



April 13, 2011

District Director
Department of Health and Human Services
P.O. Box 25087
Federal Center, Bldg 20
Denver, Co. 80225-0087

Re: FDA Audit of March 23-25, 2011

Dear District Director,

Attached is our response to your Audit, conducted at our facility on March 23-25. We are very appreciative of the professionalism of your staff and the depth of the audit.

The concerns presently surrounding our industry have prompted a number of our customers to request an acknowledgement from FDA that its audit of Sunland has been successfully completed. As indicated in our Audit Response, most of the observations noted were corrected prior to the completion of the audit.

As stated in our corrective actions you will find an attached email from Carolyn A. Pinney showing that the samples collected had been tested and the results are as follows: Sample Number 681978 for Salmonella sp. was none detected, and Sample number 681981 for filth was under your threshold. Product will be taken off of Hold.

As indicated by the results we believe we are in full compliance. Please acknowledge the audit successfully closed so we may move forward with our customers.

Sincerely,

A handwritten signature in black ink that reads "Jimmie Shearer". The signature is written in a cursive, flowing style.

Jimmie Shearer
President & CEO

Sunland Inc.
42593 US Highway 70, P.O. Box 1059, Portales, NM 88130
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FDA Audit Response

MARCH 23-25, 2011

Date: April 13, 2011

Observation 1

Failure to store raw materials in a manner that protects against contamination.

Specifically, on 3/23/11, uncovered trailers ^{(b) (4)} filled with raw in-shell peanuts were observed to be stored outdoors and exposed to the elements. These raw in-shell peanuts came from under the conveyer belt during a cleanout of Barn ^{(b) (4)}. Birds too numerous to count were observed flying over and landing on the in-shell peanuts. Apparent bird excreta also was observed on some of the in-shell peanuts. Management stated that these in-shell peanuts would be processed into shelled peanuts.

- ❖ **Corrective Action: Bird excreta was removed before peanuts were put back in the process to be shelled. Date completed: March 26, 2011**

Observation 2

Failure to provide adequate or other protection against pests.

Specifically,

- On 3/23/11- 3/24/11, the plastic strip door curtain located at the north production warehouse dock door was missing a strip. Raw product is stored approximately 20 feet from the plastic strip door curtain.
 - **Corrective Action: Plastic Strip door curtain was replaced March 24, 2011 before the auditors left. A retaining strip had been added to curtain track to hold the strips in place.**
- On 3/23/11, three gaps were observed on the exit door on the southwest portion of the loading dock, and located approximately 6 feet from finished product. The first gap approximately ½ inch wide by 1 inch high, was observed under the northwest portion of the door. The second gap approximately ½ inch wide by 1 inch high, was observed under the northwest portion of the door. The third gap approximately ¼ inch wide by 7 feet high, was observed along the northern side of the door frame.
 - **Corrective Action: A door had already been ordered before the March 23-25, 2011 audit. The door and frame was all replace March 30, 2011.**
- On 3/24/11, two gaps were observed on the south dock door in the peanut butter cleaning room, and located approximately 12 feet from raw product. The first gap approximately

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½ inch wide by 10 feet high, was observed along the north side of the dock door. The second gap approximately ¼ wide by 3 feet high, was observed along the south side of the dock door.

- **Corrective Action: Longer weather stripping will be put in place under the south dock man door. Will be completed by April 30, 2011. The south side of the dock door was fixed. Completed: March 30, 2011.**

Attached is an email from Carolyn A. Pinney letting us know that the samples collected had been tested and the results are as follows: Sample Number 681978 for Salmonella sp. was none detected, and Sample number 681981 for filth was under your threshold. Product will be taken off of Hold.

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