



PRODUCE

FOOD SAFETY AUDIT EXPECTATIONS

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## COSTCO PRODUCE FOOD SAFETY PROGRAM - UPDATES

Costco is making changes to the Produce Food Safety Audit Program.

1. Facility Audits - Will continue to have Costco specific requirements.
2. Costco will continue to hold facilities/suppliers responsible to monitor their growers' third-party audits, including audit review and corrective action oversight.
3. Growers and Harvest Crews - must have an annual Food Safety Audit. Harvest Crew audits must be conducted during an active harvest each year.
4. Growers and Harvest Crews - may now use the **CB/audit company** of their choosing for their third-party food safety audit, with the exception of Field-Packed commodities, which will continue to have Costco-specific requirements. See Field-Packed Commodities section.
5. Growers and Harvest Crews - may now use the **audit scheme** of their choosing for their third-party food safety audit, with the exception of Field-Packed commodities, which will continue to have Costco-specific requirements. See Field-Packed Commodities section.
6. Azzule Data Management - Costco will continue using Azzule for data management, but will now allow suppliers to use the SCP (Supply Chain Program) for all third-party audits.
7. Supply Chain Transparency - As always, suppliers are responsible to maintain complete transparency on Azzule, for their entire supply chain of products sold to Costco.

Costco will continue to oversee audits for all commodities packed in the field (third-party grower and harvest crew food safety audits) and packers, processors, coolers, cold storage facilities, distribution centers, etc. in a facility (third-party facility food safety audits).

Costco has the same Expectations for our suppliers, but will now rely on facilities to manage their own supply chain and monitor their growers' third-party Grower and Harvest Crew Audits. It will now be up to the supplier and grower to decide which scheme and CB to use, for commodities not packed in the field and sent to a facility for further packing or processing. The schemes and CBs for commodities not packed in the field and sent to a facility for further packing or processing no longer need to be on the Costco approved list.

Confirmation that the facility is monitoring all third-party Grower and Harvest Crew Audits will be covered in the Facility Third-Party Food Safety Audit.

Costco will continue to need access to all food safety audits and from time to time will do a review of a supplier's/operation's supply chain.

## AUDIT PURPOSE

The purpose of a Food Safety Audit is to make observations and review information pertaining to the food safety status of existing and potential entities/suppliers. This information is shared with the Costco Food Safety Group and the Costco Produce Buying Staff. The Costco Food Safety Group will use this audit to determine what areas, if any, are in need of improvement to meet the Costco Produce Food Safety audit criteria.

Food safety is a joint responsibility. The intention of this audit is to assure compliance with standards and to identify areas of opportunity for continuous improvement.

## FIELD-PACKED COMMODITIES AND GROWER & HARVEST CREW AUDITS

All growers that pack in the field are required to have at least one third-party Grower Food Safety Audit during each growing season. These audits will be reviewed by Costco Food Safety Staff.

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

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

Picking bags, gloves, knives and aprons must be covered by equipment storage & control procedures and should be on a documented cleaning schedule. The grower is responsible to see that cleanliness and good repair of equipment is maintained. Harvesting equipment must be on a documented cleaning and sanitizing program. All Grower Audits must be accompanied by a Harvest Crew Audit, for each growing season.

## FIELD-PACKED COMMODITIES - WATER REQUIREMENTS

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

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

## FIELD-PACKED COMMODITIES - GROUP/MULTI-SITE CERTIFICATIONS

The following Group/Multi-Site Certifications will be allowed: CanadaGAP, GLOBALG.A.P. and SQF

Costco accepts the following GLOBALG.A.P. Certifications:

Option 1 – Single Site

Option 1 – Multi-Site without QMS

Option 1 – Multi-Site with QMS

Option 2 – Group Certification

All Field-Packed Group/Multi-Site Audits must include the appropriate Costco Addendum at the same sampling rate per scheme requirements.

Audits for non field-packed commodities are no longer required to include the Costco Addendum.

