SQF Quality Audit

Capital City Produce

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
US015192 | 270192

DECISION DATE
06/18/24

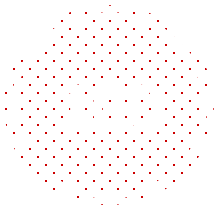
AUDIT TYPE
UNANNOUNCED

RECERTIFICATION DATE
04/21/24

AUDIT DATES
04/30/24 - 05/02/24

EXPIRATION DATE
07/05/24

ISSUE DATE
06/18/24



Facility & Scope

Capital City Produce
16550 Commercial Ave.
Baton Rouge LA 70816
USA

Food Sector Categories:
25, 26

Products:
Produce, Eggs, Dairy Products and Frozen Fruits / Vegetables.

Scope of Certification:
Location: 16550 Commercial Avenue, Baton Rouge, LA 70816
Scope Statement: 25. Repackaging of Products Not Manufactured On Site; 26. Storage and Distribution - Eggs, Dairy Products and Frozen Fruits / Vegetables.
Exemptions: None

Certification Body & Audit Team

Bureau Veritas Certification NA
16800 Greenspoint Park Drive, Suite 300S Houston, TX 77060

CB#: CB-1-BVC
Accreditation Body: ANSI
Accreditation Number: 747

Lead Auditor: Joe McCommons (204768)
Technical Reviewer: Anissa Abdennouri (451413)
Other Members:
Joe McCommons

Hours Spent on Site: 25
Hours of ICT Activites: 0
Hours Spent Writing Report: 6

Section Responses

Audit Statement	Audit
SQF Practitioner Name	Name the designated SQF Practitioner **RESPONSE:** BOB WELLS, SQF PRACTITIONER
SQF Practitioner Email	Email of the designated SQF Practitioner **RESPONSE:** BWELLS@CCPFRESH.COM
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** TERRECA BATES-WELLS: DIRECTOR OF SPECIAL PROJECTS, BOB WELLS: SQF PRACTITIONER, ANDY BRYANT: DAY-SHIFT OPERATIONS MANAGER, DARELL EVANS: QA/IC MANAGER, LLOYD ANTOINE: RECEIVING MANAGER, JOE MCCOMMONS: 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:** CAPITOL CITY PRODUCE IS A WHOLESALE FOOD DISTRIBUTION FACILITY THAT IS LOCATED IN AN I-12 CORRIDOR AREA IN BATON ROUGE, LA. THE COMPANY HAS BEEN IN BUSINESS SINCE 1947 AND AT THE CURRENT LOCATION SINCE 2010 BEING AUDITED FOR SQF 11 YEARS WITH FOOD SAFETY AND 8 YEARS FOR QUALITY. THE FACILITY OPERATES 7 DAYS A WEEK, 24 HOURS A DAY. THERE ARE 2 SHIFTS AT THE FACILITY THAT RUN FROM 7 AM TO 6 PM, 6 PM TO 4 AM. THERE ARE APPROXIMATELY 220 TOTAL EMPLOYEES AT THE SITE WITH AROUND 180 EMPLOYEES ON THE MAIN SHIFT AND AROUND 40 EMPLOYEES ON THE SECOND SHIFT. THE OPERATION INCLUDES WHOLE CASE-IN-CASE-OUT ORDER FULFILLMENT/DISTRIBUTION AND A REPACKAGING OPERATION WHICH TAKES BULK PRODUCE CASES AND REPACKS THEM INTO SMALLER SALEABLE UNITS. THE WAREHOUSE HANDLES PRODUCE, EGGS, DAIRY PRODUCTS AND FROZEN FRUITS / VEGETABLES. THERE IS NO PROCESSING/CUTTING OF FOODS AT THE FACILITY (WITH EXCEPTION OF PRODUCE INSPECTION WHICH IS DISCARDED). THE WAREHOUSE IS 90,000 SQUARE FEET. THE WAREHOUSE IS DIVIDED INTO A FREEZER ROOM (APPROXIMATELY 5000 SQ. FT.), LARGE COOLER SPACE, TWO PRODUCE AISLES THAT ARE HELD AT ELEVATED COOLER TEMPERATURES FOR SPECIFIC PRODUCE TYPES. THE REMAINDER IS OFFICE AND ANCILLARY AREAS. THE SITE IS CURRENTLY UNDERGOING RENOVATION/ADDITION OF A 40,000 SQ. FT. EXPANSION WHICH IS PLANNED TO BE IN OPERATION BY THE END OF THE YEAR. PRODUCTS HANDLED AT THIS FACILITY ARE DISTRIBUTED IN THE CENTRAL SOUTH REGION (SUCH AS CUSTOMERS IN LOUISIANA, MISSISSIPPI, ALABAMA, PORT CUSTOMERS – SHIPS AND OIL RIGS). LOCATION: 16550 COMMERCIAL AVENUE, BATON ROUGE, LA 70816 SCOPE STATEMENT: 25. REPACKAGING OF PRODUCTS NOT MANUFACTURED ON SITE; 26. STORAGE AND DISTRIBUTION - EGGS, DAIRY PRODUCTS AND FROZEN FRUITS / VEGETABLES. EXEMPTIONS: NONE

Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** CALEB PREJEAN: VP OF OPERATIONS, TERRECA BATES-WELLS: DIRECTOR OF SPECIAL PROJECTS, BOB WELLS: SQF PRACTITIONER, ANDY BRYANT: DAY-SHIFT OPERATIONS MANAGER, DARELL EVANS: QA/IC MANAGER, LLOYD ANTOINE: RECEIVING MANAGER, JOE MCCOMMONS: AUDITOR
Auditor Recommendation	Auditor Recommendation **RESPONSE:** CERTIFICATION TO BE CONTINUED AS THERE WERE NO NON-CONFORMANCES IDENTIFIED.
2.1.1	**Management Responsibility** The SOP 2.1 Commitment / 2.1.1 Management Policy (V3, dated 1/24/2022) outlines the company's commitment to food safety and quality and the methods by which food safety/quality will be accomplished. The statement and mission for food safety and quality was signed by the President and dated 1/24/2022. The policy is in English. All persons understand English at the company. The policy is posted at the employee entrance. There was also a 2.1.2 Management Commitment Policy (V3, 1/24/2022). The culture was defined for food safety and quality in the Commitment 2.1.2 Policy. The 2.1.2 document also provides for the SQF Practitioner to have training and program resources to achieve the food safety and quality goals. The SQF practitioner and back up are defined. The SQF practitioner is the Bob Wells (receiving shift supervisor) and is HACCP certified (12/13/2007) and SQF trained in 3/18/2015). The back-up Practitioner is the inventory coordinator and is HACCP certified (4/23/2022). The SOP for commitment also outlines the food safety and quality responsibility of the CEO / executive teams, practitioner, which includes employee training, reassessment and review. The organizational chart (dated last reviewed 4/30/2024) is documented with positions responsible for food safety oversight identified. Job descriptions are on file for key individuals and positions within the organization (descriptions reviewed were warehouse ops manager, day shift supervisor, Dir. of Procurement, sanitation, CEO, Director of Ops, order selector Inventory Specialist/Food Safety Practitioner , QA associate and others were among the job descriptions that were reviewed during this audit. The job descriptions contained responsibilities to support quality. The back-ups for key positions were defined in the SOP 2.1.1.3 (v3, 1/24/22) document. The site was found to properly display the SQF shield on trucks, marketing documents and shipping documents.
2.1.1.1	Senior site management shall prepare and implement a policy statement that outlines the site's commitment to quality and includes at a minimum: i. Establishment and maintenance of a quality management system; ii. Compliance with customer, regulatory, and company quality requirements; iii. Identification of quality objectives and the methods used to measure them; and iv. Continuous improvement of its quality performance. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.1.1.2	The policy statement shall be displayed in a prominent position and communicated to all staff. It may be included in or separate from the organization's food safety policy. **RESPONSE:** COMPLIANT **EVIDENCE:**

2.1.1.3 Senior site management shall implement, maintain, and continuously improve the quality culture within the site that ensures at a minimum:

i. Quality objectives and key performance indicators are communicated to all staff;
ii. Provision of adequate resources to meet the objectives and key performance indicators;
iii. Awareness by all staff of their quality responsibilities and their accountability in meeting the requirements of the SQF Quality Code;
iv. Responsibility to notify management of actual or pending quality issues and empowerment to resolve quality issues within their scope of work; and
v. Education of all staff to understand the importance of quality controls and deviation consequences.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.4 Senior site management shall ensure the personnel performing key process steps and responsible for achieving quality objectives and meeting customer, regulatory, and company quality requirements are identified in the reporting structure and have the required competencies to carry out these functions.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.5 Job descriptions for personnel performing key process steps and responsible for achieving quality requirements shall be documented and include provisions for coverage in the absence of key personnel.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.6 Senior site management shall designate an SQF quality practitioner for each site with responsibility and authority to:

i. Oversee the development, implementation, review, and maintenance of the SQF Quality System, including quality fundamentals outlined in 2.4.2 and the quality plan outlined in 2.4.3;
ii. Take appropriate action to ensure the integrity of the quality system; and
iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the quality system.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.7 The SQF quality practitioner shall:

i. Be competent to implement and maintain food quality plans using a risk-based methodology such as HACCP;
ii. Understand the Quality Code and the requirements to implement and maintain a quality management system; and
iii. Be competent, through training or experience, in process control and/or other quality tools to reduce process variation impacting quality and achieve customer requirements.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.8 Senior site management shall develop and implement a quality communication program to ensure all staff:

