

1201 Harbor Bay Parkway Alameda, CA 94502

Memorandum

Date: 08/18/2020
From: Ismael Garibay
Consumer Safety Officer
ORA/OHAFO-W/HAFW5/Fresno RP
Subject: CORE RT3 ASSIGNMENT: Salmonella
Newport/Red onion (suspect)/Jul 2020 -
Thomson International Inc
To: Andrew E. Kay
Supervisory Consumer Safety Officer
ORA/OHAFO-W/HAFW5/Sacramento RP

Firm: Thomson International, Inc
11220 S Vineland Rd
Bakersfield, CA 93307
FEI: 3004391505

SUMMARY

This is a memorandum of a for-cause investigation into an outbreak of *Salmonella newport* following a Class 1 Recall that was voluntarily initiated by Thomson International Inc., a grower, packer, and distributor of vegetables and fruits. This investigation was conducted in accordance with Coordinated Outbreak Response and Evaluation Network (CORE) RT3 ASSIGNMENT: Salmonella Newport/Red onion (suspect)/Jul 2020 - Thomson International Inc, LLC; Priority: High; FACTS#: 12055268, and eNSpect OP ID 170696.

Thomson International Inc. voluntarily initiated a recall on 08/01/2020 for red, yellow, white, and sweet onions shipped from May 1, 2020 through the present. The onions are being recalled because they have the potential to be contaminated with *Salmonella*. In addition, the onions were distributed to wholesalers, restaurants, and retail stores in all 50 states, the District of Columbia, and Canada. The full list of implicated products with corresponding product images are available at <https://www.fda.gov/safety/recalls-market-withdrawals-safety-alerts/thomson-international-complete-list-recalled-products>.

This investigation was conducted to perform environmental sampling and to collect documents and information specified in CORE RT3 Assignment (**Attachment 2**).

ADMINISTRATIVE DATA

Inspected firm: Thomson International Inc
Location: 11220 S. Vineland Rd
Bakersfield, CA 93307
Phone: 661-845-1111
FAX: 661-845-1161
Mailing address: 9582 Buena Vista Blvd.

Bakersfield, CA 93307
Email address: (b) (6), (b) (7)(C).com
Dates of investigation: 08/03/2020-08/05/2020
Days in the facility: 3
Participants: **Ismael Garibay, Investigator**
Joseph Willems, Investigator
Non-FDA
Participants: **DeLarian Dyson, Environmental Scientist**
Cristina Jimenez, Environmental Scientist
Julian Potier, Environmental Scientist

On 08/02/2020, Ms. Nicole Yuen, Emergency Response Coordinator, and I, Investigator Garibay, called and spoke with Mr. Jack S. Thomson, President, of Thomson International Inc. The reason for the phone call was to pre-announce the investigation in accordance with ORA Field Alert #57, Conducting Inspections, Investigations, Sample Collections and State Program Evaluations During the COVID-19 Pandemic.

On 08/03/2020, we initiated an investigation at Thomson International Inc. and presented our FDA credentials to Mr. Jack S. Thomson, President, Mr. Jose A. Perez, Operations Manager, (b) (6), (b) (7)(C), (b) (6), (b) (7)(C), Administrator/Food Safety, and (b) (6), (b) (7)(C) Sales Assistant. We issued the Form FDA 482, Notice of Inspection (**Attachment 3**), to Mr. Thomson who identified himself as the most responsible individual at the firm.

On 08/04/2020, we issued another Form FDA 482 (**Attachment 4**), to Mr. Jack S. Thomson, President, due to Mr. Julian Potier, Environmental Scientist, of the California Department of Food and Agricultural (CDFA) joining the investigation.

This was a team investigation, involving:

I, Investigator Garibay, was the lead investigator, and was present on all days of the investigation. I acted as the sample collector for samples INV 1145759-61.

Investigator Joseph Willems was present on all days of the investigation and was the scribe, prepared the sample collection reports, and collected sample INV 1141449.

Mr. DeLarian Dyson, Environmental Scientist, was present on 08/03-04/2020 and assisted during the environmental sampling portion of this investigation.

Ms. Cristina Jimenez, Environmental Scientist, was present on 08/03/2020 and 08/05/2020 and assisted during the environmental sampling portion of this investigation.

Mr. Julian Potier, Environmental Scientist, was present on 08/04-05/2020 and assisted during the environmental sampling portion of this investigation.

The use of “I”, “me”, and “my” refers to Investigator Garibay, and “we”, “us”, and “our” refers to all Investigators and Environmental Scientists.

