SQF Food Safety Audit Edition 9

Aguilares S.P.R. de R.L. - ASR9606183D4 - Aguilares S.P.R. de R.L. Invernaderos de Prod. ASR9606183D4

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
6318 | 176513

AUDIT RATING
95
Good

DECISION DATE
04/10/2023

AUDIT TYPE
RECERTIFICATION

RECERTIFICATION DATE
02/13/2024

AUDIT DATES
03/01/2023 - 03/03/2023

EXPIRATION DATE
04/29/2024

ISSUE DATE
04/10/2023

Facility & Scope

Aguilares S.P.R. de R.L. - ASR9606183D4 (43078)
Aguilares S.P.R. de R.L. Invernaderos de Prod.
ASR9606183D4
Rancho Aguilares S/N Mpio.
Salamanca GTO, 38481
Mexico

Food Sector Categories:
2. Indoor Growing and Harvesting of Fresh Produce and Sprouted Seed Crops

Products:
Products: Tomato (heirloom, beefsteak, vine, grape, Campari, cluster, round, cocktail, roma and cherry) bell pepper and mini bell pepper.

Scope of Certification:
Scope of Certification: Sowing, agricultural labors and harvest (fresh produce). Exclusions: N/A

Certification Body & Audit Team

SCS Global Services
2000 Powell St.
Suite 600
Emeryville, CA 94608
United States

Web Site: http://www.scsglobalservices.com

CB#: CB-1-SCS
Accreditation Body: ANSI
Accreditation Number: 0821

Lead Auditor: Garcia, Gladys (133199)
Technical Reviewer: Simmons, Richard (203462)

Hours Spent on Site: 24
Hours of ICT Activities: 0
Hours Spent Writing Report: 8

Non-Conforming

2.3.2 Specifications (Agricultural Inputs, Packaging, Harvested Product, and Contract Services)

The specifications for seedlings, services, inputs were available in the document “F-200-EAG-20”. The specifications include the request of technical data sheets, letter of guarantee, SDS and certificates, among others. Documents were available for review. For seedlings, specifications requested are letter of guarantee and certificate of quality or food safety. The seedlings are produced by the other company that belongs to the same group of "Aguilares". Documents were available for review, for example: for seedlings, specifications requested are letter of guarantee or certificate of food safety, it was observed certificate number: 267669 in PrimusGFS v3.2 of “Aguilares SPR de RL” with validity on May 05, 2023 by NSF. A list of approved supplier of inputs and services was in place and was available for review in document with code: " F-500-OCE-03" . The chemicals and fertilizers are provided from approved suppliers. Products are 90 % exported to USA and Canada and 10% National. The responsibilities for verifying compliance with these specifications are the safety and quality department and the purchasing department. The SQF Practitioner is responsible for approving any new products and specifications. The company has the document: " F-500-OCE-02: List of approved suppliers. A list of current contract service providers is maintained in Service Supplier list and found to include providers of services including microbiological tests and the service of collection of sanitary waste. Supplier Contract arrangements for collection of sanitary waste were reviewed during the audit and found to be satisfactory. N/A. 2.3.2.4 No farms or packinghouses are hired. NC Minor 2.3.2.2: Arrival logs of agrochemicals and arrival logs of fertilizers includes the review of batch and date of expiry, but in the sampled records of January 2023 and February 2023 of both records does not includes this information.

2.3.2.2 Food contact packaging, seeds, and agricultural inputs shall be verified to ensure product safety is not compromised and the material is fit for its intended purpose. Verification shall include certificates of conformance, certificate of analysis, or sampling and testing (refer to 2.4.4.1).

RESPONSE: MINOR

EVIDENCE: Arrival logs of agrochemicals and arrival logs of fertilizers includes the review of batch and date of expiry, but in the sampled records of January 2023 and February 2023 of both records does not includes this information.

ROOT CAUSE: The activity of registering the entrances to the warehouse is not defined in a specific procedure of the warehouse area.

2.3.2.2 ENG.pdf

CORRECTIVE ACTION: *Identification code is assigned to the internal control of income to the general store FO-15-PAB-01 "Warehouse entry log". *The survey activity is carried out in the PR-900-PAA-01 "Reception, storage and control of inputs".

CamScanner 03-28-2023 17.38.pdf

FO-15-PAB--01 Bitácora de en... almacén.pd

FOTOS FECHAS CADUCIDAD.pdf

PR-900-PAA-01 Recepción

VERIFICATION OF CLOSEOUT: Reviewed and Approved Root Cause, Corrective Actions and evidences by G.M.G.R.

COMPLETION DATE: 03/24/2023 **CLOSEOUT DATE:** 04/07/2023

2.4.1 Food Legislation (Mandatory)

The supplier has ensured that product delivered to their customers complies with regulatory requirements includes CFR regulation, FSMA rules, microbiological parameters, etc. The site keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by bulletins, Local agency of vegetal protection and production associations Regulatory compliance for this operation includes every area legislation updating. The supplier keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by means of bulletins from SENASICA and FDA online page web. The supplier has documented in the procedure: IT-200-OCE-01 includes the legislation and updating of applicable regulatory, the information that the certification body and SQF will be notified within 24 hours if a food safety event requiring public notification occurs is documented in procedure: "IT-200-OCE-01". The person responsible for reviewing updates on applicable regulatory topics is the SQF Practitioner. Nc Minor 2.4.1.1: The company within the list of applicable documents indicates that it must comply with the FSMA Final Rule on Produce Safety, this document in section §112.151 specifies the analytical methods to analyze the water, however the company uses the methodology NOM-210 SSA1 2014 appendix H for E. coli in water of irrigation, but this methodology is not approved for this legislation.

2.4.1.1 The owner/senior site manager shall ensure that, at the time of delivery to its customer, the food supplied shall comply with food safety and production legislation applicable in the country of use and sale, if known. Any specific licensing requirements or commodity-specific regulations shall be maintained and kept current.

RESPONSE: MINOR

EVIDENCE: The company within the list of applicable documents indicates that it must comply with the FSMA Final Rule on Produce Safety, this document in section §112.151 specifies the analytical methods to analyze the water, however the company uses the methodology NOM-210 SSA1 2014 appendix H for E. coli in water of irrigation, but this methodology is not approved for this legislation.

ROOT CAUSE: Because FSMA §112.151 had not been reviewed to identify approved methods.

2.4.1.1 ENG.pdf

CORRECTIVE ACTION: Microbiological analyzes for E. coli are requested with the UFC/100 ML membrane filtration methodology (approved by FSMA section 112.151), which will be used from now on for the indicated parameter. F-100-PAA-32 Annual sampling program is attached and is specified in F-200-OCE-18 (01) Cultivation of organic red tomato and pepper Safety Plan.

Análisis de peligros.pdf

F-100-PAA-32 Inocuidad Programa m... anual.pd

FSMA Apartado 112.151.pdf

Orden de analisis de agua de riego.pdf

RESULT ANALISIS ENG.pdf

RESULT DE ANALISIS SPA.pdf

VERIFICATION OF CLOSEOUT: Reviewed and Approved Root Cause, Corrective Actions and evidences by G.M.G.R.

COMPLETION DATE: 03/24/2023 **CLOSEOUT DATE:** 04/07/2023

2.5.2 Verification Activities (Mandatory)

The company has documented procedures for verifying the monitoring activities with code: F-200-OCE-19 , including pre-requisite programs (pest control program, cleaning sanitation inspections, calibration). The methods applied are documented in these procedures, include the responsible employee to implement the monitoring activities and the responsible supervisor for the authorization of records. The responsible person for this is the Food Safety and Quality Manager. NC Minor 2.5.2.2: Sampled applications of agrochemicals dated February 2023 in: “F-100-INP-41” of greenhouse #14 of bell peppers, shown the application of product “SERANADE ASO” with reentry interval: 0 hrs, but the data sheet of product indicated that the reentry interval is 2 hrs.

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

RESPONSE: MINOR

EVIDENCE: Sampled applications of agrochemicals dated February 2023 in: “F-100-INP-41” of greenhouse #14 of bell peppers, shown the application of product “SERANADE ASO” with reentry interval: 0 hrs, but the data sheet of product indicated that the reentry interval is 2 hrs.

ROOT CAUSE: The frequency of verification has not been established.

2.5.2.2 ENG.pdf

CORRECTIVE ACTION: SOP 7 "Validation and Verification of Procedures" establishes the verification period for authorized agrochemicals and fertilizers, and updates the F-100-PAA-26 and the F-100-INP-41 with the correct re-entry time.

F-100-INP-41-FEBRERO 2023 INV ... firma.pdf

F-100-INP-41-FEBRERO 2023 INV 14 firma.pdf

F-100-PAA-26 Enero 2023 verificada.pdf

POE 7 Validación y Verificación de

Revision F-100-PAA-26 SQF SANIDAD.pdf

VERIFICATION OF CLOSEOUT: Reviewed and Approved Root Cause, Corrective Actions and evidences by G.M.G.R.

COMPLETION DATE: 03/24/2023 **CLOSEOUT DATE:** 04/07/2023

2.8.1 Allergen Management (Mandatory)

The site's Allergen Management Policy to control allergens and prevent contamination of other products is found in document Allergen Management Plan and is the responsibility of SQF Practitioner. A risk analysis was observed to be in place for allergens including raw materials, ingredients and processing aids such as food grade lubricants. Workplace allergens from locations such as lunch rooms, locker rooms and vending machines were found to be part of the allergen program and the use of fertilizers with allergenic compounds, however the company defines that these are applied only by drip irrigation and there is no contact with the product. NC Minor 2.8.1.1: The document: “IT-100-PAA-75: Allergens management” establishes that the utensils that are used to management of inputs with allergenic components they must be identified, however was observed only in greenhouse 15A “La Estancia”, that the utensils are not identified, these utensils used to put the organic fertilizer called: “FON FISH”, this fertilizer is put in de substrate, however, the utensils were observed Stored separately from other utensils.

2.8.1.1 The methods and responsibility for the control of allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A hazard and risk analysis and control measures of those agricultural inputs and processing aids, including food grade lubricants, that contain food allergens (refer to food safety plan 2.4.3); ii. An assessment of workplace-related food allergens that may originate from change rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of production and the country (ies) of destination if known; iv. A list of allergens that is accessible by relevant personnel; and v. Individual management plans for control of the identified allergens.

RESPONSE: MINOR

EVIDENCE: The document: “IT-100-PAA-75: Allergens management” establishes that the utensils that are used to management of inputs with allergenic components they must be identified, however was observed only in greenhouse 15A “La Estancia”, that the utensils are not identified, these utensils used to put the organic fertilizer called: “FON FISH”, this fertilizer is put in de substrate, however, the utensils were observed Stored separately from other utensils.

ROOT CAUSE: IT-100-PAA-75 Allergen Management, which establishes the identification of this type of utensils, was not disseminated to personnel involved in the activity of adding organic fertilizers.

2.8.1.1 ENG.pdf

CORRECTIVE ACTION: *The utensils used for the addition of fertilizers with allergenic components are identified under the name "Harinas", from the greenhouse area "La Estancia 15A". *Dissemination of IT-100-PAA-75 Allergen Management to personnel involved in the activity of adding organic fertilizers.

CAPACITACION A... PERSONAL 1.pdf

CAPACITACION A... PERSONAL 2.pdf

CAPACITACION A... PERSONAL 3.pdf

CAPACITACION A... PERSONAL 4.pdf

CAPACITACION ALERGEN... APOYADORES

EVIDENCIAS IDE... MATERIALES.pdf

Gestion de Alergenos IT-100-PAA-75... 02.pdf

VERIFICATION OF CLOSEOUT: Reviewed and Approved Root Cause, Corrective Actions and evidences by G.M.G.R.

COMPLETION DATE: 03/24/2023 **CLOSEOUT DATE:** 04/07/2023

18.8.1 Storage of Agricultural Chemicals, Soil Amendments, and Toxic Substances

The chemicals for cleaning and sanitizing operations, grease, oils, among others used during the production are stored in closed and locked rooms in its original container, all areas are located outside greenhouses. All pesticides and fertilizers used in production areas are stored in its original container and with the original label. Fertilizers and pesticides are stored in separated and locked rooms. Chemicals for pest control are stored by the each supplier. The storage areas for chemicals are closed and locked. Employees in warehouse areas are trained and managed an inventory of all chemicals. Protective clothing was observed in areas. Employees were audited by interview. Toxic chemicals (no agriculture) are stored in an enclosed and locked room, this is provided with secondary containment.. Food grade lubricants are stored in a section separated of other not food grade lubricants. Storage areas for empty containers were observed locked and enclosed. Collection of empty containers is conducted by external and approved service supplier. NC Minor 18.8.1.2 : It was observed in organic fertilizers warehouse the storage of liquids fertilizers called: “Oliver- Calcio” and “Brand Organic”, both with inventory greater than 500 ml, there are no containment measures

18.8.1.2 Chemical storage locations shall: i. Be compliant with national and local legislation; ii. Be designed to ensure there is no cross-contamination between chemicals, proper ventilation to the exterior, and spill control or containment (including tank capacity); iii. Be equipped with details of purchase, appropriate and compliant labels, vendor approval, and an up-to-date inventory of all chemicals contained within and removed from the storage location; and iv. Be equipped with employee health and safety requirements, such as signage, safety data sheets, instruction, emergency wash facilities, and other labor law requirements.

RESPONSE: MINOR

EVIDENCE: It was observed in organic fertilizers warehouse the storage of liquids fertilizers called: “Oliver- Calcio” and “Brand Organic”, both with inventory greater than 500 ml, there are no containment measures

ROOT CAUSE: The area for liquid fertilizers does not have the capacity to safeguard large volumes of product

18.8.1.2 ENG.pdf

CORRECTIVE ACTION: An extra area for the storage of liquid fertilizers is designated and identified within the fertilizer store. Which is identified as "Liquid Fertilizers" and has a stop that prevents it from spreading outside the storage area in the event of a possible spill. Evidence is attached to demonstrate the retention capacity (volume) of the top implemented in the area.

ACCIÓN CORRECTIVA JUSTIFICACIÓN.pdf

VERIFICATION OF CLOSEOUT: Reviewed and Approved Root Cause, Corrective Actions and evidences by G.M.G.R.

