Minor

Evidence: • There is sign of leak on the ceiling tiles in the locker room

Root Cause: An air conditioner in the conference room that is above the locker room had previously been leaking water. Buckets used to catch the water would sometimes overflow onto the ground. The air conditioner was replaced in August 2024 due to the leaking water. No signs of leaks from the newer air conditioner unit.

Corrective Action: To replace the ceiling tiles that had water stains.

Verification Of Closeout: Photos of replaced tiles that does not show sign of water damage / leaks were submitted.

Completion Date: July 15, 2025 **Closeout Date:** July 17, 2025

11.1.2.5 - Ducting, conduit, and pipes that convey ingredients, products, or 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. A risk analysis shall be conducted to ensure food contamination risks are mitigated.

Response: Compliant

11.1.2.6 - 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. A risk analysis shall be conducted to ensure food contamination risks are mitigated.

Response: N/A

Evidence: • No pipes carrying sanitary waste over/above products

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11.1.2.7 - Doors, hatches, and windows and their frames in food processing, handling, or storage areas shall be of a material and construction that 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

11.1.2.8 - 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. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

Response: Compliant

11.1.2.9 - Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 11.2.5).

Response: Compliant

Summary -

Response: Floors were generally observed to be smooth and adequately maintained, except as noted. The drains were observed to be clean and functional and are located so that they are easily clean. Waste containers are located away from food handling areas or entrance to the facility. Wall and ceilings were observed to be adequately maintained. There are no conduits or pipe that convey steam or waste/wastewater above exposed food. Doors are observed to be of solid construction. None of the stair /catwalks were over exposed products. They are designed and constructed so as not to present product contamination risk. Minor NC: 11.1.2.1 - Areas of the floor is damaged/not smooth by the pasteurizer towards the ammonia room. Minor NC: 11.1.2.4 - There is sign of leak on the ceiling tiles in the locker room

11.1.3 - Lightings and Light Fittings

11.1.3.1 - 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 and shall comply with local light-intensity regulations or industry standards.

Response: Compliant

11.1.3.2 - Light fixtures 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 fixtures cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program.

Response: Compliant

11.1.3.3 - Light fixtures in the warehouse or other areas where product is covered or otherwise protected shall be designed to prevent breakage and product contamination.

Response: Compliant

Summary -

Response: The facility installed LED lightings in product handling areas. The light fittings are protected to prevent product contamination and of adequate intensity for the staff to work effectively.

11.1.4 - Inspection/ Quality Control Area

11.1.4.1 - If online inspection is required, a suitable area close to the processing line shall be provided for the inspection of product (refer to 2.4.4). 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 handwashing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination.

Response: Compliant

Summary -

Response: Production workstations were observed to be organized and clean. No product contamination issues observed at the workstations or the lab during the audit. Product evaluation is conducted in the lab. The lab was observed to be clean, supplied with appropriate waste handling containers and hand washing station.

11.1.5 - Dust, Insect, and Pest Proofing

11.1.5.1 - All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed, and proofed against dust, vermin, and other pests. External personnel access doors shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, vermin, and other pests.

Response: Compliant

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

Response: Minor

Evidence: • The roll up door at the loading dock and the door in hot juice kettle room were not effectively sealed when closed to prevent pest entry. There were gaps at the bottom of the doors.

Root Cause: The doors are manually opened and closed which leads to worn brushes and excessive denting of the door when they hit the bottom causing some small gaps. The hot juice kettle door is slightly bent due to this, and the bug screen door sits just outside of the plant floor where the concrete is not smooth due to fork truck traffic.

Corrective Action: The loading dock door will have new and larger brushes placed on the bottom of the door to prevent any gaps. In the short-term loading dock blocks have been purchased and placed over the ramp gate that has the worn areas. The hot juice kettle room door will have the bottom panel replaced and the concrete patched to have a smooth seal for the bug screen. Long term the goal is to have electric doors within the next 1-2 years.

Verification Of Closeout: The facility submitted Work Orders for the repairs.

Completion Date: August 22, 2025 **Closeout Date:** August 1, 2025

11.1.5.3 - Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredients or product storage areas or processing areas where ingredients, packaging, and products are handled, processed, or exposed.

Response: Compliant

Summary -

Response: There are no windows in the product handling, storage areas. The personnel access doors are fly-protected and equipped with self-closing mechanism. External doors, overhead dock doors, sealing around the trucks in the docking areas are adequately sealed and fly protected except as noted. No Poison rodenticides observed in the interior of the facility. Minor NC:11.1.5.2 - The roll up door at the loading dock and the door in hot juice kettle room were not effectively sealed when closed to prevent pest entry. There were gaps at the bottom of the doors.

11.1.6 - Ventilation

11.1.6.1 - Adequate ventilation shall be provided in enclosed processing and food handling areas. Where appropriate, positive air-pressure systems shall be installed to prevent airborne contamination.

Response: Compliant

11.1.6.2 - All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned

as per 11.2.5 to prevent unsanitary conditions.

Response: Compliant

11.1.6.3 - Extractor fans and canopies shall be provided in areas where open cooking operations are carried out or a large amount of steam is generated. 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).

Response: N/A

Evidence: • There are no open cooking operations on site.

