Revision 1





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Operation: Packinghouse	CB Registration No. PLc-PGFS-1944-5	PrimusGFS
Final Audit Report	PrimusGFS ID #27034 – Cert:2	Version 1.6 – Feb 10
Audit Report Summary	Audited by PrimusLabs	
Organization:	Heller Bros. Packing Corp	
	Contact(s): Carlos Torres	
	Address: 288 9th Street 34787	
	Location: Winter Garden, Florida, United States	
	Phone: 407–656–4986	
Packinghouse:	Heller Bros. Packing Corporation	
	Contact: Don Barwick	
	Location: 288 9th Street 34787 Winter Garden, Florida, United States	
Shipper:	Heller Bros. Packing Corp	
Operation Type:	Packinghouse	
	The scope of the audit includes 4 ranches and 1 packinghouse. This report is for the	
Audit Scope:	packinghouse. The commodities grown at the grove were citrus fruit, specifically	
	grapefruit, oranges and tangerines.	
Date Audit Started:	03/14/2013 08:00	
Date Audit Finished:	03/14/2013 17:00	
Product(s):	Grapefruit, Oranges, Tangerines	
Auditor:	Bob Gates (PrimusLabs)	
Average Score of the Audit:	97.36%	
Score after acceptance of corrective action	s: 98.00% Click here to see Corrective Action Activity	

Audit Scoring Summary	Pre-Corrective Action Re	view	Post-Corrective Action R	eview
Food Safety Management System Requirements	Score:	222	Score:	222
	Possible Points:	222	Possible Points:	222
	Percent Score:	100.00%	Percent Score:	100.00%
Good Manufacturing Practices Requirements	Score:	981	Score:	989
	Possible Points:	1014	Possible Points:	1014
	Percent Score:	96.75%	Percent Score:	97.53%
HACCP System Requirements	Score:	15	Score:	15
	Possible Points:	15	Possible Points:	15
	Percent Score:	100.00%	Percent Score:	100.00%
Total:	Score:	1218	Score:	1226
	Possible Points:	1251	Possible Points:	1251
	Percent Score:	97.36%	Percent Score:	98.00%

Sections:

Food Safety Management System Requirements	Good Manufa
Management System	General GMP
Records Requirements	Pest Control
Procedures and Corrective Actions	Storage Areas &P
Internal and external inspections	Operational Practi
Rejection and release of product	Employee Practice
Supplier Monitoring	Equipment
Traceability and Recall	Equipment Cleani
Product testing	General Cleaning
	Buildings and Gro
	Chemicals Files
	Pest Control Docu
	Operation Monito

Good Manufacturing Practices Requirements

Pest Control Storage Areas &Packaging Materials Operational Practices Employee Practices Eauipment Eauipment Cleaning General Cleaning Buildings and Grounds Chemicals Files Pest Control Documentation Operation Monitoring Records Maintenance &Sanitation Files Employee Documentation

HACCP System Requirements

Applicability of HACCP Management Support of HACCP Review of the Written HACCP plan Execution of the HACCP plan on the Plant Floor Verification of the HACCP plan

Testing/Analyses Records Temperature Controlled Storage &Distribution Logs

FSMS	– Management System				
Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments Files
1.01.01	Is there a documented food safety policy detailing the company's commitment to food safety?	Total Compliance	5	5	Yes. There is a detailed food safety policy that details the company's commitment to food safety.
1.01.02	Is there a food safety manual or other documented food safety management system covering the scope of business included in this audit and procedures/instructions for all food safety processes?	Total Compliance	5	5	Yes. The food safety manual is site specific and covers the scope of work for the facility. It outlines procedures and instructions for all food safety processes. It was last updated 19 February 2013.
1.01.03	Is there a detailed organizational structure chart of all employees whose activities affect food safety?	Total Compliance	3	3	Yes. The detailed organization chart includes a primary and backup structure of employees and their responsibilities.
1.01.04	Is there a food safety committee and are there logs of food safety meetings with topics covered and attendees?	Total Compliance	5	5	Yes. The food safety committee consist of 5 people team, including Don Barwick, the GM and the Lead.
1.01.05	Is there documented management verification of the entire food safety management system on at least an annual basis?	Total Compliance	5	5	Yes. The meetings are held quarterly. The last meeting was held on 6 February 2013.
1.01.06	Is there a documented analysis detailing resources required to implement and improve the food safety management system processes with documented commitment from senior management to provide these resources?	Total Compliance	5	5	Yes. An analysis was performed on 19 February 2013. There was 7 items included.

FSMS -	- Records Requirements				
Question	Question Name	Given	Given	Possible	Auditor Comments Files
No.		Answer	Score	Score	
1.02.01	Are all records free of "correction fluid" (white out), pencil text	Total	3	3	Yes. No records were seen that had white out
	and erasable ink text? If using computerized records, is there a	Compliance			or other correction fluid.
	system that shows record amendments (data history) if the records				
	are changed after initial entry?				
1.02.02	Are all monitoring and process control records stored for a	Total	3	3	Yes. Records are held indefinitely.
	minimum period of a year or for at least the shelf life of product if	Compliance			
	greater than a year?				
1.02.03	Are the written procedures available to relevant users and is a	Total	5	5	Yes. A master copy of all the SOPs are
	master copy maintained in a central file?	Compliance			available in the office and the SOPs could be
					accessed by the associates.

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	File
1.03.01	Are there written Standard Operating Procedures (SOPs) that detail work instructions for food safety related activities performed in the field operations?	Total	5	5	Yes. The Food Safety Management System includes SOPs that covers detailed work instructions for the field activities related to field operations. The original SOP is maintained in the main office.	i
1.03.02	Are there written Standard Operating Procedures (SOPs) that detail work instructions for food safety related activities in the facility operations?	Total Compliance	5	5	Yes. There are SOPs that outline detailed work instructions for key food safety processes for the facility operations.	
1.03.03	Is there a corrective action procedure that describes the requirements for follow up and prevention of future occurrences?	Total Compliance	5	5	Yes. NUCOA forms are used to record nonconforming actions.	