COMPLETION DATE: 03/14/2023 **CLOSEOUT DATE:** 04/07/2023

Section Responses

Audit Statement	Audit
SQF Practitioner Name	Name the designated SQF Practitioner **RESPONSE:** Omar Chavez
SQF Practitioner Email	Email of the designated SQF Practitioner **RESPONSE:** ochavez@grupou.mx
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** Gladys Garcia: Lead auditor, Omar Chavez: Quality Coordinator, Angelica Toledo: Manager, Carolina Camino: Coordinator of the quality and food safety management system, Deny Sierra: Coordinator of the quality and food safety management system, Maricruz Garcia: quality assistant, Cecilia Tierrablanca: documenter.
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details **RESPONSE:** The company Aguilares SPR de RL is located in Salamanca, Guanajuato. The core business is the organic production in greenhouses of products: tomatoes and bell peppers with 20 greenhouses distributed in 6 sections called: “Pronase 1”, “Pronase 2”, “Pronase 3”, “Pronase 4/Garambullo”, “Aguilares” and “La Estancia” with 34.96 hectares of tomatoes and 4.8 hectares of bell peppers. The agriculture water supply is from wells. The process starts in the reception of seedlings, growing, fertilization, irrigation, crop protection, harvesting and transportation of crops. The number of employees is: 720, the production schedule is from 07:00 am to 03:00 pm of Monday to Saturday and the personnel who realized applications of agrochemicals works 11:00 am to 06:00 pm. The product destination market is: USA, Canada and Mexico. The company works all year. The company has 2 HACCP plans. This was an announced audit of SQF Food Safety Code Edition 9.0 and SQF Quality Code Edition 9.0. The applicable codes for this audit are: 2 and the quality code
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** Gladys Garcia: Lead auditor, Omar Chavez: Quality Coordinator, Angelica Toledo: Manager, Carolina Camino: Coordinator of the quality and food safety management system, Deny Sierra: Coordinator of the quality and food safety management system, Maricruz Garcia: quality assistant, Cecilia Tierrablanca: documenter.
Auditor Recommendation	Auditor Recommendation **RESPONSE:** Issue of Certification of Registration recommended once deficiencies rectified.

2.1.1 **Management Responsibility (Mandatory)**

The company has a quality and safety food policy (F-200-INP-01) is written in Spanish and signed by the administrative director issued on February 25, 2023, the policy was observed displayed on different areas and lunch rooms. The policy includes the commitment and the methods used to measure food safety objectives, regulatory and customer requirements and the commitment of the plant to continuously improve its food safety performance. The company establishes as objectives: 1) no more than 15 monthly major reports for non-compliance with personal hygiene regulations per each business unit and 2) maintain SQF certification during the current year with an excellent rating. The Policy and objectives are written in Spanish and is communicated to the facility's staff by induction training. The staff speaks Spanish. The company has the Food Safety Culture Plan that establishes the continuous training of personnel on food safety issues and the recognition of their responsibilities to support the food safety program and the notification of problems of this type to their superiors. The SQF Practitioner has duties including the development and maintenance of food safety fundamentals and HACCP-based food safety plans. The SQF practitioner has a certificate issued by NSF in HACCP dated April 01- 02, 2019 and a certificate of implementing SQF Edition 09 dated November 28-29, 2022 issued from NSF. The alternate for the SQF Practitioner is the coordinator of the quality and food safety management system., who has a training by the SQF Practitioner on February 20, 2023 about HACCP and a certificate of implementing SQF Edition 09 dated November 28-29, 2022 issued from NSF. The job descriptions are written for staff responsible for food safety and quality, with coverage for absenteeism assigned and substitutes of SQF Practitioner. The job descriptions for: Coordinator of quality and food safety systems, production coordinator, food safety assistant and general maintenance coordinator were reviewed and contained food safety responsibilities and the provision to cover personnel during absences. Personnel were aware of the site's requirement to report food safety issues to management, as evidenced by interviews with maintenance assistant and quality inspector. Senior site management has processes in place to demonstrate continuous improvement, to ensure the integrity of the food safety systems and to have personnel are in place with the competency and resources for achieving the food safety objectives. The quality and food safety Manual (MC-200-EAG-01), defines after the Quality and Safety organization chart that the administration has defined blocking times with SCS to prevent recertification audits occur out of season or when the facilities are not in operation, only the days indicated in the calendar as non-working days are designated to not being able to receive visits.

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

RESPONSE: COMPLIANT

2.1.1.2 Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment and documentation of clear and concise food safety objectives and performance measures and their communication to all relevant staff; ii. Adequate resources are available to meet food safety objectives and performance measures; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Staff are informed and are aware of their food safety and regulatory responsibilities; v. Staff are informed and held accountable for their food safety and regulatory responsibilities; vi. Staff are positively encouraged and required to notify management of actual or potential food safety issues; and vii. Staff are empowered to act to resolve food safety issues within their scope of work.

RESPONSE: COMPLIANT

2.1.1.3	The reporting structure shall identify and describe the site personnel with specific responsibilities for tasks within the food safety management system and identify backup for absence of key personnel. Job descriptions for the key personnel shall be documented. **RESPONSE:** COMPLIANT
2.1.1.4	Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review, and maintenance of the SQF System, including Good Agricultural/Operating Practices outlined in 2.4.2, and the food safety plan outlined in 2.4.3. ii. Take appropriate action to ensure the integrity of the SQF System; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System **RESPONSE:** COMPLIANT
2.1.1.5	The primary and substitute SQF practitioner shall: i. Be employed by the site; ii. Hold a position of responsibility related to the management of the site's SQF System; iii. Have completed a HACCP training course; iv. Be competent to implement and maintain HACCP based food safety plans; and v. Have an understanding of the SQF Food Safety Code: Primary Plant Production and the requirements to implement and maintain an SQF System relevant to the site's scope of certification. **RESPONSE:** COMPLIANT
2.1.1.6	Senior site management shall ensure the training needs of the site are resourced, implemented, and meet the requirements outlined in system elements 2.9 and that site personnel have met the required competencies to carry out those functions affecting the legality and safety of food products. **RESPONSE:** COMPLIANT
2.1.1.7	Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities. **RESPONSE:** COMPLIANT
2.1.1.8	Senior site management shall designate defined blackout periods that prevent unannounced re-certification audits from occurring out of season or when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed-upon unannounced audit. **RESPONSE:** COMPLIANT

2.1.2 Management Review (Mandatory)

The SQF system is reviewed annually by the Director, SQF Practitioner and Managers of each area, annual review is documented on February 25, 2023. The review includes the food safety and quality manual, internal politics, food safety and quality plans, internal and external audit findings, the investigations and resolutions of corrective actions and customer complaints with investigations and trends and systems, business continuity plan, performance of the food safety culture, food fraud, food defense program, allergen plan and food safety objectives. The food safety plans and the rest of the SQF system are reviewed by management when potential changes are made to products and processes, no changes was detected. The SQF practitioner is responsible for maintaining records of all reviews, validations and changes to the SQF System. This is indicated in food safety and quality manual. The quality and food safety team and the SQF Practitioner meet with senior management monthly. Records of meeting with senior management sampled: October, 2022 and January, 23 with topics: quality and food safety indicators, employee non-compliance reports, reinforcement of BPA training.

2.1.2.1	The SQF system shall be reviewed by senior site management at least annually and include: i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan); ii. Food safety culture performance; iii. Food safety objectives and performance measures; iv. Corrective and preventative actions and trends in findings from internal and external audits, customer complaints, and verification and validation activities; v. The hazard and risk management system; and vi. Follow-up action items from previous management review. Records of all management reviews and updates shall be maintained. **RESPONSE:** COMPLIANT
2.1.2.2	The SQF Practitioner(s) shall update senior site management on at least a monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented. **RESPONSE:** COMPLIANT
2.1.3	**Complaint Management (Mandatory)** The procedure for handling customer complaints is documented on: PR-200-OCE-04. It defines the methods and responsibilities for handling customer complaints, the procedure includes the complaints trend analysis is performed by the SQF Practitioner, who graphs monthly the complaints to verify the root cause and follow up of the corrective action. Complaints are handled by quality and food safety department. The quality and food safety coordinator is responsible for the data base of complaints and the statistics information of each month. The company has had no food safety complaints in 2022.
2.1.3.1	The methods and responsibility for handling, investigating, and resolving complaints from commercial customers, consumers, and authorities arising from products grown or handled on-site, shall be documented and implemented. **RESPONSE:** COMPLIANT
2.1.3.2	Adverse trends of customer complaint data shall be investigated and analyzed, and root cause established by personnel knowledgeable about the incidents. **RESPONSE:** COMPLIANT
2.1.3.3	Corrective and preventative action shall be implemented based on the seriousness of the incident and the root cause analysis as outlined in 2.5.3. Records of customer complaints, their investigation and resolution shall be maintained. **RESPONSE:** COMPLIANT
2.2.1	**Food Safety Management System (Mandatory)** A food safety and Quality Manual has been developed, documented and maintained in hard copy and electronic form; it is maintained by the SQF Practitioner. The policies and procedures are documented in this manual and outline how the SQF Code are met. This manual contains the scope of the certification, a list of products in the scope: tomatoes and bell peppers, the specifications of finish product, the description of the regulations for primary food production, HACCP plan, the organizational chart and all food safety policies and procedures that make up the SQF System of this site. It is made available to all relevant staff by means of controlled copies to the staff related to the procedure. The last revision and update of the HACCP plan was carried out on February 2023.

2.2.1.1 The methods the site uses to meet the requirements of the SQF Food Safety Code: Primary Plant Production shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include: i. Food safety policies and organization chart; ii. Products covered under the scope of certification; iii. Food safety regulations that apply to the site and to the country of sale if known; iv. Agricultural inputs/materials, packaging materials, and finished product specifications; and v. Written procedures and programs (Good Agricultural Practices and/or Good Operational Practices) and other documentation necessary to support the development, implementation, maintenance, and control of the SQF System (e.g., food safety plans, validation, and verification).

RESPONSE: COMPLIANT

2.2.1.2 Food safety plans, Good Agricultural/Operating Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any potential changes implemented have an impact on the site's ability to deliver safe food. The reason for the change shall be documented.

RESPONSE: COMPLIANT

2.2.2 Document Control (Mandatory)

The supplier has written and implemented a procedure for control of procedures, instructions and records, defining the methods and responsibilities for document control (PR-200-OCE-01). All changes are recorded in the control changes of each document. Records were found during the audit to be readily accessible and properly stored. A current list of all SQF documents is maintained and documents were observed to be stored securely and are accessible in electronic and physical format. The register of SQF documents is included in the food safety and quality manual, in electronic format. The responsible for document control is the General Coordinator of Quality Systems.

2.2.2.1 The methods and responsibility for maintaining document control, including records, shall be documented and implemented. They shall ensure that documents and records are i. Controlled; ii. Current; iii. Safely stored to prevent unauthorized access, loss, damage, and deterioration; iv. Organized in a registry or listing form; and v. Readily accessible in a manner that ensures employees use up-to-date and current policies, procedures (work instructions/task lists), and forms when documenting food safety related activities.

RESPONSE: COMPLIANT

2.2.3 Records (Mandatory)

There is a procedure for record control with code "PR-200-OCE-02". The SQF Practitioner is responsible for assuring records are handled correctly. There is Document retention and Destruction Policy and the time to retain all the documents for one year in site (system records and product), after, those will be stored (death file). The records are stored at least 5 years. Records are legible and suitably authorized by the supervisor or Manager, electronic copies are available for relevant staff, this demonstrates inspections, analyses, and showing the activities have been completed. All records are provided by the SQF practitioner and copies are readily accessible, retrievable and securely stored in an electronic archive, which is restricted to all staff and just the SQF practitioner can go through.

2.2.3.1 All manual or electronic/digital records shall be legible, suitably authorized, and/or signed by those undertaking activities to demonstrate that inspections, supervisory reviews, testing, and other essential activities have been completed.

RESPONSE: COMPLIANT

2.2.3.2	Records shall be retained in accordance with periods specified by a customer or regulations or at a minimum no less than product shelf life. **RESPONSE:** COMPLIANT
2.3.1	**Plant Variety/Hybrid or Product Development** N/A. No product development is performed in the company.
2.3.1.1	The methods and responsibility for designing, developing, and converting product concepts (e.g. new varieties, hybridization, crops, species) to commercial realization shall be documented and implemented and comply with regulatory and customer requirements. Records for new products testing, shelf life, and final approvals shall be maintained. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No product development is performed in the company.
2.3.1.2	The food safety plan shall be reviewed and revised accordingly for each new product and its associated process through conversion to commercial production and distribution, or where a change to inputs, process, or packaging occurs that may impact food safety. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No product development is performed in the company.
2.3.1.3	New products shall be tested and inspected to ensure they meet stated shelf life, maximum residue limits (MRLs), and other regulatory and customer requirements (e.g., potency, strength, purity). **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No product development is performed in the company.
2.3.1.4	The process flows for all new and existing processes shall be designed to ensure that products meet specifications and to prevent cross-contamination. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No product development is performed in the company.

2.3.2 Specifications (Agricultural Inputs, Packaging, Harvested Product, and Contract Services)

The specifications for seedlings, services, inputs were available in the document “F-200-EAG-20”. The specifications include the request of technical data sheets, letter of guarantee, SDS and certificates, among others. Documents were available for review. For seedlings, specifications requested are letter of guarantee and certificate of quality or food safety. The seedlings are produced by the other company that belongs to the same group of "Aguilares". Documents were available for review, for example: for seedlings, specifications requested are letter of guarantee or certificate of food safety, it was observed certificate number: 267669 in PrimusGFS v3.2 of “Aguilares SPR de RL” with validity on May 05, 2023 by NSF. A list of approved supplier of inputs and services was in place and was available for review in document with code: " F-500-OCE-03" . The chemicals and fertilizers are provided from approved suppliers. Products are 90 % exported to USA and Canada and 10% National. The responsibilities for verifying compliance with these specifications are the safety and quality department and the purchasing department. The SQF Practitioner is responsible for approving any new products and specifications. The company has the document: " F-500-OCE-02: List of approved suppliers. A list of current contract service providers is maintained in Service Supplier list and found to include providers of services including microbiological tests and the service of collection of sanitary waste. Supplier Contract arrangements for collection of sanitary waste were reviewed during the audit and found to be satisfactory. N/A. 2.3.2.4 No farms or packinghouses are hired. NC Minor 2.3.2.2: Arrival logs of agrochemicals and arrival logs of fertilizers includes the review of batch and date of expiry, but in the sampled records of January 2023 and February 2023 of both records does not includes this information.

