

# CORRECTIVE ACTION PLAN

RESPONSE TO AUDIT COMMENTS DATED 5/2/07

## A. HACCP Management

1. Prerequisite Programs: They are included in our plan, please see attachment.
2. HACCP (Principle 1): Each process step will be included in the plan. Will be completed By 9/1/07.

## B. Facilities and Equipment

1. Our new area for our Employees facilities and restrooms are under construction. Targeted for completion by the end of 2007.

## C. Storage and Shipping

1. Product Traceability: Our Mock recall was reviewed and our recall team will aim to complete our exercise in a 4 hour or less recovery time.

## D. Food Defense

1. Management: The facility sets back about 1//4 mile on the northern edge of a 500 + acre parcel of open framed land. Two families occupy homes on the perimeter of the 6 acre processing building cluster. These families also maintain oversight of the premises during non-processing hours. Also, security cameras are planned for installation in 2008.

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## HAZARD ANALYSIS OF INGREDIENTS & PROCESSING STEPS

	<b>Point in the Process</b>	<b>Potential Hazard</b>	<b>Identified Potential Hazard</b>	<b>Implemented Control Mechanism</b>	<b>Monitoring Frequency</b>	<b>Critical Limits</b>	<b>Deviation Response</b>	<b>Responsible Party</b>	<b>Records/ CCP</b>	<b>Verification Method</b>	<b>Verified By Date</b>
1	Growing & Harvesting	C	Pesticide levels in excess of CFR limits	Obtain & review pesticide treatment & crop history report	After last application prior to harvest for every grower	CFR Limits	Reject crop	Grower	Signed pesticide & application compliance records	Finished product is tested against CFR limits, 1x/growing season	Q.A. Manager/ Upon receipt of results
2	Coring  (cauliflower & broccoli)	P	Glass, plastic, wood, & metal	Visible inspection	Continuous person(s) on the belt	No visible metal	1. Stop line & notify supervisor 2. Isolate metal 3. Identify source of metal & repair equip.	Sorter/inspectors  Q.A. Supervisor	Lab Report Review  Supervisor Shift Log?	Lab Report Review	Q.A. Manager/ Daily
3	Popping (Red & Green Bell Peppers)	P	Glass, plastic, wood	Visible inspection	Continuous person(s) on the belt	No visible glass, plastic, or wood	1. Stop line & notify supervisor 2. Glass isolation/product removal	Sorter/inspectors  Q.A. Supervisor	Lab Report Review  Supervisor Shift Log?	Lab Report Review	Q.A. Manager/ Daily
4	Wet Prep. Inspection	P	Glass, plastic, wood, & metal	Visible inspection	Continuous person(s) on the belt	No visible glass, plastic, or wood	1. Stop line & notify supervisor 2. Glass isolation/product removal	Sorter/inspectors  Q.A. Supervisor	Lab Report Review  Supervisor Shift Log?	Lab Report Review	Q.A. Manager/ Daily
5	Dicer	P	Metal	Visible inspection	Continuous person(s) on the belt	No visible metal	1. Stop line & notify supervisor 2. Isolate metal 3. Identify source of metal & repair equip.	Sorter/inspectors  Q.A. Supervisor	Lab Report Review  Supervisor Shift Log?	Lab Report Review	Q.A. Manager/ Daily



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6a	Blancher	B	Foodborne Pathogens	Product Temperature	Continuous	200-210°F 3-5 min.	Complete CCP form for non-compliance	Line Operator & QA Technician	Retain Temp. Chart Recordings	Check enzyme activity	QA Technician/ Every 2 hours or as necessary
6b	SHS	B	Foodborne Pathogens	Product Temperature	Continuous	160°F 50% RH 15 sec.	Complete CCP form for non-compliance	Line Operator & QA Technician	Retain Temp. Chart Recordings	Product temperature checks	QA Technician/ Hourly
7	IQF Freezer	B	Foodborne Pathogens	1. Product temperature 2. Environ. Temperature	1. Daily QA finished product check sheets 2. 24 hours per day chart recorder	0°F	1. Notify Ops. Supervisor 2. Place non-compliant prod. on hold 3. Continue to test until temp. is compliant 4. Complete CCP form for non-compliance	Line Operator & QA Technician	Retain Temp. Chart Recordings	Product temperature checks; must be 0-10°F	QA Technician/ Every tote if time permits. Report any changes and correct
8	Metal Detector - Packaging Line #1	P	Metal	1. Test detector 2. Test rejection timing 3. Sensitivity  1.5 mm ferrous 2.5 mm non ferrous 3.0 mm SS mag. Check 3/3 good	1x at start-up before each shift	Detect & reject test piece	1. Notify Ops Supervisor 2. Place product on hold 3. Recalibrate machine 4. Run product when machine is repaired	QA Technician	Daily QA Finished Product Checklist Reports	Shift review by QA Manager in the case of non-conformance	QA/Before each shift at startup & every hour during production. Report any malfunctions & have corrected
9	Freezer Warehouse	B	Foodborne Pathogens	1. Product temperature 2. Environ. temperature	1. Daily QA Finished Product Check sheet 2. Chart Recorder operates 24	0°F	1. Notify Operations & QA Managers 2. Place product on hold for re-testing 3. Identify	Operations Supervisor	Retain Temp. Chart Recordings	Thermometer Placed in Room	Operations Supervisor/ Daily