## FACILITY AUDITS

For purposes of this document, Facility Audits include Packinghouses, Processors, Coolers, Cold Storage Facilities, and Distribution Centers. Costco will continue to oversee all Facility Audits, requiring Packinghouse, Processing, Cooler; Cold Storage and Distribution Center Audits as before.

Grower and Harvest Crew Audits must still be completed, but oversight will be the sole responsibility of the facility to monitor as part of their Supply Chain Program. As part of the Facility Third-Party Audit, suppliers will be required to provide confirmation that the facility is monitoring all Grower and Harvest Crew Audits for commodities being supplied to Costco. These audits are to be conducted on an annual basis and the audits must meet minimum passing score/grade per the scheme/audit requirement. Oversight of the corrective actions and reaudits, if necessary, is the responsibility of the facility.

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

Employees of all facilities, except those that do not handle exposed product, must wear hair nets and moustache covers & beard nets (where applicable). This includes Packinghouses, Processors, Coolers, Cold Storage Facilities and Distribution Centers, if applicable. Costco does not view a ball cap as a hair cover or hair restraint. If a ball cap or other head covering is worn, it must be covered by a hair net.

U.S. and Canada Requirement Only: Costco does not allow drinking water (or any beverage) in any container, on the packing line or processing floor. Employers must provide employees adequate fresh water supplies located in areas which do not create food safety / hygiene issues.

## FACILITIES - SANITATION VERIFICATION

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

## FACILITIES - ENVIRONMENTAL TESTING

There must be a written program in place to verify routine equipment and facility microbiological environmental testing, for Production and Storage Facilities where water is introduced (wash step, high humidity storage, wet cleaning process, etc). Records must be maintained. Frequency and site selection is to be based on the risk assessment of the Facility and commodity involved. If out of spec results occur, full details of corrective actions must be available and retesting must occur.

## PROCESSORS - FOREIGN MATERIAL CONTROL

Costco requires that processors do a risk analysis for potential physical hazards. If a risk analysis determines that foreign material controls are needed and not in place, entities/suppliers will be evaluated by the auditor in conjunction with Costco personnel, at the time of the audit, to determine the risk of the process. If the risk is considered low, a device will not be required. If the risk is considered medium to high, the site will be required to implement foreign material controls or install a foreign material detection device as soon as possible. This will be part of the corrective actions and reviewed at the next annual audit.

All foreign material detection devices must be accompanied by a functioning rejection device (belt, air jet, etc.) with a written procedure in place to control rejected product.

## PROCESSORS - FOREIGN MATERIAL CONTROL (CONTINUED)

To confirm that foreign material detection devices are operating correctly, Costco requires facilities to document regular checks, at no more than two-hour intervals. All metal detectors must be challenged with ferrous, non-ferrous and stainless steel contaminants. An appropriate challenge device must also be used for each X-Ray.

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

## ALL AUDITS AND AUDIT SCHEMES - REQUIREMENTS

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

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

## FACILITIES AND FIELD-PACKED COMMODITIES - COSTCO APPROVED CBS

AUS-QUAL Pty Ltd	Primus Auditing Operations
Cert-ID	SCS
Eagle Certification	SGS
LSQA (GlobalG.A.P. only)	WQS LLC
NSF	

### The CBs below are another option for Produce Processors

Eurofins  
Intertek  
Mérieux (formerly Silliker/Randolph)

## FACILITIES AND FIELD-PACKED COMMODITIES - STANDARD AUDITS

Costco will accept the following non-GFSI audit schemes, from a Costco approved certifying body, without a Costco Addendum: PrimusLabs Standard GAP & GMP, SCS - GMP and SGS - GMP audit schemes which include the Costco Addendum.