INTERSTATE (I.S.) COMMERCE/ JURISDICTION (PRODUCTS MANUFACTURED AND/OR DISTRIBUTED)

On 08/04/2020, Mr. Thomson provided me with invoices, purchasing orders, Thomson sales orders, and bills of lading (**Exhibit 1**) for specific order numbers specified in the (CORE) RT3 ASSIGNMENT: Salmonella Newport/Red onion (suspect)/Jul 2020 - Thomson International Inc. These records include the shipments from Thomson International/Onions 52 to Sysco locations including (b) (4) and (b) (4)

On 08/04/2020, Mr. Thomson provided me with a product list (**Exhibit 2**) of all onions (yellow onion, sweet yellow onion, red onion, and white onion) that are processed, packed, and distributed by the firm. The product list includes the following information: onion color, packaging style, brand, size, and UPC information.

INDIVIDUAL RESPONSIBILITY AND PERSONS INTERVIEWED

During this investigation, we were accompanied by Mr. Jack S. Thomson, President, Mr. Jose A. Perez, Operations Manager, (b) (6), (b) (7)(C), Administrator/Food Safety, and (b) (6), (b) (7)(C) Sales Assistant. All four individuals were present during environmental sampling. They did not collect their own environmental sample but did photograph our environmental sampling locations. Mr. Thomson provided me with most of the information in this investigation memo, except where noted.

Mr. Jack S. Thomson, President, identified himself as the most responsible individual at the firm. During the investigation, I observed Mr. Thomson provide various orders and directions to his employees.

MANUFACTURING/DESIGN OPERATIONS

During this investigation, Mr. Jack S. Thomson, President, stated that the firm's onion receiving, processing, packaging, and shipping operations have been placed on temporary hold due to the ongoing recall. Therefore, on 08/03/2020, we performed a dry-walkthrough of the firm's onion receiving, staging, processing/packaging, and storage areas which consist of: (b) (4), (b) (4) line and (b) (4) lines, (b) (4) line, loading dock, and ambient storage rooms. Mr. Thomson explained the firm's onion receiving, staging, processing, packaging, storing, and shipping operation as follows:

Onion operation is seasonal: (b) (4)

Hours of operation (packing facility): (b) (4)

Receiving/Staging

Field packed onions are delivered to the firm in plastic bins or burlap bags (b) (4) affixed an internal ticket and logged into the firm's inventory unloaded and staged (b) (4) (b) (4).

Processing/Packaging/Storage

(b) (4) onions are forklifted to the (b) (4) (b) (4) onion processing (sorting, brushing, grading, sizing, and packing) packed onions are affixed a manufacturing code packed onions on wooden pallets are forklifted or placed on a flatbed for transfer to the firm's loading dock or ambient storage rooms.

Observations observed 08/03-04/2020

During the walkthrough and environmental sampling on 08/03/2020, we observed the following:

- Two apparent mammalian scats on the plant’s grounds.
 - One apparent dark black, dry mammalian scat approximately four inches observed on the plant’s grounds approximately 60 feet from staged onions in plastic bins and in an area where there is forklift activity.
 - One apparent dark black, dry mammalian scat approximately four inches observed approximately 5 feet from the dedicated employee portable toilet area and in an area where there is employee foot traffic. Mr. Jose Perez, Operations Manager, stated that the portable toilets are intended for employees working in the (b) (4).
- Two birds that appeared to be pigeons flying inside and landing on the ceiling beams of the (b) (4). (b) (4) The pigeons were observed flying over the firm’s (b) (4) line and (b) (4) (b) (4) lines.
- Two cats walking inside and around the (b) (4). The cats were walking around the firm’s equipment and onion packaging lines.

During environmental sampling on 08/04/2020, we observed the following:

- One cat walking inside and around the (b) (4). The cat was observed walking around the firm’s equipment and onion packaging lines.
- Three birds that appeared to be pigeons flying inside and landing on the ceiling beams of the (b) (4). We observed apparent pigeon droppings on the (b) (4) line adjacent to (b) (4) line inside the (b) (4).
- We observed apparent swallow nests along the outside top corner of the northwest (b) (4) of the (b) (4) line. The swallow nests are approximately five feet from the (b) (4) line.

DOCUMENT AND INFORMATION COLLECTION

Per the (CORE) RT3 ASSIGNMENT: Salmonella Newport/Red onion (suspect)/Jul 2020 - Thomson International Inc, LLC (**Attachment 1**); I requested the following documents and information from the firm’s management on 08/03/2020 which Mr. Thomson provided on 08/04/2020:

*a. Please identify the location of any growing area(s) (fields or ranches), including GPS coordinates (using a decimal degree format, xx.xxxxxx). Refer to **Exhibit 3**.*

*b. Records (invoices, bills of lading, etc.) supplying each of the identified shipments from Thomson International/Onions 52 to Sysco, to include if available, farm/field GPS coordinates (using decimal degree formats, xx.xxxxxx), harvest company, harvest date, lot information, and shipment dates for all types/varieties/sizes of onions in each shipment. Refer to **Exhibit 1**.*

