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PURPOSE: To define the Gordon Food Service (GFS) regional produce supplier requirements necessary to achieve and maintain the quality and safety expectations of GFS. This produce program is an integral part of the GFS and Supplier business relationship. It is designed to facilitate initial and ongoing qualification of GFS produce suppliers and to help ensure mutual business success through the review of produce suppliers' quality systems, safety systems and practices.

SCOPE: This is a GFS North American procedure that applies to any facility that manufactures, processes, packs, or holds produce for GFS's regional produce program. This includes primary suppliers and fill-in suppliers for any open-coded produce. This does not include suppliers of restricted customer-specific produce items nor non-stock items*. It applies to the GFS functions participating in approving and maintaining the supplier source qualification.

*This procedure applies to all sprout items, including restricted, non-stock and stock items.

REFERENCES: SOP0202 & CSOP0202 Supplier Recall and Withdrawal Procedures, NAPOL0600 Gordon Food Service Sprouts Policy, The FDA's Food Safety Modernization Act (FSMA) Produce Rule, The FDA's Compliance with and Recommendations for Implementation of the Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption for Sprout Operations: Guidance for Industry, The FDA's Guidance for Industry: Reducing Microbial Food Safety Hazards in the Production of Seed for Sprouting, Canadian Food Safety Inspection Agency (CFIA) Safe Food for Canadians Regulations, CFIA Preventive controls for the hygienic production of sprouted seeds

DEFINITIONS:

"Produce" means any fruit or vegetable in its raw state OR in a raw, but "simple" processed state, such as cut, diced, or sliced; this definition excludes fruits and vegetables that have undergone further processing such as freezing, thermal processing, dehydration, pasteurization, brining, or addition to syrup solutions

"Regional Supplier" means any regional direct supplier of produce, excluding Markon, non-stock product, and those who supply restricted produce required by a customer; "direct" indicates the entity providing the product directly to GFS (one step back from GFS).

RESPONSIBILITIES:

GFS VENDOR OWNER is responsible to initiate request for independent audit via the new vendor survey and provide details of program to prospective new suppliers.

GFS DIRECT PRODUCE SUPPLIERS are responsible to support this program by scheduling audits, providing any required corrective action responses, and demonstrating a high standard of performance and commitment to improvement. The supplier is responsible for ensuring these requirements are met (for the intended purpose and scope) for all products they will sell to GFS.

GFS FOOD SAFETY QUALITY ASSURANCE is responsible to follow-up on required corrective actions and determine the status of produce suppliers' qualification. QA will routinely monitor produce supplier participation and notify the appropriate internal function of any non-compliance.

GENERAL PROGRAM REQUIREMENTS:

- All direct produce suppliers are required to meet all current and future applicable federal, state, and local laws applicable at the time of production and sale of the produce to GFS. These requirements include, but are not limited to:
 - FDA - Food Safety Modernization Act of 2011¹ for suppliers providing produce to GFS US. This act involves regulations such as the Standards for Produce Safety (21 CFR Part 112), and the Current GMP's Hazard Analysis, and Risk-Based Preventive Controls for Human Food (21 CFR Part 117).
 - CFIA - Safe Food for Canadians Act¹ for suppliers providing produce to GFS Canada. This act involves regulations such as the Safe Food for Canadians Regulations (SOR/2018-108).

¹Based on the type of commodity, type of activity and business size, some sections of these regulations are not effective yet. See Post-Harvest Water Requirements, for suppliers that are not required to comply with certain water requirements yet.

