



## Customer Questionnaire Response & FAQ

Dear Valued Northwest Naturals, LLC Customer,

Strategically located in the Western United States, Northwest Naturals is located close to where the fruit is grown. We take great care in selecting our raw materials in order to meet and maintain our high standards. These discriminating standards help us supply our customers with reliable and safe products. For fruits grown outside of the United States, Northwest Naturals maintains an established network of qualified partners to secure tropical fruits, as well as the exotic. To help make your product stand out in the crowd, our team is committed to providing you with value-added services in a proactive, flexible, and efficient manner. We believe your satisfaction is a direct reflection of our effectiveness as an organization.

As a member of the Tree Top umbrella, Northwest Naturals LLC utilizes various Tree Top Inc. facilities to co-manufacture our goods. Third party audits of the individual facilities include the manufacturing lines and processes used to produce Northwest Naturals' products. Northwest Naturals' Bothell location is the corporate office and small pilot plant.

We have received your request and understand the importance of our customers' questionnaires. Due to the large volume of requests we receive, unfortunately we are unable to complete customers' individual questionnaires. As a result, we have created the attached summary package of the most common questions that are requested that will be used to substitute completing a customer specific request. In addition, we are often asked to generate separate signed statements of compliance to a variety of potential issues. To eliminate the multiple signed statements, we are affirming to the content contained herein as being accurate to the best of our knowledge as per the date of this publication, March 8, 2024.

Sincerely,

A handwritten signature in blue ink, appearing to read "CD", with a long horizontal flourish extending to the right.

Courtney Doolin-Lusk

Senior Manager, Quality & Regulatory

Northwest Naturals, LLC.

**NORTHWEST  
NATURALS.**

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### **Northwest Naturals, LLC Mission Statement**

To consistently increase profitability by providing innovative fruit juice solutions and superior service through creative, high performing employees.

### **Sustainability**

Something is sustainable when it meets the needs of the present without compromising the ability of future generations to meet their own needs. Our parent company, Tree Top Inc. has growers who know the meaning of caring for their land and trees to provide for their families, generation after generation, and the value of respecting Mother Nature and our Planet. As part of a grower-owned cooperative, we share those values and know our business is more than just about current profits. We believe it's about People, Planet and Profit.

The core principles behind our practices are to:

- Minimize harm
- Maximize benefit
- Be accountable & responsive to key stakeholders
- Support strong financial results

The following are our primary focus areas:

- Manufacturing Plant Energy Use
- Water Use and Wastewater
- Emissions/Air
- Packaging
- Employee Welfare
- Community Support & Volunteerism

## **Employee Welfare**

We build strong relationships with employees, customers, and business partners – based on mutual respect and support, valuing each other's experience, options, and diversity.

Northwest Naturals, LLC is an Equal Opportunity / Affirmative Action Employer (EEO) providing gainful employment in a wide range of fields. As part of the Tree Top Inc., we participate in an annual audit and complete an Affirmative Action Plan in compliance with the Office of Federal Contract Compliance Programs (OFCCP) and the Department of Labor. Northwest Naturals, LLC requires all vendors and suppliers to comply with applicable affirmative action, and labor laws and regulations.

Northwest Naturals, LLC strives to provide a safe work environment for all employees. Each facility has an established safety committee that meets on a regular basis. Employees are provided personal protective equipment as needed to perform safe job function and maintain GMP compliance. Examples include gloves, bump caps, hairnets, hearing, eye protection, etc.

## **Ethics and Code of Conduct**

Northwest Naturals, LLC has a formal Code of Conduct using international standards similar to those held by many major international manufacturing companies. Voluntary third-party Ethics Audits were undertaken beginning in 2013 at some of the Tree Top Inc. family of manufacturing facilities. Audits compare labor practices, environment, health and safety and code of conduct against the United Nation's Ethical Trading Initiative Standards.

## **Crisis / Disaster Program**

Northwest Naturals, LLC has a documented Crisis Management Program, including Major Facility Disaster Plan and Administrative Disaster Recovery Plan. These include procedures to follow in case of unexpected crisis events to minimize disruption and resume normal operations as quickly and safely as possible.

## **Quality Management**

Northwest Naturals, LLC is committed to continuously meeting customer specifications and regulatory requirements, providing safe and high-quality products. Northwest Naturals, LLC achieves this by establishing, monitoring, and regularly reviewing food safety and quality objectives and goals, implementing continuous improvement, HACCP, GMP, and relevant process control management programs.

The policies and procedures contained in the Northwest Naturals, LLC Quality Systems are intended to assure that the products and services we produce meet regulatory requirements and our customer's needs. Management is committed to providing the human and financial resources necessary to achieve and maintain certifications and is committed to annual review of the entire Safe Quality Food (SQF) program.

Northwest Naturals, LLC has a Quality Food Safety Manager and team on site. Quality policies, methods and procedures are documented and stored electronically. These are reviewed annually and updated as needed.

