FOOD SAFETY AUDIT REPORT

#6428
Pacific Coast Fruit
Value Added Section Only
201 NE Second Avenue
Portland, OR 97232

TYPE OF AUDIT
ANNOUNCED

INSPECTION DATE
July 29, 2010

AIB International Inc.
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RATING

A Prerequisite and Food Safety inspection was conducted at this facility on July 29, 2010.

The writer was accompanied throughout the audit by Mr. Erik Opsahl, QA Technical Advisor; Mr. Kieran Collins, Director of Warehousing; Mr. Ted Hendryx, Senior VP of Operations; and Ms. Laurie Sheppick, Value Added Operations Manager as time allowed.

At the conclusion of the audit, a meeting was held with the above to discuss the observations, recommendations, and rating. A draft copy of the report was left at the facility.

Based on the observations made, the information obtained, and the criteria set forth in the *AIB Consolidated Standards for Inspection: Fresh-Cut Produce*, the overall food safety level of this facility was considered to be:

SUPERIOR
(930)

The "Serious" or "Unsatisfactory" items are shaded, boxed, and bolded in the text of the report. Refer to the definitions in the AIB International Consolidated Standards for Inspection.

The "Improvement Needed" items are designated in bold type and require prompt attention.

AIB International Inc. states that this report as dated and provided herein is to be construed as its findings and recommendations, category scores, total score, and rating. A passing score of 700 and above is not a certification of the facility, products or programs. AIB International Inc. does not accept or assume responsibility for the Prerequisite and Food Safety Programs in effect with (customer). AIB International Inc. is only reporting the food safety conditions of (customer) as of the date of this report and assumes no responsibility or liability as to whether (customer) does or does not carry out the recommendations as contained in this report.

RATING ANALYSIS

DATE OF INSPECTION: July 29, 2010

TYPE OF INSPECTION: Announced

OVERALL RATING: **SUPERIOR**

OPERATIONAL METHODS AND PERSONNEL PRACTICES	185
MAINTENANCE FOR FOOD SAFETY	175
CLEANING PRACTICES	200
INTEGRATED PEST MANAGEMENT	190
ADEQUACY OF PREREQUISITE AND FOOD SAFETY PROGRAMS	180
TOTAL:	**930**

FACTUAL OBSERVATIONS AND SPECIFIC RECOMMENDATIONS

OPERATIONAL METHODS AND PERSONNEL PRACTICES

1. 1.1.0.0 Transports/containers and ingredients were inspected upon receipt for cleanliness, pest activity, structural defects, or other issues that could jeopardize product integrity. Inspection documentation, including rejected shipments, was maintained. Initial receiving inspections are carried out by the produce warehouse attached to this facility. Due to time constraints on the day of the inspection, the Value Added portion of the facility was the only section covered by this audit.

2. 1.2.0.0 Ingredients were stored and removed from storage to prevent product contamination. Materials were stored off the floor and 18 inches (45 cm) away from the wall to facilitate cleaning, inspection, and pest control activities.

3. 1.3.0.0 Storage areas were clean, well ventilated, and dry. Materials in storage were protected against contamination. Packaging materials, toxic chemicals, and nonproduct materials were segregated.

4. 1.4.0.0 Ingredients, packaging supplies, and other materials were rotated on a "First-In, First-Out" basis or other verifiable method to ensure stock rotation.

5. 1.5.0.0 Pallets and produce bins were clean, dry, and in good repair.

6. 1.11.0.0 Food approval documentation was on file for processing aids.

7. 1.12.0.0 Procedures were provided for transferring and handling food materials. Containers were kept off the floor or procedures followed to ensure any tubs that were inverted to remove product from the bottoms were not inverted to the point that any moisture from the bottoms would drip onto products or clean surfaces.

8. 1.15.0.0 Foreign material control devices appropriate to the product or process equipment were provided on each production line at the last possible point. The plant currently relies on wash procedures and visual inspections of produce being handled and cut to eliminate foreign material. The facility is working with metal detectors to develop a program to put these inline, however these are not fully functional at this time. Due to the size of the aperture opening the size of the test pieces that can be used will be rather large.

9. 1.16.0.0 Trash or inedible waste was stored in properly identified and covered containers.

10. 1.17.0.0 Individual ingredient scoops were provided where needed and were managed to prevent cross-contamination. Where small containers are used as scoops for portion control, they are discarded after each product run.

11. 1.18.0.0 Carryover product, work in progress, rework, and raw materials were covered and dated. Materials are used in a timely manner to prevent deterioration.