i. Know the site's quality statement, quality objectives, and the process by which quality performance is measured; and
ii. Understand the methods by which customer, regulatory, and company quality requirements, where applicable, are met.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.9 Senior site management shall establish a process to trend progress in quality performance against agreed measures. Benchmarking shall be part of this process, and the performance data shall be reported at least annually, and communicated to all staff, to demonstrate effectiveness of the quality management system.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.1.10 Sites that are certified to the SQF Quality Code may use the SQF Quality Shield. The use of the quality shield shall follow the requirements outlined in Appendix 4: SQF Quality Shield Rules of Use.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.2 Management Review

The 2.1 Commitment / 2.1.3 Management Review (v2, 1/15/2018) was documented defining the site's approach to review of the quality system and objectives. The full SQF compliance (food safety and quality) review was held with all management on March 29, 2024 and was signed by the members of senior management on 4/19/2024. The review included the meeting and signature of the VP of Ops, Special Projects Manager and the SQF Practitioner. The yearly review included SQF policies, internal and External Audit Findings, Complaints, corrective actions, hazard and risk management, culture performance for food safety, review of objectives (complaint levels and audit scores), and quality reviews. There was also a monthly meeting between SQF Practitioner and Special Projects manager to review SQF performance through a SQF scorecard. The monthly meeting was confirmed through review of all monthly meeting records. There was a meeting record for each month 2023-2024.

2.1.2.1 Senior site management shall be responsible for reviewing the performance of the SQF Quality System. Reviews shall include actions required to:

i. Monitor compliance to specifications;
ii. Measure and reduce process and product variation;
iii. Meet customer requirements;
iv. Take appropriate corrective action where applicable; and
v. Ensure sufficient resources are allocated to maintain and improve the performance of the quality system.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.1.2.3 The quality system, including food quality plans, shall be reviewed when any changes are implemented that have an impact on the site's ability to meet customer requirements and/or corporate quality requirements where applicable.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.1.2.5 Senior site management shall document and implement a change management process that details how changes in specifications, materials, equipment, or resources are evaluated for their impact on quality, communicated to customers, and effectively implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.2.6 Records of all quality system reviews, reasons for amending documents, and changes to the SQF Quality System shall be maintained. Records shall include decisions for actions related to the improvement of the quality system and process effectiveness.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.3 Complaint Management

The site had 5 complaints (rocks, insects - produce/commodity-type concerns) within the past year. These were not quality related. Investigations were on file. By investigation these were not deemed to be originated at Capitol City. The SOP for complaints is 2.1.3 Complaint Management (V3, 1/24/22). The review summary for complaints was documented and showed no significant trends over the past 5 years. The practitioner has the responsibility for overseeing the complaint process. The SOP covers complaints of food safety and quality.

2.1.3.1 The methods and responsibilities for the complaint management process shall be documented and implemented. They shall include:
i. A mechanism to collect and record all quality complaints resulting from activities at the site; and
ii. Communication processes for reporting and follow-up with senior management and customers.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.3.2 Trends from quality complaints shall be included in the performance measures established for the quality system.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.3.3 Corrective and preventative action shall be implemented based on the seriousness of the incident and identified trends and shall be completed as outlined in 2.5.3.

RESPONSE: COMPLIANT

EVIDENCE:

2.1.3.4 Records of quality complaints, their investigation and resolution, if applicable, shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.1 Quality Management System

The SOPs, policies and organizational chart are documented and maintained. The scope of certification is defined in the procedure and a quality manual with applicable procedures, quality plan and system maintenance records were maintained. Changes are documented and verified with training to applicable. staff.

2.2.1.1 Electronic and/or hard copy documentation that outlines the methods and procedures the site shall use to meet the requirements of the SQF Quality Code shall be current and maintained. It shall be made available to staff and include:
i. A summary of the organization's quality policies and the methods it will apply to meet the requirements of the SQF Quality Code;
ii. The policy statement and site organization chart;
iii. A list of the products covered under the scope of certification;
iv. Finished product specifications that agree with customers' requirements and/or meet the site's corporate quality requirements, where applicable; and
v. A description of the applications of process control methods and other quality tools that are used to control and reduce process variation and meet customer specifications.

The quality system manual may be incorporated into or be independent of the food safety system manual.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.2 Document Control

The SOP 2.2 Document Control and Records (V3, 1/24/2022) and SOP 2.2.2 (v2, 1/15/2018) were documented and defined responsibility of the SQF practitioner as responsible for approving documents and changes. SOP defined responsibility of the document control and how the documents are numbered, versioned and dated. The SOP also defined the methods of storage and retention. A register of all documents was kept current for control of version.

