

Food Safety & Quality Audit Expectations for Costco Suppliers

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The most current Costco Food Safety & Quality Audit Expectations, Contact List, and Costco audit templates can be found through the link below:

https://www.dropbox.com/sh/wg8ftlntk4fo318/AABKABKUnMyTOgS8RhJL-jHUa?dl=o

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Costco's Food Safety & Quality Commitment

Costco has pledged to provide high-quality, safe, and wholesome food products by requiring that suppliers be in compliance with the highest food safety standards in the industry. Food safety audits are vital to maintaining the highest possible food safety standards. Audit reports provide information on the effectiveness of food safety systems, as well as provide feedback for continuous improvement.

Audit information will only be shared internally between the Costco personnel. The Costco Food Safety Audit Team will review audits to identify opportunities for improvement and verify that corrective actions are completed, while the Costco buying staff will use audit information to guide purchasing decisions.

General Audit Requirements

- All operations, other than those located in China Mainland, are required to:
 - Be audited annually to a <u>Costco-approved standard</u> by a <u>Costco-approved</u> <u>certification body</u>; and,
 - Authorize the certification body to release and upload the full audit report(s) into Costco's database of choice.
- All operations located in China Mainland are required to:
 - Be audited twice a year (scheduled approximately 6 months apart) to a <u>Costco-approved standard</u> by a <u>Costco-approved certification body</u>; and,
 - Authorize the certification body to release and upload the full audit report(s) into Costco's database of choice.
- All operations involved with primary production or harvest of animal proteins for products sold to Costco are required to:
 - Be audited to a Costco-approved animal welfare standard by a <u>Costco-approved</u> <u>certification body</u> at a frequency defined by the standard or Costco.
 - Authorize the certification body to release and upload the full audit report(s) or assessments (or assessment data) into Costco's database of choice.
- All audits must be unannounced. The only exception is for the Costco Small Supplier audit.
- At the time of the audit, a site must be producing, cultivating, or processing a product that is being purchased by Costco. If that is not possible, the audit shall cover a product with a similar hazard analysis and preventive controls.
- Costco may grant a grace period for operations that do not meet the approved audit standard or certification body requirements prior to starting business with Costco. The grace period only applies to operations that cannot change to meet the Costco requirements without affecting certification. These operations must submit a full audit report that was completed within the last 12 months, as well as the corrective action response(s) for each deficiency noted in the audit to Costco food safety staff for review and approval. If the previously completed audit report is accepted, the operation's anniversary audit must fully meet Costco's audit expectations.
- Costco may, at times, shadow a supplier's 3rd party audit. A member of the Costco Food Safety staff will accompany the auditor for the entire duration of the audit. During the audit, the Costco employee will examine all documentation reviewed by the auditor and will also walk the entire operation during the inspection (interior and exterior). Observations made by the Costco employee will be disclosed after the auditor is finished with the closing meeting. Costco observations do not impact audit scoring. To ensure that Costco's observations are addressed, operations must provide Costco with an e-mailed corrective action response for each observation.

Costco Approved Certification Bodies based on the Costco region(s) you supply

Costco will accept audits from the approved list of certification bodies below.

If a supplier ships to multiple Costco regions they must use a certification body that is approved-for-use by all regions they supply products to.

US Canada China Mainland Taiwan Korea Australia New Zealand	France	Japan	Mexico	Spain	U.K. Iceland Sweden
•Acerta •AIB International •Asure Quality •Aus meat/Aus qual •BSI Group •Bureau Veritas •Control Union •DNV-GL •Eagle Food Registrations •Eurofins •FoodChain ID •Food Safety Net Services •Intertek •LRQA •LSQA •Mérieux •NSF International •PMC •Primus Auditing Operations (PAO) •Safe Food Certifications •SAI GLOBAL •SCS Global Services •SGS •TUV USA / TUV Nord •UL Solutions •Validus •WQS-QIMA / QIMA	same as the US with the addition of: •Afnor •Dekra	same as the US with the addition of: •JFIC	same as the US with the addition of: •GlobalSTD Certification	same as the US with the addition of: •Aenor •Applus	same as the US with the addition of: Will accept BRC Certifications or Salsa Audits regardless of the audit company. Also accepts ISO Certifications.

Costco will accept the audit standards listed below.

All audits must be unannounced and completed by an approved certification body.

Scope of Operation	Acceptable Audit Standards	Scoring Requirements	Additional Requirements
	Primus Standard GAP •Farm + Harvest Crew •Indoor Agriculture + Harvest Crew	Overall Total Score ≥85%	CAP required for scores
	SQF Food Safety Code(s): •Primary Plant Production	Total preliminary score ≥86	SQF/Costco guidance document used during certification
Produce farm that supplies field-packed products, including Controlled Environment Agricultural (CEA) facilities.	PrimusGFS •Module 1 FSMS + Module 2 Farm + Module 4 Harvest Crew •Module 1 FSMS + Module 3 Indoor Agriculture + Module 4 Harvest Crew	Successful Certification	N/A
All produce items that are field-packed will require an annual Ranch and Harvest	CanadaGAP: Option B Option C	Minimum Score 85%	Costco Field Packed Commodity Addendum
Crew Audit. If the operation grows multiple crops with different harvesting practices, separate audits will be required.	GlobalGAP: •IFA •HPSS •PSA	Successful Certification	Costco Field Packed Commodity Addendum
be regained.	EFI Food Safety Standards + Pest Management Standards	Successful Certification	Costco Field Packed Commodity Addendum
	Global Markets: •SQF Fundamentals for Primary Production	Costco will accept an Intermediate Level with a total preliminary score ≥80% for the first year.	Site must obtain full certification or complete a Costco Audit for any subsequent years

Scope of Operation	Acceptable Standards	Scoring Requirements	Additional Requirements
	Costco Food Safety	Minimum score of ≥85% overall and in each category. No critical findings.	See Costco Food Safety description CAP required for scores <98%
	Costco Small Supplier	Minimum score of ≥75% overall and in each category. No critical findings.	See Small Supplier description CAP required for scores <98%
	SQF Food Safety Code(s): Food Manufacturing Pet Food Manufacturing Animal Feed Manufacturing Animal Product Manufacturing	Total preliminary score ≥86	•SQF/Costco guidance document used during certification
	BRCGS: •Food Safety	Preliminary Grade ≥B	Module 14 Meeting Costco Requirements
	FSSC 22000: •C — Food manufacturing •D — Animal feed production •DII — Production of pet food	Successful Certification	•FSSC/Costco Guidance Document •Annual Onsite Surveillance Audit is required, and full report provided to Costco
Manufacture, processing, or packing of foods/feeds or	I <u>FS</u> : ●Food	Total preliminary score >85	IFS/Costco Guidance Document used during certification
ingredients.	Global Seafood Alliance: • Seafood Processing Standard	Successful Certification	GSA/Costco Guidance document used during certification
	PrimusGFS: •Module 1 FSMS + Module 5 GMP + Module 6 HACCP + Module 7 Preventive Controls	Successful Certification	N/A
	Primus Standard GMP: •GMP Processing with HACCP •GMP Packinghouse with HACCP	Overall Total Score ≥85%	•CAP required for scores <98% •Operations Supplying US will need to add <u>FSMA Addendum</u>
	GlobalGAP: • Produce Handling Assurance	Successful Certification	Costco Produce Facility Addendum
	CanadaGAP: Option B Option C	Minimum Score 85%	Costco Produce Facility Addendum
	Global Markets: •IFS Global Markets Food •BRCGS Start! •SQF Fundamentals for Manufacturing •FSSC Development Program	Costco will accept an Intermediate Level with a total preliminary score ≥80% for the first year.	Site must obtain full certification or complete a Costco Audit for any subsequent years