2.3.2.1 Specifications and/or descriptions for seeds, agricultural inputs, packaging, and contract services that impact finished product safety shall be documented, approved, comply with relevant legislation, and kept current through a review process.

RESPONSE: COMPLIANT

2.3.2.2 Food contact packaging, seeds, and agricultural inputs shall be verified to ensure product safety is not compromised and the material is fit for its intended purpose. Verification shall include certificates of conformance, certificate of analysis, or sampling and testing (refer to 2.4.4.1).

RESPONSE: MINOR

EVIDENCE: Arrival logs of agrochemicals and arrival logs of fertilizers includes the review of batch and date of expiry, but in the sampled records of January 2023 and February 2023 of both records does not includes this information.

ROOT CAUSE: The activity of registering the entrances to the warehouse is not defined in a specific procedure of the warehouse area.

2.3.2.2 ENG.pdf

CORRECTIVE ACTION: *Identification code is assigned to the internal control of income to the general store FO-15-PAB-01 "Warehouse entry log". *The survey activity is carried out in the PR-900-PAA-01 "Reception, storage and control of inputs".

CamScanner 03-28-2023 17.38.pdf

FO-15-PAB--01 Bitácora de en... almacén.pd

FOTOS FECHAS CADUCIDAD.pdf

PR-900-PAA-01 Recepción

VERIFICATION OF CLOSEOUT: Reviewed and Approved Root Cause, Corrective Actions and evidences by G.M.G.R.

COMPLETION DATE: 03/24/2023 **CLOSEOUT DATE:** 04/07/2023

2.3.2.3 Finished product specifications shall be documented, approved by the site and its customer where applicable, accessible to relevant staff, and kept current through a review process. Specifications shall include, where applicable: i. Microbiological, purity, strength, composition, and agricultural chemical limits; ii. Maximum residue limits (MRLs) for pesticides; and iii. Labeling and packaging regulatory and customer requirements.

RESPONSE: COMPLIANT

2.3.2.4 The methods and responsibilities for managing contract farms, services (e.g., spraying), packers, or storage and distribution facilities shall be documented and implemented to ensure the following are being met: i. Contract farms and services shall comply with the SQF Food Safety Code: Primary Plant Production and relevant regulatory and customer requirements; ii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel; and iii. Records of all contract reviews and changes to contractual agreements and their approvals are maintained.

RESPONSE: NOT APPLICABLE

EVIDENCE: No farms or packinghouses are hired.

2.3.2.5 A register or listing of all specifications and/or descriptions for seeds, agricultural inputs, packaging, and labels, finished products, and contract services shall be maintained and kept current.

RESPONSE: COMPLIANT

2.3.3 Approved Supplier/Input Purchasing Program (Mandatory)

The facility has a written supplier approval policy implemented in “PR-500-OCE-01”, which has been implemented and covers the procedures for approving suppliers of raw materials, ingredients and services. The procedure includes specifications, the level of risk to the facility, how approved supplier status is granted, requirements for Certificates of Analysis, audits, etc. Also included are methods to review the approved supplier performance and status. The requirements for services: laboratories and calibration services were sampled, which was reviewed during the audit and found to be complete. The fertilizers and chemicals found in the storage warehouse were verified to have come from suppliers on the Approved Supplier List. The emergency use of non-approved suppliers has been documented. The supplier qualifications are established and the Food defense plan includes sensitive areas and preventive measures to avoid intentional damage. Each entry of material is supervised and inspected by the warehouse commissioner and a verification record of the input is filled out. If a service is performed, the service issued by the food safety and quality department is reviewed.

2.3.3.1 Seeds, agricultural inputs, harvested product, market-ready product, and packaging materials that impact finished product food safety shall be supplied by an approved supplier. The methods and responsibility for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented. The approved supplier program shall contain at a minimum: i. A risk level assigned to each supplier that is based on the past performance of the supplier, criticality to the site, food safety risk, and other relevant factors determined by the site; ii. Agreed specifications; iii. A summary of the food safety controls implemented by the approved supplier, including regulatory compliance and licensing where applicable; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers, which may include testing, receiving inspection, and/or supplier audits; vi. Methods and frequency of reviewing approved supplier performance and status. Where supplier audits are used as a monitoring tool, they shall be based on risk and conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques. A register or list of approved suppliers and records of monitoring activities shall be maintained. Code Amendment #2 Approved supplier registers shall include supplier contact details. All approved and emergency suppliers shall be registered.

RESPONSE: COMPLIANT

2.3.3.2 The receipt of seeds, agricultural inputs, harvested product, market-ready product, and packaging materials from non-approved suppliers shall be acceptable in an emergency situation, provided they are inspected or analyzed before use.

RESPONSE: COMPLIANT

2.3.3.3	Agricultural inputs, harvested product, market-ready product, and packaging materials received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and receiving inspections as all other material providers. **RESPONSE:** COMPLIANT

2.4.1 Food Legislation (Mandatory)

The supplier has ensured that product delivered to their customers complies with regulatory requirements includes CFR regulation, FSMA rules, microbiological parameters, etc. The site keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by bulletins, Local agency of vegetal protection and production associations Regulatory compliance for this operation includes every area legislation updating. The supplier keeps updated about changes in relevant legislation, technical developments and industry codes of practice in their specific industry, by means of bulletins from SENASICA and FDA online page web. The supplier has documented in the procedure: IT-200-OCE-01 includes the legislation and updating of applicable regulatory, the information that the certification body and SQF will be notified within 24 hours if a food safety event requiring public notification occurs is documented in procedure: "IT-200-OCE-01". The person responsible for reviewing updates on applicable regulatory topics is the SQF Practitioner. Nc Minor 2.4.1.1: The company within the list of applicable documents indicates that it must comply with the FSMA Final Rule on Produce Safety, this document in section §112.151 specifies the analytical methods to analyze the water, however the company uses the methodology NOM-210 SSA1 2014 appendix H for E. coli in water of irrigation, but this methodology is not approved for this legislation.

2.4.1.1 The owner/senior site manager shall ensure that, at the time of delivery to its customer, the food supplied shall comply with food safety and production legislation applicable in the country of use and sale, if known. Any specific licensing requirements or commodity-specific regulations shall be maintained and kept current.

RESPONSE: MINOR

EVIDENCE: The company within the list of applicable documents indicates that it must comply with the FSMA Final Rule on Produce Safety, this document in section §112.151 specifies the analytical methods to analyze the water, however the company uses the methodology NOM-210 SSA1 2014 appendix H for E. coli in water of irrigation, but this methodology is not approved for this legislation.

ROOT CAUSE: Because FSMA §112.151 had not been reviewed to identify approved methods.

2.4.1.1 ENG.pdf

CORRECTIVE ACTION: Microbiological analyzes for E. coli are requested with the UFC/100 ML membrane filtration methodology (approved by FSMA section 112.151), which will be used from now on for the indicated parameter. F-100-PAA-32 Annual sampling program is attached and is specified in F-200-OCE-18 (01) Cultivation of organic red tomato and pepper Safety Plan.

Análisis de peligros.pdf

F-100-PAA-32 Inocuidad Programa m... anual.pc

FSMA Apartado 112.151.pdf

Orden de analisis de agua de riego.pdf

RESULT ANALISIS ENG.pdf

RESULT DE ANALISIS SPA.pdf

VERIFICATION OF CLOSEOUT: Reviewed and Approved Root Cause, Corrective Actions and evidences by G.M.G.R.

COMPLETION DATE: 03/24/2023 **CLOSEOUT DATE:** 04/07/2023

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.4.2	**Good Agricultural/Operating Practices (Mandatory)** The site structure and equipment are located, constructed and designed to ensure that food is produced in a safe and hygienic environment. The site facilities are enclosed areas, the site has implemented Good Agricultural Practices, applicable to the scope of this certification. The Good Agriculture´practices are include in the risk analyze mater like an important control measure to assure the safety in the site.
2.4.2.1	The site shall ensure the applicable Good Agricultural Practices described in modules 7, 8, or 18 and the Good Operating Practices described in module 10 of this Food Safety Code are documented and implemented (refer to 2.2.1.1), or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised. **RESPONSE:** COMPLIANT
2.4.3	**Food Safety Plan (Mandatory)** A Food Safety Plan (F-200-OCE-18) have been developed, implemented and maintained by the supplier. It is kept on file and maintained by the SQF practitioner and HACCP team. The Food Safety Plans have been prepared in accordance with the 12 steps identified in the Codex Alimentarius Commission HACCP guidelines. A multi-disciplinary Food Safety Team has been identified and trained, with documentation found in training log of February 20, 2023 by the SQF Practitioner. The plans include a list of products in the scope of the certification: tomatoes and bell peppers, the flow diagram for each process including all input and output steps in the process. The flow chart of product has been verified by the site per visual verification issued on February 20, 2023. The food safety team has analyzed all hazards reasonably likely to occur including physical, chemical and microbiological hazards for each process step, inputs and harvest. The Control measures are in place to eliminate or reduce the food safety risk to acceptable levels. There are no Critical Control Points in this process. The plan is periodically reviewed by the food safety team with the last review on February 20, 2023.
2.4.3.1	A HACCP-based referenced food safety plan, developed by a responsible authority, shall be implemented in the absence of a specifically developed food safety plan for the site. The site shall: i. Maintain current records indicating that the food safety plan has been reviewed and its scope of hazard analysis, risk assessments, and control measures, such as Good Agricultural or Operational Practices, cover all products produced and sold by the site and are within the scope of certification; and ii. Document when changes in the food safety plan have impacted their Good Agricultural or Operational Practices. Note: Sites shall choose either 2.4.3.1 or 2.4.3.2 with the subsequent 2.4.3 requirements as the mandatory element. **RESPONSE:** COMPLIANT
2.4.3.2	Where a site has developed its own food safety plan, either by choice or due to product(s) not included within the scope of a HACCP-based model as per 2.4.3.1, it shall be implemented and maintained and outline how the organization controls and assures food safety of the products or product groups and their associated processes that are included in the scope of the SQF certification. More than one HACCP food safety plan may be required to cover all products included in the scope of certification. **RESPONSE:** COMPLIANT
2.4.3.3	The food safety plan(s) shall be developed and maintained by a team that includes the SQF practitioner and those site personnel with agricultural, technical, and/or machinery knowledge relevant to the commodities and products. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team. **RESPONSE:** COMPLIANT

2.4.3.4	The scope of each food safety plan shall be developed and documented including the start and endpoints of the processes under consideration and all relevant inputs and outputs. **RESPONSE:** COMPLIANT
2.4.3.5	Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. These shall reference and/or include: i. The finished product specifications; ii. Information relevant to product safety, such as it is ready-to-eat, requires further processing, and/or storage conditions; and iii. The intended use of each product, which includes target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative use of the product. **RESPONSE:** COMPLIANT
2.4.3.6	The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process of primary production, all agricultural inputs, packaging material, service inputs (e.g., water, steam, gasses as appropriate), process delays, and all process outputs, including feed, waste, and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation. **RESPONSE:** COMPLIANT
2.4.3.7	The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including agricultural inputs. **RESPONSE:** COMPLIANT
2.4.3.8	The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards. **RESPONSE:** COMPLIANT
2.4.3.9	The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure. **RESPONSE:** COMPLIANT
2.4.3.10	Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure. **RESPONSE:** COMPLIANT
2.4.3.11	For each identified CCP, the food safety team shall identify and document the critical limits that separate safe from unsafe product. The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures, individually or in combination, effectively provide the level of control required (refer to 2.5.2.1). **RESPONSE:** COMPLIANT **EVIDENCE:** There are no CCPs.

2.4.3.12	The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the test frequency. **RESPONSE:** COMPLIANT **EVIDENCE:** There are no CCPs.
2.4.3.13	The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure. **RESPONSE:** COMPLIANT **EVIDENCE:** There are no CCPs.
2.4.3.14	The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs, or other changes affecting product safety occur. **RESPONSE:** COMPLIANT **EVIDENCE:** There are no CCPs.
2.4.3.15	Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5). **RESPONSE:** COMPLIANT **EVIDENCE:** There are no CCPs.
2.4.3.16	Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used. **RESPONSE:** COMPLIANT **EVIDENCE:** There are no CCPs.
2.4.3.17	Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements. **RESPONSE:** COMPLIANT **EVIDENCE:** The company uses Codex methodology

2.4.4 Product Sampling, Inspection and Analysis

The site's procedures and criteria for sampling, inspecting and food safety parameters of raw materials, surfaces and finished product have been documented and implemented in the document: “Annual sampling program: F-100-PA-32” as required with agreed specifications, regulatory and customer requirements” and in the description of product in the HACCP plan. The program includes analyses of finish product in parameters microbiological like: E. coli, fecal coliforms and Salmonella each 6 months. The analysis of microbiological parameters: Total coliforms, fecal coliforms, E.coli and Salmonella in the water are carried of each six months. The reports of analysis are kept for finish product, water of well and water of tanks were available. The company performs analyses with external laboratories, for example: "AGROLAB" which has food accreditation: A-0618-060/15 and in agricultural health accreditation: SA-0060-008/11, both issued by the Mexican Accreditation Entity (EMA). The responsible for managing the program is the SQF Practitioner. No records of retained and or rejected products were observed during the on-site inspection; there were no issues. N/A. 2.4.2.2 The company does not have a laboratory.