2.2.2.1 The methods and responsibility for maintenance, storage, and distribution of quality documents shall be documented and implemented.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.2.2 A register of current SQF Quality System documents and amendments to documents shall be maintained. Documents shall be safely stored and readily accessible.

RESPONSE: COMPLIANT

EVIDENCE:

2.2.3 Records

The SOP 2.2.3 Records was documented and dated V2, 1/15/2018. The retention of SQF document was for a minimum of two years as defined in the procedure. The completion of records (no pencils, no white out, no scratch outs, etc.) and proper error correction were defined. The records were found to be completed properly to the standard as filed records and records in use were reviewed during the audit.

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

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.2.3.3 Records shall be readily accessible, retrievable, and securely stored to prevent unauthorized access, loss, damage, and deterioration. Records shall be retained in accordance with periods specified by customers or regulations or, at a minimum, no less than the product shelf- life.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.1 Product Formulation and Realization

Products are not formulated. This is a produce warehouse with a limited repack operation. Products are not formulated at this site. This is a produce warehouse operation with a limited repack operation. That being stated, Capitol City did have a 2.3.1 Product Development and Realization procedure. The SQF Practitioner and director of procurement were identified as responsible management members. That covered validation of food safety and quality programs when new products would be introduced. There have been no new or significantly different products added to the portfolio that would warrant a enactment of the new product procedure. Additional SOP 2.3.1 Product Storage Requirements (v2, 1/15/2018) was documented and defined management of product characteristics (quality during product storage such as ripeness/color), storage requirements additionally requirements for packaging.

2.3.2	**Specifications (Raw Material, Packaging, Finished Product and Services)** The register with dates of review and risk level for each raw ingredient was documented and dated as Document 2.3.4 Raw and Packaging Materials last reviewed 4/19/2023. The bag used for product contact was certified as safe through a letter of guarantee specifying adherence to regulatory standard. The contractor service provider register with the relevant training and description of service/frequency were defined in Form 2.3.3 Contract Service Providers list (1/15/2018, v2). This list was reviewed with the internal audit on 4/9/2024 by the SQF practitioner.
2.3.2.1	Specifications for all raw materials and packaging, including but not limited to ingredients, additives, agricultural inputs (where applicable), hazardous chemicals, and processing aids that impact finished product quality shall be documented and kept current. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.3.2.2	Raw and packaging quality parameters shall be verified upon receipt to ensure they meet specifications. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.3.2.3	Product labels that are designed or specified by customers shall be approved by those customers. Records shall be maintained of customer approvals. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.3.2.4	The register of current raw material and packaging specifications shall include those raw material and packaging materials that impact product quality and customer labels. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.3.2.5	Finished product specifications shall be documented, current, approved by the site and its customers when required, and accessible to relevant staff. The specifications shall include product quality attributes, service delivery requirements, and labeling and packaging requirements. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.3.2.6	Customer product specifications and delivery requirements shall be communicated to appropriate departments and staff within the site. **RESPONSE:** COMPLIANT **EVIDENCE:**

2.3.2.7 Specifications for contract services that have an impact on in-process or finished product quality shall be documented, current, include a full description of the service to be provided, and detail relevant training requirements of contract personnel. The register of contract service specifications shall list those services impacting product quality

RESPONSE: COMPLIANT

EVIDENCE:

2.3.3 Contract Manufacturers

The site does not use contract manufacturers.

2.3.4 Approved Supplier Program

The SOP 2.3.4 Approved Supplier Program is defined and documented (V2, 1/15/18). The quality aspects for supplied products are monitored closely at receiving. Two receivers were interviewed. The quality for produce and supplier performance is tracked. The supplier approval for most produce items is managed by purchasing from Pro*Act-approved suppliers. Pro*Act is a procurement organization/buying group that vets suppliers using food safety requirements. The requirements were outlined in the Summary of the Pro*Act Supplier Management Program document dated 1/1/2024. Pro*Act requires audits for GAP and compliance with the 21 CFR 112 as well as compliance to FSMA, GAP/food safety questionnaire, letter of guarantee, HACCP / PC food safety plan and others applicable to the type of operation (processor or shipper). The approved supplier list was documented and dated 4/24/24. The requirement for supplier audits was verified by access the current audits for a dairy item, non-Pro*Act-approved and a Pro*Act approved supplier. The approval program also covers suppliers for packaging materials used for re-pack. The list of packaging suppliers for repack bags and boxes was documented (last reviewed 4/9/2024).

