

Revision 1



CORRECTIVE ACTION REPORT Operation Type: Packinghouse Audit Report Summary	CB Registration No.PA-PGFS-12387-1 PrimusGFS ID #174193 - Cert:3 Audited by Primus Auditing Operations PrimusGFS Version 3.0 Ver en Español
Organization:	Proffer Wholesale Produce, Inc. Contact(s): TiffanyReed Stephen Carter Address: 920 Fifth St. 63601 Location: Park Hills, Mssouri, United States Phone Number: 573-431-0625
Operation:	3 Generations Inc. Contact(s): TiffanyReed Location: 920 Fifth St. Park Hills, Mssouri 63601, United States
Shipper:	Proffer Express, Proffer Wholesale Produce, Inc.
Operation Type:	Packinghouse
Audit Type:	Announced Audit
Audit Scope:	This facility is a year round facility that is enclosed and operated by approximately 125 employees on two shifts at high peaks of year. The facility is approximately 125000 square feet with 9 various packing lines through out the facility. This facility handles several product mostly all are conventional. The facility receives product from approved suppliers via local farms for packing purposes. There are several suppliers for the companies storage and distribution business. On this date the facility was operating 6 of its 9 lines. There was dry packing of tomatoes into clam shells, there was repacking of tomatoes, repacking of cabbage and there was washing and packing of cherry tomatoes and washing and packing of cucumbers. The cherry line is a single pass line that uses San Tec 6 (does not require fresh water rinse). The cucumber line is a dump tank and also uses San Tec 6 and monitors it hourly at 25-85ppm PAA. There was no notation on this date to turbidity and change of tank. All product is marked with a unique sticker and noted for location, PO and date of pack and tracked through Famous. All product is kept in designated coolers and received and shipped through a designated flow. There is some top icing for sweet com that is conducted. The water is sourced is municipal water and is testing regularly for microbials. There is a designated cooler for iced product. There is no immediate threats to the facility on the exterior.
Date FSMS started:	14 Aug 2019 16:00
Date FSMS finished:	14 Aug 2019 18:00
Total Amount of Time in FSMS	2.00 Hours
Date Operation Started:	14 Aug 2019 10:00
Date Operation Finished:	14 Aug 2019 16:00
Total Amount of Time in Operation	6.00 Hours
Product(s) observed during audit:	Bell Peppers, Cabbage, Cucumbers, Eggplant / Aubergine, Green Beans/French Beans, Okra, Peppers, Pickle Cucumbers, Squash, Sweet Com, Tomatillo, Tomatoes, Winter Squash (Hard Squash), Zucchini (Courgette)
Similar product(s)/process(es) not observed:	None
Product(s) applied for but not observed:	None
Auditor:	Allen Walzel (Primus Auditing Operations)
Preliminary Audit Score:	93%
Final Audit Score:	96%
Certificate Valid From:	16 Sep 2019 To 15 Sep 2020
GPS Coordinates:	Latitude Longitude 37° 51' 14" 90° 29' 59" Click here to see

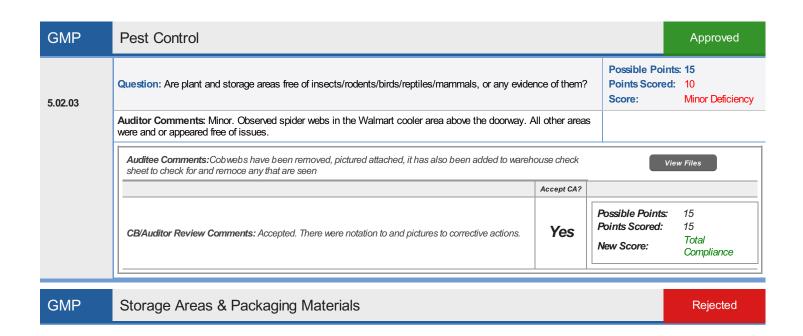
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Information related to the audited operation							
Total number of workers:	125	Maximum worker number during peak season:	125				
Number of lines in normal production:	9	Number of lines running during the audit:	6				
Square Footage/Meters:	125000 Square feet	Are/Is a CCP(s) identified:	Yes				
Allergens:	Yes	Allergen type(s):	Tree Nuts				
Temperature Controlled Storage:	Yes	Wet or dry:	Wet-Product Wash Step with Reused Water				
Water Source:	Municipal/District						