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.04.01	Is there a program for periodic self-inspections of the field operations covering any process impacting food safety and are records maintained detailing corrective actions? For Field (GAP option) this includes the growing and harvesting practices and all the relate documentation and records generated.	Total Compliance	10	10	Yes. The most recent full GAP self inspection was performed based on the Primus checklist. Addition checks, like the daily pre–op and general field inspections, supplement the self inspection process.	
1.04.02	Is there a program for periodic self-inspections of the facility operations covering any process impacting food safety and are records maintained detailing corrective actions? For Facility (GMP option) includes the observation of the facility practices and all the relate documentation and records generated.	Total Compliance	10	10	Yes. Checks like the daily pre-op, mock audits and general field inspections supplemented the self inspection process.	
1.04.03	Are there written procedures for handling regulatory inspections?	Total Compliance	3	3	Yes. Roles and responsibilities for dealing with regulatory inspections were defined and were available for review during the audit.	
1.04.04	Are there records of regulatory inspections and/or contracted inspections, company responses and corrective actions, if any?	Total Compliance	5	5	Yes. The audit records were from third party audits. Results from the audits and any corrective actions were documented.	
1.04.05	Are there documented policies and/or procedures for the calibration for measuring and monitoring devices used in the field operations such as fertilizer and crop protection application equipment, and other equipment related to the safety of the product?	Total Compliance	10	10	Yes. There are SOPs in place for calibration procedures.	
1.04.06	Are there documented policies and/or procedures for the calibration for measuring and monitoring devices used in the facility operations such as chemical application equipment, thermometers, metal detectors, ORP meters, pH meters and other equipment related to the safety of the product	Total Compliance	10	10	Yes. The pH and ORP meter were externally calibrated by JBT on 05 September 2012. The calibration and accuracy of the thermometers are checked internally.	·

FSMS – Rejection and release of product

Question	Question Name	Given	Given	Possible	Auditor Comments	Files
No.		Answer	Score	Score		
1.05.01	Is there a written procedure for handling on hold or rejected	Total	10	10	Yes. There are written procedures for	
	products?	Compliance			handling holds and rejects.	
1.05.02	Are product release procedures implemented (e.g. lot signed out,	Total	5	5	Yes. Product release is based on in-process	
	when a product lot sample is undergoing an analysis, etc.) and are	Compliance			and verification. Record were available for	
	records available for review?				review during the audit.	
1.05.03	Is there a documented system for dealing with customer complaints	Total	10	10	Yes. Forms and logs are in place. There have	e
	and buyer food safety complaints and are those on file, along with	Compliance			been no food safety complaints in the last year.	
	company responses, including corrective actions?					

FSMS ·	– Supplier Monitoring					
Question	Question Name	Given	Given	Possible	Auditor Comments	Files
No.		Answer	Score	Score		
1.06.01	Are there current written specifications for all ingredients,	Total	5	5	Yes. The specifications are defined for	
	materials, products and services purchased &/or provided that	Compliance			purchases, and are reviewed by top	
	relate to product safety, are they easily accessed and there is a review process in place for the specifications?				management.	
1.06.02	Is there a list of approved suppliers?	Total	5	5	Yes. There is a list of approved suppliers and	
100102		Compliance	5	5	it is reviewed annually.	
1.06.03	Is there a written procedure detailing the selection, evaluation,	Total	5	5	Yes. There was a SOP in place that detailed	
	approval and monitoring process of approved suppliers?	Compliance			the selection, evaluation, approval and monitoring process for suppliers.	
1.06.04	Does the organization have documented evidence to ensure that raw	Total	15	15	Yes. The company has its suppliers audited	
	material, processing aids and ingredients suppliers comply with specifications, regulatory requirements and best practice guidelines?	Compliance			by a third party.	
1.06.05	Does the organization have documented evidence to ensure that	Total	15	15	Yes. The packaging, materials and services	
	packaging, materials and services suppliers comply with	Compliance			suppliers provide letters of guarantee that the	
	specifications, regulatory requirements and best practice guidelines?				products comply with regulatory requirements.	
1.06.06	Are appropiate supplier controls in place (e.g. results of pesticide	Total	5	5	Yes. The company has its suppliers audited	
		Compliance			by a third party.	
	material/ingredients do not exceed published MRLs?					

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Question	Question Name	Given	Given	Possible	Auditor Comments	Files
No.		Answer	Score	Score		
1.07.01	Is there a documented account that indicates how the company	Total	10	10	Yes. Field products have the capability of	
	product tracking system works, thereby enabling trace back and	Compliance			being traced throughout production and	
	trace forward to occur in the event of a potential recall issue?				shipping. Company SOP 12 outlines tracing /	
					recall procedures.	
1.07.02	Does the organization have a documented recall program	Total	15	15	Yes. The company has procedures in place	
	including: procedures, recall team roles and contact details,	Compliance			for recalls. It details the procedures, roles, and	
	external contact listings, explanation of different types (classes) of				contacts.	
	recalls?					
1.07.03	Is testing of recall procedures (including trace back) performed and	Total	10	10	Yes. A mock recall was performed on 16	
	documented annually? Can the company identify where affected	Compliance			October 2012. It was a class 3 recall. There wa	S
	product was sent?	•			100% recall in less than 2 hours.	
1.07.04	Is there a daily incidents report, sometimes called a Notice(s) of	Total	5	5	Yes. NUOCA logs are used.	
	• •	Compliance			5	
	Is testing of recall procedures (including trace back) performed and documented annually? Can the company identify where affected	Compliance			October 2012. It was a class 3 recall. There w 100% recall in less than 2 hours.	a

FSMS –	- Product testing					
Question	Question Name	Given	Given	Possible	Auditor Comments	Files
No.		Answer	Score	Score		
1.08.01	Based on risk assessment, is there scheduled testing program for	Total	5	5	Yes. The risk assessment determined that no	
1	raw materials, work in progress, packaging and finished goods?	Compliance			testing is required.	
1.08.02	If test are necessary from the risk assessment, is there evidence of	N/A	0	0	N/A - The risk assessment determined that	
1	the test results for raw materials, work in progress, packaging and				no testing is required.	
t	finished goods, at the scheduled frequencies and with follow-up for					
i	identified deviations?					
1.08.03	Are testing and analysis performed by licensed/accredited	N/A	0	0	N/A - The risk assessment determined that	
l	laboratories (e.g. ISO 17025 or equivalent, National Regulations,				no testing is required.	
1	State Department, etc.)?					