Scope of Operation	Acceptable Audit Standards	Scoring Requirements	Additional Requirements
	<u>Costco Food Safety</u>	Minimum score of ≥85% overall and in each category. No critical findings.	See Costco Food Safety description CAP required for scores <98%
	Costco Small Supplier	Minimum score of ≥75% overall and in each category. No critical findings.	See Small Supplier description CAP required for scores <98%
	Costco approved certification body GDP audit standards	Audit scheme scoring requirements.	CAP required for scores <98% regardless of CB requirements
Warehouse, Storage, or Distribution. May include	SQF Food Safety Code: •Storage and Distribution	Total preliminary score ≥86	N/A
activities such as assembly or repack of pre-packaged products, freezing, or	BRCGS: •Storage and Distribution	Preliminary Grade ≥B	N/A
thawing.	FSSC 22000: •G - Transport and Storage	Successful Certification	N/A
	IFS: ●IFS Logistics	Total preliminary score ≥85	N/A
	PrimusGFS: •Module 1 FSMS + Module 5 GMP + Module 6 HACCP + Module 7 Preventive Controls	Successful Certification	N/A
	Primus Standard GMP: •Cooling & Cold Storage with HACCP	Overall Total Score ≥85%	CAP required for scores
	CanadaGAP: •Option D	Total preliminary score ≥85%	Costco Produce Facility Addendum
	GlobalGAP: • Produce Handling Assurance	Successful Certification	Costco Produce Facility Addendum
	Global Markets: •IFS Global Markets Logistics •BRCGS Start!	Costco will accept an Intermediate Level with a total preliminary score ≥80% for the first year.	Site must obtain full certification or complete a Costco Audit for any subsequent years

Scope of Operation	Acceptable Audit Standards	Scoring Requirements	Additional Requirements
	Costco Food Safety	Minimum score of ≥85% overall and in each category. No critical findings.	See Costco Food Safety description CAP required for scores <98%
	Costco Small Supplier	Minimum score of ≥75% in each category. No critical findings.	See Small Supplier description CAP required for scores <98%
Manufacture of direct	Costco approved certification body Packaging Audit standards	Audit scheme scoring requirements.	CAP required for scores <98% regardless of CB requirements
food/feed contact packaging.	SQF Food Safety Code(s): •Manufacture of Food Packaging	Total preliminary score ≥86	N/A
	BRCGS: •Packaging Materials	Preliminary Grade ≥B	N/A
	FSSC 22000: •I — Production of food packaging and packaging materials	Successful Certification	N/A
	IFS: •PACsecure2 •PACsecure1.1	Total preliminary score ≥85	N/A
	Global Markets: •IFS Global Markets PACsecure	Costco will accept an Intermediate Level with a total preliminary score ≥80% for the first year.	Site must obtain full certification or complete a Costco Audit for any subsequent years

Scope of Operation	Acceptable Audit Standards	Scoring Requirements	Additional Requirements
	Costco approved certification body Dietary Supplement audit standards	Audit scheme scoring requirements.	CAP required for scores <98% regardless of CB requirements
	SQF Food Safety Code(s): • Dietary Supplement Manufacturing	Total preliminary score ≥86	•SQF/Costco guidance document used during certification
	BRCGS: •Food Safety	Preliminary Grade ≥B	•Module 14 Meeting Costco Requirements
	FSSC 22000: •K – Production of (Bio) chemicals.	Successful Certification	•FSSC/Costco Guidance Document •Annual Onsite Surveillance Audit is required, and full report provided to Costco
Manufacture of Dietary Supplements, Vitamins, or Nutraceuticals.	<u>IFS</u> : ●Food	Total preliminary score ≥85	IFS/Costco Guidance Document used during certification
	<u>GRMA</u>	Total preliminary score ≥B	N/A
	Global Markets: IFS Global Markets Food BRCGS Start! SQF Fundamentals for Manufacturing FSSC Development Program	Costco will accept an Intermediate Level with a total preliminary score ≥80% for the first year.	Site must obtain full certification or complete a Costco Audit for any subsequent years

Scope of Operation	Acceptable Audit Standards	Scoring Requirements	Additional Requirements
	Costco approved certification body Beverage/Water/Ice audit standards	Audit standards scoring requirements.	CAP required for scores <98% regardless of CB requirements
	SQF Food Safety Code(s): •Food Manufacturing	Total preliminary score ≥86	•SQF/Costco guidance document used during certification
	BRCGS: •Food Safety	Preliminary Grade ≥B	Module 14 Meeting Costco Requirements
	FSSC 22000 •C – Food manufacturing	Successful Certification	•FSSC/Costco Guidance Document •Annual Onsite Surveillance Audit is required, and full report provided to Costco
Manufacture of ice, or bottling water	<u>IFS</u> : ●Food	Total preliminary score ≥85	IFS/Costco Guidance Document used during certification
	<u>IPIA</u>	Successful Certification	N/A
	Global Markets: •IFS Global Markets Food •BRCGS Start! •SQF Fundamentals for Manufacturing •FSSC Development Program	Costco will accept an Intermediate Level with a total preliminary score ≥80% for the first year.	Site must obtain full certification or complete a Costco Audit for any subsequent years

Re-Audit Criteria

An audit that scores below Costco's expectations or has <u>what Costco considers a critical finding</u> will be considered a failed audit.

Certification bodies and suppliers are required to notify Costco of a failed audit within 24 hours. Suppliers must notify Costco food safety staff immediately via email or phone in the event their certification becomes suspended, canceled, or withdrawn. Current list of food safety contacts can be found here.

A failed audit of any type, independent of requirements for maintaining certification, will trigger an unannounced Costco Food Safety re-audit within 60 days of the initial audit date. Re-audits for Grower, Harvest Crews and Greenhouses must be conducted against an approved audit standard within 30 days of the original audit date. If the growing/harvest season is finished or if the Facility is non-operational, a re-audit must take place within the first 30 days of the next growing/harvest/operational season.

All corrective actions identified in the original audit must be verified during the re-audit.

Costco may suspend orders after an audit failure until a re-audit can occur, and will be handled on a case by case basis.