2.4.4.1 The sampling, inspecting, and/or analyzing of agricultural inputs and finished product shall be documented and implemented. The procedures applied shall ensure: i. Inspections and analyses are completed at regular intervals as required and to agreed specifications (e.g., MRLs, purity, strength, composition as per 2.3.2) and regulatory and labeling requirements; ii. Records of all inspections and analyses are maintained; and iii. All analyses are conducted to nationally recognized methods or alternative methods which are validated as equivalent to the nationally recognized methods. Where external laboratories are used to conduct input or product analyses, the laboratories shall be accredited to ISO 17025 or an equivalent national standard, licensed or recognized by a regulatory authority if required, and shall be included on the site’s contract service specifications register (refer to 2.3.2.1). Where internal laboratories are used to conduct input or product analyses, sampling and testing methods shall be used in accordance with the applicable requirements of ISO/IEC 17025 or an equivalent national standard, including annual proficiency testing for personnel conducting analyses.

RESPONSE: COMPLIANT

2.4.4.2 On-site laboratories conducting chemical and microbiological analyses that may pose a risk to product safety shall ensure the following: i. Be located separate from any food handling or packaging activity and designed to limit access only to authorized personnel; ii. Provisions shall be made to isolate and contain all laboratory waste and to manage laboratory waste separately from food waste; iii. Laboratory wastewater outlets shall at a minimum be downstream of drains that service food processing and handling areas; and iv. Signage is displayed that identifies the laboratory area as a restricted area, accessible only by authorized personnel.

RESPONSE: NOT APPLICABLE

EVIDENCE: The company does not have a laboratory.

2.4.5 Non-conforming Agricultural Inputs and Products

The supplier has written methods and responsibilities for with holding non-conforming products, raw materials, work-in-progress, inputs, finish product and equipment in document PR-200-OCE-02, which was found to be properly implemented in the facility. Methods to segregate, identify, handle and dispose of product have been identified to minimize any inadvertent use. Non conforming products and equipment are identified are disposed in separate áreas. Records are maintained by quality supervisor. This was observed during the audit by a review of the Hold Log process, items observed coded as "Rejected". Relevant staff is aware of the supplier's Hold policy, as evidenced by interviews with employees in greenhouses area and maintenance staff. The SQF practitioner is responsible to implemented these procedure.

2.4.5.1 The methods and responsibility for how to control non-conforming products, agricultural inputs, and packaging shall be documented and implemented. The procedures shall ensure: i. Items are quarantined (held), identified, handled, re-worked, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; ii. All relevant personnel are aware of the site's hold and release instructions and approvals; and iii. Records of non-conforming product holds, release, and dispositions are maintained.

RESPONSE: COMPLIANT

2.4.6 Product Rework

N/A. Reworking operations are not conducted.

2.4.6.1 The responsibility and methods outlining how harvested or packaged product or packaging are reworked shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are supervised by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Each batch/lot of reworked product is inspected or analyzed as required before release; iv. Inspections and analyses conform to the requirements outlined in element 2.4.4.1; and v. Records of all reworking operations are maintained.

RESPONSE: NOT APPLICABLE

EVIDENCE: Reworking operations are not conducted.

2.4.7 Product Release (Mandatory)

The supplier has written procedures identified with codes "IT-100-INP-15" and "F-200-EAG-27-1" implemented for releasing products. This includes ensuring that all product inspections and analyses have been verified and documented by authorized personnel (quality supervisors and inspectors) to show that all food safety and quality controls have been met. A review of records with code: "F-100-INP-03" for product releases for products: tomatoes and bell peppers and found to be complete. The quality inspector of each bussines unit is responsible for the release product.

2.4.7.1 The methods and responsibility for releasing finished products shall be documented and implemented. The methods applied shall ensure: i. The product is released by authorized personnel; ii. The product is released only after all inspections and analyses have been successfully completed, reviewed, and documented; and iii. The product meets regulatory and other established food safety controls. Records of all product releases shall be maintained.

RESPONSE: COMPLIANT

2.4.8 Environmental Monitoring

The supplier's procedures and criteria for sampling, inspecting and analyzing water, contact surfaces, environmental and finished product (microbiological parameters and pesticides) have been documented and implemented in "Annual sampling program: F-100-PA-32". These programs include the frequency of analysis, sampling point, justification, the methodologies used, those responsible and the tests are carried out by external laboratory "AGROLAB". The program includes analyses of finish product in parameters microbiological like: E. coli, fecal coliforms and Salmonella each 6 months and the analysis of microbiological parameters: Total coliforms, fecal coliforms, E. coli and Salmonella in the water are carried of each six months. The reports of analysis are kept for finish product, water of well and water of tanks were available. No out-of-parameter results have been obtained.

2.4.8.1	A risk-based environmental monitoring program shall be in place for all products grown indoors and packhouse operations and include all processes and immediate surrounding areas. The methods and responsibility for the environmental monitoring program shall be documented and implemented. **RESPONSE:** COMPLIANT
2.4.8.2	An environmental sampling and testing schedule shall be prepared. It shall at a minimum: i. Detail the applicable pathogens or indicator organisms to test for in that industry; ii. List the number of samples to be taken and the frequency of sampling; iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and iv. Describe the methods to handle elevated or undesirable results. **RESPONSE:** COMPLIANT
2.4.8.3	Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) implemented where unsatisfactory trends are observed. **RESPONSE:** COMPLIANT
2.5.1	**Validation and Effectiveness (Mandatory)** All process conducted to implement the system are described in written procedures, every document includes frequency and methods that shall be conducted and the frequency to verify the implementation of activities (according to described methods). The methods for the validation of those mentioned activities, are also documented and conducted, frequency and methods have been fulfilled. Validation is conducted annually by the SQF Practitioner and senior management. Validation activities are conducted using external laboratories, microbial and physical testing records were available for review. The responsible for managing the program is the SQF Practitioner.
2.5.1.1	The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall ensure that: i. Good Agricultural/Operating Practices are confirmed to ensure they achieve the required results; ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and iii. Changes to the processes or procedures are assessed to ensure the controls are still effective. Records of all validation activities shall be maintained. **RESPONSE:** COMPLIANT
2.5.2	**Verification Activities (Mandatory)** The company has documented procedures for verifying the monitoring activities with code: F-200-OCE-19 , including pre-requisite programs (pest control program, cleaning sanitation inspections, calibration). The methods applied are documented in these procedures, include the responsible employee to implement the monitoring activities and the responsible supervisor for the authorization of records. The responsible person for this is the Food Safety and Quality Manager. NC Minor 2.5.2.2: Sampled applications of agrochemicals dated February 2023 in: “F-100-INP-41” of greenhouse #14 of bell peppers, shown the application of product “SERANADE ASO” with reentry interval: 0 hrs, but the data sheet of product indicated that the reentry interval is 2 hrs.
2.5.2.1	The methods, responsibility, and criteria for verifying monitoring of Good Agricultural/ Operating Practices, critical control points, other food safety controls, and the legality of certified products shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record. **RESPONSE:** COMPLIANT

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

RESPONSE: MINOR

EVIDENCE: Sampled applications of agrochemicals dated February 2023 in: “F-100-INP-41” of greenhouse #14 of bell peppers, shown the application of product “SERANADE ASO” with reentry interval: 0 hrs, but the data sheet of product indicated that the reentry interval is 2 hrs.

ROOT CAUSE: The frequency of verification has not been established.

2.5.2.2 ENG.pdf

CORRECTIVE ACTION: SOP 7 "Validation and Verification of Procedures" establishes the verification period for authorized agrochemicals and fertilizers, and updates the F-100-PAA-26 and the F-100-INP-41 with the correct re-entry time.

F-100-INP-41-FEBRERO 2023 INV ... firma.pdf

F-100-INP-41-FEBRERO 2023 INV 14 firma.pdf

F-100-PAA-26 Enero 2023 verificada.pdf

POE 7 Validación y Verificación de

Revision F-100-PAA-26 SQF SANIDAD.pdf

VERIFICATION OF CLOSEOUT: Reviewed and Approved Root Cause, Corrective Actions and evidences by G.M.G.R.

COMPLETION DATE: 03/24/2023 **CLOSEOUT DATE:** 04/07/2023

2.5.3

Corrective and Preventative Action (Mandatory)

The supplier's Corrective and Preventative Action program is written in procedure: “"PR-200-OCE-04". It describes the methods and responsibilities for investigating, resolving and managing corrective actions a charge of SQF practitioner. The identification of root causes and resolutions to deviations of food safety control points are documented. The company has records of corrective actions, for example of the internal audit of the SQF system, carried out from January 31 2023 to February 01, 2023.

2.5.3.1 The methods and responsibility for outlining how corrective and preventative actions are determined, implemented, and verified shall be documented and implemented. The procedures shall include: i. The identification of the root cause, and ii. Resolution of non-compliances of critical food safety limits and deviations from food safety requirements that are deemed significant. Records of all investigation and resolution of non-conformities, including their corrections and preventative actions, shall be maintained.

RESPONSE: COMPLIANT

2.5.4 Internal Audits and Inspections (Mandatory)

The facility's procedure for scheduling and conducting internal audits so the effectiveness of the SQF system is verified has been documented and implemented in document "Internal audit Procedure: PR-200-OCE-03". The Internal Audit Program is maintained by the SQF Practitioner. The facility and equipment inspections, internal audits of the code are part of the internal audit programs. The frequency of the audits is communicated to management; the SQF Practitioner is responsible to see that corrective actions are implemented and verified. Personnel conducting audits have been properly trained and audit areas independent of their function, last record of training of internal auditors issued on December 08-09, 2022. Records of internal audits in the facility conducted on January 31, 2023 to February 01, 2023 reviewed during the audit and found to be complete.

2.5.4.1 The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code: Primary Plant Production are audited per the SQF audit checklist or a similar tool, and objective evidence is recorded to verify compliance and/or non-compliance; ii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken (refer to 2.5.3); iii. Audit results are communicated to relevant management personnel and personnel responsible for implementing and verifying corrective and preventive actions; and iv. Changes implemented from the internal audit that have an impact on the site's ability to deliver safe food result in a review of applicable aspects of the SQF System (refer to 2.3.1.3). Records of internal audits and any corrections and corrective action taken as a result of internal audits are maintained.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.5.4.3 Regular inspections during growing and harvesting of products, packing of products, plant production, and/or equipment used shall be planned and carried out to verify Good Agricultural/Operating Practices and building/equipment maintenance are compliant to the applicable SQF Food Safety Code. The site shall: i. Take corrections or corrective and preventative actions; and ii. Maintain records of inspections and any corrective actions taken.

RESPONSE: COMPLIANT

2.6.1 Product Identification (Mandatory)

A policy defining how products are identified from receipt through production and shipping has been documented in procedure: "PR-100-EAG-17". The supplier's identification system ensures all materials, work-in-progress and finished goods are clearly identified at all stages of their process. Items are marked at receipt by staff in reception and inspection areas. Product identification records were reviewed during the audit for cherry tomatoes and bell peppers.

2.6.1.1	The methods and responsibilities for the product identification system shall be documented and implemented to ensure: i. Agricultural inputs, work-in-progress, and finished product are clearly identified during all stages of receipt, operations, storage, shipping, and transportation; ii. Finished product is labeled to the customer specification and/or regulatory requirements; and iii. Product identification records are maintained. **RESPONSE:** COMPLIANT
2.6.1.2	The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable to the customer (one up) and provides traceability through the process to the agricultural input supplier and date of receipt of inputs, food contact packaging and materials, and other inputs (one back); ii. Traceability is maintained where product is reworked (refer to 2.4.3); and iii. The effectiveness of the product trace system is reviewed at least annually as part of the product recall and withdrawal review (refer to 2.6.2.1). Records for the receipt and use of agricultural inputs and packaging material and for finished product dispatch and destination are maintained. **RESPONSE:** COMPLIANT
2.6.2	**Product Withdrawal and Recall (Mandatory)** The procedure: " PR-200-0CE-07" defines the methods and responsibilities for withdrawing and recalling product if necessary. A recall team has been designated and is led by General Director, the responsibilities of General Director include decisions about final disposition of products and the communication with customer and authorities, according to written procedure for correction and preventive action SQF Practitioner and HACCP team shall conduct investigations and document in register of corrective action, such as action taken, final disposition and methods used. The contact information for SCS and SQFI has been documented and is correct. The withdrawal policy includes the requirement to investigate a recall and determine the root cause of a recall/withdrawal with a corrective action. Mock trace exercises are completed annually, one step forward and one step back, to verify the effectiveness of the system. Records are maintained of the review of the recall plan and summaries of the trace exercises performed by the plant. Recovery test carried out with customer: packinghouse #2, on December 12, 2022, due of invoice 55058 where some keys were detected in the tomato clamshell, the product was identified and separated, the exercise was carried out in less than 2 hours.
2.6.2.1	The methods and responsibility to withdraw or recall product shall be documented and implemented. The procedure shall: i. Identify those responsible for initiating, managing, and investigating a product withdrawal or recall; ii. Describe the procedures to be implemented by site management; iii. Outline a communication plan to inform customers, consumers, authorities, and other essential bodies in a timely manner appropriate to the nature of the incident; iv. Describe how the withdrawal and recall system is reviewed, tested, and verified least annually (mock recall); and v. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and are notified in instances of a food safety incident of a public nature or product recall. Records of all product withdrawals, recalls, and mock recalls shall be maintained. **RESPONSE:** COMPLIANT
2.6.2.2	Investigation shall be undertaken to determine the cause of a withdrawal or recall, and details of investigations and any actions taken shall be documented and recorded. **RESPONSE:** COMPLIANT
2.6.2.3	SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com. **RESPONSE:** COMPLIANT