GMP – General GMP

Question	Question Name	Given	Given	Possible	Auditor Comments	Files
No.		Answer	Score	Score		
2.16.01	Is there a designated person responsible for the food safety	Total	10	10	Yes. Carlos Torres has been designated to be	
	program?	Compliance			the responsible individual for the location.	
2.16.02	Are all chemicals (sanitizers, detergents, lubricants, etc.) stored	Total	15	15	Yes. A secured room was used for chemical	
	securely, safely and are they labeled correctly?	Compliance			storage. The chemicals were stored properly.	
2.16.03	Are "food grade" and "non-food grade" chemicals handled and	Total	10	10	Yes. There was separation between the food	
	stored in a controlled manner?	Compliance			and non-food chemicals.	
2.16.04	Are signs supporting GMP's posted appropriately?	Total	10	10	Yes. GMP signage was prominently	
		Compliance			displayed throughout the facility.	

-	Pest Control				
Question	Question Name	Given	Given	Possible	Auditor Comments Fil
No.		Answer	Score	Score	
2.17.01	Are products or ingredients free of	Total	15	15	Yes. No evidence of pest activity was noted.
	insects/rodents/birds/reptiles/mammals or any evidence of them?	Compliance			
	ANY DOWN SCORE IN THIS QUESTION RESULTS IN				
	AUTOMATIC FAILURE OF THE AUDIT.				
2.17.02	Are packaging supplies free of	Total	15	15	Yes. No evidence of pest activity was noted
	insects/rodents/birds/reptiles/mammals or any evidence of them?	Compliance			
	ANY DOWN SCORE IN THIS QUESTION RESULTS IN				
	AUTOMATIC FAILURE OF THE AUDIT.				
2.17.03	Are plant and storage areas free of	Total	10	10	Yes. No evidence of pest activity was noted
	insects/rodents/birds/reptiles/mammals or any evidence of them?	Compliance			
2.17.04	Is the area outside the facility free of evidence of pest activity?	Total	10	10	Yes. A perimeter tour did not uncover any
		Compliance			indication of pest activity.
2.17.05	Does the operation have a pest control program? ANY DOWN	Total	15	15	Yes. Third party services were used. The
	SCORE IN THIS QUESTION RESULTS IN AUTOMATIC	Compliance			company was licensed and insured, and
	FAILURE OF THE AUDIT.				technicians paperwork was on file.
2.17.06	Are pest control devices (inc. rodent traps and electrical fly killers)	Total	10	10	Yes. Pest control devices were located away
	located away from exposed food products? Poisonous rodent bait	Compliance			from food products.
	traps are not used within the facility?				
2.17.07	Are pest control devices maintained in a clean and intact condition	Total	5	5	Yes. All traps looks to be in an acceptable
	and marked as monitored (or bar code scanned) on a regular basis?	Compliance			condition, and each was marked and identified.
2.17.08	Are interior, exterior building perimeter and land perimeter pest	Total	5	5	Yes. There were stations both internal and
	control devices adequate in number and location?	Compliance			external, and it appeared to be a sufficient
					number of pest control devices.
2.17.09	Are all pest control devices identified by a number or other code	Total	5	5	Yes. The devices were numbered.
	(e.g. barcode) ?	Compliance			
2.17.10	Are all pest control devices properly installed and secured?	Total	5	5	Yes. All pest control devices were properly
		Compliance			installed and secured.

GMP -	- Storage Areas &Packaging Materials				
Question	Question Name	Given	Given	Possible	Auditor Comments Files
No.		Answer	Score	Score	
2.18.01	Are ingredients (including ice), products, and packaging stored to prevent cross contamination (this includes iced product pallets stored above pallets of product without adequate protection as well any allergen cross contamination issues)?	N/A	0	0	N/A - no ice or ingredients were used
2.18.02	Is the storage area completely enclosed?	Total Compliance	10	10	Yes. The area was completely enclosed.
2.18.03	Is the facility's use restricted to the storage of food products?	Total Compliance	5	5	Yes. All items seen during the audit appeared to be related to food activities.
2.18.04	Are rejected or on hold materials clearly identified and separated from other materials?	Total Compliance	10	10	Yes. While there was no on hold product at the time of the audit, there were designated storage locations and labeling requirements in place.
2.18.05	Are products, ingredients (including ice) and food contact packaging within accepted tolerances for spoilage or adulteration? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Total Compliance	15	15	Yes. No spoilage or adulteration was noted.
2.18.06	Are all storage areas clean, especially the racking structures, lights, ceilings, floor areas by the walls and other hard to reach areas?	Total Compliance	10	10	Yes. The facility was clean.
2.18.07	Are materials (commodities, packaging, ingredients, processing aids, work in progress, etc.) properly marked with rotation codes (receipt dates, manufacture dates, etc)?	Total Compliance	5	5	Yes. A stock rotation process was in place.
2.18.08	Are materials (commodities, packaging, ingredients, processing aids, work in progress, etc.) rotated using FIFO policy?	Total Compliance	5	5	Yes. All materials were properly coded as appropriate.
2.18.09	Are storage areas at the appropriate temperatures for the specific products being stored?	Total Compliance	10	10	Yes. The storage area was at the proper temperature for the product.