Critical Findings that require re-audit:

- Contamination of raw materials (including primary packaging), finished products, or zone 1 (food contact surfaces) is observed by the auditor, including but not limited to contamination from pests or evidence of pests, allergen cross-contact, or foreign material.
- The site does not take documented corrective actions when critical limits are not met.
- Falsification or fabrication of documents or records
- Employees with sores, infected wounds, or other infectious illnesses are observed in contact with raw materials (including primary packaging), finished products, or food contact surfaces, or are working in areas with exposed raw materials (including primary packaging), finished products, or food contact surfaces.
- Allergens are present in the facility, but a documented allergen control program that addresses all allergens in the regions of manufacture and distribution has not been established.
- A documented SSOP Program (Standard Sanitation Operating Procedures) has not been established or implemented.
- A documented Food Safety Plan or HACCP Plan has not been established or implemented.
- Regulatory Requirements for the country/region of production or sale have not been met.
- A written pest control program has not been established, implemented, or does not cover both the interior and exterior of the operation (including storage areas for products, materials, or packaging).
- Facility water is not from a potable source.
- Water potability is not tested by a certified laboratory and records are not maintained (annual testing for municipal water sources and quarterly for well water).
- Finished products are not properly coded for traceability.
- Evidence of decomposed pests in the interior of the facility (including decomposed pests in traps).
- Operation has not installed a foreign material detection device by the time of their Costco anniversary audit and does not meet exemption criteria.
- An operation does not have 60 days of operational records preceding the audit, unless a formal exemption has been provided by Costco's food safety team.

Applicable to Suppliers that manufacture in, or export to, the United States:

- The facility cannot provide proof of FDA registration for the Bioterrorism Act, or is not in compliance with USDA requirements.
- Suppliers of imported products subject to FSVP requirements do not have a Costco FSVP approval letter specific to the item(s) and facility that produces the item.

Costco may initiate an immediate Costco Food Safety audit in response to a product recall, serious incident, issuance of an FDA warning letter (Form 483), or Costco concern. These audits will be conducted independent of the anniversary audit timeline and will not impact certification, if applicable.

Costco Audit Standards

Costco's Food Safety Audit

Costco's Food Safety audit must be conducted within a 90-day audit window from the date of the previous audit (45 days before/after the audit anniversary date).

During the scheduling process, the certification body will ask the site to provide blackout dates (if any). A blackout date is a period of time in which the site will not be operational or producing a Costco product or like product. Blackout dates are strictly limited to non-production days and will not be granted for any other reason. Unless blackout dates are provided by the site, all days within the 90- day audit window will be considered "audit ready" dates. If a site is not operational on an audit-ready-date, the audit must be rescheduled within the original 90 day window at the supplier's expense. It is advisable to check with your certification body regarding their cancellation policy and associated fees.

The majority of Costco Food Safety audits can be completed in a single audit day, though certain audits may require a second day due to the size, complexity, and readiness of a facility.

Costco's Small Supplier Audit

Suppliers that have fewer than 25 employees and have not previously completed a third-party food safety audit are eligible for a Costco Small Supplier Audit. Small Supplier Audits are always announced. Small Supplier Audits are intended as an introduction to Costco's food safety program and are to be performed on a <u>one-time-only basis</u>. All subsequent audits completed for Costco must be either a Costco Food Safety audit or another approved audit standard.

N6o Addendum (Applicable to Suppliers of Raw Beef to Costco Meat Plants)

All suppliers that provide raw beef protein components to Costco's Tracy, CA and Morris, IL meat plants must also complete an N6o Addendum. Costco will accept both the Costco N6o Addendum as well as N6o audits developed and performed by Costco-approved certification bodies. Costco will defer to audit scheme scoring requirements.

Animal Welfare Audits

Operations that slaughter or handle live animals (e.g. laying hens, dairy cattle, etc.) are required to have an animal welfare or certification audit. Audits are to be conducted annually, except where frequency is defined by the certification. Please refer to the Costco Animal Welfare Audit Expectations Document for further information.

Corrective Action Plans (CAPs)

Non-conformances identified in Costco, Animal Welfare, or approved certification body standards must be addressed with a corrective action plan. The CAP must be reviewed and approved by the third-party auditor that conducted the audit. Audits that score less than 98% must have their CAP uploaded to the appropriate audit database within 14 calendar days of the audit being posted. The CAP shall address the following:

- Employee(s) responsible for corrective actions.
- Root Cause Analysis.
- Corrective Action.
- Preventive Plan.
- Completion Date (or estimated completion date).

During the anniversary audit, evidence shall be provided to the auditor to confirm that all corrective/preventive actions from the previous year's audit have been implemented. If findings from the previous audit are not corrected by the time of the anniversary audit, each repeat non-conformance will be awarded a score of "o" points.

Certification and surveillance audit non-conformances must be addressed per the standard's requirements.

Required System Elements

The following elements are required to be integrated into a Costco supplier's food safety system:

HACCP/Preventive Controls

- All food operations must be operating under a food safety management system that includes a HACCP or Preventive Controls plan.
- Primary packaging manufacturers must be operating under a quality management system that includes a risk-based control plan.
- The person(s) responsible for the HACCP or Preventative Control Plan must have adequate HACCP or PCQI training. The following may be acceptable to meet the training requirements.
 - o HACCP Virtual/online or In person HACCP alliance accredited certification
 - o PCQI Virtual/online or In person FSPCA accredited certification
 - o Demonstrable training through related studies (e.g. formal education)
- HACCP or PCQI training certifications must be current within 5 years.
 - Individuals that are certified HACCP or PCQI trainers that maintain their accreditation with HACCP alliance or FSPCA will be considered current.

Supplier Approval Program

Operations must have a Supplier Approval Program in place to monitor and evaluate all raw material (including primary packaging) suppliers. The Supplier Approval Program shall at a minimum include:

- A current list of all raw material (including primary packaging) suppliers, including growers and harvest crews where applicable.
- Specifications for each raw material (including primary packaging) being supplied with defined acceptance criteria for microbiological, chemical (including radiological), and physical parameters.
- Where there are label claims such as "organic", "Gluten Free", "non-GMO", "no antibiotics", "raised without antibiotics", "no hormones added", or "no hormones administered" the operation must validate these through any combination of testing, certifications, or audits.
- Requirements for raw material (excluding food contact packaging) suppliers to be operating under a food safety management system. The system shall meet all applicable regulatory requirements.
- Requirements for food contact packaging suppliers to be operating under a quality management system. The system shall meet all applicable regulatory and customer requirements.
- A requirement for suppliers to be audited by a third party to a standard that verifies
 implementation of GMP/GDP/GAP, HACCP/Preventive Controls, a traceability system, and a
 recall management plan. The requirements shall have pass/fail criteria defined for the supplier's
 audits to maintain approved status.
- Annual verification of the supplier's audit.

Foreign Material Control

Operations must have a comprehensive foreign material control plan in place for known and reasonably foreseeable physical hazards. The foreign material control plan at a minimum must include:

- Specifications that include physical hazard parameters for all raw materials (including primary packaging).
- An incoming raw material (including primary packaging) inspection procedure that includes documented verification against specifications at a defined frequency. Corrective actions shall be documented when variances are identified and a trend analysis shall be conducted at a defined frequency. Preventive actions shall be documented when trends are identified.
- Storage, handling, and transport procedures that include necessary controls to prevent foreign material contamination, and the corrective actions should incidents occur.
- A glass and brittle plastic policy which maintains a map of glass and brittle plastic in product zones and areas, verified at a defined frequency.
- A policy that restricts the use of materials in product zones and areas that are not easily cleanable or prone to creating foreign material contamination. These materials include but are not limited to foam rubber, any type of carpet, wood, non-food grade plastic, cardboard, tape, etc.. Clothes, towels, and other cleaning materials that pose a risk of contamination or adulteration shall not be used to remove dirt and debris from products.
 Workers must not handle products in a manner that results in contamination or adulteration.
- A mechanism for employees to report concerns that includes specific language for foreign material contamination.
- Annual training on foreign material hazards for all employees at the facility, including instruction on the mechanism employees can use to report concerns.
- Procedure for visitor and contractor awareness and acknowledgement of the operation's requirements.
- Documented inspections at a defined frequency of equipment, glass and brittle plastic, and other reasonably likely sources of foreign material. Corrective actions shall be documented where deficiencies are identified and trend analysis shall be conducted at a defined frequency. Preventive actions shall be documented when trends are identified.
- Customer complaint procedures that address foreign material investigation and the documentation of corrective and preventive actions. Trend analysis shall be conducted at a defined frequency and preventive actions shall be documented when trends are identified.