12. 1.19.0.0 Housekeeping activities were ongoing throughout the hours of operation in production, raw material, and support areas to maintain a sanitary working environment. Production equipment and supplies were neatly arranged. Idle equipment used in the value added processing was moved to the sides to allow room for production work. This equipment would be re-sanitized and inspected prior to being used again. Equipment was generally accessible for cleaning and inspections.

13. 1.20.0.0 Single-service containers were not reused at this facility.

14. 1.21.0.0 Production facilities, equipment, and accessories were designed to minimize hand contact where possible and practical.

15. 1.22.0.0 Raw materials, work in progress, and finished products capable of supporting the rapid growth of pathogenic microorganisms were properly stored.

16. 1.23.0.0 Incompatible materials were stored under conditions that prevented cross-contamination. An allergen program is in place to separate where possible allergens and non-allergenic materials. Food baths and floor foaming units are used at entrances to the value added area to sanitize foot ware into these processing areas.

17. 1.24.0.0 Containers were constructed, handled, and maintained to prevent contamination. No general miss use of finished product containers was noted. Two issues were pointed out that should be addressed. One was the use of a black finished produce plastic container used to held plastic bags on the packaging table. This appeared to be an isolated incident, however it is recommended that this product container not be used for this none product use. The second item was the use of a few printed finished product corrugated containers to hold R&D materials outside of the Value Added Production areas. It is recommended that unlabeled boxes be provided or a plastic container provided that could be washed between uses. (MINOR ISSUE)

18. 1.26.0.0 All shipping vehicles were inspected prior to loading for cleanliness and structural defects that could jeopardize product integrity. Inspection documentation was maintained and included lot code designation, amounts, and the point of distribution to ensure traceability and recall.

19. 1.27.0.0 Adequate hand washing stations were located at appropriate locations and were stocked with single-use towels and sanitizers as appropriate. "Wash hands" signs were displayed by sinks and entries into production areas.

20. 1.28.0.0 Employee welfare areas were maintained in an acceptable sanitary condition. "Wash hands" signs were displayed in restrooms. Lockers were inspected on a defined frequency, locker were present in the employee break area.

21. 1.29.0.0 Trained supervisors were in place to monitor compliance to personnel practices. Personnel were observed washing hands appropriately and good personal hygiene practices were observed.

22. 1.30.0.0 Personnel in the facility were wearing adequate hair and beard restraints. Their clothing and uniforms were clean and well maintained. Personnel welfare facilities allowed direct access to the facility. Tools were stored below the waist to prevent product contamination.

23. 1.31.0.0 The facility had an implemented program where personnel donned smocks prior to entry into production areas. Specially designated areas were defined for entry into processing, and defined protocols were in place for changing into designated smocks, hairnets, and gloves prior to entry into processing areas.

24. 1.32.0.0 Loose or insecure jewelry was not observed. Personnel were not observed eating, drinking, or smoking in unauthorized areas. Personal property was stored in appropriate locations defined by company policy.

25. 1.33.0.0 Effective procedures were in place to ensure that personnel with boils, sores, infected wounds, infections, or other communicable diseases were not permitted to come in contact with food as required by law. Cuts and grazes were covered by bandages which were covered by gloves or sleeve guards. Written procedures for handling products that may have come in contact with blood or bodily fluids were documented.

26. 1.34.0.0 All non facility personnel, including visitors and contractors, followed the facility personnel practices requirements.

MAINTENANCE FOR FOOD SAFETY

27. 2.1.0.0 Facility boundaries were defined and controlled. Measures were in place to prevent contamination from local activities or neighboring properties that could impact the facility.

28. 2.2.0.0 Outside grounds were maintained in a way that prevents product contamination. Measures included but were not limited to managing drainage, litter, weeds, and dust. Waste from the Value Added processing was pneumatically moved to an open outside waste bin. Birds were attracted to this bin which is a short distance from the facility. No openings into the plant or warehouse were present that were being left open into the plant. It was understood that due to city regulations, no bird control activities can be undertaken. About the only options would be to close off the container or inclose the container to block out birds. Options to reduce the attraction to birds should be considered. (MINOR ISSUE)

29. 2.3.0.0 Some measures were taken to maintain facility security. Security strategies included fencing, controlled gate access, locked doors during off hours, limited access to sensitive areas, surveillance cameras, guard services or security patrols during off hours, employee screening, and awareness and training programs.

30. 2.4.0.0 Adequate space was observed between equipment and structures to facilitate access for cleaning and maintenance activities.