Product information for each product						
			Operation	Process(es)		
Product Group/Product Name	Seasonality	Cultural Methods	Cooling Equipment	Water Used	Antimicrobial Used	
Bell Peppers	From: May To: October	Conventional	N/A	N/A	N/A	
Cabbage	From: May To: October	Conventional	N/A	N/A	N/A	
Cucumbers	From: May To: October	Conventional	N/A	Single pass and reused/recirculated water system	Peroxyacetic acid	
Eggplant / Aubergine	From: May To: October	Conventional	N/A	N/A	N/A	
Green Beans/French Beans	From: May To: October	Conventional	N/A	N/A	N/A	
Okra	From: May To: October	Conventional	N/A	N/A	N/A	
Peppers	From: May To: October	Conventional	N/A	ΝΆ	N/A	
Pickle Cucumbers	From: May To: October	Conventional	N/A	N/A	N/A	
Squash	From: May To: October	Conventional	N/A	N/A	N/A	
Sweet Corn	From: May To: October	Conventional	Ice Machine, Top- Icing	N∕A	N/A	
Tomatillo	From: May To: October	Conventional	N/A	N/A	N/A	
Tomatoes	From: May To: October	Conventional	N/A	Single pass and reused/recirculated water system	Peroxyacetic acid	
Winter Squash (Hard Squash)	From: May To: October	Conventional	N/A	N/A	N/A	
Zucchini (Courgette)	From: May To: October	Conventional	N/A	N/A	N/A	

AUDIT SCORING SUMMARY	Pre-Corrective A	ction Review	Post-Corrective Action Revie		
	Score:	229	Score:	229	
Food Safety Management System Requirements	Possible Points:	229	Possible Points:	229	
	Percent Score:	100	Percent Score:	100	
Madula E. Cood Mountactiving Departure	Score:	1172	Score:	1218	
Module 5 - Good Manufacturing Practices	Possible Points:	1266	Possible Points:	1266	
Requirements	Percent Score:	92	Percent Score:	96	
	Score:	253	Score:	260	
Module 6 - HACCP System Requirements	Possible Points:	270	Possible Points:	270	
	Percent Score:	93	Percent Score:	96	
	Score:	1654	Score:	1707	
TOTAL	Possible Points:	1765	Possible Points:	1765	
	Percent Score:	93	Percent Score:	96	

Non-Conformance Summary By Count	Pre-Corrective Action Non- Conformances	Post-Corrective Action Non- Conformances
Food Safety Management System Requirements	0	0
Module 5 - Good Manufacturing Practices Requirements	22	11
Module 6 - HACCP System Requirements	3	2
TOTAL	25	13



5.03.02	Question: Is the storage area completely enclosed? Auditor Comments: Minor. There is a small area out back of facility that stores RPCs. All packaging is shrouded.			nts: 10 d: 7 Minor Deficiency	
	All other items are stored within the facility. All coolers are fully enclosed.	ig io orii oddo	u.		
	Auditee Comments:n/a				
	CB/Auditor Review Comments: Rejected. There were no corrective actions provided.	No	Possible Points. Points Scored:	: 10 7	
GMP	Storage Areas & Packaging Materials			Approved	
5.03.06	Question: Are all storage areas clean, especially the racking structures, lights, ceilings, floor areas by the walls and other hard to reach areas?			nts: 10 d: 7 Minor Deficiency	
	Auditor Comments: Minor. The hard to reach areas along walls in all storage areas were dirty. The were clean.				
	Auditee Comments: deep cleaning hard to reach areas is added to nightly check sheet, as well as deep cleaning preformed				
		Accept CA?			
	CB/Auditor Review Comments: Accepted. There were notation to and pictures to corrective actions.	Yes	Possible Points. Points Scored: New Score:	: 10 10 Total Compliance	
		·			
GMP	Operational Practices			Rejected	
5.04.02	Question: Are all exposed materials (product, packaging, etc.) protected from overhead contaminati ladders, motors, condensation, lubricants, walkways, loose panels, degrading insulation, etc.)?	on (e.g.	Possible Points Score Score:		
	Auditor Comments: Minor. Observed minor condensation on cooler curtains and walls in back cabbage repack area. All other areas were observed with no overhead issues observed during audit.				
	Auditee Comments:n/a		'		
		Accept CA?			
	CB/Auditor Review Comments: Rejected. There were no corrective actions provided.	No	Possible Points. Points Scored:	: 15 10	
GMP	Operational Practices			Approved	