All manufacturing operations must have a properly installed and calibrated X-ray detection device for finished product, except in the following circumstances:

- Product texture, density, or chemical composition is such that it limits the performance of the X-ray technology to an unacceptable level. These operations will be required to have a metal detector installed as well as a letter from a subject matter expert confirming that Xray is not applicable.
- Shell Eggs, whole raw agricultural commodities, whole roasted coffee beans, whole muscle
 meats, and packaging products will be exempt from the X-ray requirement. The operation
 will need to maintain current good manufacturing practices and prerequisite programs to
 mitigate foreign material contamination.
- Operations that utilize a physical barrier (e.g. screen, filter, sieve) that's appropriately sized and placed will be exempt from the X-ray device requirement. The operation will need to conduct integrity checks at a defined frequency, and maintain current good manufacturing practices and prerequisite programs to mitigate foreign material contamination.

All X-ray and metal detection devices must have a proper rejection mechanism to segregate rejected products. Rejected products must be physically controlled and have access restricted until evaluation by designated personnel can be completed.

Operations must perform documented X-ray and metal detector challenges at a defined frequency, but at a minimum:

- At the start and finish of daily production/shift.
- At ≤ 2 (two) hour intervals during the production run.
- When changes in production batches occur.
- When changes in machine settings occur.
- After downtime for repairs.

Challenge materials must conform to the manufacturer's recommendations (e.g. metal, glass, plastic, wood, etc.) and reflect the known and likely contaminants of the product and production process. Where metal detection is deployed, Ferrous, Non-Ferrous, and Stainless Steel test pieces must be used. Facilities that have not installed a detection device by the time of their Costco anniversary audit will receive an automatic audit failure.

Product Traceability

All operations shall have a traceability system in place which enables the full identification of inputs and outputs (i.e. ingredients, primary packaging, processing aids, work-in-progress, rework, finished goods), from receipt through processing and distribution and vice versa. The traceability system shall be able to trace specific lots (one step forward, one step back) within two (2) hours. All products sold to Costco must be marked with a use-by, sell-by, or best-before date that can be used for traceability/recall purposes. Produce items should also include a packed-on-date or scannable barcode/QR-code that can provide information for traceability and recalls. All bagged salads and leafy green products containing romaine must be labeled with the Harvest region and the pack date. Julian code dating is not acceptable for any Costco product.

For year-round operations, sites must annually complete at least two self-administered traceability exercises to verify the effectiveness of the traceability system. Each separate exercise must focus on a different category, which include: (1) a finished goods item, (2) an ingredient, or (3) primary packaging. The remaining category not addressed by the facility's two self-administered trace exercises will be the subject of an onsite exercise initiated by the auditor during the annual audit. If the operation is not yet producing for Costco, an item similar to what would be supplied to Costco should be chosen. The recall/traceability system must be able to account for 100% of the product in a two-hour timeframe.

For non-year-round operations, Costco requires a single traceability exercise. A second exercise will be completed by the auditor during the annual food safety audit.

Companies with corporate generated recall systems in place need only provide the auditor with a copy of their program and evidence they have tested the system on a finished product, an ingredient, and primary packaging since their last annual audit. A test shall not be required during the audit if the evidence provided shows that the system was able to recover 100% of the test subject in under 2 hours in all three exercises.

All operations must conduct an annual mock recall to verify current contact information and that the quantities received and distributed through the next step in the item's supply chain match what was produced/distributed. The exercise may count towards one of the traceability exercises; however, there needs to be evidence that the next step up was contacted to verify current contact information and the quantities received/distributed match what was produced/distributed. The current contact information for any next step up that was not part of the exercise shall be verified on an annual basis.

Costco will, at times, request vendors conduct a mock recall exercise on a single item lot, which includes each step of the item's supply chain, starting with the point of manufacture through the last distribution point prior to Costco's receipt. The mock recall exercise will allow 2 hours for each facility within the chain to conduct a trace and summarize their portion of the request, with the final mock recall summary being compiled by the vendor and emailed to Costco's food safety audit team for review. Any site within the scope of the exercise that is unable to complete a trace within the allotted 2 hours will be

required to submit root cause analysis and corrective/preventive actions, and this may result in a Costco Food Safety audit at Costco's discretion.

In the event of an actual recall, the supplier will need to contact the following people at Costco within 24 hours:

- 1) The Costco Buying team
- 2) Costco Food Safety
 - Craig Wilson, VP Food Safety 425-313-2880 w or 425-766-2699 c
 - o Robin Forgey, Director Food Safety 425-427-7187 w or 425-830-1724 c
 - or the 24 Food Safety Hotline 425-894-2433 c
- 3) <u>Impacted international food safety team(s)</u>

Allergen Control

Costco requires that all operations have a documented allergen control program that addresses all allergens in the regions of manufacture and distribution. Please refer to <u>Appendix I</u> for the list of allergens and labeling requirements for all regions that Costco currently operates in.

Microbiological Testing

All operations must have a written program in place to verify sanitation effectiveness for food contact surfaces. The program should be based on a risk assessment of the operation and validated. Examples of acceptable verification include ATP monitoring or swabbing for TPC (Total Plate Count).

Facilities that are producing high risk items must implement an Environmental Sampling Program and Finished Goods Microbial Test and Hold Program to detect pathogens of concern. <u>Detailed requirements can be found in Appendix II of this document.</u>

Water used in any operation must be from a potable source and tested by a certified third-party laboratory.

- Municipal water sources shall be tested annually.
- Private well water shall be tested quarterly.
- Samples must be drawn from various sites throughout the facility and test records are to be maintained.
- Water used for either processing or sanitation purposes must be tested for generic E.coli.
- Irrigation water is to meet or exceed the requirements of the U.S. FDA Produce Safety Rule.

Irradiation (Dog Treats)

With the exception of products that are extruded, chopped, formed, and cooked to the appropriate temperature under a verified preventive measures plan, as well as any of the formulated biscuit style treats that are baked, Costco requires that all whole muscle dog treats (chicken jerky, pig ears, pizzles, fish jerky, etc.) and imported dog treats (all styles) shall be irradiated. Per Australian Standards for pet food, if the product has been irradiated, the label must include the statement - "Must be not fed to cats"

Pest Control

Facilities must have and maintain an integrated pest management program (IPM) that manages both the interior and exterior of the facility (to include storage areas for both product and packaging).