2.6.3	**Crisis Management Planning** The crisis plan is documented in procedure with code: “PR-200-OCE-48”. The plan has been implemented and addresses known threats to the interruption of the business and compliance that the inputs and materials used in the company meet the food safety specifications. The SQF practitioner, has oversight of the plan and a crisis management team has been identified in the crisis contact list. The Plan includes responses to an extended business interruption, isolating and identifying affected product and a current crisis alert list. The crisis plan includes internal/external communications and communication in events with the quality requirements can´t be supply. The crisis team is made up of key staff in food safety, maintenance, cold storage, production and packing areas. During the audit, records of training were available for review. The documented procedure included a contact list, including legal source and experts, such as certification body, suppliers and authorities. The company performs annual exercises, the last test of the plan was conducted on February 10, 2023, involving a test scenario of gas leak in greenhouses. Records are maintained in hard copy, including follow-up corrective actions of this review and annual test of the Business Continuity Plan.
2.6.3.1	The methods and responsibility for execution of a crisis management plan shall be documented and implemented. The plan shall include: i. A list of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather or regional events such as pandemic, warfare, or civil unrest) that can impact the site’s ability to deliver safe food; ii. Designated site management responsible for decision making, oversight, communications, and management of the crisis management plan; and iii. Control measures to ensure any affected product is identified, isolated, and dispositioned appropriately. **RESPONSE:** COMPLIANT
2.6.3.2	The crisis management plan shall be reviewed, tested, and verified at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained. **RESPONSE:** COMPLIANT
2.7.1	**Food Defense Plan (Mandatory)** The supplier has a document: “Food Defense: IT-100-EAG-40”, in which the methods, responsibilities and criteria for preventing food adulteration and has been documented and implemented. A food defense protocol includes the name of the General Director responsible for food defense procedure, establish the access of only authorized personnel, designated access points, the secured storage of materials and hazardous chemicals and the control of access to contractors and visitors. The company has a procedure of biosecurity: "IT-100-PAA-55". The last exercise was on February 16, 2023 and the records of this exercise were available. The company has a food defense team, which are the same members of the HACCP team.
2.7.1.1	A food defense threat assessment shall be conducted to identify potential threats caused by a deliberate act of sabotage or terrorist-like incident. **RESPONSE:** COMPLIANT

2.7.1.2	A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum: i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident; ii. The name of the senior site management person responsible for food defense; iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points; iv. The methods implemented to protect sensitive processing points from intentional adulteration; v. The measures taken to ensure the secure receipt and storage of raw materials, ingredients, packaging, equipment, and hazardous chemicals to protect them from deliberate acts of sabotage or terrorist-like incidents; vi. The measures implemented to ensure raw materials, ingredients, packaging (including labels), work-in-progress, process inputs, and finished products are held under secure storage and transportation conditions; and vii. The methods implemented to record and control access to the premises by personnel, contractors, and visitors. **RESPONSE:** COMPLIANT
2.7.1.3	Instruction shall be provided to all relevant personnel on the effective implementation of the food defense plan (refer to 2.9.2.1). **RESPONSE:** COMPLIANT
2.7.1.4	The food defense threat assessment and prevention plan shall be reviewed and tested at least annually or when the threat level as defined in the threat assessment changes. Records of reviews of the food defense plan shall be maintained. **RESPONSE:** COMPLIANT
2.7.2	**Food Fraud (Mandatory)** The site has conducted a Food Fraud Vulnerability Assessment issued on January 2023, includes the site's susceptibility to fraudulent economic gain, including product substitution, mislabeling, counterfeiting and dilution that could impact product quality and food safety product. The site has developed a Food Fraud Mitigation Plan to address the control of the identified food fraud vulnerabilities to product food safety. This plan indicates mitigation measures for the supplies and services purchased, for example for seedlings: purchase products with a guarantee letter and carry out inspection when seedlings are received. The company perform a evaluation of each supplier and an inspection of each raw material or ingredient that arrives at the facility.
2.7.2.1	The methods, responsibility, and criteria for identifying the site’s vulnerability to food fraud shall be documented, implemented, and maintained. The food fraud vulnerability assessment shall include the site’s susceptibility to product substitution, mislabeling, dilution, and counterfeiting or stolen goods that may adversely impact food safety. **RESPONSE:** COMPLIANT
2.7.2.2	A food fraud mitigation plan shall be developed and implemented, which specifies the methods by which the identified food fraud vulnerabilities shall be controlled and how the plan is communicated to relevant personnel to ensure effective implementation. **RESPONSE:** COMPLIANT
2.7.2.3	The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually with gaps and corrective actions documented. Records of reviews shall be maintained. **RESPONSE:** COMPLIANT

2.8.1 Allergen Management (Mandatory)

The site's Allergen Management Policy to control allergens and prevent contamination of other products is found in document Allergen Management Plan and is the responsibility of SQF Practitioner. A risk analysis was observed to be in place for allergens including raw materials, ingredients and processing aids such as food grade lubricants. Workplace allergens from locations such as lunch rooms, locker rooms and vending machines were found to be part of the allergen program and the use of fertilizers with allergenic compounds, however the company defines that these are applied only by drip irrigation and there is no contact with the product. NC Minor 2.8.1.1: The document: “IT-100-PAA-75: Allergens management” establishes that the utensils that are used to management of inputs with allergenic components they must be identified, however was observed only in greenhouse 15A “La Estancia”, that the utensils are not identified, these utensils used to put the organic fertilizer called: “FON FISH”, this fertilizer is put in de substrate, however, the utensils were observed Stored separately from other utensils.

2.8.1.1 The methods and responsibility for the control of allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A hazard and risk analysis and control measures of those agricultural inputs and processing aids, including food grade lubricants, that contain food allergens (refer to food safety plan 2.4.3); ii. An assessment of workplace-related food allergens that may originate from change rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of production and the country (ies) of destination if known; iv. A list of allergens that is accessible by relevant personnel; and v. Individual management plans for control of the identified allergens.

RESPONSE: MINOR

EVIDENCE: The document: "IT-100-PAA-75: Allergens management" establishes that the utensils that are used to management of inputs with allergenic components they must be identified, however was observed only in greenhouse 15A "La Estancia", that the utensils are not identified, these utensils used to put the organic fertilizer called: "FON FISH", this fertilizer is put in de substrate, however, the utensils were observed Stored separately from other utensils.

ROOT CAUSE: IT-100-PAA-75 Allergen Management, which establishes the identification of this type of utensils, was not disseminated to personnel involved in the activity of adding organic fertilizers.

2.8.1.1 ENG.pdf

CORRECTIVE ACTION: *The utensils used for the addition of fertilizers with allergenic components are identified under the name "Harinas", from the greenhouse area "La Estancia 15A". *Dissemination of IT-100-PAA-75 Allergen Management to personnel involved in the activity of adding organic fertilizers.

CAPACITACION A... PERSONAL 1.pdf

CAPACITACION A... PERSONAL 2.pdf

CAPACITACION A... PERSONAL 3.pdf

CAPACITACION A... PERSONAL 4.pdf

CAPACITACION ALERGEN... APOYADORES

EVIDENCIAS IDE... MATERIALES.pdf

Gestion de Alergenos IT-100-PAA-75... 02.pdf

VERIFICATION OF CLOSEOUT: Reviewed and Approved Root Cause, Corrective Actions and evidences by G.M.G.R.

COMPLETION DATE: 03/24/2023 **CLOSEOUT DATE:** 04/07/2023

2.8.1.2	Product labeling, in accordance with regulatory requirements, shall include allergens where risks from cross-contamination have been documented. **RESPONSE:** COMPLIANT
2.9.1	**Training Requirements** The supplier has implemented a training program: " F-300-OCE-13" which covers the necessary competencies for plant personnel. This program requires training to be conducted on food safety, proper handling of hazardous substances, traceability, food defense, allergens, SQF system and hygiene rules. This training program is administered by the human resources department. The training records were available for review and were observed signed by employees.
2.9.1.1	The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented (refer to 2.1.1.6). **RESPONSE:** COMPLIANT
2.9.1.2	Appropriate training shall be provided for personnel carrying out the tasks essential to the effective implementation of the SQF System and the maintenance of food safety and regulatory requirements. **RESPONSE:** COMPLIANT
2.9.2	**Training Program (Mandatory)** The supplier has documented and implemented a training document includes in the food safety and quality manual that outlines the necessary competencies for all plant personnel to ensure regulatory, food safety and all other regulations requirements critical to the maintenance of the SQF System are met. This training program is administered by the human resources department which includes training on topics: HACCP, GAP , allergens, food defense, food fraud, chemical handling, pest control, hygiene regulations, etc. The training records were available for review and were observed signed by employees.
2.9.2.1	A training program shall be documented and implemented. It shall outline the necessary competencies for specific duties and the training methods to be applied to relevant personnel upon initial hire and for ongoing refresher training. The training program shall include at a minimum: i. Appropriate HACCP training for personnel involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all personnel engaged in operating critical control points (CCPs); iii. Personal hygiene training for all personnel involved in the handling of food products and food contact surfaces; iv. Good Agricultural/Operating Practices for all personnel engaged in food handling operations; v. Allergen management, food defense and food fraud for all relevant on-site personnel; and vi. Identification and implementation of refresher training. **RESPONSE:** COMPLIANT
2.9.2.2	Training materials, the delivery of training, and work instructions on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in language(s) understood by personnel. **RESPONSE:** COMPLIANT
2.9.2.3	Training records shall be maintained and include: i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Verification that the trainee is competent to complete the required tasks. **RESPONSE:** COMPLIANT

18.1.1 **Premises Exterior**

The site's buildings, property and surroundings were observed during the audit to not pose a food safety risk to products. Measures have been established to maintain a suitable external environment and the facility performs daily external inspections as part of their facilities inspection program. There are external controls that are monitored as part of the program. The risks are documented on Risk analysis of product: "F- 200-OCE-18 " documented in food safety and quality manual: “MC-200-EAG-01”. These documents include the controls for food safety. The facility’s map document includes the facility’s surroundings and installations. The company has a permit of land use dated 12-13-2021 category: Cultivation of food products in greenhouses issued by the General Directorate of Urban Development- Irapuato.

18.1.1.1 The location and construction of the premises and building shall ensure that: i. Adjacent and adjoining buildings, operations, and land use do not interfere with safe and hygienic operations; and ii. Relevant regulatory authority approval has been obtained and is on file.

RESPONSE: COMPLIANT

18.1.1.2 The methods and responsibilities to maintain a suitable exterior environment shall be documented and implemented. These include: i. Effective, periodic monitoring and/or inspection of the premises, the surrounding areas, storage facilities, machinery, and equipment; ii. Controls to ensure that the exterior is kept free of waste and/or accumulated debris to prevent the attraction of pests and vermin; iii. Paths, roadways, loading and unloading areas are adequately drained and maintained; and iv. Records of inspections and correction actions are maintained.

RESPONSE: COMPLIANT

18.1.2 **Growing Areas**

The greenhouses and storing areas for harvesting tools and chemicals are constructed of suitable materials including solid walls and steel. They were observed during the audit to be properly designed, maintained and cleaned so that food safety is not compromised. The internal surfaces were observed smooth and impervious with light-colored finish. The production of tomatoes, cucumbers and bell peppers is performed in plastic or mesh greenhouses. Wall to wall and wall to floor junctures were observed to be sealed and free of debris. Ducting, piping and conduit conveying services were observed to be properly designed and installed to prevent contamination and for ease of cleaning. Overhead cleaning was found to be part of the master cleaning schedule. Doors, windows and frames in product areas were observed to be properly constructed of materials with the same functional requirements as internal walls. No was observed issues of food contamination for equipment and installation. Lighting was of the appropriate intensity for employees to carry out their tasks efficiently. All lighting is either covered or is shatter-proof. Suitable area is provided for inspection and quality control activities.

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

RESPONSE: COMPLIANT

18.1.2.2 Drains and waste/material trap systems shall be constructed and located so they can be easily cleaned and not present a hazard to harvested products.

RESPONSE: COMPLIANT

18.1.2.3	Walls, partitions, ceilings, and doors shall be of durable construction and/or easily replaced. Internal surfaces shall have even, light-colored finishes, be impervious to liquids, and shall be kept clean (refer to 18.3.3). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of harvested product waste. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities. Greenhouse glass or plastic for roof or wall construction shall be kept in good repair, clean, and designed and installed for effective pest management. **RESPONSE:** COMPLIANT
18.1.2.4	Ducting, conduit, and pipes that convey products or services, such as air, steam, water, sanitary waste, or wastewater, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces, and allow ease of cleaning (refer to 18.3.3). **RESPONSE:** COMPLIANT
18.1.2.5	Adequate ventilation shall be provided in enclosed product handling and storage areas and meet commodity-specific regulations where applicable. All ventilation equipment and devices shall be adequately cleaned per 18.3.3. **RESPONSE:** COMPLIANT
18.1.2.6	Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, inputs, and food contact surfaces, and shall allow ease of cleaning. **RESPONSE:** COMPLIANT
18.1.2.7	Doors, hatches, and windows and their frames in food handling or storage areas shall be of a material and construction that meets the same functional requirements as for internal walls and partitions. Doors and hatches shall be of solid construction, and windows shall be made of shatterproof glass or similar material. **RESPONSE:** COMPLIANT
18.1.2.8	Stairs, catwalks, and platforms in food handling areas shall be designed, constructed, and cleaned so they do not present a product contamination risk, and have no open grates directly above exposed food product surfaces. **RESPONSE:** COMPLIANT
18.1.2.9	The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/packed (refer to 2.4.4 for internal lab requirements). The inspection area shall: i. Have easy access to handwashing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination. **RESPONSE:** COMPLIANT
18.1.2.10	Lighting and light fixtures in product handling areas, inspection stations, ingredient/ input and packaging storage areas, and all areas where the product is exposed shall be: i. Of appropriate intensity to enable personnel to carry out tasks efficiently and effectively; and ii. Shatterproof, manufactured with a shatterproof covering, or fitted with protective covers. Where fixtures cannot be recessed, including in warehouses, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program. **RESPONSE:** COMPLIANT