11.1.6.4 - Fans and exhaust vents shall be insect-proofed and located so they do not pose a contamination risk and shall be kept clean.

Response: Compliant

Summary -

Response: Ventilation was observed to be adequate with no objectionable odors. The fans and exhaust vents were observed to be insect-proofed and well maintained.

11.1.7 - Equipment and Utensils

11.1.7.1 - Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.

Response: Minor

Evidence: • The procedures for purchasing equipment have not been documented.

Root Cause: Process of purchasing at Growers' has been informally completed but was not documented in the procedure. This was not documented due to lack of understanding that the requirement was for the approval process by personnel and not just to include sanitary design and appropriate construction of the items purchased.

Corrective Action: Updated SOP MFPO205 with a purchasing guidelines section to outline purchase approvals.

Verification Of Closeout: An updated procedure dated 7/9/2025 was submitted.

Completion Date: July 9, 2025 **Closeout Date:** July 10, 2025

11.1.7.2 - Equipment and utensils shall be designed, constructed, installed, operated, and maintained to meet any applicable regulatory requirements and to not pose a contamination threat to products.

Response: Compliant

11.1.7.3 - Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers. Where possible, food contact equipment shall be segregated from non-food contact equipment.

Response: Compliant

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

Response: Compliant

11.1.7.5 - 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

11.1.7.6 - 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 11.2.5.1. Bins used for inedible material shall be clearly identified.

Response: Compliant

11.1.7.7 - All equipment and utensils shall be cleaned after use (refer to 11.2.5.1) or at a set and validated frequency to control contamination and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

Response: Minor

Evidence: • Equipment parts were placed directly on the platform floor in the press shed at the finisher

Root Cause: After construction in the building a few years ago the previous rack was not placed in the area due to lack of space. Yellow mats to store parts on has been used instead. Due to lack of yellow mats in the area operators set the parts on the floor.

Corrective Action: Purchasing a rack to stage in the area to place parts on.

Verification Of Closeout: Photos of proper storage was submitted.

Completion Date: July 25, 2025 **Closeout Date:** July 17, 2025

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

Response: Compliant

11.1.7.9 - Non-conforming equipment shall be identified, tagged, and/or segregated for repair or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product. Records of the handling, corrective action, and/or disposal of non-conforming equipment shall be maintained.

Response: Compliant

Summary -

Response: Equipment specifications are maintained electronically and manually. The specifications for the Pasteurizer and the storage tank were provided upon request. There is a documented Materials of Construction Policy and the Equipment Design and Approval procedure with effective date of 6/16/25. Section 4 of the policy outlines the sanitary design requirements. All processing equipment and packing tables are made of stainless steel and designed to comply to sanitary design / regulatory requirements. Equipment was observed to be in good condition. Product containers and utensils are constructed with nontoxic material. Equipment and utensils are cleaned at appropriate frequencies and are properly stored to prevent contamination. Minor NC:11.1.7.1 - The procedures for purchasing equipment have not been documented. Minor NC: 11.1.7.7 - Equipment parts were placed directly on the platform floor in the press shed at the finisher

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11.1.8 - Grounds and Roadways

11.1.8.1 - A suitable external environment shall be established, and the effectiveness of the measures shall be monitored and periodically reviewed. The premises, its surrounding areas, storage facilities, machinery, and equipment shall be kept free of waste or accumulated debris, and vegetation shall be controlled so as not to

attract pests and vermin or present a food safety hazard to the sanitary operation of the site.

Response: Minor

Evidence: • Scrap metals and uncapped pipes that are potential pest harborage were stored directly on the ground behind the C Concentrate room.

Root Cause: Contractors had been onsite and had not disposed of all their scrap materials. There was no formal walk of the exterior of the building or contractor completion overview of scrap materials.

Corrective Action: All scrap metal has been removed into scrap containers or moved into the appropriate storage area. Item was added to the monthly GMP walk in Redzone, picture attached.

Verification Of Closeout: Photo of the area without the scrap metals and uncapped piped were submitted.

Completion Date: June 26, 2025 **Closeout Date:** July 10, 2025

11.1.8.2 - Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operations of the premises. They shall be adequately drained to prevent the pooling of water. Drains shall be separate from the site drainage system and regularly cleared of debris.

Response: Compliant

11.1.8.3 - Paths from amenities leading to site entrances shall be effectively sealed.

Response: Compliant

Summary -

Response: The roadway leading to the facility is paved. No pooling of water or equipment storage that would attract pest/ vermin or present a food safety/sanitation hazard to the operation of the site except as noted. Grounds and areas surrounding the premises are well maintained and clean. The exterior of the building is monitored via the monthly GMP inspection. Minor NC: 11.1.8.1 - Scrap metals and uncapped pipes that are potential pest harborage were stored directly on the ground behind the C Concentrate room.

11.2.1 - Repairs and Maintenance

11.2.1.1 - 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

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

Response: Compliant

11.2.1.3 - Failures of plant and equipment in any food processing, handling, or storage areas shall be documented and reviewed, and their repair(s) incorporated into the maintenance control schedule.

Response: Compliant

11.2.1.4 - Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas.

Response: Compliant

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

Response: Compliant

11.2.1.6 - Temporary repairs, where required, shall not pose a food safety risk and shall be included in routine inspections (refer to 2.5.4.3) and the cleaning program. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions.