5.04.04	Question: Are production areas clean and well maintained; especially lights, ducts, fans, floor areas and equipment, and other hard to reach areas?	Possible Point Points Scored: Score:				
	Auditor Comments: Minor. The hard to reach areas of the comers and along walls were dirty. The major areas were clean.					
	Auditee Comments: deep cleaning hard to reach areas is added to nightly check sheet, as well as deep preformed	Vie	ew Files			
		Accept CA?				
	CB/Auditor Review Comments: Accepted. There were notation to and pictures to corrective actions.	Yes	Possible Points: Points Scored: New Score:	15 15 Total Compliance		
GMP	Operational Practices					
5.04.15	Question: Are single service containers used for their intended purpose only so that potential cross is prevented?	contaminatio	Possible Point Points Scored Score:			
	Auditor Comments: Major. Observed several RPCs being used as stands to hold boxes as they we	ere packed				
	Auditee Comments: RPCs being used as stands have been marked as NOT FOR PRODUCT USE, this temporary while actual tables are being constructed	is	Vie	ew Files		
	CB/Auditor Review Comments: Accepted. There were notation to and pictures to corrective actions.	Yes	Possible Points: Points Scored: New Score:	5 5 Total Compliance		
GMP	Worker Practices			Rejected		
5.05.13	Question: Are workers issued non-reproducible identification (e.g., badges, company ID cards, etc.)?			s: 5 : 0 Non-Compliance		
	Auditor Comments: No. There are no identification badges					
	Auditee Comments:n/a corrective action will be done but not in time for the purpose of regaining points					
	Auditee Comments:n/a corrective action will be done but not in time for the purpose of regaining points	Accept CA?				
	Auditee Comments:n/a corrective action will be done but not in time for the purpose of regaining points CB/Auditor Review Comments: Rejected. There were no corrective actions provided.		Possible Points: Points Scored:	5 0		
		Accept CA?				
GMP		Accept CA?				
GMP 5.06.02	CB/Auditor Review Comments: Rejected. There were no corrective actions provided.	No		Rejected		
	CB/Auditor Review Comments: Rejected. There were no corrective actions provided. Equipment Question: Are non-food contact equipment surfaces free of flaking paint, corrosion, rust and other u	No No hygienic	Points Scored: Possible Point Points Scored:	Rejected ss: 10		
	CB/Auditor Review Comments: Rejected. There were no corrective actions provided. Equipment Question: Are non-food contact equipment surfaces free of flaking paint, corrosion, rust and other u materials (e.g., tape, string, cardboard, etc.)? Auditor Comments: Minor. Observed tape and cardboard being used on the cherry tomato line. All	No No hygienic all other non	Points Scored: Possible Point Points Scored:	Rejected ss: 10		
	CB/Auditor Review Comments: Rejected. There were no corrective actions provided. Equipment Question: Are non-food contact equipment surfaces free of flaking paint, corrosion, rust and other u materials (e.g., tape, string, cardboard, etc.)? Auditor Comments: Minor. Observed tape and cardboard being used on the cherry tomato line. All food contact areas were in good condition with no issues observed. Auditee Comments: the machine use has ended for the season, and maintenance will work on this before	No No hygienic all other non	Points Scored: Possible Point Points Scored:	Rejected ss: 10		

GMP	General Cleaning			Rejected			
5.08.03	Question: Do floor drains flow in a manner that prevents contamination (e.g., from high to low risk areas, from high risk directly to drain system), are they covered, appear clean, free from odors and are well maintained? Possible Po Points Score:						
	Auditor Comments: Minor. The drains in the wet cooler with com appeared dirty. All drains were w proper places including under packing lines and in the wet cooler. All appeared clean and free of iss						
	Auditee Comments: drains are being cleaned regularly						
		Accept CA?					
	CB/Auditor Review Comments: Rejected. There were no corrective actions provided.	No	Possible Points: Points Scored:	5 3			
GMP	General Cleaning			Approved			
5.08.05	Question: Are plastic strip curtains maintained in good condition, kept clean and mounted so that t touching the floor?	he tips are no	Possible Poir Points Scoree Score:				
	Auditor Comments: Minor. Observes strips touching along the loading dock in the main shipping a strips were in good condition and not touching the floor.						
	Auditee Comments:curtains have been trimmed		v	iew Files			
		Accept CA?					
	CB/Auditor Review Comments: Accepted. There were notation to and pictures to corrective actions.	Yes	Possible Points: Points Scored: New Score:	5 5 Total Compliance			
	<u> </u>						
GMP	General Cleaning			Approved			
5.08.07	Question: Is cleaning equipment maintained clean and stored properly?		Possible Poir Points Scored Score:				
	Auditor Comments: Minor. Observed brooms not properly stored in areas All other items observed were properly stored and/or in use.						
	Auditee Comments: brooms placed in proper storage area, cleaning team reminded of putting the brocafter use	oms away	V	iew Files			
		Accept CA?					
	CB/Auditor Review Comments: Accepted. There were notation to and pictures to corrective actions.	Yes	Possible Points: Points Scored: New Score:	5 5 Total Compliance			
			_				
GMP	Site			Approved			

