



Purpose

Food safety requirements apply to all current and potential suppliers that currently or intend to manufacture or supply product for Robinson Fresh. All suppliers must have a fully implemented and executed food safety program with documentation available and kept current for review. Food safety programs shall include, but is not limited to, the following:

Requirements

Good Agricultural Practices (GAP)

Supplier shall have programs in place to ensure compliance with Good Agricultural Practices (GAP) as applicable and as described in the FDA's "Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables." The GAP program shall contain, but is not limited to:

- Water usage
- Ground history
- Adjacent land use
- Fertilizer and pesticide usage
- Employee safety and hygiene
- Field sanitation
- Traceability
- Audit programs

Pesticide Usage and Residue Tolerances

Supplier shall only utilize plant protection products that are registered in the county of production and approved for commodity. Supplier should develop and maintain procedures which establish and continually identify relevant control points in the production of the product to ensure pesticide residue tolerances do not exceed the published maximum residue level (MRL) of the country of destination. Supplier's processes shall not allow shipment of product to C.H. Robinson if the established MRL was exceeded. Supplier's pesticide tolerance records shall be maintained for a period of two (2) years from their creation, and C.H. Robinson may review all such records and/or request additional MRL testing at any time.

Bio Solids and Uncomposted Animal Manures

The use of bio solids and uncomposted animal manures on lands used to produce product provided to Robinson Fresh is prohibited.

Surface Water

All surface water (pond, canal, river, reservoir, etc.) that may potentially come in contact with the edible portion of the crop must be treated.



Good Manufacturing Practices (GMP) Program

All production/storage facilities and personnel are responsible for implementing and complying with the Federal Current Good Manufacturing Practices (GMP), as stated in CFR 21, Part 110. GMPs shall cover compliance in the following areas:

- Personnel
- Buildings, grounds, equipment
- Sanitation practices, product and materials handling practices, product safety practices

Hazard Analysis and Critical Control Points (HACCP)

All production facilities must document and implement a food safety/hazard analysis and critical control points (HACCP) program for all Robinson Fresh products and processes. This program shall include, but is not limited to, flow chart, hazard analysis, CCPs (if applicable), critical limits, monitoring procedures, corrective action plan if critical limits are exceeded, verification steps, documentation, and record keeping.

Product Protection, as Applicable

All production facilities must document and implement procedures and devices to protect products from potential contamination. This may include, but is not limited to, metal detectors, screens and filters, water testing and treatment, back-flow prevention, glass, brittle/hard plastic and ceramic controls.

Sanitation Program

All production facilities must document and implement comprehensive sanitation programs covering buildings, grounds, equipment, and utensils. This program shall include, but is not limited to:

- Master cleaning schedule with areas, frequencies, and responsibilities
- Written standard sanitation operating procedures (SSOPs)
- Pre-operational inspection prior to start-up, supplemented with ATP or a similar program to verify the effectiveness of cleaning
- Documented corrective action procedures and preventive measures when results show failure

Environmental Monitoring and Control Program

All production facilities must document and implement an environmental monitoring and control program. This program may include, but is not limited to:

- Monitoring for pathogens and indicator organisms unique to the process or product being manufactured
 - Monitoring using rapid methods or microbiological swabbing
 - Sampling locations, instructions, and schedules representative of size of facility
 - Corrective action procedures defined if positive results are detected
 - An effective hold and release procedure if food contact surfaces are tested for pathogens
- **Under no circumstances may product be released into commerce until pathogen test results have been confirmed as negative.



Product Microbiological Testing Program

If product testing is conducted, supplier shall have an effective product control systems in place, use an accredited third party laboratory, and outline testing specifications.

- All lots of tested product (either done internally or by regulatory agencies) must be held and released only upon receipt of negative test results.

Allergen Management Program, If Applicable

All production facilities must document and implement an allergen program if any of the following “top 8” allergens (peanuts, tree nuts, eggs, wheat, dairy, shellfish, fish, soy) are present and used in the facility. This program shall include, but is not limited to:

- A master list or matrix of all food allergens in the facility
- Documented procedures for control of allergens
- Compliance to U.S. FDA Food Allergen Labeling and Protection Act of 2004
- Documented training program for employees on the proper handling of allergen sensitive ingredients and products

Chemical Control Program

All production facilities must document and implement a chemical control program. This program shall include, but is not limited to:

- Approval of all chemicals for use in a food processing facility
- Labels on ALL chemicals and MSDS sheets
- Isolated and secure areas for all chemicals; controlled access
- Segregated storage for food grade and non-food grade lubricants
- Training on how and where to use chemicals

Pest Control Program

Supplier shall document and implement a comprehensive pest control program appropriate for each operation. This program shall include, but is not limited to:

- Licensed pest control provider (copy of license, certification, and insurance)
- Documentation of services being provided
- Copy of label and MSDS/SDS for all chemicals used
- Service reports including records of treatments
- No use of bait inside of a facility

Supplier Approval Program

Supplier shall document and implement a supplier approval program for raw materials, ingredients, and packaging. This shall include, but is not limited to:

- Identifying criteria for approval
- Reviewing required supplier documentation
- Monitoring of supplier performance
- A master list of approved suppliers



Incoming Ingredients and Packaging

Supplier shall document and implement an incoming ingredient and materials inspection program to maintain the quality and food safety of the products.