18.1.3	**Insect and Pest Proofing** The doors and other openings were observed during facility tours to be properly sealed to prevent any pest infestation or dust coming into the facility. External personnel doors were observed to be self-closing and sealed to prevent dust and pest ingress. All external doors were sealed to prevent infestation. The pheromone stations, and interior and exterior rodent stations are located so the product is not at risk for contamination.
18.1.3.1	All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed and proofed against dust, vermin, and other pests. External personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against ingress of dust, vermin, and other pests. **RESPONSE:** COMPLIANT
18.1.3.2	External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to prevent pest entry by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas. **RESPONSE:** COMPLIANT
18.1.3.3	Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or operating equipment. Poison rodenticide bait shall not be used inside growing rooms, product storage areas, or other food handling areas. **RESPONSE:** COMPLIANT
18.2.1	**Product Handling Equipment and Utensils** The equipment used in the greenhouses are small tractors for transport of the product harvested. The food contact surfaces are limited to the harvest crates that are made of food grade plastic. They were observed during the audit to be properly maintained so that food safety is not compromised. Product contact surfaces, surfaces not in contact with food and storage areas are constructed of suitable materials including painted steel and hard plastic. The plastic boxes are checked at the start of the harvest day to verify the cleanliness. The water tanks cleaning is performed annually in compliance with the document Cleaning Plan. The cleaning records show that the last cleaning was January 16, 2023 and February 24, 2023. The supervisors perform a daily inspection and fill the record that includes the inspection of containers, carts and personnel. N/A. 18.2.1.3 : No uses benches, tables, conveyors, packers in the greehouses.
18.2.1.1	The methods and responsibility for purchasing and specifications development for equipment and utensils shall be documented and implemented. The methods shall ensure that equipment and utensils: i. Are designed, constructed, installed, and operated so as not to pose a threat to products; and ii. Meet any applicable regulatory requirements. **RESPONSE:** COMPLIANT
18.2.1.2	Product contact surfaces and those surfaces not in direct contact with product in product handling areas, raw material storage, packaging material storage, and cold storage areas shall be constructed of materials that will not contribute a food safety risk. Paint used in a food handling or contact zone shall be suitable for use, in good condition, and shall not be used on any product contact surface. **RESPONSE:** COMPLIANT

18.2.1.3	Benches, tables, conveyors, packers, and other mechanical equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious, and free from cracks or crevices. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No uses benches, tables, conveyors, packers in the greehouses.
18.2.1.4	Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned per the cleaning and sanitation program. Bins used for inedible material shall be clearly identified. **RESPONSE:** COMPLIANT
18.2.1.5	All equipment and utensils shall be cleaned after use (refer to the cleaning and sanitation program) and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination. **RESPONSE:** COMPLIANT
18.2.1.6	Vehicles and/or other devices used to transport and move products in food contact, handling, or processing zones, or cold storage rooms shall be designed and operated so as not to present a food safety hazard. Site-owned and operated shipping vehicles shall be maintained and clean so they do not impact the safety of shipped products. **RESPONSE:** COMPLIANT
18.2.2	**Equipment Maintenance and Repair** The food safety and quality manual include a section of maintenance where defines the methods and responsibilities for the maintenance and repair of all plant equipment and buildings. The schedule of Preventive Maintenance and tasks are documented in electronic system by the maintenance Manager. The work orders have the signature of Food Safety supervisors when the work is completed. This documentation was found on file in the document Working Order. During the audit the equipment sampled as harvest cars of greenhouse#14 and well “Casa Blanca” have completed maintenance in the weeks scheduled. Maintenance personnel interviewed show knowledge in good agricultural practices and food safety, with last training dated on January 18, 2023 by Coordinator of the quality and food safety management system. N/A. 18.2.2.5: No observed uses of comprssed air systems and othe gases
18.2.2.1	The methods and responsibility for the maintenance and repair of equipment and buildings and facilities shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination. The methods shall ensure: i. Routine preventive maintenance of facilities and equipment in any food handling or storage area is performed according to a maintenance control schedule; ii. Preventive maintenance and repair of items identified as impacting food safety controls and practices are prioritized for completion according to defined schedules or immediately when they are not properly functioning; and iii. Records are maintained for all preventive maintenance and equipment failure/immediate repair activities and corrective actions. The maintenance schedule shall cover buildings, equipment, and other areas of the premises critical to product safety and quality. **RESPONSE:** COMPLIANT
18.2.2.2	The maintenance supervisor and/or site supervisor shall be informed when repairs or maintenance are undertaken in product handling or storage areas and when the activities pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times. **RESPONSE:** COMPLIANT

18.2.2.3	Temporary repairs, where required, shall not pose a food safety risk and shall be included in the cleaning program and/or routine inspections. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions. **RESPONSE:** COMPLIANT
18.2.2.4	Equipment located over product or product conveyors shall be lubricated with food-grade lubricants, and its use shall be controlled to minimize the contamination of the product. **RESPONSE:** COMPLIANT
18.2.2.5	Compressed air systems, and systems used to store or dispense other gases used in the operational process that come into contact with food or food contact surfaces, shall be maintained and regularly monitored for quality and applicable food safety hazards. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** No observed uses of comprssed air systems and othe gases

18.2.3 Maintenance Personnel and Contractors

The company subcontracts to the company: " COMERPLAN". The work orders have the signature of Food Safety supervisors when the area has been cleaned and released. This documentation is on file in the maintenance office. The last training for maintenance personnel was carried out in June 18, 2021 by by Coordinator of the quality and food safety management system.

18.2.3.1	Maintenance personnel and contractors shall comply with the site's personnel and operational hygiene requirements (refer to 18.5). **RESPONSE:** COMPLIANT
18.2.3.2	All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed. **RESPONSE:** COMPLIANT
18.2.3.3	Maintenance personnel and contractors shall remove all tools and debris from any maintenance activity, once it has been completed, and inform the area supervisor and maintenance supervisor, so appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to restarting site operations. Maintenance, operations, and/or sanitation shall sign-off on communications. **RESPONSE:** COMPLIANT

18.2.4 Calibration

The methods and responsibilities for calibration are documented in food safety and quality Manual: "MC-200-EAG-01". The calibration procedure describes the calibration methodology, testing equipment involves comparing the accuracy of devices to a reference device. The policy includes the procedures to address the disposition of any affected product should inspection equipment be found to be out of calibration. All equipment is verified by supervisors in food handling areas. All calibration equipment (standard weights) are calibrated by accredited laboratories (ISO IEC 17025:2005). Calibration schedule is documented in F-100-INP-31. Calibrations are conducted annually. Calibration test results were available for review.

18.2.4.1	The methods and responsibility for calibration and re-calibration of chemical application, measuring, testing, and inspection equipment used in growing and harvesting processes or to demonstrate compliance with customer specifications shall be documented and implemented. The methods shall ensure: i. Calibration is performed according to regulatory requirements and/or the equipment manufacturer's recommended schedule; ii. Calibrated measuring, testing, and inspection equipment is protected from damage and unauthorized adjustment; iii. Affected product is handled per non-conforming product procedures when equipment is found to be out of calibration; iv. Software used for calibration activities is effective and appropriate; and v. Records of calibration activities are maintained. **RESPONSE:** COMPLIANT
18.2.4.2	Equipment shall be calibrated against manufacturer, national or international reference standards, methods, and schedules. In cases where such standards are not available, the site shall provide evidence to support the calibration reference method applied. **RESPONSE:** COMPLIANT
18.3.1	**Pest Prevention** A procedure Measures for the urban pest control defines the methods and responsibilities for pest management and has been effectively implemented by supplier: "Fumigaciones Ecologicas" and "Karim Martinez"; these suppliers have a valid sanitary license . The premises was free of waste and debris as observed during the interior and exterior tours. A Pest Control Operators has been trained for pest management. The procedures of each supplier includes the measures for the urban pest control defines the methods of pest control, frequency of interior and exterior inspections and targeted pests. A current site map of each bussines unit is accurate showing the location of external and internal devices. A pesticide application log gives details and dates of all chemical usage. The application of the pesticides are recommendation from the Pest Control Manager of the each organization: "Fumigaciones Ecologicas" and "Karim Martinez" . A log of chemicals used for the each Pest Control Operator is found in the Control pest record file and includes SDS information. Inspection activity reports are signed by the food safety and quality manager after the monitor performs de traps inspection. Any observations or issues highlighted by the pest control monitor are addressed and documented by each the supplier.
18.3.1.1	The methods and responsibility for pest prevention shall be documented and effectively implemented. The pest prevention program shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity so as to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include the identification, location, number, and type of bait stations set on a site map; vii. List the chemicals used. They are required to be approved by the relevant authority, and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make personnel aware of the bait control program and the measures to take when they come into contact with a bait station; ix. Outline the requirements for personnel awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends. **RESPONSE:** COMPLIANT

18.3.1.2	Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators, who comply with regulatory requirements; iii. Use only approved chemicals; iv. Maintain a site map indicating the location of bait stations, traps, and other applicable pest control/monitoring devices; and v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments. **RESPONSE:** COMPLIANT
18.3.1.3	Inspections for pest activity shall be conducted on a regular basis by trained personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of pest activity inspections and pest control devices shall be maintained. **RESPONSE:** COMPLIANT
18.3.1.4	Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation shall be investigated and resolved. Records shall be kept of the disposal, investigation, and resolution. **RESPONSE:** COMPLIANT
18.3.1.5	No domestic animals shall be permitted on the site in food handling or storage areas **RESPONSE:** COMPLIANT
18.3.2	**Cleaning** The site has a Cleaning and Sanitation Program and specific cleaning procedures that describes the methods and responsibilities for cleaning of food contact surfaces, harvesting equipment, lunch rooms, storage areas and sanitary facilities. Sanitation Standard Operating Procedures are written and include what is cleaned, chemical usage (concentrations, etc.), cleaning methods and who is responsible. A master sanitation plan includes all areas of the site with frequencies and responsibilities for deep cleaning. A review of the plan for February 06 , 2023 to February 17, 2023 showed cleaning tasks were completed as scheduled. There is a suitable area for cleaning containers and other utensils that does not cause a food product contamination. The document called Validation and Verification Schedule includes the methods, frequencies and responsibilities for verifying the effectiveness of cleaning methods
18.3.2.1	The methods and responsibility for cleaning of the product handling equipment and environment shall be documented and implemented. Cleaning procedures and schedules shall include: i. A list of equipment, utensils, and storage areas that require periodic cleaning; ii. Instructions on how cleaning is performed for the various areas and equipment; iii. The frequency of when cleaning is to be completed; iv. Personnel responsible and the methods used to verify the effectiveness of the cleaning and sanitation program (e.g., validation of procedures, concentration of detergents and sanitizers); and v. Records of cleaning activities and effectiveness reviews/inspections are maintained. **RESPONSE:** COMPLIANT
18.3.2.2	Detergents and sanitizers shall be suitable for use in a food handling environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i. The site maintains a list of chemicals approved for use; ii. An inventory of all purchased and used chemicals is maintained; iii. Detergents and sanitizers are properly stored per the storage program; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained personnel handle sanitizers and detergents. **RESPONSE:** COMPLIANT

18.3.2.3	Detergents and sanitizers that are mixed for use shall be correctly mixed according to the manufacturer's instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained. **RESPONSE:** COMPLIANT
18.3.2.4	Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils. Racks and containers for storing cleaned utensils and protective clothing shall be clearly identified and maintained in a manner that prevents contamination of products, equipment, or storage areas. **RESPONSE:** COMPLIANT
18.3.2.5	Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food handling areas, product contact surfaces, equipment, personnel amenities, sanitary facilities, and other essential areas are clean before the start of operations. Pre-operational inspections shall be conducted by qualified personnel and records maintained. **RESPONSE:** COMPLIANT
18.4.1	**Personnel Practices** A Good Agricultural Practices procedure for all employees has been documented in the food safety and quality manual and was observed implemented during the audit tour. Employees are prohibited from working in contact with the product or food storage areas who are suffering from, or who are or were carriers of, an infectious disease that may be passed through food. The site has documented measures to prevent contact of product materials with bodily fluids and respond appropriately to any bodily fluid spillage. The policy includes the prohibition of any product contact activity for persons with exposed cuts, sores or lesions and requires that minor cuts or abrasions be covered with a waterproof, metal detectable, colored bandage or dressing. The GAP policy prohibits smoking, eating, drinking (except for water in designated area) or spitting in the facility. Smoking is permitted only in designated areas.
18.4.1.1	A documented and implemented procedure for personal hygiene and personnel practices shall ensure that personnel engaged in the handling of product use appropriate personal hygiene practices. The procedure shall include instructions that: i. Jewelry and other loose objects that pose a threat to the safety of the product are not worn or taken onto any growing, product handling, or storage operations. ii. Fingernail polish, artificial nails, and long nails are not permitted where product is handled with bare hands; iii. False eyelashes and eyelash extensions are not permitted; iv. Hair restraints are used where product is exposed; and v. Smoking, chewing, eating, drinking (except for water which shall be available to all personnel), or spitting is not permitted in any growing areas, during harvesting, and in packing operations. Personnel and visitor practices, including those listed in 18.4, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices. Note: The wearing of plain bands with no stones or jewelry accepted for religious or cultural reasons and prescribed medical alert bracelets can be permitted; however, the site will need to consider its customer requirements and the applicable food legislation. **RESPONSE:** COMPLIANT
18.4.1.2	Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in growing, product handling, or harvesting and packaging operations. **RESPONSE:** COMPLIANT

18.4.1.3	Procedures and responsibilities shall be in place that specify the handling of product and/or product contact surfaces that have been in contact with or exposed to blood or other bodily fluids. **RESPONSE:** COMPLIANT
18.4.1.4	Personnel with exposed cuts, sores, or lesions shall not be engaged in handling product or product contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a suitable waterproof and colored dressing. **RESPONSE:** COMPLIANT
18.4.2	**Sanitary Facilities and Handwashing** The policy covering hand washing requirements and toilets use is described in the food safety and quality manual. The hand wash basins are located at appropriate employee access points. The toilets were installed outside the greenhouses and these were observed in good condition and supplied. Hand wash sinks are made of non-corrosive materials and supplied with potable water. Soap in a fixed dispenser and waste containers are available. The hand sanitizers are available in the facility. Signs are posted reminding employees to wash their hands before returning to work. Signs are posted at hand wash stations and in bathrooms. Employees are required to wash hands when wearing gloves. Interviews conducted with harvesters, supervisors and transport personnel during the audit demonstrated that employees understand the hand washing requirements. All the waste from the toilets is collected by the same company, the company has a septic tank and the waste from this septic tank is collected by an external company.
18.4.2.1	Toilet and handwashing facilities shall be provided and designed, constructed, and located in a manner that minimizes the potential risk for product contamination. The following shall be considered: i. There shall be sufficient toilet facilities for the maximum number of personnel, and they shall be constructed so that they can be easily cleaned and maintained; ii. Handwash basins with clean and potable water, hand soap, disposable towels or effective hand drying devices, waste bins, and a tank that captures used handwash water for disposal (if not connected to drains) shall be provided inside or adjacent to toilet facilities and in accessible locations throughout food handling areas as required; iii. Signage in appropriate languages shall be provided adjacent to handwash basins instructing personnel to wash their hands after each toilet visit; iv. Racks for protective clothing used by personnel and visitors shall be provided; and v. Toilet and wash stations shall be maintained in clean and sanitary conditions. Tools/equipment used for cleaning toilet rooms shall not be used to clean operational areas. **RESPONSE:** COMPLIANT
18.4.2.2	Personnel shall have clean hands, and hands shall be washed by all personnel, contractors, and visitors: i. On entering food handling areas, and before putting on gloves; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After handling wash down hoses, cleaning materials, dropped products, or contaminated material. **RESPONSE:** COMPLIANT
18.4.2.3	Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system as per regulations. **RESPONSE:** COMPLIANT
18.4.3	**Protective Clothing** Personnel clothing was observed clean and with adequate conditions. Gloves are used by personnel in contact with harvest and hand washing practices are described properly by employees who mention the use policy. Policy about hand washing and sanitizing is displayed in working areas.