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- All direct produce suppliers are required to undergo a yearly GMP audit from a GFS-approved audit firm and/or maintain an active GFSI Certification (Table 1). Prospective new produce suppliers are required to provide GFS with an independent audit report completed within the past 12 months.
- GFS produce suppliers are responsible for all costs associated with the audit and reporting of results.
- GFS reserves the privilege of auditing a produce supplier in situations where audit findings indicate potentially significant business risks to GFS. If such an audit is deemed necessary, the supplier will be responsible for all expenses related to the GFS audit.
- All direct produce suppliers are required to maintain traceability that meets the 2002 Bioterrorism Act, as amended from time to time.
- All direct produce suppliers are required to maintain an internal supplier validation process for all their raw product suppliers and/or any facility that manufactures, processes, packs, or holds product destined for GFS.
- GFS Food Safety Quality Assurance will utilize third party audit report information, and additional data upon request, as input to final produce supplier qualification. There are three possible supplier qualification statuses:
 - Approved, Disapproved, Probation/Pending (supplier action required)
- All direct produce suppliers are required to fill out the "Regional Produce Supplier - Checklist" at initiation of business and/or as requested by GFS.
- All direct produce suppliers are required to direct contact GFS Food Safety Quality Assurance in the event their facility becomes non-compliant to any of the outlined requirements.

POST - HARVEST WATER REQUIREMENTS

All direct produce suppliers are required to meet all water requirements stated in current and future applicable Federal, State, and Local laws. This includes, but is not limited to the FDA - Food Safety Modernization Act of 2011 and CFIA - Safe Food for Canadians Regulations for suppliers providing produce to GFS US and GFS Canada respectively.

Certain sections of the FDA-Food Safety Modernization Act and CFIA-Safe Food for Canadians Regulations are not fully enforceable yet for some suppliers (due to the type of commodity, activity and business size). Until these sections are fully enforceable for these suppliers, the below expectations must be met:

1) Water Testing for generic *E. coli* must be conducted at least once per year, or at the frequency required by commodity specific guidelines. Testing shall be performed by an accredited lab using tests that are APHA or AOAC approved. Results must be below detection limits for all samples. Test results should include date and location of sample collection, test method, test results, and a signature from the lab. Results must be provided for review upon request.

**Each available potable water site in the facility or field should be tested once per year. Samples should be taken with sodium thiosulfate if water is chlorinated to inactivate the antimicrobial properties of chlorine.

2) A Water Sanitation Program for all water used post-harvest for rinsing, washing, re-hydration and/or cooling in the facility must be in place and copies of completed water sanitizer monitoring logs must be included. The program must be provided for review upon request. Acceptance criteria are:

* > 1ppm free chlorine after application and pH < 7.5 **OR**

* ORP >650 mV and pH <7.5 **OR**

*other approved treatments per product EPA label for human pathogen reduction in water

FRESH-CUT FACILITY REQUIREMENTS

In addition to the general requirements for produce suppliers, all fresh-cut facilities must have an Environmental Testing Program in place. The program must include:

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- Both pre-operational and operational swabs, and must be provided for review upon request. Additionally, SOPs that outline the specific response to positive test results, including handling of product, equipment, and the facility environment, must be provided upon request.
- A specific testing program for *Listeria spp.* in those areas where the bacterium may become established (e.g., drains, cooling coils, cooling unit drip pans, surfaces covered with condensate and any other places that are continuously wet and largely undisturbed).
- All fresh-cut facilities are required to have a plan that demonstrates how hazards to food are identified and controlled. Therefore, the environmental testing program must also include other tests as deemed necessary by that plan.

LEAFY GREENS REQUIREMENTS

In addition to the general requirements for produce suppliers, all direct produce suppliers providing leafy greens (Arugula, Butter Lettuce, Chard, Escarole, Iceberg Lettuce, Red Leaf Lettuce, Spinach, Baby Leaf Lettuce, Cabbage, Endive, Green Leaf, Lettuce, Kale, Romaine Lettuce, or Spring Mix) from California or Arizona are required to ensure that these items come from LGMA (Leafy Green Marketing Agreement) certified members.