2.3.4.1 Raw materials, ingredients, packaging materials, processing aids, and services, including co-manufactured products, that impact finished product quality shall be supplied by an approved supplier.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4.2 Material suppliers shall be selected and approved based on their ability to supply materials that meet quality specifications. The evaluation program shall require suppliers to:
i. Maintain controlled and current copies of specifications;
ii. Have processes that are capable of consistently supplying materials that meet specification and other defined quality metrics (e.g., delivery, service, etc.);
iii. Provide evidence that the supplied product meets agreed specifications and metrics; and
iv. Have a complaint management system in place that includes corrective actions processes.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4.3 Materials supplied shall only be accepted by the site based on either a certificate of analysis for each lot received, or inspection of the lot at receipt, to ensure materials comply with specifications.

All receipts shall be visually inspected for damage and product integrity.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4.4 The approved supplier program shall include an agreement with suppliers for the return or disposal of materials that fail to meet specifications or are damaged or contaminated.

RESPONSE: COMPLIANT

EVIDENCE:

2.3.4.5 Any supplier audits performed shall be conducted by individuals knowledgeable of applicable regulatory and food quality requirements and trained in auditing techniques.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.1 Customer Requirements

The QA inspection team demonstrated the integration and application of customer requirements in the inspection of incoming produce. The QA inspector interviewed brought up the customer's quality criteria on the handheld inspection screen while performing the inspection. Customer specific criteria is managed and monitored successfully. The process for reviewing customer requirements – Quarterly review. The review example observed during the audit was product specific requirements that were checked on each order. As well as a quality performance/relationship review conducted with the customer. KPIs for service parameters, quality of product, and order accuracy is detailed.

2.4.1.1 The methods and responsibilities for managing customer requirements and/or consumer expectations shall be documented and implemented. They shall include at a minimum:
i. A review and approval process for all new or updated customer requirements, as they occur;
ii. A process for collection and analysis of data for product quality attributes to ensure specifications continue to meet consumer expectations; and
iii. A communication process to notify identified customers when the ability to supply compliant products is temporarily halted.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.2 Quality Fundamentals

The environment for supporting quality was maintained. The walls (concrete block, metal paneling and steal frame) were found to be in good condition. The doors used for shipping/receiving were in excellent condition and pest-proofed. All personnel doors were clean and in good condition. Dock levelers were found to be in good condition and seals present to prevent pests and dust. The floors were in good condition with minimal damage and wear. The drains were long trench drains with grated covers running under racks where wet produce may be stored. There was no areas of standing water that presented a hazard to food safety. Drains were found to be clean and drain cleaning was conducted on a regular basis. The calibration SOP 12.2.3 was documented V3, 1/24/22. In the procedure, the directory of calibration activity was defined to the equipment, device ID, frequency, method and responsibility. The calibration certificates for the NIST thermometer (exp. 3/7/2025), the scales (performed 4/2/2024), and the weight used for daily scale monitoring (exp. 3/26/25). The daily scale calibrations conducted by in-house employees were recorded. This was accomplished by using a 5 lb. weight. The weekly (receiving and shipping) thermometer calibrations were recorded. These were conducted by in-house personnel. The record of the previous year was reviewed. The storage of goods was in appropriate temperature areas. Truck and product temperatures were maintained and monitored with record at receiving and shipping. Quality (product meeting USDA or customer requirements for produce) were monitored at receipt, shipment and in an inspection conducted daily with quality high risk products.

2.4.2.1 The buildings and equipment shall be constructed, designed, and maintained to facilitate the manufacture, handling, storage, and/or delivery of food that meets customer specifications, regulatory requirements, and/or company quality requirements.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.2.2 The methods and responsibility for the calibration of measuring, test, and inspection equipment used for quality testing of raw materials, work-in-progress, and finished product, for food quality 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

EVIDENCE:

2.4.2.3 Storage and transport of raw materials, work-in-progress, and finished product shall be suitable to maintain the integrity of the product without loss, waste, or damage and to meet customer requirements for inventory management and transportation, where applicable.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3 Food Quality Plan

The quality plan was documented and last reviewed for currency as a plan on (4/9/2024) with the following: , flow diagram, definition of PRPs, ingredient and packaging hazard analysis for quality, process hazard analysis/ risk assessment, production evaluation and quality plan summary. The analysis does not identify any CQPs but defines in detail the quality points and supporting programs that are closely monitored to result in high quality product and service. These quality points were receiving (temperature, standards), rework inspection / culling, temperature storage, transportation temperatures, and quality parameters to meet customer expectation. Records were observed to be kept for the following Quality Points (QPs): the temperatures (receiving, storage and shipping), standards evaluation (receiving, shipping) and customer quality requirements. Through interview with receivers and quality inspectors the QPs were found to be properly interviewed, monitored and recorded.

2.4.3.1 A food quality plan shall be developed, effectively implemented, and maintained in accordance with a risk-based method such as HACCP. The food quality plan may be combined with or independent from the food safety plan, but either way it must identify quality threats and critical quality points and their controls.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.2 The food quality plan shall outline how the site controls and assures the quality attributes of the products or product groups and their associated processes.