Northwest Naturals, LLC management are members of various trade organizations including Northwest Food Processors Association, Grocery Manufacturers Association, Juice Products Association, Apple Processors Association, Institute of Food T, AOAC International, National Environmental Health Association, and International Association for Food Protection.

## **Regulatory Compliance - FSMA**

We have implemented and comply with all required aspects of the Food Safety Modernization Act, per the U.S. Code of Federal Regulations, Title 21, Part, 117. This includes all applicable portions such as for Foreign Supplier Verification. Northwest Naturals products are all covered under the Juice HACCP rule (Title 21, Part 120). For all products supplied under the Tree Top umbrella, not covered under the Juice HACCP rule (Title 21, Part 120), the required hazard analysis has been performed, and all identified potential hazards and generated food safety plans comply with Subpart C – Hazard Analysis and Risk-Based Preventive Controls.

Throughout the Tree Top Inc. family are several quality and operations personnel that are PCQI certified per FDA training requirements which ensures that we have at least one PCQI certified individual per location.

## **Current Good Manufacturing Practices**

Facility specific Good Manufacturing Practices (GMPs) outline the requirements to produce safe foods and are required of all employees and visitors. This program controls Personnel (disease control, cleanliness, jewelry, personal item storage, food, and beverage consumption, smoking and visitor control), Plant and Grounds, (grounds, plant construction and design, lighting, and ventilation), Sanitary Operations (cleaning compounds, pest control, sanitation of food contact surfaces), Sanitary Facilities, Equipment and Utensils, Procedures, Warehousing and Distribution, and Defect Action Levels. Inspections and audits occur with regular frequency and timely correction of findings. The Northwest Naturals, LLC Good Manufacturing Practices program has been modeled after the FDA CGMP guidelines.

## **Pest Control**

A Pest Control Program is in place to exclude and control conditions that encourages pest activity from Northwest Naturals, LLC production area, product and packaging storage, and the outside premises of each plant. Pests include, but are not limited to birds, rodents, and insects. An updated map showing the location of all devices, both internal and external, is available for each facility. Northwest Naturals, LLC facilities utilize licensed contracted pest control operators (PCO) on a weekly inspection basis. The PCO, Sprague, is responsible for providing a report of all activity to Northwest Naturals, LLC management for review and trending analysis. No pesticides are stored on site.

## **Training**

Northwest Naturals, LLC employees have annual scheduled training via a computer-based training system (Alchemy). Some topics included in this training: GMP, Safety, Allergen Awareness, HACCP, SSOP's Personal Hygiene, SQF and job-related training. All training is logged and maintained at the facility.

## **Sanitation**

A written Master Sanitation schedule for periodic cleaning of the facility is implemented and documented. This includes detailed instructions for frequency, method, and responsibility. Effectiveness of cleaning SSOP's is validated using visual, analytical, and microbiological checks. The cleanliness of the equipment is checked using ATP swabs after cleaning to verify sanitation. The facility Production Manager oversees the sanitation program. Cleaning records are maintained in paper format.

## **Preventative Maintenance**

A program is in place to maintain and repair the plant, equipment and building in a manner that minimizes the risk of product, packaging, or equipment contamination. This is accomplished through work orders, PM check sheets, and the Preventive Maintenance Program list.

## Environmental Monitoring Program

An Environmental Monitoring Program is in place to monitor the facilities environment for microbial risks. Monitoring of both processing and non-processing areas is conducted at minimum monthly using scientifically acceptable methods. The monitoring plan includes target organisms, zones, swabbing sites, action levels, and corrective action responses. The controls for *Salmonella* and *Listeria* spp. will be product, process, and facility specific. Samples are taken during normal times of operation to assure results represent environmental conditions throughout the operation cycle. For those facilities with forced air in food contact areas, air quality testing is conducted twice per year, with sampling locations and documentation of results for historical records/trend analysis.

## Sample Retain Program

Northwest Naturals, LLC facilities have developed a “written sample retain procedure” following the guidelines of our Retention program containing representative samples of all products produced within each plant. All retain samples are kept in appropriate storage for at least the intended shelf-life period date.

## Shelf Life

If shipped and stored unopened and frozen (0° F or below), Northwest Naturals’ products have a guaranteed shelf life of at least 12 months from our last quality check of the product. As long as they have been stored frozen the entire time, most of our products should be stable for another 12 months. There may be a small amount of color or acid degradation so a quality check should be run before use. Some products will also experience solid separation. We retest our lots still in inventory every 6 months for quality purposes. If the product you have stored has reached the 12 months and you wish to retest it, we would suggest the following: lab testing for all specified analytical and microbiological values listed on the specification, as well as a sensory panel review. This is only suggested testing, and it is recommended that you perform the testing that will give you the information you need to ensure your finished product meets your expectations. Please feel free to reach out to us for specific questions or concerns.