GMP – Operational Practices

GMP -	Operational Practices				
Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments File
2.19.01	control, internal vehicle use, etc. ensure that finished (processed) products are not contaminated by raw (unprocessed) products?	Total Compliance	15		Yes. There did not appear to be any opportunity for finished product to become contaminated by unfinished products.
2.19.02	Are all exposed materials (product, packaging etc.) protected from overhead contamination (e.g. ladders, motors, condensation, lubricants, walkways, loose panels, degrading insulation, etc.)?	Total Compliance	15	15	Yes. All materials were protected from overhead hazards.
2.19.03	Are packing and/or processing areas completely enclosed?	Non-Compliance	0	15	No. The packing area was not fully enclosed.
2.19.04	Are production areas clean and well maintained; especially lights, floor areas by the wall and equipment, and other hard to reach areas?	Total Compliance	15		Yes. The production areas were maintained to prevent the accumulation of dirt, minimize condensation and mold growth, and facilitate cleaning.
2.19.05	Is all re–work/re–packaging handled correctly?	Total Compliance	10	10	Yes. Rework was not normally applicable, but an SOP was in place if it were ever to be done.
2.19.06	Are raw ingredients examined before use?	Total Compliance	5	5	Yes. The product itself is inspected during harvest and packing.
2.19.07	Are finished products coded (carton and unit packaging) for the day of production?	Total Compliance	10	10	Yes. The pallets were labeled and the cartons were coded.
2.19.08	Are foreign material control methods (e.g. metal detectors, metal traps, visual inspection, etc.) in place? Are these systems regularly tested (where relevant) to ensure proper operation?	Total Compliance	10	10	Yes. Visual methods were employed.
2.19.09	Does the facility have the appropriate test strips, test kits or test probes for verifying the concentrations of anti-microbial chemicals (product washing water, terminal sanitizers, dip stations, etc) being used and are they in operational condition?	Total Compliance	10	10	Yes. The company uses the appropriate methods to check the strength of the anti-microbial solution.
2.19.10	Are hand washing stations adequate in number, appropriate in location, in working order, have warm water and adequately stocked (e.g. disposable towels, soap, etc.)?	Total Compliance	15	15	Yes. The stations were readily accessible and were properly stocked and maintained.
2.19.11	Are toilet facilities adequate in number and location and are they adequately stocked (e.g. toilet paper, disposable towels, soap, etc.)?	7 Total Compliance	15	15	Yes. The toilet facilities were properly stocked and in the proper location.
	Are secondary hand sanitation stations e.g. hand dip, gel or spray stations adequate in number and location? Are the stations maintained properly?	Total Compliance	3	3	Yes. Hand gel sanitizer was place near the hand washing stations.
	Are foot dip stations adequate in number and location? Are the stations maintained properly?	N/A	0	0	N/A. Foot dip stations were not in use in the facility
	Are single services containers used for their intended purpose only so that potential cross contamination is prevented?	Total Compliance	5		Yes. Single serving containers were not seen being improperly used in the facility.
	Are re–usable containers clearly designated for the specific purpose (trash, raw product, finished product, re–work, ice, etc. such that cross contamination is prevented?	Total Compliance	5	5	Yes. Reusable containers, such as trash cans, were identified and labeled.
2.19.16	Are food safety measuring devices working properly?	Total Compliance	3	3	Yes. Food measuring devices were working properly.

GMP – Employee Practices

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments Fil
2.20.01	Are employees washing and sanitizing their hands before starting work each day, after using the restroom, after breaks and whenever hands may be contaminated?	Total Compliance	15	15	Yes. There is a monitor in place to ensure employees wash their hands prior to the start of work and after each break.
2.20.02	Are employees fingernails clean, short and if gloves are not used, free of nail polish?	Total Compliance	5	5	Yes. Employees nails were observed to be clean and free of polish.
2.20.03	Where gloves are used, are they latex-free (e.g. vinyl, nitrile) or powder-free latex?	N/A	0	0	N/A – gloves were not used.
2.20.04	Are all cuts and wounds covered with waterproof detectable blue bandages (Band Aids) that contain a metal strip?	Total Compliance	5	5	Yes. Blue waterproof metal detected band aids are required and available for use in the first aid kit.
2.20.05	Are employees with boils, sores, open wounds or exhibiting signs of foodborne illness excluded from operations involving direct and indirect food contact?	Total Compliance	10	10	Yes. Company policy clearly excludes any employee exhibiting these conditions from direct or indirect food contact.
2.20.06	Are employees wearing hair nets (or similar hair restraints) and beard–nets?	Non-Compliance	0	5	No. Beard nets were not worn by all associates with facial hair
2.20.07	Is jewelry confined to a plain wedding band?	Total Compliance	3	3	Yes. No prohibited jewelry was seen being worn during the audit.
2.20.08	Are all employees wearing outer garments suitable for the operation (e.g. smocks, aprons , sleeves and gloves)?	N/A	0	0	N/A - no special garments were employed.
2.20.09	Do employees remove protective outer garments e.g. smocks, aprons, sleeves and gloves when on break and before using the toilets and when going home at the end of their shift?	N/A	0	0	N/A - no special garments were employed.
2.20.10	Is there a designated area for employees to leave protective outer garments e.g. smocks, aprons, sleeves and gloves when on break and before using the toilets?	N/A	0	0	N/A - no special garments were employed.
2.20.11	Employees personal items are not being stored in the production and material storage areas?	Total Compliance	5	5	Yes. No employee personal items were seen within the facility during the audit.
2.20.12	Is smoking, eating, chewing and drinking confined to designated areas?	Total Compliance	10	10	Yes. There is a designated smoking, eating and drinking area.
2.20.13	Are all items removed from shirt or blouse top pockets?	Total Compliance	3	3	Yes. No items were noticed in the shirt pockets of the associates during the audit.

GMP – Equipment

OTHE	Equipment					
Question	Question Name	Given	Given	Possible	Auditor Comments	File
No.		Answer	Score	Score		
2.21.01	Are food contact surfaces free of flaking paint, corrosion, rust and	Total	15	15	Yes. All equipment in direct contact with	
	other unhygienic materials (e.g. tape, string, cardboard, etc.)?	Compliance			food was in good repair and suitable for its	
					intended use	
2.21.02	Are non-food contact surfaces free of flaking paint, corrosion, rust	Total	10	10	Yes. All non-food contact areas appeared to	
	and other unhygienic materials (e.g. tape, string, cardboard, etc.)?	Compliance			be clean and devoid of any contaminants or	
					other unhygienic materials.	
2.21.03	Does equipment design and condition (e.g. smooth surfaces, smooth	Total	15	15	Yes. The equipment in use was suitably	
	weld seams, non-toxic materials, no wood) facilitate effective	Compliance			designed for the intended purpose and	
	cleaning and maintenance?				minimized the risk of contamination of product.	
2.21.04	Are thermometers (independent of thermostat probes) present in	Total	5	5	Yes. Thermometers were present in the	
	all coolers and freezers?	Compliance			coolers.	
2.21.05	Are all thermometers non-glass and non-mercury?	Total	10	10	Yes. The thermometers were plastic,	
		Compliance			non-glass and non-mercury.	