SPROUTS REQUIREMENTS

In addition to the general requirements for produce suppliers, direct suppliers providing sprouts are required to ensure their items meet the following requirements:

- As used herein, the term "sprouts" includes, but is not limited to: alfalfa, broccoli, clover, bean, wheat, radish, soybean and mustard sprouts. This applies to all sprouts, except sprouts that are harvested above the soil or substrate line without their roots. This policy also does not include other young plants such as microgreens, or other types of produce with "sprout" in the name, such as Brussels sprouts.
- US and Canada direct sprout suppliers must ensure their items comply respectively with the FDA and CFIA guidance documents outlining the standards for growing, harvesting, packing, and holding of product for human consumption for sprout operations. US direct sprout suppliers must also ensure the compliance of the Reducing Microbial Food Safety Hazards in the Production of Seed for Sprouting guidance.
- Direct sprouts suppliers must ensure the items follow regulatory guidance and were handled under programs that manage the following:
 - Supplier approval and compliance, including appropriate microbiological testing of seeds
 - Antimicrobial treatment of seeds.
 - Agricultural water, including appropriate microbiological testing of seeds.
 - Good manufacturing and sanitation practices to prevent microbiological growth and cross-contamination.
 - Environmental monitoring, including appropriate microbiological testing and corrective action measures.
 - Spent irrigation water, including appropriate microbiological testing.
 - Periodic finished product microbiological testing, with test & hold protocol to ensure product under test does not enter the marketplace.

FACILITY AUDITING REQUIREMENTS

Audit Scheduling:

- The direct produce supplier is responsible for scheduling the annual audit from an approved third party source (Table 1). If an audit is obtained by an audit firm other than the GFS-approved firms listed in Table 1, GFS QA must approve that the audit scope and content is equivalent and sufficient to meet the

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standard requirements. GFS QA reserves the right to request a copy of the inspection/audit standard from the supplier. Each calendar year the supplier must schedule an audit to be completed within 12 months (+/-1 month) of the previous report.

- It is our preference that suppliers sign or authorize a direct release for GMP audit formats with the auditing firm to provide a completed audit report to GFS Food Safety Quality Assurance. GFSI Certifications shall be provided as soon as they become available.

Audit Scoring Standards:

- Each direct supplier is required to maintain an acceptable overall score from an approved audit firm (Table 2). Facilities who have a below acceptable score may be required to complete a re-audit within 90 days, at the expense of the supplier.
- The direct produce supplier must provide a documented corrective action plan to GFS as defined in Table 2. This plan must be provided within 10 business days of GFS receipt of the audit report.
- Failure to maintain acceptable audit reports and audit scores will, at a minimum, place a supplier on probationary status and/or result in disqualification as a GFS produce supplier.

TABLE 1: Approved Audit Types, Firms and Standards*

Audit Type	Audit Firm	Approved Standard for all Direct Handling, Re-packing, Processing, Box In/Box Out, etc Facility
GMP	AIB NSF International, Silliker – Merieux NutriSciences	Food Safety & Quality*
GMP	Other	Must obtain approval from GFS Food Safety Quality Assurance
GFSI	Any Certified Firm	All GFSI Standards

*Suppliers should work directly with the selected audit firm to identify which audit standard is most relevant to their operation.

TABLE 2: Approved Audit Scores

Audit Type	Audit Firm	Standard	Acceptable Scores	Corrective Action Required
GMP	AIB	Food Safety & Quality	900 Minimum No Section of Audit to Score <160 Points	Any "Serious" or "Unsatisfactory" Deficiency Any Section of Audit Scoring <160 Points
GMP	NSF International	Food Safety & Quality	95% or Above No Section of Audit to Score <85%	Any "Critical" or "Major" Deficiency Any Section of Audit Scoring <85%

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GMP	Silliker - Merieux NutriSciences	Food Safety & Quality	95% or Above No Section of Audit to Score <85%	Any "Critical" or "Major" Deficiency Any Section of Audit Scoring <85%
GMP	Other	Upon GFS Food Safety Quality Assurance review		
GFSI	Various	BRC SQF PrimusGFS Other GFSI	AA+, AA, A or B Food Safety Code 90-100% Upon Review	N/A N/A N/A N/A

TRACEABILITY REQUIREMENTS

All direct produce suppliers are required, at a minimum, to maintain traceability as required by US and Canada regulations. This requires the supplier to be able to identify the direct previous and subsequent source of produce. GFS performs recalls based on purchase order number; therefore, GFS produce suppliers are required to maintain record of which lot numbers of produce are sent to GFS on each GFS purchase order number. In the event of a recall or withdrawal, GFS produce suppliers will be required to meet the expectations of SOP0202 Gordon Food Service Supplier Recall and Withdrawal Procedures and provide GFS with purchase order numbers that affected product was sent to GFS on.