## SQF Program

The SQF Program is a leading, global food safety and quality certification program and management system designed to meet the needs of buyers and suppliers worldwide. It provides independent certification that a supplier’s food safety and quality management system complies with international and domestic food safety regulations.

Northwest Naturals, LLC is committed to providing quality products and we currently have SQF certification for our facility. Third party audit is conducted annually to a Global Food Safety Initiative (GFSI) Standard. All facilities are SQF Food Safety Code Certified by Merieux NutriSciences <http://www.nwnaturals.com/resource-library/documents>

<i>Facility</i>	<i>Audit Date</i>	<i>Date of Expiry</i>	<i>Certificate#</i>	<i>Rating/Score</i>
Bothell	3/29/23	5/30/24	17762	Excellent/99
Prosser	12/5/23	2/25/25	9907	Good / 93

## Food Safety / HACCP

In accordance with the regulation promulgated under the United States Federal Food, Drug and

Cosmetic Act and the U.S. Code of Federal Regulations, Title 21, Part 120 regarding Hazard Analysis and Critical Control Point Systems: Northwest Naturals, LLC certifies that all fruit products sold and delivered into commerce comply with Hazard Analysis and Critical Control Point (HACCP) Systems and Procedures for Safe and Sanitary Processing and Importing of these products as stated in 21 CFR 120.

Northwest Naturals, LLC has established HACCP plans, flow charts and pre-requisite programs to meet FDA requirements. A dedicated HACCP team has been created for each facility and all programs are reviewed at least annually. The Food Safety Plan may include Critical Control Points (CCPs), which are identified by hazard analysis, with controls that are based on scientific evidence to effectively eliminate or reduce the hazard. Records of training, monitoring, annual verification activities and non-conformances are maintained for CCPs, Control Points (CPs) and pre-requisite monitoring programs. The HACCP plans have not been independently certified but are reviewed as part of the SQF Audit process/reviewed by the HACCP team members on an annual basis. Internal audits are completed monthly at each facility. Corporate Quality Assurance will also audit the progress and improvement in maintaining Good Manufacturing Practices and sanitation at each facility once per year or as needed by risk assessment. In addition, Northwest Naturals, LLC provides fruit ingredients to several of the world's top food/beverage companies who generally audit our facilities annually. These partners continually seek improvement, which help us to become the world class fruit ingredient supplier you can trust and rely on.

### **Supplier Management - FSVP**

A Supplier Approval program is used to approve and monitor suppliers. Northwest Naturals, LLC has a supplier verification policy to verify that each of our suppliers and/or manufacturers meet regulatory food safety requirements and Northwest Naturals, LLC expectations. This policy includes suppliers of ingredients, packaging supplies, chemicals, cleaning supplies, lubricants, etc. Only approved products from approved suppliers shall be used.

Northwest Naturals products are all covered under the Juice HACCP rule (Title 21, Part 120), thus exempting them from the Foreign Supplier Verification requirement (Title 21, Part 1.500).

Northwest Naturals, LLC has a Supplier Quality Partnership Analysis policy to provide a consistent, thorough way to verify the supplier compliance to regulatory and Northwest Naturals, LLC requirements. Key elements of this policy include a risk assessment of suppliers and on-site Supplier Partnership Analysis. The frequency of an analysis will be determined based on the risk of the supplier.

### **Food Fraud**

Northwest Naturals, LLC Food Fraud Program outlines the key elements we have put in place over the past several years to identify and mitigate risks of Economically Motivated Adulteration in our supply chain. In conjunction with the Supplier Management and HACCP programs, a full Vulnerability Assessment (VACCP) has been created and is reviewed at least annually. We have initiated the appropriate safeguards in addition to the ones inherent to the current programs.

### **Food Defense**

Northwest Naturals, LLC Food Security Program outlines the key security elements we have put in place over the past several years. We are fully aware of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (The Bioterrorism Act), especially items under Section 305 and 306 that require the FDA to develop regulations to better protect the U.S. food supply from, and enable effective reaction, to terrorist attacks.



Northwest Naturals, LLC prides itself on providing high quality, safe products to our customers and has comprehensive Quality and Food Safety policies and programs in place.

Northwest Naturals, LLC considers the following elements:

- Risk Assessment Teams
- Identified threats and risks
- Process flow diagrams for each type of process used to product food and food ingredients
- Control measures to reduce or eliminate the threat or risk
- Controlled processes related to employee hiring, visitor/contractor management, mail handling, water, and air handling
- Routine Security Assessment Audits
- Follow up after Security Audits
- Facility Access Control

As part of our audits, performed at least annually, the physical security of our facility is reviewed, as are our warehouse locations and co-packers. All employees are allowed access to the facility with the use of magnetic key cards with restricted security clearance as needed. Northwest Naturals, LLC facility is accessed via self- closing/locking doors. Key card access is disabled upon termination of employment. All new employees undergo a background check prior to hiring.