GMP – Equipment Cleaning

Juestion	Question Name	Given	Given	Possible	Auditor Comments	Fi
0.	(Answer	Score	Score		
22.01	Are food contact surfaces clean?	Total	15	15	Yes. The food contact surfaces were	
		Compliance			inspected during the audit and appeared to be	
					clean.	
.22.02	Are non-food contact surfaces clean?	Minor	7	10	There was accumulation between the floor	
		Deficiency			boards near the conveyors to the shipping area.	
.22.03	Are items (barrels, bins, etc.) that are used to hold or store product	Total	10	10	Yes. All items intended to hold products	
	clean?	Compliance			were clean.	
.22.04	During cleaning are foods and packaging protected?	Total	15	15	Yes. There was no product or packaging	
		Compliance			present during cleaning.	
.22.05	Are cooling units including coils in coolers and freezers clean and	Total	5	5	Yes. The cooling units coils were clean and	
	free of aged, dirty ice?	Compliance			free of ice.	
.22.06	Are all fan guards dust-free and the ceiling in front of the fans free		3	5	There was black build by one fan in the	
	of excessive black deposits?	Deficiency			cooler area.	
.22.07	Is stored equipment that is not used on a daily basis stored in a	Total	10	10	Yes. Equipment not in use was stored in a	
	clean condition with food-contact surfaces protected and/or are	Compliance			satisfactory manner.	
	they retained on cleaning schedules in some manner, even though					
	they are not in use?					
.22.08			10	10		

	Are all utensils, hoses, and other items not being used stored clean and in a manner to prevent contamination?	Total Compliance			Yes. Equipment not in use was stored in a satisfactory manner.
2.22.09	Are maintenance tools that are used in the production and storage	Total	3	3	Yes. There was a dedicated area for
	areas of the facility clean, sanitary and corrosion free?	Compliance			maintenance equipment away from the production areas.
2.22.10	Are excess lubricants and grease removed from the equipment?	Total Compliance	5	5	Yes. Inspection of the equipment did not show any excessive lubricants are greases. Company policy calls for excess grease or lubricant to be removed.

	General Cleaning		<i>a</i> .			
Question No.	Question Name	Given	Given	Possible	Auditor Comments	File
	Are spills cleaned up immediately?	Answer Total	Score 10	Score 10	Yes. Spill are cleaned up immediately and	
2,23,01	Are spins created up initieutately.	Compliance	10	10	appropriate waste handling and spillage controls were in place.	
2.23.02	Are waste and garbage frequently removed from packing and storage areas?	Total Compliance	5	5	Yes. No excessive accumulation of trash or waste was noted during the audit.	
2.23.03	Do floor drains flow in a manner that prevents contamination (e.g. from high to low risk areas, from high risk directly to drain system), are they covered, appear clean, free from odors and well maintained?	N/A	0	0	N/A – There were not floor drains.	
2.23.04	Do high level areas including overhead pipes, ducts, fans, etc. appear clean?	Total Compliance	10	10	Yes. The overhead areas were clean.	
2.23.05	Are plastic strip curtains maintained in a good condition, kept clean and mounted so that the tips are not touching the floor?	Total Compliance	5	5	Yes. The plastic strips were clean, in good condition and the tips did not touch the floor.	
	Is safety equipment for the sanitation crew adequate, in good condition and stored to prevent cross contamination to ingredients, packaging or product?	-	3	3	Yes. The equipment appears satisfactory for its intended use and appeared to be in good condition overall.	
2.23.07	Is cleaning equipment available and stored properly?	Total Compliance	5	5	Yes. All items were hung up or properly stored.	
2.23.08	Is cleaning equipment identified in order to prevent potential cross contamination issues e.g. production, maintenance, outside, restroom equipment?	Total Compliance	5	5	Yes. Color coding was use.	
2.23.09	Are all items used for sanitation appropriate for their designated purpose? (no steel wool, metal bristles, etc.)	Total Compliance	5	5	Yes. No inappropriate materials were seen in use.	
2.23.10	Are toilet facilities and hand-wash stations clean?	Total Compliance	15	15	Yes. The facilities and hand washing stations were clean and well maintained.	
2.23.11	Are employee locker and lunchroom facilities clean, including microwaves and refrigerators? No rotting or out of date foodstuffs?	Total Compliance	5	5	Yes. The lockers and lunchrooms for the employees were well maintained.	
2.23.12	Is the maintenance shop organized – i.e. equipment and spares stored in a neat and tidy fashion?	Total Compliance	5	5	Yes. The maintenance area was properly maintained.	
	Are internal transport vehicles (e.g. forklifts, bobcats, pallet jacks, trolleys, floor cleaners, etc.), clean, do not emit toxic fumes and being used in a sanitary manner?	Ñ/A	0	0	N/A – These vehicles were not used.	
2.23.14	Are shipping trucks clean and in good condition?	Total Compliance	5	5	Yes. An inspection was performed prior to loading to assure truck conditions were satisfactory.	

GMP – Buildings and Grounds

0					
Question	Question Name	Given	Given	Possible	Auditor Comments H
No.		Answer	Score	Score	
2.24.01	Are all lights in the production, product storage areas, packaging	Total	15	15	Yes. The bulbs and strip lights were
	storage areas and maintenance shops intact and protected?	Compliance			adequately protected.
2.24.02	Has the facility eliminated or controlled any potential metal, glass	Total	15	15	Yes. A glass and brittle procedure was in
	or plastic contamination issues?	Compliance			place.
2.24.03	Has the facility eliminated the use of wooden items or surfaces?	Total	5	5	Yes. There was no wooden food contact
		Compliance			surfaces or items.
2.24.04	Is there adequate lighting in the packing and storage areas?	Total	5	5	Yes. The packing and storing areas were well
		Compliance			lit.
2.24.05	Is ventilation adequate to remove dust, steam, and odors?	Total	3	3	Yes. Ventilation appeared to be satisfactory.
		Compliance			
2.24.06	Are floor surfaces in good condition, with no standing water, no	Minor	7	10	There was a debris trapping crack in to cooler
	debris trapping cracks and are they easy to clean?	Deficiency			floor.
2.24.07	Are the floor drains where they are needed for drainage and	Total	5	5	Yes. Floor drains were clean and appeared to
	cleanup?	Compliance			be in the proper location for draining.
2.24.08	Are doors to the outside pest proof?	Total	5	5	Yes. The outside doors were pest proof.
		Compliance			
2.24.09	Are dock doors fitted with buffers to seal against trucks?	Total	3	3	Yes. The shipping dock doors were fitted
		Compliance			with buffers that appeared to be in acceptable
					condition.
2.24.10	Are dock load levelers and shelters maintained in a good condition,	Total	3	3	Yes. No indication of pest or debris was
	pest proof and debris free?	Compliance			seen. Levelers and shelters were in good
					condition.
2.24.11	Are exterior walls free of holes to exclude pests? Are pipes, vents,	Total	5	5	Yes, The walls were free of holes and any
	air ducts designed and protected in order to prevent pest entry e.g.	Compliance			opening were covered to prevent pest entry.
		-			