31. 2.5.0.0 Floors, walls, and ceilings throughout the facility were well constructed and generally well maintained. Floor drainage was designed and maintained to allow access for cleaning and to prevent product contamination. There was no evidence of roof leakage. In some areas the top floor covering is wearing thin or had been damaged to the point that pieces were missing. In Plant 1, the thin covering is worn in spots down to the concrete. The area along the sides of the floor drain has been repaired and is generally in good condition. Plant 2 the floor covering has been chipped away in some spots that allows water to accumulate. No areas were noted where the covering was separating creating a void that could not be cleaned out. A floor recovering plan is suggested. (MINOR ISSUE)

32. 2.6.0.0 Fixtures, ducts, refrigeration units, and pipes were properly installed and maintained to prevent contamination from leaks, condensation, or loose material. There was no evidence of loose materials, such as insulation, flaking rust, and paint, in the overheads or from production equipment in or above the product zone.

33. 2.7.0.0 **Lights through out the plant have been provided with protection from breakage through the use of lens covers and plastic coated bulbs. It was noted that the plastic cover around the tomato slicer in plant 2 was cracked. This cover should be replaced. It was not know if this was a brittle plastic or not, when replacing this make sure a non brittle plastic is used. (IMPROVEMENT NEEDED)**

34. 2.8.0.0 No air make up units are used in the Value Added areas. Internal cooling units are used to maintain product temperatures.

35. 2.9.0.0 Adequate barriers were in place to prevent rodents, insects, and birds from entering the facility. Cracks, crevices, and other pest harborages were eliminated and doors were pest proofed to prevent pest entry.

36. 2.10.0.0 **There was no evidence of leaks or excessive lubrication in product zones where contamination was likely. In areas where drive motors or gearboxes were mounted over product zones, deflector plates or catch pans were intact and maintained to prevent product contamination. The only issue noted during this inspection was with the chain hoist used to place the baskets inside the spin dryers. A minor amount of oil was wiped from the drain hole in the black chain case. No evidence or actual drips was present. It is recommended that this unit be thoroughly cleaned and placed on an inspection schedule to look for possible oil accumulation. Look for a means to attach a catch pan under the unit if needed, one option would be to fabricate a pan that would attach to the basket lift arm. (IMPROVEMENT NEEDED)**

37. 2.11.0.0 Food-grade lubricants were used on food processing equipment.

38. 2.12.0.0 Operations were separated to prevent product contamination.

39. 2.13.0.0 Facility design standards identified the appropriate materials, modification and repair procedures to reduce potential contamination, facilitate cleaning and eliminate pest harborage.

40. 2.14.0.0 Equipment and utensils were designed and constructed of materials that were easily cleaned and maintained.

41. 2.15.0.0 The facility followed an understood Temporary Repair Program that defined food-grade materials appropriate for use as temporary repair materials. It was understood that generally temporary repairs would not be allowed. It was recommended that the program be written up to indicate that no temporary repairs would be allowed or if allowed what materials could be used in making the repair. (MINOR ISSUE)

42. 2.16.0.0 Food contact surfaces were smooth, corrosion-free, constructed of nontoxic material. No spot or tack welds were identified.

43. 2.17.0.0 Temperature measuring devices, including thermometers, were used to maintain temperatures to ensure against pathogenic growth. A program is in place to calibrate thermometers against and NIST certified thermometer.

44. 2.18.0.0 Compressed air did not come in contact with produce.

45. 2.19.0.0 Transporting equipment, such as forklifts and pallet jacks, were maintained to prevent contamination of materials.

46. 2.20.0.0 Food contact parts were stored off the floor in a clean environment.

47. 2.21.0.0 A program was in place to monitor water quality and records were provided. The program included water used for food contact. Back siphonage devices were provided and records of checks of the devices was current.

48. 2.22.0.0 Hand washing facilities provided hot and cold running water. Hand washing facilities were labeled and separate from utensil washing facilities.

CLEANING PRACTICES

49. 3.1.0.0 Cleaning was done in a way that prevents contamination of raw materials, products, and equipment.

50. 3.2.0.0 Food approval documentation was provided for cleaning chemicals and sanitizers used to clean food contact surfaces.

51. 3.3.0.0 Adequate cleaning equipment and tools were available and stored away from production areas. Cleaning tools were identified by type to separate them based on their intended use.

52. 3.4.0.0 Daily housekeeping cleaning activities were carried out in a way that prevents contamination. Housekeeping activities were assigned to the appropriate department to maintain work and support areas during production. No floor washing was allowed during production hours and none was observed. Floor squeegees were used to remove any spillage during processing hours.

53. 3.5.0.0 Deep cleaning of equipment and structures was conducted according to the Master Cleaning Schedule to prevent the development of microorganisms, insects, or foreign material. Periodic cleaning tasks complied with written procedures.