In addition, third parties are not given access to our plants unless a Northwest Naturals, LLC employee escorts them. Northwest Naturals, LLC policy requires that incoming ingredients and materials have identifiable tamper evident seals, including bulk and truckload shipments.

### **FDA Registration / Bioterrorism Act**

Northwest Naturals, LLC facilities are individually registered, and current with the biennial registration requirements. In the Bioterrorism Act, Congress directed the FDA to keep registration information confidential for security reasons. At Northwest Naturals, LLC we respect that decision and in the spirit of cooperation with government efforts to assure the safety of the food supply, we have determined that we must keep our facility registration information confidential. Therefore, we will not ask for your registration information either. Northwest Naturals, LLC has also confirmed that all our suppliers, where applicable, have complied with the registration requirements as outlined.

Products produced in Northwest Naturals, LLC facilities shall be produced under regulatory guidance of the US Food and Drug Administration as well as the state regulatory agencies where the individual facilities are located (Washington, Oregon, and California). Government agencies perform routine audits of our facilities. Northwest Naturals, LLC has not been issued any FDA 483 forms at any facility within the past three years.

### **Shipping and Receiving Requirements**

Northwest Naturals, LLC has a policy in place to inspect and document incoming and out-going products, ingredients, packaging materials, containers, and trailers to assure no contamination has occurred. Vehicles shall be inspected prior to loading/upon receipt for cleanliness and suitability. Information should be available documenting the nature of the last three shipments for bulk juice/concentrate trailers.

Food products shall not be shipped in mixed loads with other non-food materials where contamination of the food products may occur due to foreign substances, toxic materials, off-

odors, or other conditions which may render the food ingredient unacceptable.

If the product(s) must be temperature controlled, as specified in the Northwest Naturals, LLC Ingredient Specification, such control shall be provided at the time of loading, and during transit. The communication requirements to the carrier are the responsibility of the product supplier.

All Truck Load trailers shall be sealed, and the seal numbers recorded on the Bill of Lading by Northwest Naturals, LLC personnel. For LTL Loads, Northwest Naturals, LLC requires that all LTL drivers have a padlock, which they are responsible for, to secure the doors of the trailer between pick-ups and deliveries. Once products/ingredients are loaded onto the vehicle, the safety and security of the load is the driver's responsibility.

### **Change Management**

A formal change control procedure is necessary to ensure commercialized products are manufactured, handled, and distributed using controlled processes, which are intended to generate product that consistently meets customer expectations. An overriding corporate policy is in place to assure all these changes are properly documented with corporate level approval required for significant process changes. A cross-functional team, called a Change Committee, meets on a regular basis to review all proposed changes, and assess the impact to the facility, process, products, or safety. This committee shall be defined by each facility. Example of committee: Plant Manager, QA Manager, Maintenance Manager, Safety Designee. Customers may be notified of significant changes affecting the manufacture of their products.

### **Foreign Material**

Foreign material controls vary by product and may include magnets, metal detection, sieves and in all cases filters. Northwest Naturals, LLC maintains a positive release program for finished goods to ensure products comply with all applicable specifications and attributes.

### **Complaints**

Customer Complaints Policy is in place to provide prompt and effective action and complaint resolution when dealing with customer complaints. This procedure is designed to identify the special causes of variation and to develop corrective actions to eliminate them to improve the production process. All customer complaints will be placed into the customer complaint database. The complaint is investigated, and a corrective action report created. Once complete, within 5 business days, a notification with all complaint details will be sent to the customer.

### **Recall & Trace**

Northwest Naturals, LLC has a recall policy in place and a Crisis Management Plan combined, identifies the responsibilities, Emergency Contact List, Legal Contacts, Flow Chart and assigned responsibilities in the event of a recall.

The scope of our recall policy includes all items produced or packed by Northwest Naturals, LLC. Data on all ingredients, supplies, and finished products associated with the recall must be collected and documented at a minimum of 100%. The time frame for the completion of a trace should be no more than two (2) hours from the time of receiving the initial communication of an issue (this time frame may be less, dependent on customer and/or situational requirements).

Mock recalls or product trace are performed at the facilities at least annually to monitor the effectiveness of our ability to trace product should a recall ever become necessary. All ingredients and finished products are given a unique lot number for traceability in our system.

This allows us to trace our product from receiving, to the product produced, and shipped to the customer.