	by using fine mesh?				
2.24.12	Are interior walls and ceilings free of cracks and crevices to prevent pest harborage and allow proper sanitation?	Total Compliance	5	5	Yes. No cracks or crevices were detected.
2.24.13	Do false ceiling areas have adequate access to allow for inspection and cleaning?	N/A	0	0	N/A - false ceilings were not observed in the production areas.
2.24.14	Is an 18" internal wall perimeter being maintained within the facility, with adequate access to these wall perimeters thereby allowing inspection and cleaning ?	Total Compliance	5	5	Yes. An 18 inch buffer was maintained.
2.24.15	Is the exterior area immediately outside the facility free of litter, weeds and standing water?	Total Compliance	5	5	Yes. The facility was in good condition, both inside and out.
2.24.16	Are control measures being implemented for the storage of pallets, equipment, tires etc. (i.e. out of the mud, stacked to prevent pest harborage, away from building perimeter)?	Total Compliance	5	5	Yes. All items were appropriately stored.
2.24.17	Are pallets inspected to separate and replace dirty or broken pallets?	Total Compliance	5	5	Yes. Dirty or broken pallets were not brought into the facility for use.
2.24.18	Is the area around the dumpster/cull truck/trash area clean?	Total Compliance	3	3	Yes. The dumpster area was clean.
2.24.19	Are outside garbage receptacles and dumpsters kept covered or closed?	Total Compliance	5	5	Yes. Outside receptacles and dumpster areas were closed and maintained.
2.24.20	Are all water lines protected against back siphonage?	Total Compliance	5	5	Yes. The water lines had back flow preventors in place.
2.24.21	Is the on–site laboratory (where appropiate) completely enclosed and separated from production and storage areas?	N/A	0	0	N/A. There was no on-site laboratory.

GMP – Chemicals Files Given Possible Auditor Comments Files Question Question Name Given No. Answer Score Score 2.25.01 Are copies of all Materials Safety Data Sheets (detergents, Yes. MSDSs were on file for all the Total 5 5 sanitizers, pesticides, etc.) on file and fully accessible at all times Compliance chemicals checked during the audit. with clear indexes? 2.25.02 Are there copies of specimen labels for chemicals used, where the Total 5 5 Yes. Specimen labels were maintained. full label is not immediately accessible e.g. rodent chemicals, Compliance product sanitizers? 2.25.03 Is there a chemical inventory and/or usage log? Total 3 Yes. A chemical inventory and log was in 3 Compliance place. The quantities on hand and the logs were accurate for the chemical checks. 2.25.04 Are there specific Standard Operating Procedures (SOPs) for the N/A 0 0 N/A - these types of equipment were not in changing and testing of water and ice systems e.g. washing flumes, use. hydrovacuums, hydrocoolers, ice making machines, ice injectors,

etc?

GMP –	Pest Control Documentation					
Question	Question Name	Given	Given	Possible	Auditor Comments Fi	les
No.		Answer	Score	Score		
2.26.01	Is there a documented pest control program, including a copy of the	Total	15	15	Yes. Massey Pest Control, a local third-party	
	contract with the extermination company (if used), Pest Control	Compliance			pest control service was employed.	
	Operator license(s) (if baits are used) and insurance documents?					
2.26.02	Is there a schematic drawing of the plant showing numbered	Total	10	10	Yes. Massey provides a drawing of the plant	
	locations of all traps and bait stations, both inside and outside the	Compliance			with trap and bait stations, both inside and	
	plant?				outside, are identified.	
2.26.03	Are service reports created for pest control checks detailing	Total	10	10	Yes. Massey issues reports twice a month for	
	inspection records, application records, and corrective actions of issues noted (in-house and/or contract)?	Compliance			tin cats and once a month for bait traps.	

GMP -	- Operation Monitoring Records					
Question	Question Name	Given	Given	Possible	Auditor Comments	Files
No.		Answer	Score	Score		
2.27.01	Does the facility have incoming goods (products, ingredients and	Total	5	5	Yes. Incoming inspections are performed.	
	packing materials) inspection data?	Compliance				
2.27.02	Are there inspection logs on incoming trailers for rodents and	Total	10	10	Yes. Incoming inspections were recorded.	
	insects, cleanliness, holes and temperature control?	Compliance				
2.27.03	Are there records for the necessary process monitoring activities	Total	10	10	Yes. The risk assessment determined that	
	(e.g. pH, water temperature, metal detection, labeling, heating	Compliance			temperature and JBT needed to monitored.	
	processes, etc.) showing the monitoring frequencies, results and					
	where necessary the corrective actions?					
2.27.04	Are there records (with corrective actions) that show	Total	10	10	Yes. Records were available for the testing	
	anti-microbial (e.g. free chlorine, ORP, peracetic acid) strength	Compliance			of the wash water.	
	testing of wash water and ice solutions prior to start up and					
	throughout the production runs?					
2.27.05	Is there a hand/foot/tool dip station log?	Total	3	3	Yes. There is a daily hand/foot/tool dip	
		Compliance			station log. It is checked daily by the	
					supervisor.	
2.27.06	Is there a tool accountability program for knives and similar hand	Total	3	3	Yes. There is a tool accountability program	
	tools used in the production area?	Compliance			in place for the tools used in packinghouse.	