Response: Compliant

11.2.1.7 - Food contact equipment and equipment located over food contact equipment shall be lubricated with food-grade lubricant, and its use shall be controlled to minimize the contamination of the product.

Response: Compliant

11.2.1.8 - Paint used in a food handling or processing area shall be suitable for use, in good condition, and not be used on any product contact surfaces.

Response: Compliant

Summary -

Response: The methods and responsibilities for repairs and maintenance is documented in the Preventive Maintenance and Work Order System with effective date 5/29/25 procedure that outlines the process, procedure and monitoring. The program covers routine preventive maintenance and unplanned maintenance. The maintenance program is managed via the RedZone Software. Any employee can make a work request using RedZone and is eventually turned to a Work Order. Red Zone has the location and asset number of the equipment, generates PM per manufacturers recommendation or as determined by the facility and work orders. Work order records from 5/10/25, 6/18/25, 4/22/25, 3/25/25 and 1/23/25 reviewed were properly completed. The facility uses food grade lubricants and non- food grade lubricants that are segregated in separate storage cabinet and their use is controlled to minimize product contamination. The SDS for the lubricants were in place. The procedure for temporary repair is covered in section F of the policy. No temporary repairs were observed during the inspection.

11.2.2 - Maintenance Staff and Contractors

11.2.2.1 - Maintenance staff and contractors shall comply with the site’s personnel and process hygiene requirements (refer to 11.3).

Response: Compliant

11.2.2.2 - 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

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

Response: Compliant

Summary -

Response: Section A of the Preventive Maintenance and Work Order System require all contactors to comply with the GMP policy that include process hygiene requirements. All contractors are required to read the GMP policy before signing the visitors log "By signing in all Visitors acknowledge that they have been trained and will follow the company GMP policy". Section G require "all maintenance tools, equipment and any other items will be removed and accounted for" and area inspected for missing and extra parts. Section H includes the provision for cleaning and QC approval. Work Order records reviewed included to provision to the work area to be cleaned and for tool reconciliation.

11.2.3 - Calibration

11.2.3.1 - The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety plans, and other process controls, or to demonstrate compliance with customer specifications, shall be documented and implemented. Software used for such activities shall be validated as appropriate.

Response: Compliant

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

Response: Compliant

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

Response: Compliant

11.2.3.4 - Procedures shall be documented and implemented to address the resolution of potentially affected products when measuring, testing, or inspection equipment is found to be out of calibration.

Response: Compliant

11.2.3.5 - Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use.

Response: Compliant

11.2.3.6 - A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained.

Response: Compliant

Summary -

Response: The calibration methods and responsibility is documented in the General Lab Workflow document # TSW1217 with effective date 2/7/25. The calibration procedures cover the pH meters, the Scales, the Refractometer, Thermometers and Magnets. The procedure includes the type of equipment, calibration frequency Harvest (Weekly: Brix, incubator temps and scales.: batch room scales), and person responsible. The ice method is used to calibrate the thermometers against a NIST calibrated thermometer S/N 240326326 dated 28 Feb 2024. A calibration log for equipment that require calibration is in place. The last 3rd party calibration for the all the scales i.e. batch room, truck and lab scale was on 5/19/2025 by Precision Scale and Balance. The 3rd party calibration by Temp-Press, Inc for the thermometers was on 7/18/2024.

11.2.4 - Pest Prevention

11.2.4.1 - A documented pest prevention program shall be effectively implemented. It shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include the identification, location, number, and type of applied pest control/monitoring devices on a site map; vii. List the chemicals used. The chemicals 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 and to identify trends.

Response: Compliant

11.2.4.2 - Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators, who comply with regulatory requirements; iii. Use only approved chemicals; iv. Provide a pest prevention plan (refer to 2.3.2.8), which includes a site map, indicating the location of bait stations traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and vii. Provide a written report of their findings and the inspections and treatments applied.

Response: Compliant

Evidence: • Business License from the State of New York Pesticide Business Registration expires 9/30/27, PCO license expires 11/21/2027 and liability insurance 10/1/2025.

11.2.4.3 - Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be conducted on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of all pest control inspections and applications shall be maintained.

Response: Compliant

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

Response: Compliant

11.2.4.5 - Pesticides shall be clearly labeled and stored per 11.6.4 if kept on-site.

Response: Compliant

11.2.4.6 - No animals shall be permitted on-site in food handling and storage areas.

Response: Compliant

Summary -

Response: There is a documented Pest Management Program the outlines the process that includes the procedure and monitoring. The pest management program is outsourced (Ehrlich)) and regular service is scheduled monthly for interior and the exterior control devices. The map is dated 4.14.2024. The SDS and

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labels are on the CD, usage log, trend report and service reports are in place. The SDS for Contrac All-Weather Blox was provided upon request. The premises and surrounding areas are adequately maintained and free of pest harborage. No contamination issues were observed and there have not been contamination by pest activities. The last service date was 6/20/2025.