Recall Coordinator: Courtney Doolin- Lusk, Senior Manager, Quality & Regulatory

Phone: 425-285-2618, Fax: 425-881-3063

Email: [courtneyd@nwnaturals.com](mailto:courtneyd@nwnaturals.com)

For after-hours emergency: Courtney Doolin-Lusk, Ph. # 206-409-4422

email: [courtneyd@nwnaturals.com](mailto:courtneyd@nwnaturals.com)

### **Product Lot Coding**

Northwest Naturals LLC has three types of lot numbers. The first is for our blended items in which the lot number is a sequential number. Lot numbers are never reused; each is a unique identifier for a specific batch. Our internal tracking system uses the product code and the lot number, although the lot number alone is adequate as an identifier. An example would be lot B-17-01234, this was a batch made in 2017 and was approximately the one thousand two hundred thirty-fourth batch made. The other lot number formats are for straight commodities, where we are not making a batch. An example would be lot P-07-312HX10, this is a non-blended product received November 8<sup>th</sup>, 2007. The rest of the digits (HX10) are internal source codes that aid in the uniqueness of the lot number.

Another lot number example would be TP-09-152, this is a processed product, typically a clarified juice concentrate, received onto inventory June 1<sup>st</sup>, 2009. In all cases, please refer to the six-digit product code for the product type.

### **Rework vs. Reprocess**

Rework is considered product that is brought in from inventory or reworked during a week other than original production week and is blended back, re-inspected, sorted, sieved, dried, etc. Any rework utilized is tracked with the original lot number for usage. Color coded tags are used to identify rework products with allergenic ingredients and is done with same formulation items only (like into like).

The definitions of rework and reprocess are often used interchangeably by different organizations. Tree Top Inc. facilities primarily uses only the rework term throughout our manufacturing locations. Product is allowed to be reworked back into the process for various failed product quality attributes during the same production date, following all appropriate steps to ensure complete traceability. Due to adding the product into a current production stream, needed to be reworked later, defined guidelines are available per the reason for failure. Following all appropriate steps to ensure complete traceability is also a requirement in these circumstances. Rework of product due to failing a food safety measure are never allowed.

Northwest Naturals, LLC uses the term Redump as we typically only have extra of our specialty blends that are then only ever used in new lots of the same blend code.

### **Hold for Non-Conforming Product**

Northwest Naturals, LLC has an established Hold for Non-Conforming Product Policy. This policy addresses all holding and releasing practices for non-conforming products, ingredients, processing aides, containers/packaging associated with goods produced at Northwest Naturals, LLC, or its affiliates. All items are tagged and held in the electronic system to prevent accidental shipping. Final disposition is assigned by the Operations Manager or Food Safety Manager. Northwest Naturals, LLC maintains a positive release program for finished goods to ensure

products comply with all applicable specifications and attributes. In the event a product fails to meet quality standards, the product is unable to be released for shipment without written customer authorization.

## Allergens

A Food Safety Allergen Control Policy is in place for all the 'Big 9' allergens and their derivatives. Two "sensitizing" agents are also included within the scope of the allergen control program: Sulfite and FD&C Yellow #5 (tartrazine). Northwest Naturals, LLC has policies in place for allergen sensitive ingredient controls. An ingredient Hazard Analysis has been conducted for all plant ingredients, process aids, flavors, acidulants, enzymes, food grade lubricants, and food contact antimicrobial agents.

Each manufacturing facility follows Good Manufacturing Practices (GMPs) and follows allergen control strategies to minimize the potential cross contact of food allergens, including but not limited to HACCP, training, separation of like materials, and sanitation. Standard operating procedures are in place to prevent the cross contamination of non-allergenic products. Each facility has an allergen team with representatives from all appropriate departments. Allergen Control Plan is reviewed annually and updated when necessary – especially when new ingredients are added, when processes or protocols are changed, or when new products or equipment are introduced to the plant. Dedicated tools, containers and utensils are clearly marked, or color coded to identify allergenic ingredient and or product.

Validated Allergen Cleaning Program, Overall Plant Design, Sanitation Standard Operating Procedures, Cleaning Validation Procedures, Cleaning Verification Procedures, Confirmation and Compliance, Staff Training and Education are all included in our Food Safety Allergen Control Policy. Our Allergen Assessment and Sensitizing Policy is available on our website at <http://www.nwnaturals.com/resource-library/documents>

In defining allergens Northwest Naturals, LLC follows the U.S. FDA (FALCPA) to label the limited number of products which utilize allergens. The specific breakdown by facility follows:

<i>Facility Name</i>	<i>Location</i>	<i>Allergen(s) Utilized</i>
Prosser	Prosser, WA	None
Bothell	Bothell, WA	None

## Kosher

Northwest Naturals, LLC products displaying the "cRc" symbol have been certified as kosher by the Chicago Rabbinical Council. Our Kosher Certificate is available to download from our website at; <http://www.nwnaturals.com/resource-library/documents>

## Organic

Northwest Naturals, LLC does offer organic products. Products produced in Washington State are certified Organic by the Washington State Department of Agriculture, the facilities in Oregon are certified by Oregon Tilth. These certificates are available to download from our website at: <http://www.nwnaturals.com/resource-library/documents>

## Halal

The majority of Northwest Naturals, LLC products are currently not Halal certified but most are Halal compliant in that they do not contain alcohol, natural L-cysteine extracted from hair or

feathers, animal fats and/or extracts, bloods of any origin, blood plasma, pork and/or other meat by-products, and alcohol is not used as a processing aid. Some products may contain flavorings that are not considered Halal compliant. Please check with your customer service representative for additional product details. Please contact your salesperson for certified item inquiries.