2.27.07	Is there a daily pre-operation inspection log?	Total Compliance	5	5	
2.27.08	If the site is new, has the site been risk assessed for adjacent land use, flooding, environmental pollutants and other food safety	Compliance N/A	0	0	an
2.27.09	issues? Does the facility have documented evidence to ensure that any food safety hazards relevant to waste water treatments (e.g. settling	Total Compliance	10	10	mı
2.27.10	ponds, land applications, etc.) are controlled? Is there an annual certificate of inspection for the backflow prevention systems on water lines into and within the facility?	Total Compliance	3	3	ba

Yes. A daily pre–operation log is in place and was observed to be in use during the audit. N/A – The site is not new.

Yes. The waste water is sent to the local municipality for treatment.

Yes. An annual certificate of inspection for back flow prevention performed on 8 June 12 by the City of Winter Garden was available.

GMP –	Maintenance & Sanitation Files					
Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.28.01	Does the facility have a preventative maintenance program and schedule?	Total Compliance	10	10	Yes. There was a master preventative maintenance schedule and program in place through out the facility.	
2.28.02	Is there a log of maintenance work or repairs ordered and is it signed off on work completed?	Total Compliance	10	10	Yes. A Post Maintenance Check was used to document the acceptance of equipment back into production.	
2.28.03	Are there logs showing that equipment is cleaned and sanitized after maintenance work has been completed?	Total Compliance	5	5	Yes. After maintenance work, the equipment is cleaned and sanitized. A log is in place that must be signed off by the supervisor after cleaning and sanitation.	
2.28.04	Is there a written cleaning schedule (Master Sanitation Schedule) that shows what and where is to be cleaned and how often?	Total Compliance	10	10	Yes. The applicable SOPs included this information for daily, weekly and seasonal cleaning.	
2.28.05	Are there written cleaning procedures (Sanitation Standard Operating Procedures) for the facility and all equipment?	Total Compliance	10	10	Yes. General and specific SSOPs were established.	
2.28.06	Are sanitation logs on file that show what cleaning was done, when and who carried out the cleaning?	Total Compliance	5	5	Yes. The sanitation records were on file and up to date.	
2.28.07	Are there documented procedures and completion records for clean-in-place (CIP) activities, where applicable (e.g. cleaning re-circulating water systems such as washing flumes, ice injectors, etc.)?	N/A	0	0	N/A – No CIP operations were in use.	
2.28.08	o	Non–Compliance	0	5	No. ATP testing is not employed.	
2.28.09	Is there a log indicating that floor drains are cleaned on a regular basis (minimum daily in wet and fresh-cut production areas)?	Total Compliance	5	5	Yes. The floor drains are cleaned weekly and a cleaning log was in place.	
2.28.10	Are there records showing cooling units are serviced and cleaned at least on an annual basis or more frequently as required?	Total Compliance	10	10	Yes. Cooling units are serviced and cleaned annually by a third party company.	
2.28.11	Is there a documented glass management policy and procedure (including company glass policy, glass breakage procedure and where necessary glass register)?	Total Compliance	5	5	Yes. There was a glass or brittle plastic register available.	

GMP -	- Employee Documentation					
Question	Question Name	Given	Given	Possible	Auditor Comments	Fil
No.		Answer	Score	Score		
2.29.01	Do employee records have logs of new employee food safety (GMP) orientation training (with topics covered and attendees), and a document signed by each employee stating they will comply with the operations personal hygiene and health policies?	Total Compliance	5		Yes. New employees received orientation that included food safety training and this training was signed off by the new employee.	
2.29.02	Are there logs of ongoing employee food safety education training with topics covered and attendees?	Total Compliance	10	10	Yes. All employees received GMP training. Continuing training is provided as appropriate.	
2.29.03	Is there a documented training program with training logs for the sanitation employees including best practices and chemical use details?	Total Compliance	5	5	Yes. The sanitation crew training records were available for the latest training.	
2.29.04	Are there written procedures in place that require food handlers to report any cuts or grazes and/or if they are suffering any illnesses that might be a contamination risk to the products being produced? (In the US, auditors can check procedure/policy but not actual records).	Total Compliance	3	3	Yes. An SOP was in place to address this issue.	
2.29.05	Are there written sickness reporting and return to work procedures?	Total Compliance	3	3	Yes. This is part of the employee training program.	
2.29.06	Is there an employee non-compliance/disciplinary action procedure (verbal confirmation accepted)?	Total Compliance	3	3	Yes. A verbal disciplinary action policy is in place.	l
2.29.07	Are visitors and contractors required to sign a log stating that they will comply with the operation's personal hygiene and health policies?	Total Compliance	3	3	Yes, a log was maintained.	

GMP –	Testing/Analyses Records					
Question	Question Name	Given	Given	Possible	Auditor Comments	Files
No.		Answer	Score	Score		
2.30.01	Are there records of routine equipment microbiological testing?	Total	5	5	Yes. Routine testing is performed by Deibel	
		Compliance			Labs.	
2.30.02	Are there records of routine environmental microbiological testing?	Total	5	5	Yes. The last testing was performed on 27	
		Compliance			February 2013 by method SM 92223B. The results were acceptable.	
2.30.03	Is there at least an annual microbiological test on water used in the	Total	10	10	Yes. Annual water testing was performed by	
	facility (sampled from within the facility)?	Compliance			Flowers Chemical Laboratories on 01 July	
					2012. The tests results were all acceptable.	
	Is there (at least) an annual microbiological test for in-house produced ice or a letter of guarantee from external suppliers of ice?	N/A	0	0	N/A – Ice was not used in the production.	

GMP -	Temperature Controlled Storage & Distribution Logs				
Question	Question Name	Given	Given	Possible	Auditor Comments Files
No.		Answer	Score	Score	
2.31.01	Are there records of final product temperature checks for	N/A	0	0	N/A - The product was not temperature
	temperature sensitive product?				sensitive.
2.31.02	Are there temperature logs for the packing room (if refrigerated)?	Total	5	5	Yes. Temperature logs were available for the
		Compliance			packing room. The records were up to date.
2.31.03	Are there temperature logs for storage rooms?	Total	5	5	Yes. Temperature logs were available for the
		Compliance			storage room. The records were up to date.
2.31.04	Are there records of shipping truck temperature checks, indicating	Total	5	5	Yes. The shipping truck inspection logs
	that the truck was pre-cooled prior to loading?	Compliance			include temperature checks prior to loading.
2.31.05	Are there sanitary condition logs for shipping trucks (cleanliness,	Total	10	10	Yes. The pre-shipment inspection included
	trailer condition, odor, etc.)?	Compliance			verification of adequacy of the outbound trailer.