RESPONSE: COMPLIANT

EVIDENCE:

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

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.4 The scope of the food quality plan shall be developed and documented, including the start and endpoints of the processes under consideration and all relevant inputs and outputs.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.5 Product descriptions shall be developed and documented for all products included in the scope of the food quality plan. This shall include information in the finished product specifications (refer to 2.3.2.1) plus any additional quality or service attributes established by agreement with the customers.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.6 The intended use of each product shall be determined and documented. This shall include, as appropriate, target consumer groups, ease of use by consumers, consumer instructions, evidence of tampering , and other applicable information affecting product quality.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.7 The food quality team shall review the flow diagrams developed as part of the food safety plan and confirm and ensure process steps, process delays, and inputs and outputs that impact product quality are included.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.8 The food quality team shall identify and document all quality threats that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.9 The food quality team shall conduct a quality threat analysis for every identified quality threat to identify which threats are significant, i.e., their elimination or reduction to an acceptable level is necessary to ensure or maintain product quality. The methodology for determining threat significance shall be documented and used consistently to assess all potential quality threats.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.10 The food quality team shall determine and document the control measures that must be applied to all significant quality threats. More than one control measure may be required to control an identified threat, and more than one significant threat may be controlled by a specific control measure.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.11 Based on the results of the threat analysis (refer to 2.4.3.9), the food quality team shall identify the steps in the processes where control must be applied to eliminate a significant threat or reduce it to an acceptable level. These steps shall be identified as Critical Quality Points or CQPs.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.12 For each identified CQP, the food quality team shall identify and document the quality limits that separate acceptable from unacceptable product. The food quality team shall validate the critical quality limits to ensure the designated level of control of the identified quality threat (s), and that all critical quality limits and control measures individually or in combination effectively provide the level of control required.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.13 The food quality team shall develop and document procedures to monitor CQPs to ensure they remain within the established limits (refer to 2.4.3.12). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the test frequency.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.14 The food quality team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CQP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the quality failure.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.15 The documented and approved food quality plan shall be fully implemented. The effective implementation shall be monitored by the food quality team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, specifications or inputs occur which may affect product quality.

RESPONSE: COMPLIANT

EVIDENCE:

2.4.3.16 Implemented food quality plans shall be verified as part of SQF Quality System verification (refer to 2.5).

RESPONSE: COMPLIANT

EVIDENCE:

2.4.4	**Product Sampling, Inspection and Analysis** The 2.4.4. Product Sampling, Inspection and Analysis (v3, 1/24/22) was documented and outlined incoming inspection, inspection of storage produce and special circumstances. The sampling plan for inspection of loads is 5% of cases from full pallets will be inspected and no fewer than 10% of partial pallets will be inspected. 100% of small loads (5 cases or less) will be inspected. All loads are inspected for temperature front, middle and back. The schedule for quality inspection of product in storage with assignment to specific employee was documented (aisle / slot storage inspection, rework inspection / culling and QA table. A "Trouble Report" is generated for issues found from the inspections. Everything stored in the warehouse aisles and received is inspected upon receipt and produce items are inspected by schedule once in warehouse inventory. Records of quality inspections are entered into Produce Pro (electronic database for adherence to quality parameters for both customer and USDA).
2.4.4.1	Processing parameters or in-process measurements shall be established, validated, and verified at a determined frequency to meet all customer, regulatory, and/or company requirements. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.4.2	On-site laboratories and inspection stations shall be equipped and resourced to enable testing of in-process and finished products to meet customer, regulatory, and/ or company requirements and meet quality objectives. 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 2.3.2.7). **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.4.3	Process control methods shall be used to effectively control and optimize production processes to improve process efficiency, product quality, and reduce waste. Control charts and/or other quality tools shall be used for control of key processes **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.4.4	A sensory evaluation program shall be in place to ensure alignment with agreed customer and/or company requirements. Sensory evaluation results shall be communicated with relevant staff and with customers where appropriate. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.4.5	Records of all quality inspections and analyses and statistical analyses shall be maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**