At a minimum, the Integrated Pest Management Program (IPM) must meet the following requirements:

- Must be developed and implemented/performed by licensed and certified pest control
 personnel. In regions without a licensing requirement, pest control personnel must be trained
 and should maintain a written pest control program that demonstrates their understanding of
 pest control and its alignment with food safety operations.
- List the designated/trained/licensed pest control officer(s) (PCO) responsible for the program, and must outline responsibilities for both in-house personnel and contractors.
- The IPM must establish a scheduled frequency of service for all interior and exterior devices. Complete records of all services must be kept.
- The PCO must maintain a current map (updated at least annually) that shows the location and type of all interior and exterior pest control devices.
- All pest control devices must be numbered/identified. Corresponding placards should also be placed above devices to enable personnel to confirm that the devices are in their designated locations per the current pest control map.
- Pest control devices, including Insect Light Traps, must be located away from exposed food products and raw materials (including primary packaging).
- Chemical usage logs and current SDS information must be maintained.
- Bait stations and other pesticides are limited to outside use unless country/regional laws require otherwise.
- Interior devices (i.e. tin cat, glue boards, or Ketch-Alls) must be placed on both sides of all doors leading to the exterior of the facility and properly identified with placards unless country/regional laws require otherwise. Costco does not allow snap traps to be used.
- Monthly catch records must be maintained and a trend analysis performed by the PCO at least annually. For facilities conducting in-house pest control, a current map and monthly catch records must be maintained and a trend analysis must be performed monthly.

Personnel Hygiene

A written hygiene policy must be kept which defines the appropriate attire and PPE to be worn, the hygiene practices for staff, contractors, and visitors when in product zones/areas, and the appropriateness of the facilities to be used. At a minimum the policy must meet the following requirements:

All persons must wear single use hairnet/facial hair coverings when around exposed products, regardless of risk level.

- Beards or mustaches must be fully covered by a facial hair covering.
- Caps are not an adequate hair cover or hair restraint, and will require a hairnet to be worn underneath. Caps must be clean and shall not pose a risk of contamination. Caps that are made of a material that is not easily cleanable must be covered by a hair net.

Gloves must be worn when or where there is direct hand contact with ready-to-eat (RTE) products, regardless of the risk level.

- Gloves must be replaced when they become damaged or soiled, after breaks, or upon re-entry into the product zones/areas.
- Single-use gloves must be latex-free and powder-free.
- If fabric gloves are used when hands are in contact with food, they need to be covered with latex-free/powder-free gloves.
- Reusable food-safe gloves must be washed and sanitized frequently at a minimum, at the start of a shift, after breaks, and after handling potential contaminants. Gloves should always be clean and in good condition.

Where it can be demonstrated, through scientific validation studies, that the wearing of gloves is impractical or less hygienic than bare hands, Costco may offer an exemption to the glove requirement. These are rarely issued, and are only granted when the product, processes, risk-level, and validation evidence support an exemption.

Employees must not consume or store personal food, candy, gum, tobacco or beverages in areas other than designated break/lunch areas that are located away from where the product is produced, stored, or otherwise exposed. Drinking water will be allowed, but shall be limited to designated areas away from raw materials, packaging, tools, or equipment storage areas, and shall be contained in clear, covered containers.

Picking bags, gloves, knives, and aprons must be controlled and monitored through equipment storage & control procedures. These items shall be on a documented cleaning schedule. The site is responsible for the condition, cleanliness, and upkeep of all equipment and garments. Harvesting equipment must be on a documented cleaning and sanitizing program.

Hands must be washed prior to applying gloves or entering product zones/areas, and after a break, eating, drinking, smoking, using the restroom, and any time hands become contaminated. Designated and well-stocked handwashing stations shall be located at access points to all product zones/areas, and in a manner that allows employees to go directly from the hand sink to their work-station without the risk of contamination. Handwashing stations must be available inside restroom facilities and shall be used for that purpose only.

For produce farm operations, a minimum of one working field sanitation unit (clean and well-stocked toilet and hand wash stations) is required for every 20 employees. Toilet and hand washing facilities must be within a 5 minute walking distance for all employees. Hand wash stations must be located outside portable restroom facilities in order for hand washing activities to be observed/verified by supervisors.

All handwashing stations must:

- Be hands-free.
- Have an adequate supply of water at an appropriate temperature.
- Have an adequate supply of liquid soap.
- Have a hands-free towel dispenser (or other sanitary drying devices).
- Have a hands-free waste container.
- Have handwashing signage posted near the station in the language(s) spoken by workers.

Food Packaging

All Costco food item packaging must meet regulatory requirements in the regions of manufacture and distribution, as well as meet Costco's <u>PFAS in food packaging requirements</u>.

Region Specific Requirements

USA - Foreign Supplier Verification Program (FSVP)

In compliance with the Food Safety Modernization Act, Costco US has implemented a Foreign Supplier Verification Program that requires all imported items subject to FSVP per FDA, and regardless of the importer of record, be verified and issued a letter of compliance by Costco's qualified individual. The approval letter is specific for the item(s) and facility that produces the item(s). Facilities that do not comply or cannot provide the letter when requested by an auditor or Costco will receive an automatic failure for their audit regardless of the certification outcome.

Canada - Safe Food for Canadians Regulations

On January 15, 2019, the Canadian Food Inspection Agency (CFIA) enforced new food regulations known as the Safe Food for Canadians Regulations (SFCR). The SFCR mandates that food businesses that prepare food for interprovincial trade, or that import food into Canada hold a Safe Food for Canadians (SFC) license. Holders of licenses must prepare, keep, and maintain a written Preventive Control Plan (PCP), and keep and maintain traceability records.

For more information, please refer to the CFIA's website:

https://www.inspection.gc.ca/food-safety-for-industry/eng/1299092387033/1299093490225

Costco Audit Databases

Full audit reports and corrective actions must be released by the operation/supplier for the certification body to upload into Costco's database of choice. Reports must be translated to a language accepted by that country – e.g. English for the US (please email your Costco food safety contacts for region-specific requirements). Certification bodies are required to upload preliminary audit reports, including Certification audits, within 10 business days from the date an audit is completed. For Certification audits, the final report will be posted upon issuance. If an operation is not producing for Costco but would like to be Costco ready, they can proceed with an approved audit type with an approved certification body, however the site will not be registered or their report uploaded until a Costco item number is confirmed.

Enterprise Facility Audit (EFA) Database

With the exception of fresh produce, all items must be associated in Costco's EFA database to the applicable manufacturers, co-manufacturers, co-packers, and distribution centers that produce or handle finished products, as well as the vendors that sell those finished products to Costco. Please note that only Costco personnel will have access to audit documents in EFA and are unable to share documents with an operation or supplier. Suppliers who need access to audit documents can request these from the facility that paid for the audit, or from the certification body if a data-sharing agreement is in place.

For items being supplied to the US, the registration process must be initiated by the Costco buying staff. A Costco item number and vendor number is mandatory for registration to occur. Facilities that supply the US may request that the Costco buyer complete the EFA registration form to start the process.

Facilities that supply Canada can e-mail the completed registration forms to cnfsa@costco.com. Alternatively, if the facility is registered in the Costco Canada SafeFood database, Costco staff will set up the facility using that information.