INTERNAL SUPPLIER VALIDATION REQUIREMENTS

All direct produce suppliers are required to maintain an internal supplier validation process for all their direct raw produce suppliers and/or any direct supplier facility that manufactures, processes, packs, or holds product destined for GFS. This includes direct suppliers for fill-in produce destined for GFS. GFS is committed to sourcing wholesome product from our direct suppliers, and it is our expectation that our suppliers maintain a suitable direct supplier validation program in turn. A copy of the supplier's validation program must be provided upon request. These programs, at a minimum, should address:

ALL facilities

- Compliance to Applicable Federal, State, and Local Laws
- Audit Expectations (e.g., GAP, GMP, GHP, GFSI)
- Traceability Expectations

Facilities Who Are Farms

In addition to "All Facilities" requirements, facilities who are farms must meet the following:

- On-Farm Food Safety practices shall be established that consider the below items:
 - *History of soil and land use
 - *Soil amendments that will be used and how they will be implemented and stored
 - *Monitoring of water quality and its use
 - *Identification of animal intrusion and how to reduce/eliminate it
 - *Employee training guidelines, including worker health and hygiene
- *Placement of toilet and hand-washing facilities and how to dispose of sewage properly
 - *How equipment will be sanitized
 - *Proper handling of product during and post-harvest
 - *Transportation of produce
 - *Development of a crisis management strategy in the event of contamination

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Facilities Who Process (washed, cut, sliced, diced, etc.) Produce

In addition to "All Facilities" requirements, facilities who process produce must meet the following:

- A Preventive Control Plan that identifies, addresses, and prevents potential hazards and possible sources of contamination shall be in place
- Wash Water Program and Testing
- Environmental Testing Program

GFS recognizes there is little risk associated with certain commodity items, such as potatoes and bananas, thus would anticipate seeing limited or modified requirements for these supplier types.

Description of Revision	Revisor
- Corrected "brussel sprouts" to "Brussels sprouts". Replaced "you" with "suppliers" on the sentence under table 1.	Jeremy Anderson

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Regional Produce Supplier – Checklist

Supplier Name: _____ Facility Location (City, Province/State): _____

Please complete the below checklist				
	YES	NO	N/A	Comments
Has the facility had a 3 rd Party GMP Audit within the last year +/- 1 month and/or do you have a current GFSI Certification?				
Please provide a copy of the most recent 3 rd Party GMP Audit and/or GFSI Certification.				
Does the facility use any water for any post harvest activity (e.g. rinsing, washing, re-hydration, cooling produce, etc)?				
If yes , are you ensuring that you are using water that meets the expectations outlined in this GFS document?				
Do you supply leafy greens* from California or Arizona? *Leafy Greens: Arugula, Butter Lettuce, Chard, Escarole, Iceberg Lettuce, Red Leaf Lettuce, Spinach, Baby Leaf Lettuce, Cabbage, Endive, Green Leaf Lettuce, Kale, Romaine Lettuce, or Spring Mix. Radicchio is also included when product comes from Arizona.				
If yes , will these items be supplied only from LGMA certified members*? *This requirement is not applicable for indoor farms.				
Do you supply sprouts (including, but not limited to: alfalfa, broccoli, clover, bean, wheat, radish, soybean and mustard sprouts)?				
If yes , do you ensure that the sprouts follow the appropriate regulatory guidance for sprout safety?				
Is your facility a fresh cut operation?				
If yes , is there an Environmental Testing Program in place that meets the expectations outlined in this GFS document?				
Are you in compliance with current Federal, State, and Local laws?				
Does the organization maintain traceability as required by applicable regulations (One step back and one step forward)?				
Does the organization have a written Recall Plan?				
Do you have an Internal Supplier Validation process in place that addresses the areas outlined in this GFS expectations document?				

I represent and warrant that the above information is true and complete with respect to all sales of produce to Gordon Food Service or any of its affiliates.

By: _____
Title: _____

Date: _____