2.4.5	**Non-conforming Materials and Product** 2.4.4/2.4.5 Non-conforming product and materials (v3, 1/24/22) defines approach to control of products, equipment, and returns that do not meet quality requirements. A log was kept. There were no products on hold at the time of audit. The site's process is inspect and remove from storage on produce items. A hold tag is used if needed. The returns log was kept electronically and specified type of return.
2.4.5.1	Non-conforming product shall include products that fail to meet in-process or product requirements for quality. Non-conforming product shall be suitably identified, segregated, and appropriately dispositioned with records maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.5.2	Non-conforming equipment shall include equipment that is not suitable for use and/ or is not capable of producing products that meet in-process or product requirements for quality. Non-conforming equipment shall be identified and segregated from production areas, if possible, with appropriate documentation maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.5.3	The site shall document and implement a procedure to accept returned product that does not meet finished product specifications. The procedure shall include identification, handling, and disposition of returned goods to prevent redistribution or contamination of other products. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.6	**Product Rework** The product rework/recoup SOP 2.4.5/2.4.6 (v2, 1/15/2028) was documented and defined the produce rework/inspections of returns. An electronic log is used for returns. Quality rework is conducted to remove rot/decay through sorting/inspection. Reworking of produce is simply a culling action to remove any sub-standard products, multiple lots or differing products are not combined.
2.4.7	**Product Release** SOP 2.4.7 Product Release (v2, 1/15/2018) was documented and defined the product release as it related to the inbound inspection failures, and product in stock/storage holds. Records for release were observed in the receiving documents/inspections and in the hold process for quality issues.
2.4.7.1	The site shall document and implement a positive product release procedure to ensure that, at the time of delivery to its customer, the food supplied complies with all agreed customer, regulatory, and/or company requirements, including but not limited to product specifications, sensory attributes, packaging and package integrity, labeling, delivery, and service requirements. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.4.7.2	Records of all product release or disposition shall be maintained **RESPONSE:** COMPLIANT

EVIDENCE:

2.5.1 Validation and Effectiveness

The validation of quality adherence to the QPs was conducted and documented on 4/3/24. The review of procedures and records, observations of employee practices, interviews with employees, observances of conditions and other methods were used. Validation was also demonstrated by thorough monitoring of KPIs to score and trend performance. KPIs for quality were: Daily Compliance Score (Daily Tasks should total 87 points per day) and Maintain a quality target of 0.40% or less (out of compliance). The SQF Practitioner demonstrated the daily monitoring and record of NCs detailed if the result is unsatisfactorily over 0.40% - issue value/total sales.

2.5.1.1 Validation activities shall include those necessary to authenticate critical quality limits, process controls, and other quality tests established to meet customer requirements.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.1.2 Records of validation of quality criteria shall be maintained.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.2 Verification Activities

The SOP 2.5.1-2 Verification and Validation (v3, 1/24/22) was documented and the schedule for verification, Policy 2.5.2 (v4, 1/24/23) was documented. The schedule included the responsibility, frequency and document/action of all monitoring/verification activities. These verification activities supported quality. In addition, the schedule for quality inspection with assignment to specific employee was documented (aisle / slot storage inspection, rework inspection / culling and QA table. A “Trouble Report” is generated for issues found from the inspections. Everything on the aisle and received is inspected.

2.5.2.1 The verification schedule shall include activities designed to ensure the effectiveness of process controls and quality tests.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.2.2 The methods, responsibility, and criteria for verifying the effectiveness of monitoring critical quality points and other process and quality controls shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each record.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.2.3 Verification activities shall include a comparison between process control limits and specification limits to ensure alignment and appropriate process control corrections.

RESPONSE: COMPLIANT

EVIDENCE:

2.5.2.4	Records of the verification of quality activities shall be maintained. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.5.3	**Corrective and Preventative Action** Corrective actions were recorded on a specific form with investigation to root cause as appropriate for all issues noted on the inspections. This was noted as implemented for quality concerns and out of acceptable daily quality scores.
2.5.3.1	Corrective and preventative action methods shall include the identification of the root cause(s) and the resolution of non-compliance of critical quality limits and deviations from quality requirements. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.5.4	**Internal Audits** The internal audit for quality was conducted against the SQF code. A SQF Quality checklist was completed within the past year. The last internal audit was conducted on 3/28-29/2024 (signed as reviewed on 4/19/2024). The participants conducting the internal audit were the SQF practitioner, consultant and director of special products. The consultant used has experience and training with auditing and conducted the internal audit with the Capitol City staff.
2.5.4.1	Internal audit plans and methods shall include assessments of food quality plans, process controls, quality tests, and other activities implemented to meet finished product specifications as well as customer and company requirements. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.5.4.2	Staff conducting the quality internal audits shall be trained and competent in internal audit procedures and have knowledge and experience in quality processes and process control methods as they relate to the scope of certification. Where practical, staff conducting internal audits shall be independent of the function being audited. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.6.1	**Product Identification and Traceability** All products are given a receiving label with lot, item and name identification. Products were identified utilizing manufacturer/supplier labels, receiving pallet labels and re-pack labels. These were applied to products and effectively accomplished labeling and facilitation of trace. Records of product movement through the warehouse were kept electronically. Information on a repack label was applied for products that are repacked into the smaller denominations.
2.6.1.1	Finished product shall be labeled to the agreed customer, regulatory, and/or company requirements. **RESPONSE:** COMPLIANT **EVIDENCE:**