11.2.5 - Cleaning and Sanitation

11.2.5.1 - The methods and responsibility for the effective cleaning of the food handling and processing equipment and environment and storage areas 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. Validation of the cleaning procedures for food contact surfaces (including CIP); vi. Methods used to confirm the correct concentrations of detergents and sanitizers; and vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

Response: Minor

Evidence: • There was cobwebbing on the wall in the hold filter press room

Root Cause: Most of the facility is checked during weekly walks, but areas that are not in the opened were an oversight due to the materials that were in the area making it less visible.

Corrective Action: Adding cobwebs to the master cleaning list for janitorial cleaning to be monitored weekly specifically in harder to see areas.

Verification Of Closeout: The facility submitted task check list that showed this was checked as clean on 7/8/25

Completion Date: July 3, 2025 **Closeout Date:** July 17, 2025

11.2.5.2 - 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 purchased and used chemicals is 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 handle sanitizers and detergents.

Response: Compliant

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

Response: Compliant

11.2.5.4 - 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 any modifications to CIP equipment shall be validated. Personnel engaged in CIP activities shall be effectively trained.

Response: Minor

Evidence: • Section #7 of The Tank Room Work Instruction Doc # MFW1247 reviewed on 2/7/25 includes the parameters (chemical and concentration used, contact time and temperature (140-150 deg. F) critical to assuring effective cleaning. The Batch Record for the Batch room cleaning dated 4/9/2025 does not include provision for recording the cleaning solution temperature.

Root Cause: Tank cleaning records were previously updated, but failure by Growers team to update all equipment records. Operator knowledge of inherent cleaning practices weren't translated to operator checks.

Corrective Action: Paper and electronic logs for cleaning equipment were all updated to include temperature requirement to correspond to what was listed in the SOPs. SOP's cleaning requirements were reviewed for accuracy. This includes the batch room, concentrators and pasteurizers.

Verification Of Closeout: The facility submitted updated documents that includes provision to record the required temperature

Completion Date: July 14, 2025 **Closeout Date:** July 17, 2025

11.2.5.5 - Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing areas, product handling equipment, and storage areas as well as the tools themselves.

Response: Compliant

11.2.5.6 - Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils used by staff. The areas for these cleaning operations shall be controlled so they do not interfere with manufacturing operations, equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required.

Response: Compliant

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

Response: Compliant

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

Response: Compliant

11.2.5.9 - The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared. A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

Response: Compliant

Summary -

Response: There is a documented master sanitation schedule that has details of what is to be cleaned and frequency. Concentration of chemical used as applicable is included in the procedures. The facility documented Sanitation Program is broken down by the SSOPs of the different equipment and areas to be cleaned. The SSOPs includes the item to be cleaned, responsibility, frequency, chemical required/concentration, PPE required and the safety procedures. The verification for effectiveness (pre-Operational inspections) is by visual inspection by supervisors/management. Validation of the effectiveness of cleaning is by ATP (Hygiena luminometer) at frequencies defined by the program. The CIP system is documented to include the quantity and concentration of the cleaning chemical, temperature and time. CIP and preoperational records were in place. SDS of ProClean CIP wash and Madisan 75 were provided upon request. Minor NC: 11.2.5.1- There was cobwebbing on the wall in the hold filter press room Minor NC:

11.2.5.4 - Section #7 of The Tank Room Work Instruction Doc # MFW1247 reviewed on 2/7/25 includes the parameters (chemical and concentration used, contact time and temperature (140-150 deg. F) critical to assuring effective cleaning. The Batch Record for the Batch room cleaning dated 4/9/2025 does not include provision for recording the cleaning solution temperature.

11.3.1 - Personnel Welfare

11.3.1.1 - Personnel who are known to be 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. Medical Amendment added: Code Amendment #1A medical screening procedure shall be in place for all employees, visitors and contractors who handle exposed product or food contact surfaces.

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, open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury that causes the spillage of bodily fluid, a properly trained staff member 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/or disposed of.

Response: Compliant

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

Response: Compliant

Summary -

Response: The facility has a current GMP policy with effective date 6/7/24 that addresses measures to prevent contact of products and packaging from carriers of infectious diseases. The Health section (5B) of the policy outlines the screening procedure. No employees observed with signs of illness or exposed sores. No smoking, drinking and eating was observed in the product handling areas. The employee interviewed are aware of the GMP policies

11.3.2 - Handwashing

11.3.2.1 - All personnel shall have clean hands, and hands shall be washed by all staff, contractors, and visitors: i. On entering food handling 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, cleaning materials, dropped product, or contaminated material.

Response: Compliant

11.3.2.2 - Handwashing stations shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.

Response: Compliant

11.3.2.3 - Handwashing stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with: i. A potable water supply at an appropriate temperature; ii. Liquid soap 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

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

Response: N/A

Evidence: • No high-risk process areas on site

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

Response: Compliant

11.3.2.6 - When gloves are used, personnel shall maintain the handwashing practices outlined above.

Response: Compliant

Summary -

Response: The hand washing stations are appropriately located, constructed of non-corrosive material and is provided with soap, water, paper towel dispenser and a trash container. Hand washing sign in the appropriate language is prominently posted and employees were observed washing their hands

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11.3.3 - Clothing and Personal Effects

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 it does not present a contamination risk to products.

Response: Compliant

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

Response: Compliant

11.3.3.4 - Excessively soiled uniforms shall be changed or replaced when 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 in designated sealed containers in personnel lockers. They should not be placed or stored on packaging, ingredients, product, or equipment.