### **Gluten**

Northwest Naturals, LLC has a comprehensive Supplier Verification policy. As part of this program, all suppliers are asked to disclose gluten content or contamination in the products that they provide. Northwest Naturals, LLC facility does not utilize any ingredients that may potentially contain gluten.

### **Genetically Modified Organisms**

Food and food ingredients from genetically engineered plants were introduced into the U.S. food supply in the 1990s. The FDA regulates the safety of foods and food products from plant sources including food from genetically engineered plants. Currently, Tree Top Inc. only accepts fruit grown by our owner/growers or commercial growers producing industry-standard, traditional fruit varieties. Northwest Naturals, LLC only purchases juice concentrates made from traditional fruit varieties. Certain ingredients currently in use, such as ascorbic acid, beet sugar, some flavors and processing aids may be derived from bioengineered ingredients. Whenever possible, traditional non-bioengineered ingredients are utilized. Please check with your customer service representative for additional product details.

### **Irradiation**

To the best of our knowledge, no Northwest Naturals, LLC products are produced with irradiation.

### **Sewage/Sludge**

To the best of our knowledge, no products that Northwest Naturals, LLC produces are grown using sewage or sludge.

### **Vegan/BSE Status**

Northwest Naturals, LLC produces fruit juice products. These products are suitable for vegetarians and vegans. Cane sugar may be used in some formulated products and some manufactures may use bone char in their process.

### **Safety Data Sheets**

Northwest Naturals, LLC fruit juice products are “food” We are not aware of any chemicals that may be present in these foods that may be hazardous to your health. Since these products are “food” they are exempt from OSHA 29 CFR 1910 (Revised July 1, 1985) and do not require an SDS (Safety Data Sheet). The above information is believed to be correct but does not purport to be all-inclusive and shall be used only as a guide.

### **California Proposition 65**

The quality and safety of the food we produce is of the utmost importance to us. We are compliant today, to the best of our knowledge and as we can verify with today’s standard tests, with California’s Prop 65. CA Prop 65 regulates the limit of many chemicals found in foods or packaging and requires notification of products containing and/or exceeding such. Northwest Naturals, LLC uses the expertise of national food and beverage associations to stay abreast of such issues and follows recommendations on notifications and testing to remain compliant with such laws.

## **California Transparency in Supply Chains Act of 2010**

Northwest Naturals, LLC as a division of Tree Top Inc. is required to comply with the California Transparency in Supply Chains Act of 2010. The Act requires Tree Top Inc. to disclose on our company's web site, a statement disclosing to what extent, if any, we comply with a list of items that were deemed to help eradicate slavery and human trafficking from our direct supply chains for tangible goods offered for sale. Our website is compliant with the new law, and we invite you to review our position and the steps we're taking for human rights at <http://www.treetop.com/HumanRights.aspx>

## **ETHICAL PRACTICE STATEMENT**

Northwest Naturals LLC is engaged in the practice of ethical trading.  
Ethical trading is defined as:

1. Employment is freely chosen – No forced labor and employees are not required to surrender their identity paper to their employers.
2. Freedom of association and the right to collective bargaining are respected – workers have the right to join trade unions.
3. Working conditions are safe and hygienic – workers are not exposed to risks and steps are taken to prevent accident, injury, or illness.
4. Child Labor shall not be used – no person shall be employed under the age of 14.
5. Living wages are paid – employees are paid the legal minimum wage rate.
6. Working hours are not excessive – working hours are compliant with the national laws and benchmark industry standards.
7. No discrimination is practiced – workers are treated equally regardless of race, cast, origin, religion, age, disability, gender, marital status, sexual orientation, or political affiliation.
8. Regular employment is provided – work performed on the basis of recognized employment through national law.
9. No harsh or inhumane treatment is allowed – physical abuse, sexual or other harassment, or intimidation is prohibited.
10. Our company is a member of Sedex.

## **Anti-Doping Statement**

Northwest Naturals, LLC products do not contain any items on The World Anti-Doping Code International Standard Prohibited List, January 2017.

## **C-TPAT Statement**

Northwest Naturals, LLC is a producer of fruit juice concentrates, purees, and other fruit-based products. Northwest Naturals, LLC does import some agricultural products and ingredients from foreign countries as well as exporting products. At the current time, Northwest Naturals, LLC is not a member of the U.S. Customs and Border Patrol's Customs-Trade Partnership against Terrorism (C-TPAT). Northwest Naturals, LLC utilizes freight brokers and forwarders for international shipments. Northwest Naturals, LLC has a comprehensive security program in place to ensure the safety of the products while they are in our control.