At this time, suppliers to Costco regions other than the US and Canada should clarify their database registration requirements with a member of the respective Costco food safety team or their Costco buyers.

Link for the EFA job aids

EFA is a Costco managed system, system errors should be reported through the following form: <u>EFA System Error</u>

Azzule Systems (Fresh Produce)

Costco uses Azzule Systems to manage Fresh Produce audit information (e.g. audit reports, corrective actions, and certificates). Suppliers in Azzule are expected to maintain complete supply chain transparency for all product(s) sold to Costco. Suppliers and audit companies should adhere to the following requirements.

- Audit reports, corrective actions, and certificates must be submitted or uploaded in Azzule by
 the audit company. Costco does not accept manually uploaded audits. Utilization of the
 Azzule Auditing Software, CB Supply Chain Program, or PrimusGFS site allows the audit
 reports to be posted directly into the auditee's Azzule Supply Chain Program (SCP).
- Audit companies must use the Azzule Auditing Software to submit the Costco Addendum, if applicable.
- Costco suppliers can then access their Azzule Supply Chain Program (SCP) to transfer the audit to Costco's Azzule site.
 - Link: Azzule How to Send Audits to your Customers
- If the supplier is not the auditee, they can retrieve or request the audit from their supplier through the SCP site, and then transfer to Costco's Azzule site.

For Azzule related questions please contact Azzule Support by email at support@azzule.com or by phone:

USA +1 805-354-7127 Mexico +52 66 77 16 50 37 Chile +56 32 3325045

Appendix I. Allergen and Labeling Requirements by Costco Region of Operation

<u>United States</u>	Crustacean Shellfish, Egg, Fish, Milk, Peanut, Soy, Tree Nuts, Wheat (Gluten), Sulfites (≥10mg/kg), Sesame
<u>Canada</u>	Crustacean Shellfish, Egg, Fish, Milk, Peanut, Soy, Tree Nuts, Wheat or Triticale, Cereals w/ Gluten, Molluscan Shellfish, Mustard, Sesame, Sulfites (directly added or equal to 10mg/kg)
	CFIA Link
<u>EU / UK /</u> <u>Iceland</u>	Crustacean Shellfish, Egg (any farmed animal), Fish, Milk (any farmed animal), Peanut, Soy, Tree Nuts, Cereals w/ Gluten (including Wheat or Triticale), Celery, Lupin, Molluscan Shellfish, Mustard, Sesame, Sulfites (≥10mg/kg)
	EU Regulation <u>Regulation (EU) No 1169/2011</u> Annex II <u>update</u>
<u>Mexico</u>	Crustacean Shellfish, Egg, Fish, Milk, Peanut, Soy, Tree Nuts, Cereal Grains w/Gluten, Sulfites (≥ 10mg/kg)
	ESHA Research <u>Link</u> FARRP <u>Link</u>
<u>Australia/New</u> <u>Zealand</u>	Australia New Zealand Food Standard Code - Standard and Schedule Standard 1.2.3 - Information requirements – warning statements, advisory statements and declarations Schedule 9 - Mandatory advisory statements Please refer to Food Standards Australia New Zealand website for most up to date requirements for allergen labelling.
China Mainland	Crustacean Shellfish, Egg, Fish, Milk (including lactose), Peanut, Soy, Tree Nuts, Wheat, Grains containing gluten and their products (suah as wheat, rye, barley, oats, spelt or their cross breeding strains) *China regulation GB 7718 (Standard for general labeling for prepackaged food) and GB 28050 (Standard for nutritional labeling for prepackaged food)

<u>Japan</u>	Mandatory: Crab, Shrimp/Prawn, Egg, Dairy Products, Peanut, Wheat, Buckwheat
·	Recommended: Abalone, Mackerel, Squid, Salmon, Salmon Roe, Almond, Cashew nut, Walnut, Matsutake Mushroom, Sesame, Soybean, Yam, Apple, Banana, Kiwifruit, Orange, Peach, Beef, Chicken, Gelatin, Pork.
	Note: "Recommended" allergen labels are mandatory unless facilities can prove that cross-contact is not a factor.
	CAA Japan Link
<u>Korea</u>	Crab, Shrimp/Prawn, Egg (confined to those from Poultry), Mackerel, Milk, Peanut, Soy (including highly refined oils), Walnut, Wheat, Buckwheat, Squid, Clam (including Oysters, Abalone, Mussel), Peach, Pork, Tomato, sulfurous acid (confined to cases where sulfurous acid is added and the final product includes 10mg/kg or more SO ₂), Chicken, Beef, Squid,
	Note: "May contain" statements are mandatory for Korean products that have a shared manufacturing process (workers, utensils, production line, storage of ingredients, etc.) with allergens, regardless of sanitation procedures.
	MFDS Labelling Requirements Link
<u>Taiwan</u>	Crustacean Shellfish, Conch, Eggs, Milk, Peanuts, Mango, Kiwi, Soy, Tree Nuts, Sulfites (≥ 10mg/kg), Cereals containing Gluten , Sesame, Fish, Mollusks, Buckwheat, Celery, Lupin and Mustard
	The warning information prescribed in Article 3 shall be labeled as either way:
	(1) Labeling on the package with the term of "This product contains",
	"This product contains, unsuitable for susceptible individuals", or other synonymous terms.
	(2) The product name claims, label in this way, all the allergic substances of product should be included in the product name.
	Link 1: Regulation of Food Allergen Labeling Link 2: Regulations Governing Food Allergen Labeling on the Recommended Labeling Allergens

Appendix II. Microbiological Testing Requirements for High Risk Foods

As outlined in the Costco Wholesale Food Safety Audit Expectations document, suppliers of high risk ready-to-eat (RTE) food items, as well as some high risk not-ready-to-eat (NRTE) food items, must have a documented Finished Goods Test and Hold Program to detect hazards of concern, as well as an environmental monitoring program.

- Costco defines high risk foods as finished products that are intrinsically susceptible to biological hazards **and** fall into one of the following categories:
 - Deemed high risk for biological hazards by a regulatory body in the product's intended consumer market.
 - Contains raw material(s) that have been a known source of contamination for vegetative pathogens, and the site's manufacturing process does not include a validated kill step.
 - Deemed high risk by Costco Wholesale.
 - Kirkland Signature items.
 - Raw ground beef, bison, veal, or beef trim (fresh and frozen).
 - Ready-to-eat meats including sliced deli meats and whole muscle cuts.
 - RTE Fish/Seafood products.
 - Fresh cut fruits and vegetables including whole and sliced cantaloupe.
 - Leafy greens, Whole field grown lettuces (including field packed lettuces).
 - Frozen fruits and vegetables.
 - Cheeses, other than hard cheeses.
 - Includes all cheeses made with either pasteurized or unpasteurized milk, other than hard cheeses.
 - Includes soft ripened/semi-soft cheeses.
 - e.g., brie, camembert, feta, mozzarella, taleggio, blue, brick, fontina, monterey jack, and muenster.
 - Soft unripened/fresh soft cheeses.
 - e.g., cottage, chevre/goat, cream, mascarpone, ricotta, queso blanco, queso fresco, queso de crema, and queso de puna.
 - Not-Ready-To-Eat/Ready-to-Cook foods that bear internal temperature requirements for a microwave cooking instruction.