Response: Compliant

11.3.3.6 - Protective clothing shall be manufactured from material that will not pose a food safety threat and is

easily cleaned. All 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

11.3.3.7 - Racks shall be provided for the temporary storage of protective clothing when staff leave the processing area and shall be provided nearby or adjacent to the personnel access doorways and handwashing facilities.

Response: Compliant

11.3.3.8 - Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or into any area where food is exposed. Wearing plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided these items are properly covered and do not pose a food safety risk. All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management.

Response: Compliant

Summary -

Response: The Risk analysis for the hair and clothing policy has an effective date 6/20/25, reviewed 5/30/23. All PPE pose little risk to the overall product safety/quality. No jewelry and other loose objects on employees were observed during the audit. The facility has the HACCP plan of the clothing supplier (Cintas) in place as assurance from unintentional contamination. The employees were observed wearing clean clothing.

11.3.4 - Visitors

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

Response: Compliant

11.3.4.2 - All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 11.3.3.8. All visitors shall wear suitable clothing and footwear when entering any food processing and handling area.

Response: Compliant

11.3.4.3 - Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed.

Response: Compliant

11.3.4.4 - Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements.

Response: Compliant

Summary -

Response: Section #2 of the GMP policy with effective date of 3/7/25, states the requirements for visitors. The auditor as a visitor was required to comply with the GMP rules i.e. removed my wristwatch and put on my hairnet

11.3.5 - Staff Amenities (change rooms, toilet, break rooms)

11.3.5.1 - Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for use by all persons engaged in the handling and processing of product.

Response: Compliant

11.3.5.2 - Change rooms shall be provided to enable staff and visitors to change into and out of protective clothing as required. Change rooms shall be kept clean.

Response: Compliant

11.3.5.3 - High-risk change areas shall be provided for staff engaged in the processing of high-risk foods or processing operations in which clothing can be soiled.

Response: N/A

Evidence: • No high-risk process areas on site

11.3.5.4 - Provision shall be made for staff to store their street clothing and personal items separate from clean uniforms, food contact zones, food, and packaging storage areas.

Response: Compliant

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

Response: N/A

Evidence: • No showers on site

11.3.5.6 - 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. Located inside or nearby areas for storing protective clothing, outer garments, and other items while using the facilities; and vi. Kept clean and tidy. Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas.

Response: Compliant

11.3.5.7 - 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 with regulations.

Response: Compliant

11.3.5.8 - Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.3.

Response: Compliant

11.3.5.9 - Separate break rooms shall be provided away from food contact/handling zones.Break rooms 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 staff 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

11.3.5.10 - 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 the introduction of contamination, including pests to the site.

Response: Compliant

Summary -

Response: The staff amenities was observed with adequate lighting and ventilation. Washroom and toilet facilities were observed to be well maintained, clean and are separate from the product handling areas. The hand wash sinks are provided inside the rest rooms. Lunch/Break room is away from the food handling area areas and was adequately maintained and clean. There is signage in the appropriate languages (English) in prominent locations in the lunchroom and lunchroom exits.

11.4.1 - Staff Engaged in Food Handling and Processing Operations

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 open for extended periods when access is required for waste removal or receiving of product/ingredient/packaging; iii. Packaging, product, and ingredients shall be kept in appropriate containers as required and off the floor; v. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; and v. All wash down and compressed air hoses shall be stored on hose racks after use and not left on the floor.

Response: Compliant

11.4.1.2 - Personnel working in or visiting food handling or processing operations shall ensure that: i. Staff shall not eat or taste any product being processed in the food handling/contact zones, except as noted in element 11.4.1.4; ii. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails, or fingernail polish is not permitted when handling exposed food; iii. Hair restraints and beard covers, where applicable, shall be used in areas where product is exposed. iv. Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed. v. Drinking 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, tools, or equipment storage.

Response: Compliant

11.4.1.3 - The flow of personnel in food processing and handling areas shall be managed such that the potential for contamination is minimized.

Response: Compliant

11.4.1.4 - In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone, the site shall implement 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 separately from processing equipment.

Response: N/A

Evidence: • Sensory evaluation is only performed in the lab.

Summary -

Response: The employees were observed following all applicable GMP to prevent product damage or contamination. No eating or drinking in the food handling areas was observed. The employee interviewed demonstrated knowledge of the GMP requirements.

11.5.1 - Water Supply

11.5.1.1 - Adequate supplies of potable water drawn from a known clean source shall be provided for water used as an ingredient during processing operations and for cleaning the premises and equipment. The source of potable water shall be identified as well as on-site storage (if applicable) and reticulation within the facility.

Response: Compliant

11.5.1.2 - Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

Response: Compliant

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

Response: Compliant

11.5.1.4 - The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.

Response: Compliant

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

Response: N/A

Evidence: • The facility does not use non potable water

11.5.1.6 - Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.

Response: N/A

Evidence: • No storage of water on site

Summary -

Response: The facility is supplied Potable water from the Village of Westfield, NY. Hot and cold water was readily available during the site tour. Section 7 of the Crisis management Plan states that the facility will shut down in the event that potable water is deemed to be contaminated The facility does not use non-potable water. No cross connections or other issues with piping was observed. The last back flow prevention test is dated 05/19/25. No storage of water on site.