18.4.3.1	Protective clothing (e.g., uniforms and smocks) shall be effectively maintained, stored, laundered, and worn to protect products from the risk of contamination. **RESPONSE:** COMPLIANT
18.4.3.2	Where applicable, clothing (i.e., any outer garment), including footwear, shall be in good condition, cleaned, and worn to protect product from the risk of contamination. **RESPONSE:** COMPLIANT
18.4.3.3	Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and when not in use stored on racks provided in the processing area or designated sealed containers in personnel lockers and not on packaging, ingredients, product, or equipment. **RESPONSE:** COMPLIANT
18.4.4	**Visitors** At the facility entrance, the visitors are warned about the compliance of the Good Agriculture and Good Manufacturing Practices and the rule of no children inside the production areas is visible. Company rules specify that visitors can not enter with symptoms of illness or injury.
18.4.4.1	All visitors, including management personnel, shall be required to adhere to site personnel practices and specifically: i. Remove jewelry and other loose objects as per 18.4.1.1; ii. Wash hands as per 18.4.2.2; iii. Wear suitable clothing and footwear when entering growing and packing areas; and iv. Enter and exit operational areas through the proper personnel entrance points. **RESPONSE:** COMPLIANT
18.4.4.2	Visitors who are exhibiting visible signs of illness or have been in recent direct contact with other sites, animals, or produce shall be prohibited from entering any growing, product handling, or harvesting operation. **RESPONSE:** COMPLIANT
18.4.5	**Personnel Amenities (change rooms, toilets, lunchrooms/breakrooms)** The company provides a well-supplied lunch area, toilets, hands washing stations and drinking water stations. The personnel belongings are stored in lockers area outside the dining room.
18.4.5.1	Personnel facilities shall be supplied with appropriate lighting and ventilation and provided to enable personnel and visitors to: i. Change into and out of protective clothing, if applicable; ii. Store street clothing, footwear, and personal items separate from food handling, packing, and storage areas. **RESPONSE:** COMPLIANT
18.4.5.2	Areas for meal breaks shall be designated and located away from food contact/ handling zones and harvesting equipment. These areas shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to accommodate the maximum number of personnel at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with signage in appropriate languages instructing personnel to wash their hands before entering the growing or food handling areas; v. Equipped with refrigeration and heating facilities, enabling personnel to store or heat food and prepare non-alcoholic beverages if required; and vi. Kept clean and free from waste materials and pests. **RESPONSE:** COMPLIANT

18.4.5.3	Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential for the introduction of contamination, including pests, to the site. **RESPONSE:** COMPLIANT
18.5.1	**Growing and Harvesting Operations** A Good Agricultural Practices policies in the food safety and quality manual for all employees has been documented and was observed implemented during the audit tour. Employees are prohibited from working in contact with the product or food storage areas who are suffering from, or who are or were carriers of, an infectious disease that may be passed through food. The site has documented measures to prevent contact of product materials with bodily fluids and respond appropriately to any bodily fluid spillage. The policy includes the prohibition of any product contact activity for persons with exposed cuts, sores or lesions and requires that minor cuts or abrasions be covered with a waterproof, metal detectable, colored bandage or dressing. The GAP policy prohibits smoking, eating, drinking (except for water in designated area) or spitting in the facility. Smoking is permitted only in designated areas. Employee interviews confirmed that employees are trained in good manufacturing practices and are knowledgeable of the requirements. The food safety inspector conducts pre-operational inspections of personnel to verify compliance with the guidelines of good agricultural practices.
18.5.1.1	All personnel engaged in any food handling operations shall ensure that products and materials are handled and stored to prevent damage or product contamination. They shall comply with the following operational practices: i. No eating or tasting any product in the food handling/contact zone, except as noted in element 18.5.1.2; ii. Entry to operational areas is only through the personnel access doors; iii. All doors are kept closed. Doors are not open for extended periods when access is required for waste removal, or receiving and/or shipping of products, ingredient, or packaging; iv. Packaging material, product, and ingredients are kept in appropriate containers as required and off the floor; v. Waste is contained in the bins identified for this purpose, removed from operational areas regularly, and not left to accumulate; and vi. All wash down and compressed air hoses are stored on hose racks after use and not left on the floor. **RESPONSE:** COMPLIANT
18.5.1.2	Personnel conducting harvesting and packaging activities shall ensure that utensils, personal effects, and inputs/materials used do not pose a food safety risk to products. These can include procedures that: i. Aprons and gloves are kept clean and not left on product, work surfaces, equipment, or packaging material but hung on apron and glove racks provided; ii. Harvest containers, if used, are inspected prior to use to ensure they are clean and free of physical debris or materials; iii. Knives and cutting instruments, where used, are approved for use, controlled, and kept clean and well maintained; iv. Cloths, towels, or other cleaning materials that pose a risk of cross-contamination are not used to wipe products or product containers; v. All packaging materials are appropriate for their intended use and kept off the floor; and vi. Non-food waste is contained in the bins identified for this purpose. Waste does not come into contact with produce, is removed regularly, and not left to accumulate (refer to 18.8). **RESPONSE:** COMPLIANT
18.5.1.3	Personnel conducting harvesting activities shall ensure product is not contaminated during the harvesting process. Work instructions and training shall include the following practices: i. Commodity-specific handling and harvesting instructions; ii. Employee access and controls on movement; iii. Damaged or decayed product is not harvested or culled; and iv. Product that contacts the ground or floor is not harvested. **RESPONSE:** COMPLIANT

18.5.1.4 Employee practices and activities, including those listed in 18.5, shall be routinely monitored for compliance, and any resulting corrective actions implemented and recorded for personnel who violate food safety practices.

RESPONSE: COMPLIANT

18.5.2 Foreign Material, Glass, and Other Hazard Control

The company has a procedure: " IT-100-INP-14" to manage any situation with glass or hard plastic broken. There is no glass material inside the greenhouses. Reviews available for review documented in: F-100-INP-30 glass and hard plastic inventory, these are performed daily.The employees know the policy. No issues of glass were observed in the greenhouses. The supervisor interviewed, knows the responsibilities to control the foreign matter. The procedure for foreign matter includes the methods and responsibilities for a contamination event.

18.5.2.1 The methods and responsibility for prevention of foreign matter and glass contamination shall be documented and implemented. Procedures and resulting records shall ensure: i. Containers, equipment, and other utensils made of glass, porcelain, ceramics, brittle plastic, or similar materials are not permitted where exposed product is handled unless clearly identified, required for effective operational control, and regularly inspected; ii. Regular inspections are conducted to ensure food handling/contact zones areas are free of glass and brittle plastic and any items made from the previously identified materials are in good repair; iii. Wooden pallets and other wooden utensils or tools used in food handling/contact zones are dedicated for that purpose. Their condition is subject to regular inspection, and they are kept clean and maintained in good order; iv. Product harvesting and handling areas are routinely inspected to remove risks from foreign materials, such as debris, wood, stones, metal, and other physical hazards; and v. Personnel are made aware of their responsibility to adhere to the site's foreign matter and glass controls.

RESPONSE: COMPLIANT

18.5.2.2 The methods and responsibility for conducting inspections to assess biological, chemical, and physical hazards and their risks to products being harvested shall be documented and implemented. Inspections shall occur before and during harvesting and through to the transport of product to its next destination (refer to 2.5.4.3).

RESPONSE: COMPLIANT

18.5.3 Receiving and Shipping

The personnel who carry out the reception of inputs, who carry out the loading and transport of products were interviewed during the inspection and mentioned that upon the arrival of each input or product load, the transport and the product or input is verified to observe compliance with the food safety requirements, all product loading and input reception guidelines were documented in the food safety and quality manual, the records were available for review documented in "F-500-INPO-01 Review of inputs received" and these record include the vehicle inspection . The products are transported from the greenhouses to the packinghouse in the harvest containers with harvesting cart and small tractor. The employees in charge of transport show knowledge about food safety practices.

18.5.3.1	Personnel conducting receiving activities shall ensure agricultural inputs, packaging materials, and product are not contaminated during the unloading process. Work instructions and training shall include the following: i. Vehicles are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the agricultural input, packaging, or product; ii. Vehicles (e.g., trucks/vans/containers) are secured from tampering using a seal or other agreed-upon and acceptable device or system; and iii. Where temperature control is required, the refrigeration unit's storage temperature settings and operating temperature are checked and recorded before opening the doors. Unloading is completed efficiently, and product temperatures are recorded at the start of unloading and at regular intervals during unloading. Records for vehicle inspection, identification of approved suppliers, and temperature checks shall be maintained. **RESPONSE:** COMPLIANT
18.5.3.2	Personnel conducting loading and transporting of harvested product shall ensure that product integrity is maintained. Work instructions and training shall include the following: i. Inspections for ensuring vehicles are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on products; ii. Securing vehicles (e.g., trucks/vans/containers) from tampering using a seal or other agreed upon and acceptable device or system; iii. Verification that appropriate storage conditions are maintained during transportation to final destinations; iv. Prevention of cross-contamination with other hazards and potential spoilage; v. Use of appropriate stock rotation practices; and vi. Recording and maintaining documents for vehicle inspection, transport conditions, and stock rotation. **RESPONSE:** COMPLIANT
18.6.1	**Water Supply** The water risk assessment is documented in "F-200-OCE-18 (05)" and includes the source, uses, treatments and storage. Potable water is sourced from wells located in the facility. The water is obtaining from 4 wells and store the water in cisterns. The microbiological analyses show the water is free of fecal and total Coliforms, Salmonella and E.coli. The water for cleaning and pesticides application is from wells located in the property of the company. The analyses are performed every 6 months of wells and twice a year of cisterns and no evidence of deviations are present. Results were found within the acceptance parameter according to the test by laboratory: Agrolab on October 2022, December 2022 February 2023 and January 2023 of: Main Tank Water of Aguilares Greenhouses, well of Pronase #1, well of Pronase #2, well called: "Casa Blanca", Water For Fumigation of Pronase 1 greenhouses, Irrigation Dripper Water of Pronase 1 greenhouses. The laboratory that performs the analyses have ISO 17025 accreditation. The company has a contigency plan documented in F-200-OCE-18 (05) in section corrective actions.
18.6.1.1	A water supply plan shall be prepared that describes the water sources and the operational areas they serve and shall include the location of water sources, permanent fixtures, and the flow of the water system. The plan shall be kept current and revised when changes occur. Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use. **RESPONSE:** COMPLIANT
18.6.1.2	Adequate supplies of potable water drawn from a known clean source shall be provided for use during operations, cleaning the premises and equipment, and handwashing. **RESPONSE:** COMPLIANT
18.6.1.3	Supplies of hot and cold water shall be provided, as required, to enable the effective cleaning of the premises and equipment. **RESPONSE:** COMPLIANT

18.6.1.4	The use of non-potable water shall be controlled so that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent backflow or back siphonage; and iv. Testing of the backflow system, where possible, is conducted at least annually and records are maintained. **RESPONSE:** COMPLIANT
18.6.1.5	Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination. **RESPONSE:** COMPLIANT
18.6.2	**Water Management Plan** The water description plan includes a map and documented procedures for the water chlorination and the treatment of irrigation water with sulfur burner documented in: “F-200-OCE-18 (05)” " issued on February 2023. The location of fertilization system and water sources are included in maps. Water is pumped from 4 wells to closed cisterns and the is used in the irrigation system. The water is used for pesticide applications and activities of hygiene is come from the well, only in La Estancia greenhouses the water receives a treatment with chlorine. The company performs water analysis each 6 months. Microbiological water testing is conducted to all water sources and were available for review, results were observed in compliance with requirements for potable water (NOM-127) to the water use in agrochemicals applications and the guidelines of produce safety rule for fertigation water according to tests of laboratory: AGROLAB issued on January 25, 2023, with results: Fecal coliforms, total coliforms and E.coli: <1.1/No Detected of Irrigation Dripper Water of greenhouse #5 and results of water of pesticides application of greenhouses Pronase 1 issued on January 24, 2023 with results: Fecal coliforms, total coliforms and E.coli: 0 UFC/100 mL. Tests were conducted by 17025 accredited laboratory: AGROLAB. The water system used to convey waste in toilets is not the same source that irrigation water source for cleaning operations. Both water systems are independent from the other. The waste water from toilets and cleaning operations are conducted and collected in septic tanks N/A. 18.2.6.4 NIce is not used in production.
18.6.2.1	The water system plan described in 18.6.1.1 shall have a documented hazard analysis conducted annually and whenever changes occur to its sources, storage, methods of transportation, storage conditions, or environmental conditions (refer to 2.4.3). Control methods applied to minimize risks associated with the hazards shall be included in the water management plan (refer to 18.6.2.2). **RESPONSE:** COMPLIANT
18.6.2.2	A water management plan describing the methods and responsibilities for managing the different types and uses of water at the site shall be documented and implemented. The plan shall include: i. Description of where and how water is used (e.g., washing and treating products, irrigation, recirculation, pesticide application, etc.); ii. Maintenance and cleaning of the water system (refer to 18.3.1 and 18.3.2); iii. The hazard analysis and preventive controls that are to be applied for the use of water during growing and harvesting, including monitoring, corrective action, and verification for each control measure that ensures water is safe and of adequate sanitary quality; and iv. Documentation and records referenced. Control measures may include: i. Water treatment and/or testing; ii. Water temperature; iii. Re-circulation, aeration; iv. Spent irrigation water; v. Source alteration or change scheduling; and vi. Timing of use or application. **RESPONSE:** COMPLIANT

18.6.2.3 Water used for washing and treating product, cleaning of product contact surfaces, and handwashing shall be monitored to ensure it complies with potable water microbiological and chemical standards or criteria established in the country of production and destination. The monitoring procedures shall include: i. A schedule indicating the location and frequency of monitoring (refer to 18.6.2.2), which shall be decided by the risk assessment, best practices within the country of production, or applicable legislation; ii. Reference to the potable water criteria or standards; iii. List of microbiological and/or chemical testing being conducted; iv. Reference to the approved laboratory that is accredited to ISO 17025 or equivalent; v. Corrective actions that will be taken if water and/or ice does not meet established criteria or standards, including further water treatment, other source possibilities, non-conforming products that might be affected, or other alternative actions; and vi. Records maintained for monitoring and/or corrective actions. Water testing and monitoring for uses such as irrigating (before and spent), fluming, and flooding shall comply with the items above and the water quality criteria defined by regulations in the country of production and destination.