54. 3.6.0.0 Maintenance cleaning appeared to be completed in a way that prevented product contamination.

55. 3.7.0.0 Food contact surfaces and utensils were cleaned and sanitized as appropriate to remove contaminants. Utensils, containers, and product zones were cleaned to prevent residues from being transferred to other products.

INTEGRATED PEST MANAGEMENT

56. 4.1.0.0 A formal Integrated Pest Management (IPM) Program with written procedures that included requirements of the facility's Prerequisite Programs was in place.

57. 4.2.0.0 An annual facility assessment that addressed all areas inside and outside of the facility was documented.

58. 4.3.0.0 The facility managed their IPM Program under organic guidelines.

59. 4.4.0.0 A signed agreement was in place with the Liberty Company to provide IPM services. A copy of the service agreement included materials, the facility name, facility contact person, frequency of services, description of services, term of contract, equipment and storage specifications (where applicable), a current list of approved chemicals, emergency call procedures, service records to be maintained, and notification requirements for changes in materials or services.

60. 4.5.0.0 Current copies of certification or registration documents were on file for all persons providing IPM services for the facility.

61. 4.6.0.0 Current copies of the pesticide specimen labels and Material Safety Data Sheets (MSDS) were on file for pesticides listed as being applied at the facility.

62. 4.7.0.0 Documentation of all pesticides, including rodenticides, applied on the premises included: materials applied, registration number, target pest, amount applied, specific area where pesticide was applied, method of application, rate of application or dosage, date and time treated, and applicator's signature. Rodenticides are the only pesticides that have been reported as used around the facility.

63. 4.8.0.0 Pesticides and application equipment were not stored at the facility.

64. 4.9.0.0 The outside IPM service provider left a service report after each visit. These records provided documentation of the checks and findings for pest monitoring devices, descriptions of the current levels of pest activity, and recommendations for actions needed to correct conditions allowing a potential for pest activity.

65. 4.10.0.0 A detailed facility survey was documented and used to determine placement of all pest monitoring devices. A current site map that lists the locations of interior and exterior pest control devices was on file.

66. 4.11.0.0 Exterior pest monitoring devices, such as traps or bait stations, were provided for exterior rodent control. Exterior rodent monitoring devices were installed around the exterior perimeter of the facility at appropriate intervals. These stations were tamper resistant, anchored in place, secured, and properly labeled in compliance with regulatory requirements. A sampling of the bait stations were checked during the inspection. Some were found to be in need of cleaning to remove debris and spider webbing. Also, it was noted that the stations were mounted vertically against the wall. This appears to make the stations less effective as the rodents much climb into the chamber where the bait is present. It is recommended that these be mounted horizontal to the ground to provide easier access for rodent and thus more effective control. In limited located this may not be possible, an alternative may be to move these few stations to another near location. (MINOR ISSUE)

67. 4.12.0.0 Glue board rodent traps in protective covers were installed to monitor rodent activity inside the facility and were properly positioned. The randomly examined glue boards appeared to be properly maintained. Traps were inspected on a weekly frequency. No evidence of rodent activity was noted by the writer during this inspection and none had been reported in the past year in the trend logs.

68. 4.13.0.0 No insect light traps are used at this facility, no evidence of insect activity was noted including flying insects or crawling insects.

69. 4.15.0.0 The only bird activity noted around the facility was that around the waste bin for the produce waste generated from the Value Added process. No roosting or nesting around the building was noted.

70. 4.16.0.0 Wildlife, including domestic animals, was not observed at the time of the survey.

ADEQUACY OF PREREQUISITE AND FOOD SAFETY PROGRAMS

71. 5.1.0.0 The facility had a documented policy statement outlining its commitment to produce safe and legal products.

72. 5.2.0.0 A current organizational chart was maintained. Responsibility and authority for ensuring food safety and defense and compliance with federal, state, local, and any other appropriate regulatory laws or guidelines were clearly assigned to the Senior VP of Operations. The facility was licensed by the Oregon State Department of Agriculture and was current.

73. 5.3.0.0 Based on a review of the facility and related documentation, an appropriate budget and adequate labor support appeared to be in place to maintain the timely acquisition of tools, equipment, monitoring devices, chemicals, and other required resources.

74. 5.4.0.0 Written procedures were established to define step-by-step processes to ensure product safety.

75. 5.5.0.0 Specific written procedures were on file for providing food safety training to all personnel and contractors. Records of new employee training and annual refresher training were maintained for all personnel.