## FACILITIES AND FIELD-PACKED COMMODITIES - SCORING FOR STANDARD AUDITS

<b>Score</b>	<b>Action Required</b>
98 – 100%	No corrective actions required
85 – 97%	Corrective actions required
< 85%	Corrective actions and reaudit required

## FACILITIES AND FIELD-PACKED COMMODITIES - GFSI CERTIFICATIONS

Costco will accept the following GFSI certifications for facilities and field-packed commodities:

BRC - Minimum Grade B	PrimusGFS - Minimum score 90%
CanadaGAP - Minimum score 85%	SQF - Minimum score 85%
GlobalG.A.P. – Passing (GAP only)	

**Costco does not accept the Harmonized Audit for Facilities or Field-Packed Commodities.**

**GlobalG.A.P. schemes accepted for Field-Packed Commodities are IFA, PSS and HPSS.**

**GLOBALG.A.P. Certifications will not be accepted for any type of Facility, including packinghouses, processing, coolers, cold storage, distribution centers, etc.**

The following GFSI audit schemes are still required to be accompanied by the applicable Costco Addendum for Facilities and Field-Packed Commodities only - BRC (facilities), CanadaGAP (field-packed commodities and facilities) GlobalG.A.P. (field-packed commodities) and SQF (field-packed commodities and facilities).

## CORRECTIVE ACTIONS - AUDITS AND CERTIFICATIONS

Corrective Actions are part of the audit process and a requirement of doing business with Costco. Auditees with an audit scoring below 98% must post a CAR (Corrective Action Report) to Azzule according to scheme requirements. Auditees must contact their CB/Audit Company regarding the process of submitting CARs to Azzule for uploading to the Costco Site.

## CORRECTIVE ACTIONS - COSTCO ADDENDUM

Corrective Actions must also be completed for the Costco Addendum and uploaded to Azzule by the auditee.

## REAUDITS

If a BRC or SQF Audit does not pass, Costco requires a reaudit. The reaudit may be a Costco approved, non-GFSI audit scheme and does not count towards the GFSI Audit Scheme Certification. The reaudit is in addition to all GFSI scheme requirements.

Reaudits for Grower, Harvest Crew and Greenhouse Audits must be conducted within 30 days of the original audit date, when allowed by scheme requirements. Reaudits for Packinghouse, Cooler, Cold Storage, Storage and Distribution and Processing Audits must be conducted within 60 days of the original audit date, when allowed by scheme requirements.

Costco may choose not to buy product from an entity/supplier during the time between a non-passing audit and a reaudit.

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

A product recall or other serious incident will initiate a requirement for a new Food Safety Audit.

## FACILITIES - COSTCO HACCP/PREVENTIVE CONTROLS REQUIREMENTS

Processing facilities that supply Costco in all countries other than the U.S. are required to operate under a HACCP Program. Entities supplying product to the U.S. are required to operate under a Preventive Controls Program. A Food Safety Plan must be in place and a risk assessment must be done to determine whether or not an entity/supplier has any Critical Control Points or Preventive Control Points. Costco requires that this be conducted regardless of whether or not they are required to do so by a regulatory body.

Facilities that do not have a HACCP plan or Preventive Control Plan in place will be required to have a functioning program in place by their next anniversary audit, for Costco product. Facilities not having a functioning HACCP or Preventive Control Program for Costco product on their first anniversary audit will fail the audit.

## DEFINITION OF HACCP/PREVENTIVE CONTROLS

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

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

Preventive Controls takes HACCP a step further by requiring suppliers to become more proactive instead of reactive. Preventive Controls are those risk-based, reasonably appropriate procedures, practices and processes that a person knowledgeable about the safe manufacturing, processing, packing or holding of food would employ to significantly minimize or prevent the hazards identified under the hazard analysis. These controls must be consistent with current scientific understanding of safe food manufacturing, processing, packaging or holding, at the time of the analysis.

## HACCP TRAINING REQUIREMENTS

The person or persons responsible for the HACCP program for a processing facility must complete formal HACCP training by a credible agency in a classroom environment. Training must be current within 5 years. Recertification after 5 years can be completed with an online course. The person or persons responsible for the HACCP Program for a Packinghouse, Cooler/Cold Storage Operations, or Distribution Facilities are strongly encouraged to attend an in-person HACCP Training Course but training and recertification requirements can be met with an online course.