11.5.2 - Water Treatment

11.5.2.1 - Water treatment methods, equipment, and materials, if required, shall be designed, installed, and operated to ensure water receives effective treatment. Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

Response: N/A

Evidence: • No water treatment at this facility

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

Response: N/A

Evidence: • No water treatment at this facility

11.5.2.3 - Treated water shall be regularly monitored to ensure it meets the specified indicators. Water treatment chemicals usage shall be monitored to ensure chemical residues are within acceptable limits. Records of testing results shall be kept.

Response: N/A

Evidence: • No water treatment at this facility

Summary -

Response: No water treatment at this facility

11.5.3 - Water Quality

11.5.3.1 - 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. Conveying food; iv. An ingredient or food processing aid; v. Cleaning food contact surfaces and equipment; vi. The manufacture of ice; orvii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.

Response: Compliant

11.5.3.2 - 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

11.5.3.3 - Water and ice shall be analyzed using reference standards and methods.

Response: Compliant

Summary -

Response: The facility is supplied Potable water from the Village of Westfield, NY. The Village Water Quality report of 2024 was in place. The facility require water to be tested for potability 2 times a year from the batch room. The last water test report from Microbac is dated 3/10/2025, Total Coliform was <1 MPN/100 ml. Test method for Total Coliform SM9223B (Colilert Quanti - Tray) - 2016

11.5.4 - Ice Supply

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

Response: N/A

Evidence: • Ice is not used in the process. No Ice supply

11.5.4.2 - Ice that is purchased shall be from an approved supplier and included in the site's food safety risk assessment. Ice shall be supplied in containers that are appropriate for use, cleanable if reused, and tested as appropriate.

Response: N/A

Evidence: • Ice is not used in the process. No Ice supply

11.5.4.3 - Ice rooms and receptacles shall be constructed of materials as outlined in element 11.1.2 and designed to minimize contamination of the ice during storage, retrieval, and distribution.

Response: N/A

Evidence: • Ice is not used in the process. No Ice supply

Summary -

Response: Ice is not used in the process. No Ice supply

11.5.5 - Air and Other Gasses

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

Response: N/A

Evidence: • Compressed air or other gases do not use for food contact surfaces

11.5.5.2 - Compressed air systems and systems used to store or dispense other gases that come into contact with food or food contact surfaces shall be maintained and regularly monitored for quality and applicable food safety hazards. The frequency of analysis shall be risk-based and at a minimum annually.

Response: N/A

Evidence: • Compressed air or other gases do not use for food contact surfaces

Summary -

Response: Compressed air or other gases do not use for food contact surfaces

11.6.1 - Receipt, Storage and Handling of Goods

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

Response: Compliant

11.6.1.2 - Controls shall be in place to ensure all ingredients, raw materials, processing aids, and packaging are received and stored properly to prevent cross-contamination risks. Unprocessed raw materials shall be received and stored separately from processed raw materials to avoid cross-contamination risk.

Response: Compliant

11.6.1.3 - The responsibility and methods for ensuring effective stock rotation principles shall be documented and implemented.

Response: Compliant

11.6.1.4 - 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

11.6.1.5 - Where raw materials, ingredients, packaging, equipment, and chemicals 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 are no risks to the integrity of those goods, no potential for contamination or adverse effect on food safety.

Response: Compliant

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

Response: Compliant

Summary -

Response: Effective storage is managed via the Stock Storage, Handling and Rotation Procedure program ADPR016 with effective date of 5/27/25. The storage areas on site are adequately well maintained. Section D of the procedure outlines the process for effective stock rotation (FIFO). Products are used within the designated shelf life. The New York State Department of Agriculture and Market establishment inspection of the temporary storage facility is rated A and dated 4/21/25

11.6.2 - Cold Storage, Freezing and Chilling of Foods

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 be 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 - The site shall have a written procedure for monitoring temperatures, including the frequency of checks, and corrective actions, if the temperature is out of specification. Freezing, chilling, and cold storage rooms shall be fitted with temperature monitoring equipment that is located to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures.

Response: Compliant

11.6.2.4 - Discharge from defrost and condensate lines shall be controlled and discharged into the drainage system.

Response: Compliant

Summary -

Response: The effective operational performance of the coolers in monitored every other day by the maintenance departments as stated in section "e" of the General lab flow procedure. The process for handling out of compliance temperature is in place. The coolers were observed to be properly designed for effective

cooling function and easy cleaning. Defrost activities are adequately controlled and no condensation was observed. Sufficient refrigeration capacity was available. Loading and unloading docks were observed be clean and in good condition to protect products during operation. The procedure for checking/ monitoring temperatures is outlined in the General Workflow Procedure. Temperature records from the Daily Sanitation Report from 5/22/25, 3/26/25, 6/23/25 and 4/14/25 were properly completed

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

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 and prevent packaging from becoming a harborage for pests or vermin.

Response: Compliant

11.6.3.2 - Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and behind the racks. Storage areas shall be cleaned at a pre-determined frequency.

Response: N/A

Evidence: • There are no racks storage

Summary -

Response: The storage area was observed to be organized and well maintained. The storage area for product ingredient, packaging and other dry good are located away from wet areas.