Training

Supplier shall document and implement a food safety training program for all employees. This shall include, but is not limited to:

- New hire training and annual refresher training
- Specific process and product training for critical food safety jobs
- Records of training—name, date, topics covered, who conducted

Food Defense

Supplier shall document and implement a food defense program appropriate for each operation. This program shall include, but is not limited to:

- Addressing all aspects of food defense, including plan management; interior to exterior physical security; receiving, storage, and shipping; utilities and personnel
- Compliance to FDA/CFSAN—Guidance for Industry: Food Producers, Processors, and Transporters: Food Security Preventive Measures Guidance
- Compliance with the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (Bioterrorism Act)

Receiving Program

Supplier shall document and implement a comprehensive receiving program that describes acceptable and/or unacceptable conditions. This program shall include, but is not limited to:

- Documenting incoming inspection of carriers for condition, cleanliness, evidence of pest activity, foreign substances, or odors
- Verification of security seals, if applicable
- Documenting incoming inspection of food items and food contact packaging for lot codes, damage, and potential contamination
- Documenting temperature of incoming refrigerated products
- Ensuring products are placed promptly in appropriate storage conditions
- Developing corrective action steps for non-conforming product

Storage Practices

Supplier must implement and follow documented storage conditions. This shall include, but is not limited to:

- All food items and packaging must be stored at least 18 inches away from walls and ceilings and 6 inches off the floor or on a pallet if contained in appropriate protective packaging.
- Refrigerated storage rooms must have their temperature controlled, monitored, and documented to the appropriate temperature requirements.



Shipping and Handling Procedures

Supplier must implement and follow documented shipping and handling procedures to protect product from any potential adulteration during loading and transit. This shall include, but is not limited to:

- Documenting and inspecting trailer conditions and integrity
- Implementing and following first in, first out (FIFO) procedures
- Documenting lot codes to ensure lot traceability
- Ensuring proper temperatures are maintained during staging and shipping

Trace Back/Recall Program

Supplier must develop and maintain standard operating procedures which ensure that an effective trace back and recall system is in place. Supplier shall have a documented and implemented formal recall plan and procedures. This program shall include, but is not limited to:

- Product traceability procedures
- Produce traceability initiative (PTI)/GTIN numbers—may be required dependent on final customer
- Mock recall exercises conducted at least once annually
- Corrective and preventive action procedures (if necessary)
- Reportable Food Registry: Supplier shall comply with all aspects of the Reportable Food Registry, Section 417 of the Food, Drug, and Cosmetic Act (21 U.S.C. 350f). Registered Food Facilities that manufacture, process, pack, or hold food for human or animal consumption in the United States under section 415(a) of the Food, Drug, and Cosmetic Act (21 U.S.C. 350d) shall report when there is a reasonable probability that the use of or exposure to an article of food will cause serious adverse health consequences or death to humans or animals.
- Robinson Fresh must be notified and contacted in a timely manner not to exceed two hours of a recall situation via email with appropriate recall initiation letter AND a phone call (with acknowledgment) to the following people:
 - Megan Arnold
 - Dustin Tillett
 - Robinson Fresh sourcing representative

FDA Food Safety Modernization Act (FSMA)

Supplier must develop, implement, and maintain processes that ensure compliance as applicable with the Food Safety Modernization Act (FSMA) that was signed into law on January 4, 2011.

Third Party Food Safety Audit/Certification Requirements

Third party food safety audits/certifications shall be conducted annually on all growing, harvesting, manufacturing, storage, and distribution operations through an approved GFSI benchmarked audit scheme.

GFSI Certifications are listed below. For more information, go to www.mygfsi.com.

- BRC: A or B certification
- SQF Certification: Code 7 edition, level 2



- IFS: Foundation or higher level
- Primus GFS certification
- Globalgap Integrated Farm Assurance certification
- Canada GAP certification

Third party food safety audits that are not GFSI recognized may be submitted for review for potential/provisional approval. Other third party audits that may be considered include:

- NSF International
- SCS Global
- Silliker
- Steritech
- AIB
- Primus Standard
- USDA Harmonized Audit

Audits must be conducted as close to the prior year's audit date as possible and at the beginning of the harvesting season to remain certified and approved as a supplier to Robinson Fresh.

- Audit scores must be passing and certified as measured by the GFSI certification body. Audit scores not passing will require a re-audit for verification of corrective actions.
- **Robinson Fresh must be notified within 24 hours of an automatic failure occurring during the audit process.**
- Copies of all audits (full audit report, corrective action report if applicable, and certificate) must be provided to Robinson Fresh for review, analysis, and retention.
- Food safety audits may be shared with Robinson Fresh customers.
- Non-GFSI food safety audits will be reviewed and evaluated for potential provisional approval.

Food Safety Documentation Compliance Requirements

Each supplier is responsible for providing all documents required for evaluation for approval and reevaluation on an annual basis. Required information may include, but is not limited to:

- Full disclosure of all growing, packing, and shipping operations
- Annual third party GFSI audit, corrective action plan, and certificates for ALL growing, harvesting, packing, and storage operations. Non-GFSI audits may be submitted for review for potential provisional approval.
- Crisis contact list
- Signed indemnification agreement/supplier contract
- Liability insurance certificate
- Organic certification/s (if applicable)
- Multi-residue analysis (MRLs) as requested
- Heavy metal analysis as requested
- GMO status
- Other documents as requested by Robinson Fresh relating to brand, customer, country, and/or commodity specific requirements



MONITORING AND VERIFICATION

A Robinson Fresh food safety representative will ensure all requirements are met per supplier. Any suppliers found not complying with this procedure will be suspended until all requirements are satisfied.

Supplier’s failure to comply with these food safety requirements will not be considered an approved supplier to Robinson Fresh and may be subject to suspension, termination, and/or fees.

DOCUMENTATION RETENTION

The records retained from each supplier will be kept on file for a minimum of 2 years.

Revisions

Date	Revision No.	Revision Made	Initials
6/1/15	0	Program Written and Released	RFFS
4/23/18	1	Amended Biosolids section to include uncomposted animal manures and added Surface Water treatment requirement	RFFS
9/17/18	2	Added microbial product testing section	RFFS