The person or persons responsible for the Preventive Controls Plan must be a recognized PCQI (Preventive Control Qualified Individual) per the FDA requirements.

## ALL OPERATIONS - PEST CONTROL

Pest Control Programs must be developed and monitored by licensed, trained and certified pest control personnel. In the case of a country without a licensing requirement, pest control personnel must be trained and have written protocol to demonstrate their understanding of pest control as it applies to food safety. A sampling of interior pest control devices and outside bait stations should be inspected by the auditor, unless prohibited by local law.



## ALL OPERATIONS - GLOVE POLICY

Costco requires disposable gloves to be non-latex & powder-free. Gloves should be maintained in good condition, intact and clean. Gloves are required to be used in a processing environment. Procedures for the proper handling and usage of gloves must be developed, implemented, and verified where required. Reusable non-latex rubber gloves must be washed and sanitized frequently, after breaks, and/or after handling potential contaminants. In a processing environment, cotton gloves may be used only if non-latex gloves are worn over them. Gloves are to be provided by the Grower, Harvest Crew, Processor or Packinghouse/Facility. Costco prohibits workers in any capacity from supplying their own gloves, of any kind.

## ALL OPERATIONS - HAND WASHING

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

## ALL OPERATIONS - FOOD CONTACT SURFACES

A food contact surface is any surface of equipment or a utensil with which food normally comes into contact.

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

## ALL OPERATIONS - CODE DATES

Finished product sell units (for example, clam shell, bag, package, and carton) are marked with a use-by, sell-by or packed-on code that can be used for traceability/recall purposes as stated in item specifications provided by Costco buyers. Scannable barcodes are acceptable, providing they contain traceability/recall information. Julian dates are not acceptable.

## ALL OPERATIONS - MOCK RECALL/TRACEABILITY EXERCISE

For year-round operations, Costco requires a mock recall/traceability exercise twice a year. This should include one step forward and one step back. An additional mock recall/traceability exercise should be done during the annual Food Safety Audit, on a Costco item (if possible) chosen at the auditor's discretion.

Documentation must indicate the date and time the exercise was initiated, product chosen, amount produced, affected lot codes, percent located, and time the exercise was completed. The exercise must include documentation supporting the affected finished product lot(s) to all potentially affected raw material(s), and also show how the system can trace the potentially affected product(s) and affected customers who have received the product(s). 100% of product should be accounted for within two hours. (Includes waste, shrink, etc.)

Companies with corporate generated recall systems in place need only to provide the auditor with a copy of their program and a sample mock recall or trace back exercise. For non year-round operations, Costco requires a mock recall/traceability exercise once a year in addition to having one during their Food Safety Audit.



**READY TO EAT & AT-RISK PRODUCE - TEST & HOLD GUIDELINES - U.S. AND CANADA**

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

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

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

Ready-to-Eat	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
EHEC – U.S. only	Negative (test method must detect for Stx1 or Stx2 and EAE genes at a minimum. Note: There are now test kits available that detect more than these genes or that detects a group of markers that include the EAE, stx1 and 2 genes. These kits are also acceptable for use on Costco products.)	
Salmonella	Negative	
E. coli 0157:H7 – Canada only	Negative	

Cantaloupe Specific	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
EHEC – U.S. only	Negative (test method must detect for Stx1 or Stx2 and EAE genes at a minimum. Note: There are now test kits available that detect more than these genes or that detects a group of markers that include the EAE, Stx1 and 2 genes. These kits are also acceptable for use on Costco products.)	
Salmonella	Negative	
E. coli 0157:H7 – Canada only	Negative	

**READY TO EAT & AT-RISK PRODUCE - TEST & HOLD PROGRAM GUIDELINES**

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

**SHADOW AUDITS**

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

## DATA MANAGEMENT - AZZULE

Costco is using Azzule Systems to manage PRODUCE audit documents, including corrective actions for the following entities: Packinghouses, Processors, Coolers, Cold Storage Facilities and Distribution Centers (including packing that occurs in areas without walls) plus audits for field-packed commodities that supply produce to Costco. Suppliers must contact their CB/Audit Company to have the required information uploaded to Azzule Systems. The contact email for Azzule Systems is: [securesites@azzule.com](mailto:securesites@azzule.com)

As audits are completed, they will be uploaded by the CB/Audit Company to Azzule Systems, and from there will be transferred by the entities/suppliers using the SCP (Supply Chain Program) to the dedicated Costco section within Azzule. This submission process should take place according to scheme requirements.