11.6.4 - Storage of Hazardous Chemicals and Toxic Substances

11.6.4.1 - Hazardous chemicals and toxic substances with the potential for food contamination shall be: i. Clearly labeled, identifying and matching the contents of their containers; ii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; and iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff.

Response: Compliant

11.6.4.2 - Storage of hazardous chemicals and toxic substances shall be: i. Located in an area with appropriate signage indicating that the area is for hazardous storage; ii. Controlled, lockable, and accessible only by personnel trained in the storage and use of chemicals; iii. Adequately ventilated;iv. Stored where intended and not comingled (e.g., food versus non-food grade);v. Designed such that pesticides, rodenticides, fumigants, and insecticides are stored separately from sanitizers and detergents; and vi. Stored in a manner that prevents a hazard to finished product or product contact surfaces. Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances.

Response: Compliant

11.6.4.3 - Hazardous chemicals and toxic substances shall be correctly labeled and: i. Used only according to manufacturers' instructions; ii. Controlled to prevent contamination or a hazard to raw and packaging material, work-in-progress, finished product, or product contact surfaces; iii. Returned to the appropriate storage areas after use; and iv. Be compliant with national and local legislation.

Response: Compliant

11.6.4.4 - Daily supplies of chemicals used for continuous sanitizing of water, as a processing aid, or for emergency

cleaning of food processing equipment and 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 only authorized personnel.

Response: Compliant

11.6.4.5 - Personnel who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals,: i. Shall be fully trained in the purpose of the hazardous chemicals and toxic substances, their storage, handling, and use; ii. Be provided first aid equipment and personnel protective equipment (PPE); and iii. Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements.

Response: Compliant

11.6.4.6 - The site shall dispose of empty, obsolete, and unused chemicals, pesticides, toxic substances, and containers in accordance with requirements and ensure that primary containers are: i. Not reused; ii. Segregated and securely stored prior to collection; and iii. Disposed through an approved vendor.

Response: Compliant

11.6.4.7 - In the event of a hazardous spill, the site shall: i. Have spillage clean-up instructions to ensure that the spill is properly contained; and ii. Be equipped with PPE, spillage kits, and cleaning equipment.

Response: Compliant

Summary -

Response: The storage procedure is documented. The procedure in the event of a spill. is documented in section S of the cGMP procedures. Sanitation supplies and other chemicals were observed to be secured in a storage cage. Handling of Hazardous Chemical training record was in place. Last Chemical safety training was on 5/20/25. Inventory of chemical on site is in place and maintained by the SQFP. No pesticides are stored on site. SDS for chemicals on site are in place. SDS for CHLOR-CLEAN Foam and Madisan 75 were provided upon request.

11.6.5 - Loading, Transport, and Unloading Practices

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

11.6.5.2 - Vehicles (e.g., trucks/vans/containers) used for transporting food within the site and from the site 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

11.6.5.3 - Vehicles (e.g., trucks/vans/containers) shall be secured from tampering using seals or other agreed-upon and acceptable devices or systems.

Response: Compliant

11.6.5.4 - Loading and unloading docks shall be designed to protect the product during loading and unloading. Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity during loading and transport.

Response: Compliant

11.6.5.5 - Refrigerated units shall maintain the product at the required temperature. The unit's temperature settings shall be set, checked, and recorded before loading, and the product temperature shall be recorded at regular intervals during loading, as applicable.

Response: Compliant

11.6.5.6 - 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

11.6.5.7 - On arrival, prior to opening the doors, the food transport vehicle's 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 start of unloading and regular intervals during unloading.

Response: Compliant

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

Response: Compliant

Summary -

Response: The Van Truck Loading and Receiving Work Instructions that outlines the process of loading the trailer that includes inspection of the condition of the vehicle (section 5) via a checklist before loading. Records of tanker inspection, documentation, loading equipment condition/ cleanliness, weigh ticket were in place. The Work instruction also outlines the process for receiving/unloading including seal verification and vehicle inspection. The auditor did not observe any issue with the documented unloading process. Receiving records from 4/29/25, 6/18/25 and 4/2/25 demonstrated compliance. Products are received and stored in areas as applicable including cooler storage. Outgoing Tanker Inspection and loading report of and Dry or Reefer Inspection& loading report of 4/24/25, 3/4/25, 5/1/25 and 2/24/25 were observed to be properly completed. Section S of Customer service procedure outlines the requirements for transportation. If the ambient temp is above 60F reefers will be used for 65+ brix concentrate, otherwise dry vans are acceptable. If a reefer is used the driver is instructed to set the temp. at 35 F

11.7.1 - High-Risk Processes

11.7.1.1 - The processing of high-risk food shall be conducted under controlled conditions, such that sensitive areas, in which the 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: N/A

Evidence: • No High-Risk Processing at this this facility.

11.7.1.2 - Ambient air in high-risk areas shall be tested at least annually to confirm that it does not pose a risk to food safety.

Response: N/A

Evidence: • No High-Risk Processing at this this facility.

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

Response: N/A

Evidence: • No High-Risk Processing at this this facility.

11.7.1.4 - Staff engaged in high-risk areas shall change into clean clothing and footwear or temporary protective outerwear when entering high-risk areas. Staff access points shall be located, designed, and equipped to enable staff to change into the distinctive protective clothing and practice a high standard of personal hygiene to prevent product contamination.