RESPONSE: COMPLIANT

18.6.2.4 The producer shall verify that any ice used is made from water that meets the microbiological and quality standards as specified in element 18.6.2.3.

RESPONSE: NOT APPLICABLE

EVIDENCE: Ice is not used in production.

18.7.1 Ambient/Dry Storage

There are separated rooms for storing harvesting crates, packing materials, fertilizers, pesticides and sanitizers. They were observed clean and properly designed to maintain hygienic conditions. The harvesting crates are stored in the packinghouse. The harvesting carts and scissors are stored in the each greenhouses.

18.7.1.1 The responsibility and methods for ensuring proper storage of inputs, packaging, and finished product shall be documented and implemented. The methods shall ensure: i. Effective stock rotation; ii. Utilization of inputs, work-in-progress, and finished product within their shelf life; iii. Risks to temporarily stored materials and/or products are analyzed, and controls are applied if necessary; iv. Rooms used for the storage of inputs, packaging, and other dry goods shall be located away from wet/growing areas (refer to 18.1.2 for construction requirements). Records to control storage and stock rotation shall be maintained.

RESPONSE: COMPLIANT

18.7.1.2 Inputs and packaging shall be received and stored separately from indoor farmed grown products or chilled materials to ensure there is no cross-contamination. When sourced externally, products shall be received and segregated to ensure there is no cross-contamination.

RESPONSE: COMPLIANT

18.7.1.3 Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and areas behind the racks. Storage areas shall be cleaned at a predetermined frequency (refer to 18.3.2) and designed and constructed to prevent packaging from becoming a harborage for pests or vermin.

RESPONSE: COMPLIANT

18.7.2 Controlled Temperature and Atmosphere Storage

N/A. Cold systems are not used at the greenhouses.

18.7.2.1	The producer/grower shall ensure any chilling, cold storage, and controlled atmosphere facility is of suitable size, design, and construction, and is capable of effective operational performance, which includes sufficient refrigeration and controlled atmosphere capacity for chilling or storing the maximum anticipated throughput of products with allowance for periodic cleaning of storage **RESPONSE:** NOT APPLICABLE **EVIDENCE:** Cold systems are not used at the greenhouses.
18.7.2.2	Chilling, cold storage, and controlled atmosphere storage facilities shall ensure the following design and construction standards are maintained: i. Storage facility meets the requirements of 18 2.1; ii. Discharge from defrosting and condensate lines is controlled and discharged to the drainage system; and iii. Loading dock areas in controlled temperature areas are appropriately sealed, drained, and graded. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** Cold systems are not used at the greenhouses.
18.7.2.3	Chilling, cold storage, and controlled atmosphere facilities shall be fitted with temperature monitoring equipment or a suitable temperature monitoring device that is properly located to monitor the warmest part of the room and is fitted with a temperature gauge that is easily read and accessible. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** Cold systems are not used at the greenhouses.
18.8.1	**Storage of Agricultural Chemicals, Soil Amendments, and Toxic Substances** The chemicals for cleaning and sanitizing operations, grease, oils, among others used during the production are stored in closed and locked rooms in its original container, all areas are located outside greenhouses. All pesticides and fertilizers used in production areas are stored in its original container and with the original label. Fertilizers and pesticides are stored in separated and locked rooms. Chemicals for pest control are stored by the each supplier. The storage areas for chemicals are closed and locked. Employees in warehouse areas are trained and managed an inventory of all chemicals. Protective clothing was observed in areas. Employees were audited by interview. Toxic chemicals (no agriculture) are stored in an enclosed and locked room, this is provided with secondary containment.. Food grade lubricants are stored in a section separated of other not food grade lubricants. Storage areas for empty containers were observed locked and enclosed. Collection of empty containers is conducted by external and approved service supplier. NC Minor 18.8.1.2 : It was observed in organic fertilizers warehouse the storage of liquids fertilizers called: “Oliver- Calcio” and “Brand Organic”, both with inventory greater than 500 ml, there are no containment measures
18.8.1.1	Agriculture chemicals, fertilizers, soil amendments, and other toxic substances shall be stored so as not to present a hazard to personnel, product, product handling equipment, or areas in which product is handled, stored, or transported. Specifically, they shall not be stored inside food handling areas and product and packaging storage rooms. **RESPONSE:** COMPLIANT

18.8.1.2 Chemical storage locations shall: i. Be compliant with national and local legislation; ii. Be designed to ensure there is no cross-contamination between chemicals, proper ventilation to the exterior, and spill control or containment (including tank capacity); iii. Be equipped with details of purchase, appropriate and compliant labels, vendor approval, and an up-to-date inventory of all chemicals contained within and removed from the storage location; and iv. Be equipped with employee health and safety requirements, such as signage, safety data sheets, instruction, emergency wash facilities, and other labor law requirements.

RESPONSE: MINOR

EVIDENCE: It was observed in organic fertilizers warehouse the storage of liquids fertilizers called: “Oliver-Calcio” and “Brand Organic”, both with inventory greater than 500 ml, there are no containment measures

ROOT CAUSE: The area for liquid fertilizers does not have the capacity to safeguard large volumes of product

18.8.1.2 ENG.pdf

CORRECTIVE ACTION: An extra area for the storage of liquid fertilizers is designated and identified within the fertilizer store. Which is identified as "Liquid Fertilizers" and has a stop that prevents it from spreading outside the storage area in the event of a possible spill. Evidence is attached to demonstrate the retention capacity (volume) of the top implemented in the area.

ACCIÓN CORRECTIVA JUSTIFICACIÓN.pdf

VERIFICATION OF CLOSEOUT: Reviewed and Approved Root Cause, Corrective Actions and evidences by G.M.G.R.

COMPLETION DATE: 03/14/2023 **CLOSEOUT DATE:** 04/07/2023

18.8.1.3 Hazardous chemicals and toxic substances shall be handled and applied by properly trained personnel. These materials shall be used by or under the direct supervision of trained personnel who have a thorough understanding of the hazards involved, including the potential for the contamination of food and food contact surfaces.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

18.8.2	**Purchasing Chemicals** The approved list of pesticides is available and contain information of Mexican regulation and their intended market: U.S.A and Canada . The access of MRL is reviewed in electronic database and official web pages. The inventory of all chemicals is keep on electronic system of company.
18.8.2.1	Purchased fertilizers, agricultural chemicals, and soil amendments shall be approved for use in the country of production (site location), the country of destination, and for the specific commodity. Purchased chemicals, where required by regulation, shall be labeled with the active ingredient(s), applicable dosage rates, and application instructions. Where no regulations or partial regulations govern the use of chemicals, the grower/producer shall have a documented risk assessment on the justification for use of non-regulated chemicals. **RESPONSE:** COMPLIANT
18.8.2.2	Chemicals that are specifically banned for use in the country of production or the country of destination shall not be purchased or stored. **RESPONSE:** COMPLIANT
18.8.2.3	Suppliers of chemicals shall be included in the approved supplier program (refer to 2.3.4), and a current inventory of all chemicals purchased and used shall be maintained. **RESPONSE:** COMPLIANT
18.8.3	**Soil Amendments** The fertilizers storage area assigned for this use specifically, no produce or packaging stored in this area, no water or crop contamination issues are observed. No raw manure is used on the crop.
18.8.3.1	The methods and responsibilities for soil amendment preparation and/or treatment shall be documented, implemented, and designed to prevent contamination of product. The procedures or work instructions shall outline how to treat manure and other untreated organic fertilizers ensuring: i. Treatments and application methods are verified as being in compliance with the approved or recommended methods applied and do not pose a hazard to the soil amendments; ii. Treatment methods applied are validated as being appropriate and effective at inactivating pathogens in organic soil amendments; iii. No raw untreated manure is used; and iv. Records of the approvals, validation, and verification, of organic soil amendment treatments are maintained. **RESPONSE:** COMPLIANT
18.8.3.2	The methods and responsibility for soil amendment applications shall be documented and implemented to ensure organic soil amendment applications are timed to pose minimum risk to product safety including: i. All applications of soil amendments are in accordance with national or local guidelines, best practices, and codes of Good Agricultural Practice; ii. Equipment used for soil amendment application is maintained in good condition and calibrated to ensure accurate application (refer to 18.2.2); iii. Records of all equipment maintenance and calibration are maintained; iv. Signage complies with national and local codes of practice; and v. Sufficient data is recorded to provide a detailed record of soil amendment applications. **RESPONSE:** COMPLIANT

18.8.4	**Agricultural Chemicals** The crop protection program is prepared and documented by the technical advisor. The employees monitor pests and diseases in crops, records of monitoring pest and disease were available for review. Procedures for pesticide applications are documented and records are used to control the pesticide applications in all production areas. Records include information of target pest, disease, pesticide used, concentration, dose, methods and frequency. The person making decisions on chemical applications has a license number: 2224363 in agronomic engineering issued by SEP. The supplier has a group of experts specialized in agronomy. The supervisors demonstrated knowledge of regulatory requirements (EPA, USDA, COFEPRIS and Canada guidelines), doses and threshold level data. The people who make the applications of chemicals and the responsible of this program have a training of good use and handling of agrochemicals issued on February 02, 2023 by external provider: RIVAS. All pesticide applications are documented in records: F-100-INP-41. Maximum allowable levels are measured by pesticide residue testing conducted by external accredited laboratory, the last test was conducted on February 02 2023 of greenhouse #2 of tomatoes. Biological control is implemented and is combined with control access in furrows with high threshold of pest and disease. The biological control is authorized for tomato and bell pepper. Storage areas for empty containers were observed locked and enclosed. Collection of empty containers is conducted by external and approved service supplier.
18.8.4.1	The methods and responsibility for the spray or crop protection program, indicating the applications used for a target pest or disease and the threshold levels that initiate the application, shall be documented and implemented. **RESPONSE:** COMPLIANT
18.8.4.2	The person making decisions on chemical applications shall: i. Demonstrate knowledge of and access to information regarding chemical applications and the maximum residue limits allowable in destination markets; ii. Use only chemicals approved for cultivation of the specified products and approved for use in the intended market; and iii. Demonstrate competence and knowledge of chemical applications and crop withholding periods. Code Amendment #4 This requirement shall apply to the person(s) applying chemicals as well as the person making decisions on chemical application. **RESPONSE:** COMPLIANT
18.8.4.3	Records of all chemical applications shall be maintained and include: i. The chemicals used; ii. Crop information; iii. Date, method, concentration, and frequency of application; and iv. Evidence that the timing between chemical application and harvest complies with the approved harvest interval for the chemical application. **RESPONSE:** COMPLIANT
18.8.4.4	Biological controls that are approved for the cultivation of the specified products shall be used according to instructions or per expert recommendations. **RESPONSE:** COMPLIANT

18.9.1	**Waste Management** A procedure: " IT-950-OCE-06 Waste management plan" defining the methods and responsibilities for handling dry, wet and liquid waste has been documented and implemented. Waste was observed to be removed on a scheduled basis and is documented on pre-operational inspections and internal audits conducted by the plant. This procedure was observed implemented with the receipts of different service suppliers. All waste is removed from septic tank. Waste from products and lunch rooms are removed on daily basis by contract service supplier. Oils, waxes and sponges are discarded from maintenance areas. Plastics are recycled and are removed by contract service. Empty containers are removed by approved contract service. Waste is placed in garbage containers. Containers were observed covered with plastics and no pest and vermin attraction were observed. N/A. 18.9.1.5 The company does not generate inedible waste designated for animal feed.
18.9.1.1	The methods and responsibility for the effective and efficient disposal of all solid waste, such as inedible material, unusable packaging including trademarked material, and liquid and unsanitary waste from the farm, shall be documented and implemented. Reviews of the effectiveness of waste management shall be part of the site's daily inspections, and the results of these inspections shall be included in the relevant reports. **RESPONSE:** COMPLIANT
18.9.1.2	Waste systems shall be designed and constructed and waste shall be regularly removed from the growing areas and packing facility so they do not become food safety risks to finished product, growing, harvesting, and packing operations. **RESPONSE:** COMPLIANT
18.9.1.3	Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system and meet local regulatory requirements. **RESPONSE:** COMPLIANT
18.9.1.4	Trolleys, vehicles, waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so they do not attract pests and other vermin. **RESPONSE:** COMPLIANT
18.9.1.5	Inedible waste designated for animal feed shall be stored and handled so it does not cause a risk to the animal or further processing for human consumption. **RESPONSE:** NOT APPLICABLE **EVIDENCE:** The company does not generate inedible waste designated for animal feed.