The most current Costco Produce Food Safety Audit Expectations and Addendum documents can be found through this link on the Azzule website:

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

## RESOURCES

### HACCP TRAINING

eHACCP.org

<http://www.ehaccp.org>

Food Safety Net HACCP Certification

<http://www.food-safety.net/haccp-certification-course.html>

International HACCP Alliance

<http://www.haccpalliance.org/sub/training.html>

NEHA HACCP Education and Training

<http://nehahaccp.org/>

University of Rhode Island Food Safety Education

<http://web.uri.edu/foodsafety/>

### FOOD SAFETY TRAINING

FSMA Training

<http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm461513.htm>

NEHA Food Safety Training

<http://www.nehatraining.org/products/haccp.htm>

Resources for Food Safety Program Development

<http://producesafetyalliance.cornell.edu/>

## TRAINING – PREVENTIVE CONTROLS

Food Preventive Controls Alliance

<https://www.ifsh.iit.edu/fspca>

Produce Safety Alliance

<https://producesafetyalliance.cornell.edu>

Safe Food Alliance

<https://safefoodalliance.com>

## FOOD SAFETY PROGRAM DEVELOPMENT

Canadian Food Inspection Agency's HACCP / Food Safety Enhancement Program (FSEP)

<http://www.inspection.gc.ca/eng/1297964599443/1297965645317> (English)

<http://www.inspection.gc.ca/fra/1297964599443/1297965645317> (French)

Canadian Produce Marketing Association

[www.cpma.ca](http://www.cpma.ca)

Developing a Food Safety Plan

<http://extension.psu.edu/food/safety/farm/how-do-i-write-a-food-safety-plan/sample-harmonized-food-safety-plan/view>

FDA Food Safety Modernization Act (FSMA)

<http://www.fda.gov/Food/GuidanceRegulation/FSMA/>

Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables

<http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/ProducePlantProducts/ucm187676.htm>

Health Canada – Pesticides and Pest Management

<http://www.hc-sc.gc.ca/cps-spc/pest/index-eng.php> (English)

<http://www.healthy Canadians.gc.ca/environment-environnement/pesticides/index-fra.php#a1> (French)

LGMA – Leafy Greens Marketing Agreement

<http://www.caleafygreens.ca.gov/sites/default/files/California%20LGMA%20metrics%2008%2026%2013%20%20Final.pdf>

On Farm Food Safety – Risk Assessment, Create a Food Safety Manual

<http://onfarmfoodsafety.org/>

Produce Safety Alliance (A collaboration between Cornell University, USDA, FDA)

<https://producesafetyalliance.cornell.edu/>

Produce Marketing Association (PMA)

[www.pma.com](http://www.pma.com)

United Fresh Produce Association

<http://www.unitedfresh.org/>

USDA Pesticide Data Program

<http://www.ams.usda.gov/datasets/pdp>

## ADDITIONAL RESOURCES

Azzule [www.azzule.com](http://www.azzule.com)

Traction [www.traction.com/costcofood](http://www.traction.com/costcofood)

## Costco Food Safety Contacts

### U.S. CONTACTS

Name	Title	Phone	Email
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Puja Shrestha	Food Compliance	011-61-2-9805-3838	<a href="mailto:pshrestha@costco.com.au">pshrestha@costco.com.au</a>

### CANADA CONTACTS

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Marcelle Lavergne	Director	613-221-2311	<a href="mailto:marcelle.lavergne@costco.com">marcelle.lavergne@costco.com</a>

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