Order #	Cust PO #
0164626	1914859
0169326	1914965
0170701	1915078A
0172701	1915141
0175601	1915267
0179208	1915352A
0179308	1915445

0180808	1915529
0184415	1915621A
0184915	1915683
0186715	1915807
0189022	1915874A
0189722	1915996
0192922	1916091
0196829	1916172A

*c. For the lot information identified in the above question, please provide a list of customers that received onions from the same lots. Refer to **Exhibit 4**.*

*d. Please collect a customer list for all onions harvested in 2020. If possible, list customers by onion type. Refer to **Exhibit 5**.*

- i. Did any customers receive stored onions from prior growing seasons? On 08/04/2020, Mr. Thomson stated that no customers receive stored onions from prior growing seasons.*

*e. How are the whole onions labeled and packaged, and is brand and lot information provided on their packaging? Refer to **Exhibit 6**.*

*f. What brands of onions were sold by Thomson from May 2020 to present? What determines which onions are sold under each brand? Refer to **Exhibit 2**.*

*g. Document how lot numbers are assigned for onions, who assigns them, and what constitutes a lot. Please clarify how lot information is maintained. Refer to **Exhibit 7**.*

SAMPLES COLLECTED

The following samples were collected during this investigation:

- On 08/03/2020, we collected 108 environmental swabs submitted as sample INV 1145759 (**Attachment 5**) for *Salmonella* analysis. Environmental swabs were collected from Zones 1, 2, and 3 from the (b) (4) line and consumer bagger line (b) (4) bagger). No *Salmonella* was detected in the sample.
- On 08/04/2020, we collected 100 environmental swabs submitted as sample INV 1145760 (**Attachment 6**) for *Salmonella* analysis. Environmental swabs were collected from Zones 1, 2, and 3 from the (b) (4) consumer bagger line ((b) (4)), (b) (4), and (b) (4) (b) (4) line. No *Salmonella* was detected in the sample.
- On 08/04/2020, Investigator Willems collected 2 subsamples of apparent scat to be analyzed for *Salmonella* under sample INV 1141449 (**Attachment 7**). No *Salmonella* was detected in the sample.
- On 08/05/2020, we collected 71 environmental swabs submitted as sample INV 1145761 (**Attachment 8**) for *Salmonella* analysis. Environmental swabs were collected from Zones 1, 2, and 3 from the (b) (4) line, loading dock, ambient onion storage rooms, and adjacent equipment and area. No *Salmonella* was detected in the sample.

CLOSE-OUT MEETING

On 08/05/2020, Investigator Willems and I held a close-out meeting with Mr. Jack S. Thomson, President, and Mr. Jose Perez, Operations Manager. We each issued Mr. Thomson a Form FDA 484, Receipt for Samples (**Attachments 9 & 10**).

The firm's management was cooperative, and we did not encounter any refusals during this investigation.

EXHIBITS COLLECTED

1. EX 1 Copy of Records (invoices, bills of lading, etc.) supplying each of the identified shipments from Thomson International/Onions 52 to Sysco, 150 pages
2. EX 2 Thomson International Inc. 2020 Onion Product List, 2 pages
3. EX 3 Thomson International GPS Field Locations 2020, 10 pages
4. EX 4 List of customers that received onions from the same lots in question, 25 pages
5. EX 5 Thomson International Inc. 2020 Customer Distribution List, 1 page
6. EX 6 Thomson International Inc. pallet tag and sticker label example, 1 page
7. EX 7 Thomson International Inc. 2020 lot number designation, 2 pages

ATTACHMENTS

1. Investigation Memorandum Thomson International Inc. dated 08/18/2020, 6 pages
2. Coordinated Outbreak Response and Evaluation Network (CORE) RT3 ASSIGNMENT: Salmonella Newport/Red onion (suspect)/Jul 2020 - Thomson International Inc, LLC., 5 pages
3. Form FDA 482, Notice of Inspection, issued to Mr. Jack S. Thomson, President, on 08/03/2020, 3 pages
4. Form FDA 482, Notice of Inspection, issued to Mr. Jack S. Thomson, President, on 08/04/2020, 3 pages
5. Form FDA 464, Sample Collection Report, for environmental sample INV 1145759, 119 pages
6. Form FDA 464, Sample Collection Report, for environmental sample INV 1145760, 112 pages
7. Form FDA 464, Sample Collection Report, for sample INV 1141449, 10 pages
8. Form FDA 464, Sample Collection Report, for environmental sample INV 1145761, 81 pages
9. Form FDA 484, Receipt for Samples, issued to Mr. Jack S. Thomson, President, 1 page
10. Form FDA 484, Receipt for Samples, issued to Mr. Jack S. Thomson, President, 2 pages

Ismael Garibay
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Division of Human and Animal Food Operations
West V (HAFW5), Fresno RP

**Joseph M.
Willems -S**

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