Response: N/A

Evidence: • No High-Risk Processing at this this facility.

11.7.1.5 - Product transfer points shall be located and designed, so they do not compromise high-risk segregation and minimize the risk of cross-contamination.

Response: N/A

Evidence: • No High-Risk Processing at this this facility.

Summary -

Response: No High-Risk Processing at this this facility.

11.7.2 - Thawing of Food

11.7.2.1 - Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose. 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 or shall be appropriately plumbed.

Response: Compliant

11.7.2.2 - 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: Compliant

11.7.2.3 - 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: Compliant

Summary -

Response: Section L (Tempering of frozen fruit) of the Stock Storage, Handling and Rotation procedure (effective date 5/27/25) provide details of the thawing process. There is a documented Defrosting of frozen Fruit at Ambient Temperatures at Growers Co-Op Risk Assessment (reviewed date 6/2/25) that includes temperature, day and time of thawing and the methods for thawing

11.7.3 - Control of Foreign Matter Contamination

11.7.3.1 - The responsibility and methods used to prevent foreign matter contamination of the product shall be

documented, implemented, and communicated to all staff. Inspections shall be performed (refer to 2.5.4.3) to ensure plant and equipment remain in good condition and equipment has not become detached or deteriorated and is free from potential contaminants.

Response: Compliant

11.7.3.2 - Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or other similar materials shall not be permitted in food processing /contact zones (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers are used, or MIG thermometers are required under regulation). Where glass objects or similar material are required in food handling/contact zones, they shall be listed in a glass inventory, including details of their location and condition.

Response: Compliant

11.7.3.3 - Regular inspections of food handling/contact zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass inventory.

Response: Compliant

11.7.3.4 - 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: Compliant

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

Response: Compliant

11.7.3.6 - Wooden pallets and other wooden utensils used in food processing and handling areas shall be dedicated for that purpose, clean, and maintained in good order. Their condition shall be subject to regular inspection.

Response: Compliant

11.7.3.7 - 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

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

Response: Compliant

11.7.3.9 - Gaskets, rubber impellers, and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency (refer to 2.5.4.3).

Response: Compliant

Summary -

Response: The methods and responsibility to control Foreign Matter Contamination is documented in the HACCP plan. The facility has in place a Foreign Material Control and Detection system doc # TSCH032 (Excel Spread sheet) in place that includes but not limited to, the equipment, devices type, location, objected

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targeted, responsibility, monitoring frequency Specific Work Instructions. There are separate procedures for Glass and Brittle Material with effective date 5/28/25 that includes the process to address breakage and wood control that includes the responsibility and the step-by-step control procedure. There is a Glass, Brittle Plastic and Ceramic register used to a quarterly audit. The last audit was on 3/3/2025.

11.7.4 - Detection of Foreign Objects

11.7.4.1 - 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

11.7.4.2 - Where detection and/or removal systems are used, the site shall establish limits for detection, based on a risk assessment of the product and its packaging, and identify the location(s) of the detector(s) in the process.

Response: Compliant

11.7.4.3 - 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

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

Response: Compliant

11.7.4.5 - In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition.

Response: Compliant

Summary -

Response: The Foreign Material Control device matrix include the type of devices and the monitoring procedure, frequency and responsibilities. The facility uses magnets and screens for foreign material detection. The work instructions include how to check and the frequency of checks. Records are maintained by the SQFP. CCP #3-line screen and magnet check from 5/28/2025, 4/9/2025, 2/20/2025 and 5/6/2025 were reviewed and observed to be in compliance

11.8.1 - Waste Disposal

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

Response: Compliant

11.8.1.2 - Waste shall be removed on a regular basis and not allowed to 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

11.8.1.3 - Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor

drainage system or by an alternative method that meets local regulatory requirements.

Response: Compliant

11.8.1.4 - Trolleys, vehicle waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition, cleaned, and sanitized regularly to prevent the attraction of pests and other vermin.

Response: Compliant

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

Response: Compliant

11.8.1.6 - Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials waste considered high-risk for handling or other reasons. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

Response: N/A

Evidence: • No trademarked materials on site

11.8.1.7 - Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health.

Response: N/A

Evidence: • No Inedible waste designated for animal feed on site

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11.8.1.8 - Waste held on-site prior to disposal shall be stored in a separate storage facility that is suitably insect proofed and located where it does not present any hazards.

Response: Compliant

11.8.1.9 - Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall either be removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal where it does not present any hazards.

Response: Compliant

11.8.1.10 - Reviews of the effectiveness of waste management shall form part of regular site inspections (refer to 2.5.4.3), and the results of these inspections shall be included in the relevant inspection reports.

Response: Compliant

Summary -

Response: There is documented Waste and By-product Disposal procedure (Document # MFPR210 with effective date of 6/13/25) that describe the Waste Management and Disposal process that includes the purpose, scope and responsibility, Waste is dumped daily and as required. Sections D & E outlines the process for liquid waste disposal. The waste containers were observed adequately maintained. No overflow of waste/trash was observed. Waste pick up is serviced two times a week or as needed. There is also provision for the recycle of cardboard waste material. The dumpster for carboard is located behind the scale house and the area was observed to be clean

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