Possible Points: 5 Question: Is there a facility floor plan showing the layout of the building, production areas, storage areas, water Points Scored: 0 sources and fixtures, layout of equipment and traffic flow patterns? Score: Non-Compliance 5.09.02 Auditor Comments: No. There was no interior map observed. View Files Auditee Comments:interior layout created Accept CA? Possible Points: 5 Points Scored: Yes CB/Auditor Review Comments: Accepted. There were notation to and pictures to corrective actions. Total New Score: Compliance **GMP Buildings and Grounds** Rejected Possible Points: 10 Points Scored: 7 Question: Is ventilation adequate to control dust, condensation, odors and vapors? Score: Minor Deficiency 5.10.05 Auditor Comments: Minor. There was ventilation issues in the coolers with evidence of condensation on curtains. Auditee Comments:na Accept CA? Possible Points: 10 No CB/Auditor Review Comments: Rejected. There were no corrective actions provided. Points Scored: **GMP** Buildings and Grounds Rejected Possible Points: 10 Question: Are floor surfaces in good condition, with no standing water, no debris trapping cracks and are they Points Scored: easy to clean? Score: Minor Deficiency 5.10.06 Auditor Comments: Minor. There were minor areas of rough and or cracked concrete. Auditee Comments:na Accept CA? Possible Points: 10 No CB/Auditor Review Comments: Rejected. There were no corrective actions provided. Points Scored: 7 **GMP Buildings and Grounds** Approved Possible Points: 5 Question: Is an 18" (46 cm) internal wall perimeter being maintained within the facility, with adequate access to Points Scored: 3 these wall perimeters, thereby allowing inspection and cleaning? Score: Minor Deficiency 5.10.13 Auditor Comments: Minor. There was pallets up against walls in coolers and box loft. There was adequate spacing and well maintained access in other areas. Auditee Comments: pallets have been moved away from walls View Files Accept CA? Possible Points: Points Scored: Yes CB/Auditor Review Comments: Accepted. There were notation to and pictures to corrective actions. Total New Score: Compliance

GMP	Chemical Files			Approved		
5.11.04	Question: Are there specific Standard Operating Procedures (SOPs) for the monitoring/testing and changing of recirculated and batch water systems (e.g., dump tanks, flumes, hydrovacuums, hydrocoolers, etc.) and testing of single pass water systems? Possible Popoints Score:					
	Auditor Comments: Minor. Missing statement to when water is changed and checks on turbidity. I monitoring and changing SOP noted for the dump tanks that including hourly monitoring of PAA. The dump tank on the tomato line as well as the cucumber line		Э			
	Auditee Comments:turbidity checks will be preformed and have been added to SOP			View Files		
		Accept CA?				
	CB/Auditor Review Comments: Accepted. SOP updated.	Yes	Possible Points Points Scored: New Score:			
GMP	Pest Control Documentation			Approved		
5.12.03	Quarties: Are service reports created for nest control checks detailing inspection records, application records, and			ints: 10 ed: 7 Minor Deficiency		
	Auditor Comments: Minor. There was no tread data available for the facility. There were current bi monthly inspections in place and corrective actions noted from Williams on external devices. This included application of bate on exterior. Weekly internal monitoring of glue boards on interior and any rodent activity.					
	Auditee Comments:trend report provided by HE Williams					
		Accept CA?				
	CB/Auditor Review Comments: Accepted. The trend report was provided.	Yes	Possible Points Points Scored: New Score:			
GMP	Operation Monitoring Records			Rejected		
5.13.05	Question: Are there records of visual monitoring and/or testing and changing of recirculated and bat systems (e.g., dump tanks, flumes, hydrovacuums, hydrocoolers, etc.), for build-up of organic mater		Possible Points Score Score:			
	Auditor Comments: Major. There were no notation to changing of the water and or turbidity checks					
	Auditee Comments:production for dump tanks has ended for the season, turbidity checks have been a sop, system has been purchased, and will be done during next season. SOP update has been provided			View Files		
		Accept CA?				
	CB/Auditor Review Comments: Rejected. Will need to follow up on next years audit.	No	Possible Points Points Scored:	≈ 5 1		
GMP	Maintenance & Sanitation Files			Rejected		