76. 5.6.0.0 A multidisciplinary Food Safety Committee was established to conduct monthly inspections of the entire facility. Documentation of the monthly inspections included identified observations, specific assignments, Corrective Actions, and actual accomplishments. It was recommended that continuing attention be given to conducting thorough, detailed self-inspections so that issues such as those noted during this audit are being identified and corrected. (MINOR ISSUE)

77. 5.7.0.0 A risk-based audit of procedures was documented by competent inspectors. Audit documentation included identified observations, specific assignments, Corrective Actions, and actual accomplishments.

78. 5.8.0.0 A written program for evaluating Customer Complaints was established. This program included a plan for quick distribution of complaint information to all departments responsible for implementing Prerequisite and Food Safety Programs.

79. 5.9.0.0 A written Chemical Control Program that addresses all chemicals used in the facility was established.

80. 5.10.0.0 The facility established a formal Microbial Program to address microbiological analysis in the production and packaging environment. Analysis for TPC (Total Plate Count), and Listeria were included as part of the testing programs.

81. 5.11.0.0 A documented Allergen Control Program was in place to address the allergens used or handled at this facility.

82. 5.12.0.0 The facility had a written policy stating that no glass, brittle plastics, or ceramics were to be used in the facility, except where absolutely necessary. Included in the policy was a procedure to handle any breakage in the facility. A list of all essential glass brittle plastics and ceramics was developed. It was noted that the tomato slicer in plant 2 was not on the list of equipment, a cracked plastic cover was noted on this piece of equipment. It was recommended that the list be reviewed to ensure it is complete. (MINOR ISSUE)

83. 5.13.0.0 A formal documented Cleaning Program that included a Master Cleaning Schedule (MCS) for periodic cleaning assignments as well as a daily housekeeping schedule was developed and implemented in this facility. The MCS specified frequency, responsibility, postcleaning evaluation techniques and Corrective Actions. Written cleaning procedures were developed for all equipment, structures, and grounds that impacted storage, processing and packaging of food products.

84. 5.14.0.0 A formal Preventive Maintenance Program and work order system was used to prioritize problems in structural, equipment, or utensil maintenance. It was suggested that the PM for the hoisted used at the spin dryers be reviewed and modified to ensure no oil leaks develop above this product area. (MINOR ISSUE)

85. 5.15.0.0 Incoming raw materials, packaging, and transports received into the facility were inspected by trained personnel according to established written procedures.

86. 5.16.0.0 A written Regulatory Affairs and Inspections Program was on file. The program included a list of personnel delegated to accompany all inspectors along with the company policy regarding recording devices, cameras, records, and sample taking. It was recommended that the comments on sample taking be expanded to include the plants procedures such as taking duplicate samples and asking what testing would be conducted. (MINOR ISSUE)

87. 5.17.0.0 Evidence of registration under the FDA Bioterrorism Act was on file at the facility. The facility had conducted a Vulnerability Assessment to identify food defense risks. A food defense program was in place.

88. 5.18.0.0 A documented Traceability Program that addressed identification of lot numbers of raw materials, rework, food contact packaging materials, work in progress, finished product, distribution, and processing aids was developed and in place. All finished products were coded and recorded.

89. 5.19.0.0 A written Recall/Withdrawal Program was on file. Distribution records were maintained to identify the initial point of distribution to facilitate segregation and recall of specific lots. The Recall Program was tested twice annually and test results were documented.

90. 5.20.0.0 A written program was in place to control nonconforming products, including work in progress, finished products, and returned goods. Corrective Actions equal to the seriousness of the risk appeared to be taken.

91. 5.21.0.0 A written program outlining the evaluation, selection, and maintenance of suppliers of goods and services that affect product quality and food safety had been implemented.

92. 5.22.0.0 Appropriate specifications were on file for raw materials, food contact packaging materials, finished products, work in progress, and processing aids. These specifications were detailed to ensure compliance with relevant food safety and legislative requirements.

93. 5.23.0.0 Letters of Guarantee or Certifications for received materials and finished products were on file and current. Letters of Guarantee indicated compliance.

94. 5.25.0.0 A Hazard Analysis Critical Control Point (HACCP) Program was developed and implemented for processes and process lines. The HACCP plan was signed and was managed by a trained HACCP team leader with assistance of HACCP trained team members. Finished Product Profiles were provided for each product produced. A current Process Flow Diagram was in place. The seven principles of HACCP were followed in the development of the HACCP Program and included a risk assessment for both the ingredients and the process. Documented training was current for management and nonmanagement personnel and for those with designated CCP responsibilities. The HACCP plan was validated by the in house HACCP committee. Through the hazard analysis the plant has determined that no Critical Control Points are present.

95. 5.29.0.0 The facility maintained processing records that were legible, genuine, in good condition, and contained sufficient information to comply with government requirements.