2.6.1.2	Product changeover procedures shall include verification of quality attributes required to meet finished product specifications and customer requirements. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.6.1.3	Finished product shall be traceable forward to the customer, such as the retailer, distributor, or manufacturer (one forward). **RESPONSE:** COMPLIANT **EVIDENCE:**
2.6.1.4	All raw materials, ingredients, and packaging materials used in manufacturing a finished product and processing aids associated with the product shall be identified with the finished product lot number and traceable back to the supplier (one back). **RESPONSE:** COMPLIANT **EVIDENCE:**
2.6.2	**Product Withdrawal and Recall** The recall plan (SOP 2.6.3, v4, 1/24/22) includes definition in the scope that specifically states withdrawal may be administered in the event of failure to meet quality requirements.
2.6.2.1	The site's recall and withdrawal procedures shall apply to product recalled or withdrawn due to failure to meet customer specifications or corporate quality requirements. Records shall be maintained and meet customer, regulatory, and company requirements, as applicable. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.6.3	**Crisis Management** The crisis management plan was documented (2.6.2, v3, 1/24/2022). The crisis team was defined. The SQF Practitioner, COO, Director of Operations and others were responsible for oversight of the program depending on the issue or event. The known threats were fire, flood, weather/hurricane, water leak, power failure, pandemic, terrorism, supply chain disruption, equipment failure, quality issues that prohibit ability to supply customer appropriately and IT disruption.
2.6.3.1	The crisis management plan prepared by senior site management shall include the methods by which the site shall, in the event of a crisis, maintain continuity of supply that meets customer, regulatory, and/or company product and service quality requirements. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.6.3.2	The site shall contact its customers in the event of a crisis that impacts its ability to supply quality product. **RESPONSE:** COMPLIANT **EVIDENCE:**

2.7.1	**Food Fraud** The 2.7.2 Food Fraud SOP (V2 1/15/2018) was documented. The food fraud assessment was last conducted on 4/9/2024. A record of the assessment was maintained. An online tool was used. The results of the assessment indicated risk levels were low and there were no high-risk mitigations needed for substitution, finished product mislabeling, dilution, or counterfeiting.
2.7.1.1	The food fraud vulnerability assessment shall include the site's susceptibility to ingredient or product substitution, mislabeling, dilution, and counterfeiting that could adversely impact food quality. This assessment may address both food safety and quality. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.7.1.2	A food fraud mitigation plan shall be developed and implemented that specifies the methods to be used for controlling identified food fraud vulnerability that could adversely impact food quality. **RESPONSE:** COMPLIANT **EVIDENCE:**
2.8.1	**General Requirements for Identity Preserved Foods** Identity preserved status is not maintained as the site does not handle any products with claims. The site does not handle identity preserved foods.
2.9.1	**Training Requirements** The training requirements are defined in SOP 2.9.1-7 Training Program. Yearly and upon hire trainings are conducted. The training for all employees covers GMP/SQF, Basic HACCP, food defense (FIRST),and allergens. Chemical safety/SSOP is given to sanitation employees. For specialized training employees with certain responsibilities received training in calibration (refractometer, thermometer and scales), pre-op, pre-op swab, pest control, and internal audit. Additional training was observed around supporting programs such as cleaning/sanitation, swab testing, incoming inspection for quality/outgoing inspection for quality and USDA / quality program.
2.9.2	**Training Program** Weekly trainings are given in rotation of existing employees with new hires. The records of the training were recorded in roster/attendance lists and tracked on the SQF Training 2024 electronic document. The training had attendees, training topic, description, delivery method and date. The records specific for a selector, QA inspector and a repack employee were sampled for completeness. All records of training for these individuals were in the file and current within the last year per the training SOP requirement.
2.9.2.1	The employee training program shall include the necessary competencies for specific duties and the training methods to be applied for those staff carrying out tasks associated with: i. Process control and monitoring of critical quality points (CQPs); ii. Steps identified as critical to effective implementation of the food quality plan and the maintenance of food quality; and iii. Product inspection and testing. **RESPONSE:** COMPLIANT **EVIDENCE:**

2.9.2.2 The employee training program shall include:
i. Applicable process control and quality tools training for those responsible for operating, inspecting, and overseeing key manufacturing processes;
ii. Training, calibration, and proficiency testing of internal laboratory personnel;
iii. Training of personnel responsible for sensory evaluations;
iv. Training in the application of risk-based principles, such as HACCP, used for the identification and control of quality threats for staff involved in developing and maintaining the food quality plan; and
v. Provision for identifying and implementing the refresher training needs of site personnel.

RESPONSE: COMPLIANT

EVIDENCE:

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

EVIDENCE: