PRODUCE

FOOD SAFETY AUDIT EXPECTATIONS

LAST UPDATED: 01 DECEMBER 2015


This document is proprietary to Costco Wholesale and should not be distributed without express permission from Costco.
## CONTENTS

- Audit Purpose .................................................................................................................. 3
- Audits............................................................................................................................... 3
- Audit Types....................................................................................................................... 4
  - Ranch .............................................................................................................................. 4
  - Greenhouse .................................................................................................................... 4
  - Harvest Crew ................................................................................................................ 4
  - Packinghouse with HACCP ............................................................................................ 4
  - Processing with HACCP ................................................................................................ 5
  - Cooling/Cold Storage with HACCP ................................................................................. 5
  - Storage and Distribution ............................................................................................... 5
- GFSI Certifications .............................................................................................................. 5
- Group / Multi-site Certifications ........................................................................................ 6
- Standard GAP and GMP Audits ....................................................................................... 6
- Gap Audits ........................................................................................................................ 6
- GMP Audits ....................................................................................................................... 7
- Requirements for all Audits and Schemes ......................................................................... 7
- Scoring For Standard Audits ........................................................................................... 7
- Costco Approved Audit Companies .................................................................................. 7
- Reaudits ............................................................................................................................ 8
- Automatic Reaudits ......................................................................................................... 8
- Corrective Action Reports ............................................................................................... 9
- Azzule Database Managements ....................................................................................... 9
- Costco HACCP Requirements ......................................................................................... 9
  - Definition of HACCP ..................................................................................................... 10
  - HACCP Training Requirements ................................................................................... 10
- Foreign Material Control – Processors ............................................................................. 10
- Pest Control ..................................................................................................................... 11
- Glove Policy ..................................................................................................................... 11
- Hand Washing – All Operations ...................................................................................... 11
AUDIT PURPOSE

The purpose of a food safety audit is to gather current information about the food safety status of existing and potential entities/suppliers. This information is shared with the Costco Food Safety Group and the Costco Produce Buying Staff. The Costco Food Safety Group will use this audit to determine what areas, if any, are in need of improvement to meet the Costco Produce Food Safety criteria. The Costco Produce Buying Staff will use the information as an aid to assist them in making purchases.

The intention of this audit is not to be punitive, but to provide both the entity/supplier and Costco the opportunity for continued improvement.

AUDITS

All those that grow, harvest, pack, further process, distribute or store fresh produce are required to have an annual food safety audit, by a Costco-approved third party.

All those that grow, harvest, pack, further process, distribute or store fresh produce in China are required to have an audit every six months, by a Costco-approved third party.

Annual audits are to be conducted as close as possible to the anniversary of the previous annual audit date. New entities/suppliers with a food safety audit conducted in the past year by a Costco-approved CB/Audit Company may submit the audit to Costco for review. If the audit scores less than 98%, corrective actions must be included for each deficiency on the audit.

In order to be more beneficial to the auditee, an auditor should audit a site no more than three years in a row. The same CB/Audit Company is acceptable, as long as the auditor has a minimum one-year break, although Costco would prefer that auditors have a two-year break, before returning to an audit site.
AUDIT TYPES

RANCH

The ranch audit is to be performed one time each year or during the growing season. The ranch audit is divided into sections that correspond to areas of potential contamination risk in the field operation. These areas include ranch history, adjacent land use, fertilizer usage, water usage, pest control, harvest practices, employee safety & hygiene and food security. A “ranch” is defined as a parcel of ground (not necessarily a “lot” for production purposes) with the following characteristics: common management and contiguous grounds. For the purpose of farm or ranch audits, manual development or self-audits, a ranch or farm is defined as contiguous ground that is under common management. The ranch audit must be accompanied by a Harvest Crew audit, for each growing season.

GREENHOUSE

The greenhouse audit is to be performed one time each year or during the growing season. The greenhouse audit is divided into sections that correspond to areas of potential contamination risk in the greenhouse operation. These areas include traceability, ground history, adjacent land, pest and foreign material controls, growing media, fertilizer/crop nutrition, irrigation/water use, plant protection, employee hygiene and food security. A harvest crew audit (see below for details) will be performed at the same time as the greenhouse audit module in order to assess areas of potential contamination risk in the harvesting operation. A greenhouse is defined as a building constructed of glass or plastic, for the cultivation of plants under controlled environmental conditions.

HARVEST CREW

The harvest crew audit is to be performed periodically during the harvest season. The harvest crew audit is divided into sections that correspond to areas of potential contamination risk in the harvesting operation. These areas include employee safety & hygiene, harvest practices and food security. A ‘harvest crew’ is defined as a crew of harvest personnel under common management. All crews harvesting product supplied to Costco must have at least one Harvest Crew food safety audit, during each growing season. Example: done in the last 12 months, for similar harvest practices. If this is the first third-party audit, the entity/supplier is not to be penalized for lacking previous audits.

PACKINGHOUSE WITH HACCP

The packinghouse audit is to be performed at a minimum of once per year. Questions are used to assess the facility’s food safety program. The audit is comprised of three main sections; Good Manufacturing Practices, Food Safety Requirements and HACCP. The audit encompasses the areas of pest control, equipment, sanitation, employee hygiene practices, and all other operational practices and documentation as they relate to food safety. Food security is also addressed. A “packinghouse” is where whole commodities are prepared and packed for commercial distribution after being subjected to processes such as sorting, washing, weighing, etc.

Facilities must have a program in place (Approved Supplier Program) to approve and monitor their suppliers (all raw materials, ingredients and primary packaging). Vendors’ growers and other suppliers must provide them with a current (once per year or during the growing season) third-party food safety audit and a product specification sheet which includes product requirements, labeling and code dates. With the exception of growers, raw material and ingredient suppliers must be operating under a HACCP program.
PROCESSING WITH HACCP

The processing audit is to be performed at a minimum of once per year. Questions are used to assess the facility’s food safety program. The audit is comprised of three main sections; Good Manufacturing Practices, Food Safety Requirements and HACCP. The audit encompasses the areas of pest control, equipment, sanitation, employee hygiene practices, and all other operational practices and documentation as they relate to food safety. Food security is also addressed.

Facilities must have a program in place (Approved Supplier Program) to approve and monitor their suppliers (all raw materials, ingredients and primary packaging). Vendors’ growers and other suppliers must provide them with a current (once per year or during the growing season) third-party food safety audit and a product specification sheet which includes product requirements, labeling and code dates. With the exception of growers, raw material and ingredient suppliers must be operating under a HACCP program.

COOLING/COLD STORAGE WITH HACCP

The cooling/cold storage audit is to be performed a minimum of once per year. The cooling/cold storage audit questions are used to assess the facility’s food safety program. The audit is comprised of three main sections; Good Manufacturing Practices, Food Safety Requirements and HACCP. The audit encompasses the areas of pest control, equipment, sanitation, employee hygiene practices, and all other operational practices and documentation as they relate to food safety. Food security is also addressed. A ‘cooling/cold storage facility’ is where product is temporarily stored prior to distribution in order to maintain the proper temperature. Precooling processes (ice injectors, Hydovac, pressure cooling, etc.) may also be used in the daily operations. If any packing, repacking, and grading etc. is occurring on site, a Packinghouse Audit should be used.

STORAGE AND DISTRIBUTION

The Storage & Distribution audit is to be performed at a minimum of once per year. The Storage & Distribution audit questions are used to assess the facility’s food safety program. The audit is comprised of three sections; Good Manufacturing Practices, Food Safety Requirements and HACCP. The audit encompasses the areas of pest control, equipment, sanitation, employee hygiene practices, and all other operational practices and documentation as they relate to food safety. Food security is also addressed. A ‘storage and distribution facility’ is where generally large retailers, foodservice companies or distribution companies store product temporarily prior to further distribution to local markets. It also includes terminal market operations where multiple companies are located on one site from which all companies distribute independently. If there is any packing, repacking, grading, etc., occurring on site, then a Packinghouse Audit should be used.

GFSI CERTIFICATIONS

Costco will accept the following GFSI certifications: CanadaGAP and SQF Edition 7.2 with a minimum score of 85%, BRC Certification Grade A or B, GLOBALG.A.P. Integrated Farm Assurance Crops-Fruit and Vegetables (IFA-Crops-FV) and Produce Safety Standard (PSS) Certifications, (Costco does not accept the shortened version of GLOBALG.A.P. IFA-Crops-FV Shortened Reward Inspection Audit) PrimusGFS GMP with a minimum preliminary score of 85%. Costco requires a reaudit when PrimusGFS GMP preliminary scores are below 85%. (The PrimusGFS requirement to receive certification remains 90% with a final score of 85% in each module.) GLOBALG.A.P. audits will not be accepted for packinghouses, processing or any type of facility.

All GFSI certifications are required to be accompanied by the appropriate Costco Addendum (Harvest Crew, Growing, Packinghouse, Coolers, Storage and Processing) with the exception of PrimusGFS GAP and GMP and PrimusLabs Standard GMP v14.09, using Edition 1.2 of the guidelines as the addendum questions have been incorporated into these schemes.
GROUP / MULTI - SITE CERTIFICATIONS

The following Group/Multi-Site certifications will be allowed: CanadaGAP, GLOBALG.A.P. and SQF. If an operation is approved for a Group/Multi-Site audit, the Costco requirement is for 25% of the growers to be audited. Failure to audit 25% will require a reaudit. Effective with Group/Multi-Site audits done on and after 01/01/17, the Costco requirement will be for 35% of the growers to be audited.

Multiple Crops: If multiple crops are to be included in the audits, an effort should be made to split the commodity groups, as much as possible. An example would be as follows: A group of growers supplies Costco with cherries, apples and pears. Apples and pears would be one group and cherries would be a second group. Therefore, approximately half of the 25% of growers should be audited for cherries and the other half for apples or pears.

Costco accepts the following GLOBALG.A.P. Certifications:
Option 1 – Single Site
Option 1 – Multi-Site without QMS
Option 1 – Multi-Site with QMS
Option 2 – Group Certification

All Group/Multi-Site Audits must include the appropriate Costco Addendum.

STANDARD GAP AND GMP AUDITS

Costco will accept Standard GAP and GMP food safety audits from a Costco approved certifying body with applicable addendums.

The PrimusLabs GAP audit requires the applicable Costco Addendum, with a minimum overall score of 85%. The PrimusLabs Standard GMP, v14.09, is accepted when using Edition 1.2 of the guidelines and has been updated to include the Costco Addendum criteria.

GAP AUDITS

All crews harvesting product supplied to Costco must have at least one third-party Harvest Crew Food Safety Audit during each growing season. If an operation grows more than one commodity, separate audits will be required if harvesting practices are not similar.

A minimum of one working field sanitation unit for each 20 employees, to include a toilet and a hand wash station, is required. Toilet and hand washing facilities must be within a 5 minute walking distance for all employees. Driving distance will not be considered. Hand wash stations should be located outside portable restroom facilities in order for hand washing activities to be observed by supervisors.

Picking bags, gloves, knives and aprons must be covered by equipment storage & control procedures and should be on a documented cleaning schedule. The grower is responsible to maintain cleanliness and good repair of equipment.

Harvesting equipment must be on a documented cleaning and sanitizing program.
GMP AUDITS

Adequate working toilet facilities are available to accommodate the number of employees in the facility. Hand sinks must be available inside restroom facilities for use after using the restroom AND also near the workers’ entrance to the facility or in a convenient area for use prior to starting work, after a break or at any other time hands become contaminated. Larger facilities may require additional hand sinks.

Employees of all entities/suppliers, with the exception of those that do not handle product, should wear hair nets and appropriate coverings for all facial hair, such as beards and moustaches. This includes packinghouses and cold storage facilities, if applicable. Costco does not view a ball cap as a hair cover or hair restraint. If a ball cap or other head covering is worn, they must be covered by a hair net.

US Requirement Only: Costco does not allow drinking water (or any beverage) in any container, on the packing line or processing floor. Employers must provide employees adequate fresh water supplies located in areas which do not create food safety/ hygiene issues. Employers in the U.S. must meet all Federal and State laws pertaining to supplying drinking water to staff, for example 29 CFR 910.141(b)(1)(I), 29 CFR1928(c)(1).

REQUIREMENTS FOR ALL AUDITS AND AUDIT SCHEMES

Costco will only accept audits, audit schemes and certifications performed while the audit site is fully operational, for example, actively cultivating crops, harvesting crops, packing, processing, etc., no matter the audit type or scheme. This includes follow-up/reaudits and unannounced audits for Group/Multi-Site audits.

If the growing season is finished or if the facility is non-operational, the audit must take place within the first 30 days of the next growing season.

SCORING FOR STANDARD AUDITS – GAP AND GMP

<table>
<thead>
<tr>
<th>Score</th>
<th>Action Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>98 – 100%</td>
<td>No corrective actions needed</td>
</tr>
<tr>
<td>85 – 97%</td>
<td>Corrective actions required</td>
</tr>
<tr>
<td>&lt; 85%</td>
<td>Corrective actions and reaudit required</td>
</tr>
</tbody>
</table>

COSTCO APPROVED AUDIT COMPANIES

GFSI Certifications will be accepted from the following Certification Bodies: AUS-QUAL Pty Ltd, Cert-ID, Eagle Certification, NSF, NSF-AG, NSF-GFTC, Primus Auditing Operations, SCS, SGS and WQS.

Costco will accept GlobalG.A.P. audits, as detailed under the GFSI section, from LSQA.

Costco will accept the following GAP and GMP food safety audits: Primus Auditing Operations and SGS. Costco will also accept GMP audits from NSF-GFTC and CBs approved for the Foods Department. A list of those CBs can be found at the following link: www.TraQtion.com/costcofood
REAUDITS

If a GFSI audit does not pass, Costco requires a reaudit to be conducted. The reaudit may be an approved non-GFSI audit which does not count towards scheme certification. The reaudit is in addition to ANY scheme requirements.

Reaudits for ranch, harvest crew and greenhouse audits must be conducted within 30 days of the original audit date. Reaudits for Packinghouse, Cooler, Cold Storage, Storage and Distribution and Processing Audits must be conducted within 60 days of the original audit date.

If the growing season is finished or if the facility is non-operational, the audit must take place within the first 30 days of the next growing season.

A product recall or other serious incident will initiate a requirement for a new food safety audit.

AUTOMATIC REAUDITS

Ranch, Harvest Crew and Greenhouse – Section 1 only

Processing, Packinghouse, Cooler and Cold Storage, Storage and Distribution – Sections 1 & 2

Automatic Reaudits – Section 1

- No functioning hand-wash stations.
- Product contamination/adulteration is observed.
- A documented Food Safety Plan/GAP Manual has not been established.
- Product mishandled by workers, such as, but not limited to, using cloths or towels to dry product or remove dirt and/or debris.
- Failure to have a written pest control program.
- Water test results fail to meet set standards and no corrective action has been taken to include a re-test.
- Evidence of systemic fecal contamination by wild animals and/or a single account of human or domestic animal fecal matter, in the growing area, close to the growing area or in any storage area.
- Employees with obvious sores, infected wounds or other infectious illnesses are not allowed to have direct contact with exposed food products, production, equipment or storage areas.
- Products not properly coded for traceability throughout the process.
- Evidence of pest infestations (insects, rodents, birds, reptiles or mammals) in any finished, field-packed product or primary packaging supplies

Automatic Reaudits – Section 2

- Failure to take corrective actions, when critical limits are not met in a HACCP program.
- A documented Food Safety Plan/Manual has not been established.
Automatic Reaudits – Section 2 (continued)

- A documented SSOP Program (Standard Sanitation Operating Procedures) has not been established and implemented.
- Food allergens are present and an allergen control program has not been developed.
- Evidence of pest infestations (insects, rodents, birds, reptiles or mammals) in any finished product or primary packaging supplies.

**US Requirement Only:**
- Processing Facilities, Packinghouses, Coolers, Cold Storage and Storage and Distribution Facilities supplying product to the U.S. and not meeting registration requirements of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (the Bioterrorism Act) or companies located in the U.S. supplying product to Costco locations in other countries.

http://www.registrarcorp.com/fda-food/registration/

**CORRECTIVE ACTION REPORTS (CAR)**

Corrective Actions are part of the audit process and a requirement of doing business with Costco. Auditees with an audit scoring below 98% must post a CAR (Corrective Action Report) to Azzule within 14 days of the audit being posted.

Auditees must contact their CB/Audit Company regarding the process of submitting CARs to Azzule for uploading to the Costco Site. Corrective Actions must also be completed for the Costco Addendum.

**AZZULE – DATA MANAGEMENT**

Costco is using Azzule Systems to manage ALL PRODUCE audit documents, including corrective actions. All entities/suppliers supplying produce to Costco must contact their CB/Audit Company and have them contact Azzule Systems to have the required information uploaded to the site. The contact email for Azzule Systems is: secure@azzule.com

As audits are completed, they will be uploaded by the CB/Audit Company to Azzule Systems, and from there will be transferred to the dedicated Costco area within the website. This submission process should take place within 15 calendar days of the audit date. Each entity/supplier is to submit their CAR (corrective action report) to their CB/Audit Company or through Azzule, within 14 calendar days of the audit and Costco Addendum posting.

In order to prevent a lag in reporting on time, audit companies should obtain an audit release agreement from the auditee, prior to the audit taking place.

The Costco Produce Food Safety Audit Expectations and Addendum can be found through a link on the Azzule website.

http://www.azzule.com/services/costcoaddendumsandexpectations.aspx

**COSTCO HACCP REQUIREMENTS**

All processing facilities, packinghouses, coolers and cold storage facilities that supply Costco are required to operate under a HACCP Program.

Facilities that do not have a HACCP plan in place will be required to forward their HACCP Plan to Costco Food Safety Staff within 120 days as part of their corrective actions.
DEFINITION OF HACCP

HACCP is an acronym that stands for Hazard Analysis and Critical Control Point. HACCP is a method to help manufacturers identify and evaluate their processes to control food safety issues. Essentially, HACCP helps manufacturers identify:

- What can go wrong in their process?
- Physical, microbiological, chemical and other risks to their processes.
- How to control their process so that it doesn’t go wrong.
- If it does go wrong, what happens then? How do you fix it?

HACCP TRAINING REQUIREMENTS

The person or persons responsible for the HACCP program must complete formal HACCP training and have their certification available for review, on the day of the audit.

HACCP TRAINING REQUIREMENTS – PROCESSING

Costco requires at least one member of the HACCP team to have a certificate from a minimum 2-day formal, classroom HACCP training class.

HACCP TRAINING REQUIREMENTS – PACKINGHOUSES, COOLERS, COLD STORAGE AND DISTRIBUTION FACILITIES

Costco strongly recommends that at least one member of the HACCP team has a certificate from a minimum 2-day formal, classroom HACCP training class.

REFRESHER TRAINING – Costco requires that at least one member of the HACCP team has a current HACCP Certificate from training within the last 5 years. (Online training is acceptable for refresher training.)

FOREIGN MATERIAL CONTROL – PROCESSORS

Costco requires processors to control physical hazards by the use of x-ray or metal detection technology. Entities/suppliers without x-ray or metal detection will be evaluated by the auditor in conjunction with Costco personnel to determine the risk of the process. If risk is considered low, a device will not be required. If risk is considered medium to high, the site will be required to install a foreign material detection device as soon as possible (preferably x-ray technology).

In the event you have been required to install a foreign material detection device, Costco would like photo documentation of your device, after installation, and a copy of your Foreign Material Plan emailed to the Food Safety Staff, with 150 days of the original audit date.

Costco requires facilities to document regular checks, at no more than two-hour intervals, confirming foreign material detection devices are operating correctly. During the audit, the auditor will ask plant staff to demonstrate that all devices are operating properly. All metal detectors must be challenged with ferrous, non-ferrous and stainless steel contaminants. An appropriate challenge device must also be used for each X-Ray. All foreign material detection equipment must be accompanied by a functioning rejection device (belt, air jet, etc.).

Costco expects all foreign material devices to be challenged by the auditor, whether or not they are being used for Costco product. If the number of devices exceeds 10, Costco requires that a minimum of 30% of the devices be challenged.

A written procedure must be in place to control product rejected by foreign material detection devices. The program must state how the product is segregated from general production and handled. This process must be documented.
FOREIGN MATERIAL CONTROL – PROCESSORS (CONTINUED)

If it is determined that a facility requires foreign material detection and there is not a device in place or if the facility is not able to demonstrate that all devices are working properly by the facility’s anniversary audit, an automatic failure will occur and a reaudit will be required.

Costco would like all vendors to consider x-ray technology when replacing their foreign material detection equipment.

PEST CONTROL

Pest control programs must be developed and monitored by licensed, certified pest control personnel. In the case of a country without this requirement, pest control personnel must be trained and have written protocol to demonstrate their understanding of pest control as it applies to food safety.

GLOVE POLICY

Costco requires disposable gloves to be non-latex & powder-free. Gloves should be maintained in good condition, intact and clean. Gloves must be used where there is direct hand contact with RTE (ready-to-eat) products. A “No Bare Hands” policy is in place unless an exception has been granted by Costco Food Safety. Procedures for the proper handling and usage of gloves have been developed, implemented, and verified where required. Reusable non-latex rubber gloves must be washed and sanitized frequently, after breaks, and/or after handling potential contaminate. In a processing environment, cotton gloves may be used only if non-latex gloves are worn over them.

Gloves are to be provided by the harvest crew, grower or packinghouse/facility. Costco prohibits workers in any capacity from supplying their own gloves, of any kind.

HAND WASHING – ALL OPERATIONS

Hand washing must take place with soap and water. There is no approved substitute for hand washing, including hand wipes, sanitizer, etc. Employees are required to wash their hands before starting work, after each visit to the toilet, using a handkerchief or tissue, handling contaminated material, smoking, eating, drinking, after breaks and prior to returning to work when their hands may have become a source of contamination.

See the Costco Produce Addendum for specific requirements.

FOOD CONTACT SURFACES – ALL OPERATIONS

With the exception of commodities where using wooden bins is the industry standard, produce must not come in contact with surfaces which are not accessible and/or cannot be cleaned, including but not limited to the following: foam rubber, any type of carpet, nonfood-grade plastic, etc.

CODE DATES – ALL OPERATIONS

Finished product sell units (for example, clam shell, bag, package, and carton) are preferably marked with a use-by, sell-by or packed-on code that can be used for traceability/recall purposes.) Scannable bar codes are acceptable, providing they contain traceability/recall information. Julian dates are not acceptable.

Suppliers should refer to item specifications provided by Costco buyers.
**TRACE BACK / MOCK RECALL EXERCISE – PROCESSING, PACKINGHOUSES, COOLERS, COLD STORAGE AND DISTRIBUTION FACILITIES (YEAR ROUND)**

For year-round processing, packinghouses, coolers, cold storage and distribution facilities, Costco requires a trace back exercise at least twice a year. An additional trace back exercise should be done during the annual food safety audit, on a Costco item (if possible) chosen at the auditor's discretion. Documentation must indicate the date and time the exercise was initiated, product chosen, amount produced, affected lot codes, percent located, and time the exercise was completed. The exercise must include documentation supporting the trace back from the affected finished product lot(s) to all potentially affected raw material(s), and also show how the system can trace the potentially affected product(s) and affected customers who have received the product(s). 100% of product should be located within two hours. Companies with corporate generated recall systems in place need only to provide the auditor with a copy of their program and a sample mock recall or trace back exercise.

**TRACE BACK / MOCK RECALL EXERCISE – PROCESSING, PACKINGHOUSES, COOLERS, COLD STORAGE AND DISTRIBUTION FACILITIES (NON YEAR-ROUND)**

Costco requires non year-round processing, packinghouses, coolers, cold storage and distribution facilities to do a trace back exercise at least once a year. An additional trace back exercise should be done during their food safety audit, on a Costco item chosen at the auditor's discretion. Documentation must indicate the date and time the exercise was initiated, product chosen, quantity produced, affected lot codes, percent located and time the exercise was completed. The exercise must include documentation supporting the trace back from the chosen affected finished product lot(s) to all the potentially affected raw material(s), and then also show how the system can trace all the potentially affected product(s) and the affected customers who have received the product(s). 100% of product should be located within two hours. Companies with corporate generated recall systems in place need only provide the auditor with a copy of their program and a sample mock recall or trace back exercise.

**RAW MATERIAL SOURCES – PROCESSING, PACKINGHOUSES, COOLERS, COLD STORAGE FACILITIES, DISTRIBUTION CENTERS AND GROWERS**

Costco suppliers must have a program in place to approve and monitor their suppliers: all raw materials, ingredients and primary (direct food contact) packaging. Raw material and ingredient suppliers must provide a current (within 1 calendar year) third-party food safety audit and a product specification sheet which includes product attributes, labeling and code dates. Additionally, facilities supplying raw materials and ingredients must be operating under a HACCP program. Primary packing suppliers must supply a current third-party food safety audit. Suppliers of primary packaging should have a documented monitoring program in place to evaluate compliance to specifications, legal requirements and lot coding. Suppliers of all raw materials, ingredients and primary packaging should perform a trace forward and trace back exercise once a year.

Primary packaging can be overseen by the Grower or the Packinghouse/Facility, depending on which is most appropriate for the operation. If the product if field-packed, it makes more sense for the grower or ranch to have the oversight.

**US Only:** Currently, Costco US accepts a Letter of Guarantee for packaging in place of a third-party food safety audit. Effective 01/01/17, Costco US will require that all primary packaging suppliers have a third-party food safety audit.
WATER REQUIREMENTS – GROWING OPERATIONS

Microbial water testing must occur during the production and harvest season. The frequency of testing and point of water sampling shall be determined based on the risk assessment and current industry standards for commodities being produced (Testing must have occurred at a minimum within the last 12 months). The type of test and acceptance criteria must also be determined based on the risk assessment but should include microbial pathogens of concern and standard indicators of fecal contamination (generic E. coli and/or fecal coliforms). If testing does not meet the acceptance criteria corrective actions are required and may include retesting or demonstrate mitigating actions. If all agricultural water is from a municipal source, the testing must be done at the source where the water is used.

Note: If mitigating actions taken are not sufficient to protect product to be harvested, Costco reserves the right to require applicable microbiological product testing.

MICROBIAL ENVIRONMENTAL TESTING – PROCESSING, PACKINGHOUSE, COOLER, AND COLD STORAGE FACILITIES

There must be records of routine equipment and facility microbiological environmental testing, for production and storage facilities that either have a wash step or involve high humidity storage. Frequency and site selection is to be based on the risk assessment of the product and facility involved. If out of spec results occur, then full details of corrective actions must be available.

SANITATION VERIFICATION – PROCESSING AND PACKINGHOUSE FACILITIES

There must be a written program in place to verify sanitation effectiveness for food contact surfaces. The program should be based on a risk assessment and validation studies. Examples include ATP monitoring or swabbing for TPC (Total Plate Count).

TEST AND HOLD PROGRAM GUIDELINES – READY TO EAT PRODUCE - U.S. & CANADA

Costco has a test and hold policy in place for all ready-to-eat and at-risk produce. This includes items such as, but not limited to, cut salad mixes, baby leaf salads, cut fruit, and prepared vegetable trays. With the exception of cantaloupe, Costco does not consider whole fruit ready-to-eat produce.

*At this time, this applies only to the U.S. and Canada.

Costco U.S. and Canada specifications for ready-to-eat produce are as follows:

<table>
<thead>
<tr>
<th>Ready-to-Eat</th>
<th>Target</th>
<th>Maximum Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Plate Count (TPC)</td>
<td>&lt; 100,000 cfu/gram</td>
<td>1,000,000 cfu/gram</td>
</tr>
<tr>
<td>Generic E. coli</td>
<td>&lt;10 cfu/gram</td>
<td>50 cfu/gram</td>
</tr>
<tr>
<td>E. coli 0157:H7 – Canada only</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EHEC – U.S. only</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Salmonella</td>
<td>Negative</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Negative (test method must detect for Stx1 or Stx2 and EAE genes at a minimum. Note: There are now test kits available that detect more than these genes or that detects a group of markers that include the EAE, stx1 and 2 genes. These kits are also acceptable for use on Costco products.)
TEST AND HOLD PROGRAM GUIDELINES – READY TO EAT PRODUCE - U.S. & CANADA (CONTINUED)

<table>
<thead>
<tr>
<th>Cantaloupe Specific</th>
<th>Target</th>
<th>Maximum Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Plate Count (TPC)</td>
<td>&lt; 1,000,000 cfu/gram</td>
<td>10,000,000 cfu/gram</td>
</tr>
<tr>
<td>Generic E. coli</td>
<td>&lt;10 cfu/gram</td>
<td>100 cfu/gram</td>
</tr>
<tr>
<td>EHEC – U.S. only</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(Negative (test method must detect for Stx1 or Stx2 and EAE genes at a minimum. Note: There are now test kits available that detect more than these genes or that detects a group of markers that include the EAE, stx1 and 2 genes. These kits are also acceptable for use on Costco products.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Salmonella</td>
<td>Negative</td>
<td></td>
</tr>
<tr>
<td>E. coli 0157:H7 – Canada only</td>
<td>Negative</td>
<td></td>
</tr>
</tbody>
</table>