The below items may be excluded from the Test and Hold requirement except where the finished product undergoes pathogen testing voluntarily, at buyer's request, as required in product specifications, or due to regulatory requirements. Please contact Costco Food Safety if you have any questions. These items will not be excluded from environmental monitoring program requirements.

- RTE products that are processed and packaged aseptically, and have had their process validated by a process authority
- Precooked items with cooking instructions sufficient to be considered a kill step may be exempt from the Test and Hold Program on a case by case basis.

Test and Hold Program Requirements

Costco Wholesale requires suppliers to have a science-based sampling plan developed and maintained by or under the consultation of a competent person that is designed to detect the hazards of concern. The test method developed should be fit for purpose and validated by a recognized 3rd party authority if available (e.g. AOAC, AFNOR, ISO). The Test and Hold Program must be performed on all production lots for Costco Wholesale. Sample size and frequency shall be defined and adequately represent the production lot. All Test and Hold programs are subject to Costco review upon request.

When developing a finished product testing program food processors shall have:

- Written procedures for finished product testing with details on hold procedures and release.
- Sampling procedures.
- Sampling frequency and size.
- Acceptance/Rejection criteria.
- Methodology for each target organism.
- Proposed follow-up and/or corrective actions in the case of non-conformances.

Product shall be sampled as finished product taken from just before packaging or from finished product packages. Raw material or In-process product testing does not replace a finished product test and hold program.

A documented hold and release procedure with corrective actions for non-conforming test results must be maintained and made available to Costco Wholesale upon request. For products subject to the Test and Hold Program, all product lots must remain within the supplier's control until satisfactory test results are obtained. Additionally, all finished product lots that undergo pathogen testing voluntarily, at buyer's request, as required in product specifications, or due to regulatory requirements must remain within the supplier's control until satisfactory test results are obtained.

An example of an appropriate sampling plan in a ready-to-eat food processing facility would be a N=60 sampling plan. The sampling plan would utilize grab samples with hourly composite sampling and have appropriate lot definition. Samples would be aseptically taken from the production line just before packaging. Samples would be sent to an ISO 17025 accredited laboratory or tested on-site using a recognized test method.

Please see annexes for specific Finished Goods Test and Hold requirements in addition to the expectations below for <u>fresh fruits/vegetables</u>, <u>frozen fruits/vegetables</u>, and <u>fresh and frozen ground meats</u>.

Environmental Sampling Monitoring Program Requirements

The purpose of the Environmental Sampling program is to assess the effectiveness of sanitation and other good manufacturing practices in ready-to-eat and high risk processing environments and the potential for product contamination. Suppliers subject to the Finished Goods Test and Hold program producing high risk, ready-to-eat food items (including frozen produce and fresh produce where water is introduced) must have a documented Environmental Sampling Monitoring Program to detect organisms of concern. The program must be based on a risk assessment of the operation and its effectiveness must be re-evaluated when deficiencies are identified or at least on a regular basis by a 3rd party reviewer. On-going review and analysis of the data from routine monitoring programs should be performed to detect trends before major issues develop.

Suppliers of high risk, ready-to-eat food items should have the following included in their Environmental Monitoring Programs:

- Sampling protocol.
- Test methods and records.
- Sample locations.
- Frequency of tests and number of samples.
- Acceptance/Rejection criteria.
- Evaluation and trending of results.
- Corrective actions for unsatisfactory results.

If positive/unsatisfactory test results are obtained (presence/indicator of target organism), full details of the root cause analysis, corrective actions, and retesting results must be available for review by Costco Food Safety upon request. If pathogen testing is done on food contact surfaces, all product lots processed over the swabbed surface(s) since the last validated sanitation cycle shall remain within the supplier's control until satisfactory test results are obtained.

An example of an acceptable environmental monitoring procedure would include ATP monitoring coupled with pathogen swabbing. Swab sites would be rotated at a set frequency, including food contact surfaces and investigative swabbing. Products processed using equipment where a food contact surface was swabbed for pathogens would be placed on hold pending satisfactory test results.

Costco Wholesale expects suppliers to follow government guidance documents for the control of *Listeria monocytogenes* in ready-to-eat foods. See <u>Resources</u> section for guidance documents.

Annex 1: Fresh Produce Specific Requirements

Costco has a Test and Hold Program requirement in place for all high risk, ready-to-eat produce. This includes items such as, but not limited to:

- Cut salad mixes.
- Baby leaf salads.
- Whole field grown lettuces, including field packed lettuces.
- Fresh cut fruit and vegetables.
- Frozen Fruits.
- Frozen vegetables.
- Prepared vegetable trays.
- Cantaloupe and Hami Golden Melons (whole and sliced/cut).
 - Costco considers cantaloupe and hami golden melons an at-risk produce item, both whole melon and sliced/cut.

Raw produce items which are rarely consumed raw may not be subject to the Finished Goods Test and Hold Program. Suppliers must monitor and verify sanitation activities. Please contact Costco Food Safety for clarification on these items.

Facilities producing fresh produce items are required to have a finished goods Test and Hold Program with a sampling plan of N=60 or greater. All sampling plans must be fit for purpose, sample size and frequency shall be defined and adequately represent the production lot, and validated by a recognized authority if available.

All test and hold data and purchase order information for fresh produce must be uploaded to Azzule prior to shipment of goods to Costco. For questions on test and hold, please email testandholdfoodsafety@costco.com.

Costco specifications for at-risk, ready-to-eat produce are defined below.

Fresh Produce Testing Requirements			
Bacteria of Concern	Target	Maximum Level	
Total Plate Count (TPC)	< 100,000 cfu/gram	1,000,000 cfu/gram	
Generic E. coli	<10 cfu/gram	50 cfu/gram	
	Negative		
*Contact Costco Food Safety if you have questions.	Note: 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.		
Salmonella	Negative		

Field Packed Produce Testing Requirements			
Bacteria of Concern	Target	Maximum Level	
Total Plate Count (TPC)	< 1,000,000 cfu/gram	10,000,000 cfu/gram	
Generic E. coli	<10 cfu/gram	100 cfu/gram	
	Negative		
*Contact Costco Food Safety if you have questions.	Note: 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.		
Salmonella	Negative		

Cantaloupe-Specific Testing Requirements			
Bacteria of Concern	Target	Maximum Level	
Total Plate Count (TPC)	< 1,000,000 cfu/gram	10,000,000 cfu/gram	
Generic E. coli	<10 cfu/gram	100 cfu/gram	
	Negative		
EHEC *Contact Costco Food Safety if you have questions.	Note: 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.		
Salmonella	Negative		
Listeria	Negative An Environmental Sampling Plan must be provided to Costco outlining sampling that will be conducted at the processing facility to minimize the potential of contamination of product with Listeria monocytogenes. The plan must identify Listeria spp. growth areas and harborages and how each area will be sampled and responded to in the event of positive findings.		

Annex 2: Frozen Fruit and Vegetable Specific Requirements

All frozen fruit and vegetables sold to Costco Wholesale, shall be subjected to a Test and Hold program. There are two requirements to be in compliance with these guidelines:

- 1. Approval of testing programs.
- 2. Ongoing upload of test results into the Azzule Portal.