5.14.07	Question: Are there records showing verification of cleaning and sanitizing chemical concentrations	?	Possible Points Points Scored: Score:	-
	Auditor Comments: No. There were no log or records of this.			
	Auditee Comments:NA			
	CB/Auditor Review Comments: Rejected. There were no corrective actions provided.	No	Possible Points: Points Scored:	5 0
GMP	Maintenance & Sanitation Files			Rejected
5.14.09	Question: Is there a routine program and written procedure to verify sanitation effectiveness using rasanitation checks (e.g., ATP measurements, allergen specific proteins)?	pid post	Possible Points Points Scored: Score:	
	Auditor Comments: Major. There was no RLU factors evaluated and or used. There was a SOP for on wet area. They were using Hygienia Go/No Go swabs that only changed colors.	checking dail	у	
	Auditee Comments:ordering the correct ATP			
		Accept CA?		
	CB/Auditor Review Comments: Rejected. There were no corrective actions provided.	No	Possible Points: Points Scored:	15 5
GMP	Testing			Approved
5.16.01	Question: Is there a written risk-based, scientifically valid microbiological testing program that may pathogen testing, and details program design (zonal approach, food contact/non-food contact surfac sprout irrigation water, test & hold, water, ice, etc.), rationale for organisms tested for, procedures for testing (surfaces, water, product, ingredients, etc.), timing and frequency of testing, the testing method that performs the tests, and acceptable results/threshold levels for each organism?	es, spent r sampling ar		
	eq:Auditor Comments: Major. There were items missing from the SOP , reason for testing, what was limits.	testing and		
	Auditee Comments:EMSL document has been attached to SOP discussing parameters		View	v Files
		Accept CA?	Г	
	CB/Auditor Review Comments: Minor. There was noted EMSL documents provided yet the company 's SOP was not amended.	Yes	Possible Points: Points Scored: New Score:	15 10 Minor Deficiency
GMP	Testing			Approved
5.16.07	Question: Are there written risk-based corrective action procedures for when unacceptable test resurreceived, that describe the steps to be taken, assign responsibility for taking those steps, and steps cause is identified (e.g., root cause analysis) and corrected to minimize the potential for product corrected to minimize the product corrected to minimize the potential for product corrected to minimize the potential for product corrected to minimize the product corrected to minimize the product corrected to minimize the product corrected to minimize t	to ensure th	Possible Points Points Scored: Score:	
	Auditor Comments: Major. There was notation to corrective action yet lacked detail to risk based a acceptable ranges.	nd noted		
	Auditee Comments:corrective action procedure added to SOP		View	v Files
		Accept CA?	Г	1
	CB/Auditor Review Comments: Accepted. New SOP updated to included corrective actions.	Yes	Possible Points: Points Scored: New Score:	10 10 Total Compliance

HACCP	Preliminary Steps			Approved	
6.01.04	Question: Has the process(es) been flow charted in sufficient detail to completely describe the prochandling/processing steps?	ess or produ	Possible Points Score Score:		
	Auditor Comments: Major. There was a noted flow chart for tomato and cucumbers yet missing all	other lines.			
	Auditee Comments:additional flowcharts were created				
		Accept CA?			
	CB/Auditor Review Comments: Accepted. There were notation to and pictures to corrective actions.	Yes	Possible Points: Points Scored: New Score:	10 10 Total Compliance	
HACCP	Development of the HACCP Plan			Rejected	
6.02.01	Question: Has a documented hazard analysis for the processes been conducted, showing the various types of hazards, their likelihood of occurrence, their associated severity and their control measures? A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT. Possible Polynomials of the various types of hazards, their likelihood of occurrence, their associated severity and their control measures? A ZERO POINT Score:				
	Auditor Comments: Minor. There was missing notation to changing and testing of turbidity in tanks. There was complete reviews of the risk and pre requisites to control or eliminate risk with the flow of the product. This was for each packing line including tomato dump tanks, cucumber dump tanks and other dry pack and repacked items and the organic line.				
	Auditee Comments:turbidity checks have been added to risk assessment				
		Accept CA?			
	CB/Auditor Review Comments: Rejected. There were no corrective actions provided.	No	Possible Points: Points Scored:	15 10	
			_		
HACCP	Execution of the HACCP Plan on the Plant Floor			Rejected	
6.03.02	Question: Are the CCP monitoring activities and frequencies in compliance with the HACCP Plan and CCP Points Score: Score:				
	Auditor Comments: Minor. Missing turbidity checks. All records were in accordance to frequencies.				
	Auditee Comments:the dumptanks are no longer in use for this season, turbidity checks will be done diseason	uming next			
		Accept CA?			
	CB/Auditor Review Comments: Rejected. There were no corrective actions provided.	No	Possible Points: Points Scored:	15 10	