PRODUCT MUST BE MAINTAINED IN SUPPLIER CONTROL UNTIL ALL TEST RESULTS HAVE BEEN COMPLETED AND RESULTS ARE SHOWN WITHIN ABOVE TOLERANCES. CONTACT THE FOOD SAFETY REPRESENTATIVE IN EACH RESPECTIVE COUNTRY FOR ADDITIONAL INFORMATION.

SHADOW AUDITS

Part of the Costco Food Safety Auditing Program is to observe and evaluate auditors while they are auditing Costco entities/suppliers. This is called a Shadow Audit. Costco would like to insure that we have the best auditors working with our suppliers. During a shadow audit, Costco Food Safety staff will accompany the auditor for the entire audit day(s). A written evaluation is done and sent to the CB (certification body) that the auditor is employed by. The Costco Food Safety staff member will also be making observations during the audit; these are not discussed until after the auditor is finished with the audit. The Costco observations will not be included on your official audit document. Any non-conformances observed by Costco Food Safety Staff will not be included in the audit report but will require a corrective action response.

RESOURCES

HACCP TRAINING

PrimusLabs Training
http://primuslabs.com/services/PLU/Calendar.aspx

eHACCP.org
http://www.ehaccp.org/2015/%204

HACCP Alliance
http://haccpalliance.org/

NEHA Food Safety Training
http://www.nehatraining.org/products/haccp.htm

HACCP Training
http://www.haccptraining.org/
HACCP TRAINING (CONTINUED)

Resources for Food Safety Program Development
http://producesafetyalliance.cornell.edu/

NSF-GFTC (English) –
http://www.gftc.ca/courses-and-training/

FOOD SAFETY PROGRAM DEVELOPMENT

Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables
http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/ProducePlantProducts/ucm187676.htm

Developing a Food Safety Plan

USDA Pesticide Data Program
http://www.ams.usda.gov/datasets/pdp New

Produce Marketing Association
www.pma.com

United Fresh Produc Association
http://www.unitedfresh.org/

LGMA – Leafy Greens Marketing Agreement
http://www.caleafygreens.ca.gov/sites/default/files/California%20LGMA%20metrics%2008%2026%2013%2020Final.pdf

On Farm Food Safety – Risk Assessment, Create a Food Safety Manual
http://onfarmfoodsafety.org/

PrimusLabs program Document Development Program (GAP and GMP)
http://www.primuslabs.com/Services/Webtools.aspx#DDP

PrimusLabs Manual Development Toolkit (GAP and GMP)
http://intranet.primuslabs.com/toolkit/user/default.aspx

Canadian Food Inspection Agency’s HACCP / Food Safety Enhancement Program (FSEP)
http://www.inspection.gc.ca/eng/1297964599443/1297965645317 (English)
http://www.inspection.gc.ca/fra/1297964599443/1297965645317 (French)

Health Canada – Pesticides and Pest Management
http://www.hc-sc.gc.ca/cps-spc/pest/index-eng.php (English)
http://www.healthy_canadians.gc.ca/environment-environnement/pesticides/index-fra.php#a1 (French)

Canadian Produce Marketing Association
www.cpma.ca
# COSTCO FOOD SAFETY CONTACTS

## U.S. CONTACTS

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Milinda Dwyer</td>
<td>Produce Audits</td>
<td>425-427-7474</td>
<td><a href="mailto:mdwyer@costco.com">mdwyer@costco.com</a></td>
</tr>
<tr>
<td>Toni Roberts</td>
<td>Produce Audits</td>
<td>425-427-7211</td>
<td><a href="mailto:troberts@costco.com">troberts@costco.com</a></td>
</tr>
<tr>
<td>Eric Benolkin</td>
<td>Audit Support</td>
<td>425-427-7508</td>
<td><a href="mailto:ebelenolkin@costco.com">ebelenolkin@costco.com</a></td>
</tr>
<tr>
<td>Mike Freal</td>
<td>Audit Support</td>
<td>425.313.6801</td>
<td><a href="mailto:mfreal@costco.com">mfreal@costco.com</a></td>
</tr>
<tr>
<td>Steve Bell</td>
<td>Senior Audit Manager</td>
<td>425-313-8760</td>
<td><a href="mailto:sbell@costco.com">sbell@costco.com</a></td>
</tr>
<tr>
<td>Christine Summers</td>
<td>Director</td>
<td>425-313-6097</td>
<td><a href="mailto:csummer@costco.com">csummer@costco.com</a></td>
</tr>
</tbody>
</table>

## AUSTRALIA CONTACTS

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sarah Khaw</td>
<td>Support</td>
<td>011-61-2-9805-3838</td>
<td><a href="mailto:skhaw@costco.com.au">skhaw@costco.com.au</a></td>
</tr>
<tr>
<td>Nicole Hendieh</td>
<td>Support</td>
<td>011-61-2-9805-3824</td>
<td><a href="mailto:nhendieh@costco.com.au">nhendieh@costco.com.au</a></td>
</tr>
</tbody>
</table>

## CANADA CONTACTS

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rhonda Keeler</td>
<td>Audit Manager</td>
<td>613-221-2936</td>
<td><a href="mailto:rhonda.keeler@costco.com">rhonda.keeler@costco.com</a></td>
</tr>
<tr>
<td>Wei Que</td>
<td>Audit Support</td>
<td>613-221-2000 x5460</td>
<td><a href="mailto:Wei.Que@costco.com">Wei.Que@costco.com</a></td>
</tr>
<tr>
<td>Marcelle Lavergne</td>
<td>Director</td>
<td>613-221-2311</td>
<td><a href="mailto:marcelle.lavergne@costco.com">marcelle.lavergne@costco.com</a></td>
</tr>
</tbody>
</table>

## JAPAN CONTACTS

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Saki Kaiho</td>
<td>Manager</td>
<td>81-44.281.2848</td>
<td><a href="mailto:skaiho@costco.co.jp">skaiho@costco.co.jp</a></td>
</tr>
<tr>
<td>Yosuke Aikawa</td>
<td>AGMM</td>
<td>81-44-281-2658</td>
<td><a href="mailto:yaikawa@costco.co.jp">yaikawa@costco.co.jp</a></td>
</tr>
<tr>
<td>Takuya Yoshikawa</td>
<td>ICS</td>
<td>81-44-281-2756</td>
<td><a href="mailto:tyoshikawa@costco.co.jp">tyoshikawa@costco.co.jp</a></td>
</tr>
</tbody>
</table>

## KOREA CONTACTS

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jinhyuk Lim</td>
<td>Supervisor</td>
<td>82-2-2630-2769</td>
<td><a href="mailto:jhlim@costcokr.com">jhlim@costcokr.com</a></td>
</tr>
<tr>
<td>C.H. Park</td>
<td>AGMM</td>
<td>82-2-2630-2722</td>
<td><a href="mailto:chpark@costcokr.com">chpark@costcokr.com</a></td>
</tr>
</tbody>
</table>

## MEXICO CONTACTS

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stefanny Keller</td>
<td>Manager</td>
<td>011-52-5246-5402</td>
<td><a href="mailto:skeller@costco.com">skeller@costco.com</a></td>
</tr>
<tr>
<td>Jose Gerardo Rodriguez</td>
<td>Support</td>
<td>011-52-5552-5405</td>
<td><a href="mailto:jrodriguez@costco.com.mx">jrodriguez@costco.com.mx</a></td>
</tr>
</tbody>
</table>

## SPAIN CONTACTS

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eva Maria Perez Carballo</td>
<td>Support</td>
<td>34-91-171-04-16</td>
<td><a href="mailto:eperezc@costco.es">eperezc@costco.es</a></td>
</tr>
</tbody>
</table>

## TAIWAN CONTACTS

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sara Cheng</td>
<td>Manager</td>
<td>886-2-87919988-846</td>
<td><a href="mailto:saracheng@costco.com.tw">saracheng@costco.com.tw</a></td>
</tr>
<tr>
<td>Jemi Hou</td>
<td>Asst Manager</td>
<td>886-2-87919988-868</td>
<td><a href="mailto:jemihou@costco.com.tw">jemihou@costco.com.tw</a></td>
</tr>
<tr>
<td>Angela Tu</td>
<td>Support</td>
<td>886-2-87919988-817</td>
<td><a href="mailto:angelatu@costco.com.tw">angelatu@costco.com.tw</a></td>
</tr>
<tr>
<td>Polly Lee</td>
<td>Support</td>
<td>886-2-87919988-522</td>
<td><a href="mailto:pollylee@costco.com.tw">pollylee@costco.com.tw</a></td>
</tr>
<tr>
<td>Name</td>
<td>Title</td>
<td>Phone</td>
<td>Email</td>
</tr>
<tr>
<td>------------------</td>
<td>--------------------</td>
<td>------------------------</td>
<td>----------------------------------</td>
</tr>
<tr>
<td>Pauleen Stallard</td>
<td>Director</td>
<td>011-44-1923-830570</td>
<td><a href="mailto:pstallard@costco.com.uk">pstallard@costco.com.uk</a></td>
</tr>
<tr>
<td>Kelly Toogood</td>
<td>Asst. QA Manager</td>
<td>011-44-1923-830645</td>
<td><a href="mailto:ktoogood@costco.com.uk">ktoogood@costco.com.uk</a></td>
</tr>
</tbody>
</table>