$\mathbf{H}_{\mathbf{A}}$	HACCP	 Applicability 	y of HACCP
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Question	Question Name	Given	Given	Possible	e Auditor Comments	Files
No.		Answer	Score	Score		
3.01.01	Is there need of a HACCP system to be developed and implemented	No	0	0	No.	
	in the operation? Only YES or NO answer is allowed. IF YES, go to					
	3.02.01					
3.01.02	If the company has determined that a HACCP system is not needed	Yes	15	15	Yes. The company determined its existing	
	for the operation, is there a documented hazard analysis of all steps of				process controls were adequate to control any	
	each process showing that all hazards can be controlled through the				physical, chemical, or biological hazards and that	
	implementation of prerequisite programs negating the need to				a HACCP program was not required. The	
	develop and implement a complete HACCP system? If YES, the rest				assessment was fully documented.	
	of the HACCP Module is not applicable.					

HACCP – Management Support of HACCP

IIACC	I – Management Support of IIACCI					
Question	Question Name	Given	Given	Possible	Auditor Comments	File
No.		Answer	Score	Score		
3.02.01	Is there a team responsible for HACCP development, implementation	N/A	0	0	Yes. The food safety team is the HACCP	
	and on-going maintenance which is chaired by the site HACCP coordinator?				team.	
3.02.02	Does the plant have formal recorded HACCP training for all	N/A	0	0	No. There are no records of all employee	
	employees (especially CCP operators and management)?				HACCP training.	
3.02.03	Are changes in the process, equipment, ingredients, etc., causing	N/A	0	0	Yes. The latest HACCP changes occurred on	
	timely reviews of HACCP systems including hazard analysis, CCP				01 October 2012.	
	decisions, CCP records and staff training?					
3.02.04	Is the plant conducting self audits of the HACCP program?	N/A	0	0	Yes. HACCP self audits had been performed	
					for cooler temperatures.	
3.02.05	Have standard operating procedures (SOPs) been created for the	N/A	0	0	Yes. A procedure for monitoring of the	
	monitoring process of the HACCP System, which would include how				processes was in place. Kristy is assigned the	
	to carry out the monitoring activities?				responsibility of monitoring.	
3.02.06	Is there a person or group responsible for all the records generated	N/A	0	0	Yes. A member of the HACCP team had been	ı
	thru the monitoring activities of the HACCP plan?				established as the records keeper.	
3.02.07	Are the records maintained in an organized and retrievable manner?	N/A	0	0	Yes. A folder was maintained with all HACCI	Р
	5				documentation.	
3.02.08	Are there security measures to insure against HACCP monitoring activity record loss?	N/A	0	0	Yes. The records are backed up electronically.	

HACCP – Review of the Written HACCP plan

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
3.03.01	Does a product description exist for each product produced? Do they contain the products intended use, materials and raw ingredients, and who the intended consumer is?	N/A	0	0	Yes. The products, use, and target users had been defined.	
3.03.02	Has the process been flow charted? Is the flow chart in sufficient detail to completely describe the process or product manufacturing steps?	N/A	0	0	N/A – It was determined that there were no CCPs.	
3.03.03	Has a documented hazard analysis for the process been conducted, showing the various types of hazard and their associated severity?	N/A	0	0	N/A – It was determined that there were no CCPs.	
3.03.04	Have CCPs been developed to control the hazards identified in the hazard analysis step?	N/A	0	0	N/A - It was determined that there were no CCPs.	
3.03.05	Have monitoring requirements and frequencies been determined for the CCPs?	N/A	0	0	N/A – It was determined that there were no CCPs.	
3.03.06	Are identified CCP critical control limits supported by validation document?	N/A	0	0	N/A – It was determined that there were no CCPs.	
3.03.07	Is there a clear detailed action plan for operators to follow if the limits are exceeded? Does it describe plans to adjust the process back into control and withhold out of compliance products if necessary?	N/A	0	0	N/A – It was determined that there were no CCPs.	
3.03.08	Have recording templates (recording forms) been developed for monitoring the CCPs?	N/A	0	0	N/A – It was determined that there were no CCPs.	
3.03.09	Have specific responsibilities been assigned for the monitoring, recording and corrective action management of each CCP?	N/A	0	0	N/A – It was determined that there were no CCPs.	
3.03.10	Have verification plans and schedules been developed for each CCP?	N/A	0	0	$N\!/\!A$ – It was determined that there were no CCPs.	

HACC	P – Execution of the HACCP plan on the Plant Floor					
Question	Question Name	Given	Given	Possible	Auditor Comments	Files
No.		Answer	Score	Score		
3.04.01	Are all of the documents noted in the HACCP plan in place for real	N/A	0	0	N/A - It was determined that there were no	
	time monitoring of the CCPs?				CCPs.	
3.04.02	Are the CCP monitoring activities and frequencies in compliance	N/A	0	0	N/A - It was determined that there were no	
	with the plan?				CCPs.	
3.04.03	Do CCP operators understand basic HACCP principles and their role	N/A	0	0	N/A - It was determined that there were no	
	in monitoring CCPs ? (Interview operators to verify).				CCPs.	
3.04.04	Are CCP monitoring records signed off (or initialed) by the	N/A	0	0	N/A - It was determined that there were no	
	operator(s) who are carrying out and recording the CCP check?				CCPs.	
3.04.05	Are corrective actions detailed in writing when the failure of a CCP	N/A	0	0	N/A - It was determined that there were no	
	occurs?				CCPs.	
3.04.06	Are the CCP records reviewed and signed off daily by the quality	N/A	0	0	N/A - It was determined that there were no	
	control supervisor and/or management?				CCPs.	

HACCP – Verification of the HACCP plan

Question	Question Name	Given	Given	Possible	Auditor Comments	Files
No.		Answer	Score	Score		
3.05.01	Are monitoring and verification information reviewed and discussed	N/A	0	0	Yes. Temperature records are verified by the	
	at management level meetings?				area supervisor.	
3.05.02	Are there independent audits e.g. third party audits, of the plant's	N/A	0	0	Yes. There are records of prior Primus audits.	
	HACCP program (at least annually)?					