## **DEHP Statement**

Due to the concern of DEHP contamination, Northwest Naturals, LLC confirms that all manufactured products do not contain phthalates as added components mentioned below and there has been no impact on food quality for the above-mentioned products.

- 1) DEHP-bis(2-ethylhexyl) phthalate
- 2) DINP-Di-isononyl phthalate
- 3) BBP-Butyl benzyl phthalate
- 4) DNOP-Di-n-octyl phthalate
- 5) DIDP-Di-isodecyl phthalate
- 6) DBP-Di-n-butyl phthalate

### **Diacetyl**

Diacetyl is not added to any product produced by Northwest Naturals, LLC.

### **Fumigation**

Fumigation is specifically treating with a gaseous form of a chemical to kill a pest. Fumigation is not utilized by Northwest Naturals, LLC for any of the products produced nor in the trailer/containers product is shipped in. According to our Shipping Policy, all the containers are inspected prior to loading for shipment.

### **Gelatin Statement**

Northwest Naturals, LLC does not currently use any gelatin in their processes.

### **Melamine Statement**

Melamine is an organic based chemical most found in the form of white crystals rich in nitrogen and is widely used in plastics, adhesives, countertop, dishware, and similar products. Addition of melamine into food is not approved by the FAO/WHO Codex Alimentarius (food standard commission), or by any national authorities. Northwest Naturals, LLC products do not contain Melamine.

### **Chlorpyrifos Statement**

With the update to regulations, such as the recent change to the status for usage of Chlorpyrifos, Northwest Naturals, LLC hereby certifies that all materials used, comply with all the Federal Pesticide and Heavy Metals residue regulations.

### **Nanotechnology**

Northwest Naturals, LLC does not produce any products using nanotechnology or Engineered Nanoscale Material.

### **PHO Statement**

Northwest Naturals, LLC products do not contain partially hydrogenated oils (PHOs).

### **Palm Oil Statement**

Northwest Naturals, LLC products do not contain nor use palm oil or any palm oil derivatives. No ingredient used within our blends are palm derived.

### **Radiological Hazards**

Northwest Naturals, LLC committed to meeting all CFR code regulations (including 21 CFR 117, food Safety and Preventive Controls and Risk Based Evaluation) and all other aspects of the Food Safety Modernization Act (FSMA) enacted into law on January 4, 2011. As a part of the Preventive Controls requirement, a radiological risk assessment has been completed.

Northwest Naturals, LLC has reviewed its ingredients, packaging, and environment for the potential of a radiological risk to occur. We have concluded that this risk is “unlikely to occur” based on the following:

1. Since 2011 and the Japan Fukushima incident, the FDA has had continual surveillance at the U.S. borders monitoring and testing imported food, including radiation screening of shipments. To date, the FDA has not had any findings of radionuclides from any foods with radiation levels that would pose a public health concern.
2. Northwest Naturals, LLC does not currently source any agricultural products, processing aids or packaging materials from Japan.
3. The Environmental Protection Agency regulates testing on radionuclides in drinking water to protect public health. Municipalities are required to test for radium-226 & 228 based on a schedule that coordinates with the detection level during the initial monitoring process. The Northwest Naturals, LLC facility receives water from local municipalities and collect testing information that analyzes for possible contamination. All results indicate compliance to the standard.
4. The Nuclear Regulatory Commission’s advises, there is less risk to food and water supplies outside the 50-mile radius of our nearest Nuclear Power Plant. In the event of a failure at a nuclear power plant, Northwest Naturals, LLC will follow the recommendations of the 2 emergency planning zones (EPZ) that have been created by the NRC regarding air, food, and water supply.

### **Natural Statement**

Currently, while the Canadian Food Inspection Agency defines of the use of the term “Natural,” many countries, including the United States, have not defined and regulated the broad term “Natural” as it applies to foods.

According to the U.S. Food & Drug Administration website, the FDA has considered the term “natural” to mean that nothing artificial or synthetic (including all color additives regardless of source) has been included in, or has been added to, a food that would not normally be expected to be in that food. However, this policy was not intended to address food production methods, such as the use of pesticides, nor did it explicitly address food processing or manufacturing methods, such as thermal technologies, pasteurization, or irradiation. The FDA also did not consider whether the term, “natural” should describe any nutritional or other health benefit. Northwest Naturals hereby certifies that our single Juice Concentrates and purees are 100% Natural. They contain no artificial colors, flavors, or preservatives.

### **Patulin**

Patulin is a mycotoxin produced by certain species of mold that will grow on some fruits. Based on a review of current scientific evidence, the FDA concluded that Patulin be considered a toxic substance and set a regulatory action guidance limit of 50 micrograms per kilogram (50 parts per billion) as determined on single strength juice, reconstituted single strength juice, or the single strength apple juice component of the food. Beyond these products, the FDA has not set an action level for Patulin, e.g., dried apples.