With the exception of french fried potatoes, Costco Wholesale considers all frozen vegetables that are not enrobed in sauce to be ready-to-eat regardless of any cooking instructions that may be on the packaging.

1. Approval of testing programs.

- Suppliers are required to develop both finished product and environmental monitoring programs specific to each facility and item, as applicable.
 - Finished product testing.
 - Requires sample size and frequency to be defined and adequately represent the production lot.
 - At a minimum, requires testing for Salmonella spp. and STEC's.
 - E. coli O157:H7 will be accepted on a case by case basis with the understanding that the facility will move to STECs within one year.
 - o Environmental Monitoring.
 - Program should be designed to detect *Listeria spp.*, including testing food contact surfaces.
 - Supplier should follow the <u>FDA Draft Guidance for Industry: Control of Listeria</u> monocytogenes in Ready to Eat Foods.
- Submission is required to be on company letterhead and should be submitted to your Costco Buyer.
- Once reviewed, a second review will be completed by Costco Food Safety. Final approval will be granted or feedback will be given on aspects needing improvement.

2. Ongoing upload of test results into the Azzule Portal.

- The Azzule Portal is a web portal built for suppliers to submit test results to Costco.
- New Supplier Onboarding.
 - In order to have an account created, suppliers should contact <u>testandholdfoodsafety@costco.com</u> who will work with Azzule customer support to have the account created.
- Test results must be uploaded by Costco PO number and must be submitted prior to product being delivered to Costco.
 - Attempted PO deliveries without test results will be rejected.

The Azzule Portal currently does not support French. Suppliers who require support in French should contact Costco Canada Food Safety.

Annex 3: Fresh and Frozen Ground Meat Requirements

Suppliers of high risk items must have a documented Finished Goods Test and Hold Program to detect pathogens of concern. Costco Wholesale considers ground beef, ground bison, ground veal, and beef trim to be high risk.

All Finished products must be tested at a rate of N=60 per 2000 pounds for E.coli O157:H7. Samples are to be tested following the manufacturer's directions using any AOAC approved PCR method.

- Finished product samples are to be pulled at fifteen (15) minute intervals during processing (at the hour, quarter hour, half hour, and three quarter hour) and must be combined into one hour composites.
 - A sample pull should be approximately 1/4 lb of finished product at each 15 minute interval.
 - 25 grams +/- 0.1 gram from each 15 minute sample pull shall be placed into the composite.
 - Continue for the remaining (15) minute interval samples.
- If sample results are negative for E. Coli O157:H7 the product is eligible for release for shipping purposes.
 - No product is to leave the production facility without having negative test results for E.Coli O157:H7.
- Finished product must also be tested for indicator organisms:

IndicatorMaximum LimitTPC100,000 cfu/gColiform500 cfu/gE.coli100 cfu/q

- Indicator organism testing can use the same finished goods samples that were pulled for E.Coli O157:H7 testing.
- One sample shall be selected for general micro testing purposes.
- The sample will be selected from one individual (15) minute sample, previously used to develop the hourly composite for E.Coli O157:H7 testing purposes.
- If any sample result is positive for E. coli O157:H7, all product from that production date will be placed on hold until released by disposition, by the regulatory authority. Contaminated product will be sent to lethality, rendering, or landfill. Records regarding the disposition or movement of positive lots will be maintained and available for review. Records that should be available for review include, but are not limited to:
 - o Raw materials.
 - Raw material sources.
 - Raw material pack dates.
- All sampling plans must be fit for purpose, sample size and frequency shall be defined and
 adequately represent the production lot, and validated by a recognized authority if available.
 For further guidance on an N6o sampling plan, please refer to: <u>USDA Guidance</u>

Costco Wholesale expects suppliers to follow government guidance documents for the control of *Escherichia coli* and STEC in raw beef products. See <u>Resources</u> for guidance documents.

Microbiological Test Program Resources

The following resources may provide additional information and assistance in the development of an appropriate microbiological sampling and testing program. These resources are not all inclusive.

- ICMSF (International Commission on Microbiological Specifications for Foods)
 (2005) Microorganisms in Foods, 6, Microbial Ecology of Food Commodities, Kluwer Academic/Plenum Publishers, New York, USA
- ICMSF (International Commission on Microbiological Specifications for Foods)
 (2002) Microorganisms in Foods, 7, Microbiological Testing In Food Safety Management,
 Springer, New York, USA
- United States Food and Drug Administration Draft Guidance for Industry: Control of Listeria monocytogenes in Ready-To-Eat Foods https://www.fda.gov/regulatory-information/search-fda-guidance-documents/draft-guidance-industry-control-listeria-monocytogenes-ready-eat-foods
- Health Canada Policy on Listeria monocytogenes in ready-to-Eat Foods (2011)
 https://www.canada.ca/en/health-canada/services/food-nutrition/legislation-guidelines/policies/policy-listeria-monocytogenes-ready-eat-foods-2011.html#assignrisk
- Canadian Food Inspection Agency Preventative Controls for E. coli O157/NM in raw beef products
 https://www.inspection.gc.ca/preventive-controls/meat/raw-beef-products/eng/1541538060346
 /1541538137261
- FSIS Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga
 Toxin-Producing Escherichia coli (STEC) Organisms or Virulence Markers
 (2014)https://www.fsis.usda.gov/wps/wcm/connect/eofo6d97-9026-4e1e-aoc2-1ac6ob836fa6/C
 ompliance Guide Est Sampling STEC_0512.pdf?MOD=AJPERES

Appendix III. PFAS in Food Packaging

Several US states have passed requirements for per and polyfluoroalkyl substances (PFAS). PFAS have been used for numerous purposes including heat resistance, water repellency, and oil / stain resistance in the food packaging industry for many years. However, recent studies have shown PFAS to have a number of concerning characteristics such as a strong resistance to breaking down over time, bioaccumulation in organisms, potential carcinogenicity, and endocrine disruption.

In accordance with state, federal and Costco requirements, it's important that your company ensure these chemicals are not used in Costco products. Recent PFAS regulations that have potential to impact your products include:

- New York requiring no intentionally added PFAS in any amount, effective December 31, 2022
- California food packaging cannot have over 100ppm total organic fluorine content, effective
 January 1, 2023
- Washington regulating intentionally added PFAS in specific types of food packaging such as plates, wraps, and liners, beginning February 2023
- Vermont prohibiting PFAS content, effective July 1, 2023
- Connecticut PFAS content prohibited, beginning December 31, 2023
- Rhode Island food packaging with intentionally added PFAS in any amount is prohibited, starting January 1, 2024
- Minnesota regulating intentionally added PFAS, effective January 1, 2024
- Maryland certain food packaging intended for direct food contact with intentionally added PFAS chemicals is prohibited, starting January 1, 2024
- Hawaii prohibiting intentionally added PFAS in wraps, liners, plates, food boats, and pizza boxes, effective December 31, 2024
- Colorado intentionally added PFAS prohibited, effective January 1, 2024

Because Costco is a global retailer we are working towards eliminating PFAS in all of our products internationally. If you cannot meet the above regulatory and Costco requirements, please discuss further with the appropriate buying team ASAP.

For additional information and testing lab references:

QIMA: PFAS: the "Forever Chemicals"

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