Tree Top Inc. policies addresses Patulin in Apple juice products (Apple juice, apple juice concentrate, and apple puree) and controls Patulin through utilizing a stringent inspection process at the time of receipt, as well as the first step in processing of the apples and a thorough fruit washing step is completed prior to processing the apples. Any lot found to exceed this limit is disposed of and followed by a thorough sanitation protocol.

Northwest Naturals, LLC requires Patulin test results per lot on all applicable incoming raw



materials.

### **Pesticide Program**

Northwest Naturals, LLC suppliers use pesticides approved for use in the United States. Northwest Naturals, LLC has a pesticide residue monitoring program for finished product types. This program is used to assure that the pesticide residue levels are in compliance with State, EPA, and FDA regulations. This testing occurs at least annually, typically using crop composite samples.

### **Heavy Metals**

Some heavy metals are naturally occurring in tree fruits. Northwest Naturals, LLC has a Finished Product and Purchased Ingredient Heavy Metals Monitoring Program. The Heavy Metal screening includes Arsenic, Lead, and Cadmium. This testing occurs at least annually, typically using crop composite samples.

All raw materials are tested to the following standards:

<u>Element</u>	<u>Level (as single strength)</u>
Lead	<40 ppb
Total Arsenic	<20 ppb
Cadmium	<20 ppb

### **Laboratory Testing / Third Party Laboratories**

Northwest Naturals, LLC laboratories have procedures in place regarding test methods, training, calibrations, and proficiency testing. The Tree Top Inc. Quality Assurance Laboratory (QAL) is capable of testing Pesticides, Heavy Metals, Patulin, Nutritional and Microbiological. A scheduled program of product testing is in place for products including microbiological, chemical, physical, and organoleptic. Results are recorded and reviewed for trends. Northwest Naturals, LLC methods comply with current AOAC Methods and the Compendium of Microbiology for Foods.

Third party laboratories may be used as required by external customers or as needed. All third-party laboratories used by Northwest Naturals, LLC must have ISO/IEC 17025:2005 accreditation, renew their accreditation annually and provide a copy of their Certificate of Accreditation and scope.

### **Food Contact Packaging**

The food contact packaging used for Northwest Naturals, LLC products meets all applicable FDA regulations for use.

### **Letter of Guarantee**

An annual Letters of Guarantee is published to our website. <http://www.nwnaturals.com/resource-library/documents>

### **Food Grade Statement**

All Northwest Naturals, LLC products are considered food grade, and are suitable for use in foods intended for human and animal consumption.

### **Ready to Eat / Ready to Drink Statement (RTE/RTD)**

Our juice concentrates, purees, essences, blends, and syrups have all been processed according to Juice HACCP regulations and are safe to be consumed with no further kill step. They are

however not meant to be consumed at concentrate levels and should be diluted first.

### **Certificate of Insurance**

Certificates of Insurance can be provided upon request.

***Please visit our website at <http://www.nwnaturals.com/resource-library/documents> or contact your Sales Representative for additional information.***

### **Facility Information**

Each manufacturing facility is of appropriate size, location, construction, and design to allow manufacture of safe and compliant finished products. Equipment used is suitable for the intended purpose.

#### **Bothell Manufacturing Facility**

**11805 North Creek Parkway South, Suite A104**

**Bothell, Washington 98011**

**Phone 425-881-2200**

**Fax 425-881-3063**

Since 1980 Northwest Naturals has specialized in transforming fruit into nutritious, natural juice concentrate, fruit essences, WONF juice blends, and turnkey liquid fruit solutions. Today Northwest Naturals is a leading supplier of fruit juice concentrates, servicing both domestic and international manufacturers for products and applications.

Northwest Naturals is a wholly owned subsidiary of Tree Top, Inc. Between our two companies, we provide one of the most comprehensive portfolios of fruit production offerings available in the market today.

#### **Tree Top, Inc. Prosser Plant**

**2780 Lee Road, Prosser, WA 99350**

**Phone: 509-698-1430**

Built in 1965, the Prosser manufacturing facility is approximately 180,000 sq. ft. and produces clarified hard and soft fruit juice concentrates as well as producing retail products, such as composite frozen 3+1 and 5+1 juice cans, flexible packaging to include sauce tubes and capped pouches, as well as RTD 46 oz. juice in tin. This facility also contract manufactures products for other national retail brands and manages custom concentrate production and blends for numerous customers.

Operation: This facility operates 7 days a week/3 shifts per day with approximately 130 employees (Non-Union) Water Resource: Municipal

Lines & Controls: **Juice & Juice Concentrate Line 2 Composite Cans** – Pasteurization & In-line Filter (Filter size based on customer specific requirement).