

August 15, 2010

BCS African Food Supply, LLC  
7340 Brooklyn Boulevard  
Brooklyn Park, MN, 55443  
(612)281-2542

Public Health Service  
Food and Drug Administration  
Minneapolis District office  
Central Region  
250 Marquette Avenue, Suite 600  
Minneapolis, MN, 5401

Attention:  
Rebecca L Caulfield, Compliance Officer.

Dear Ms. Caulfield:

I am responding to your letter from July 20, 2010. I responded to you before in a letter dated August 3<sup>rd</sup> which, according to our phone conversation, you had received but not read as of yesterday, August 10, 2010.(See Exhibit 1)

I am responding to your inquires in a second letter in order to fully and clearly answer to every item in question. I will attached documentation, pictures etc in order to evidence **BCS has taken every step necessary to remedy the issues** which were brought to our attention by your agency from February 2 to March 3, 2010.

1. BCS is no longer purchasing uneviscerated fish. The uneviscerated fish we had at the time your agency came was all discarded.  
See attached pictures, 300 pounds of the said fish was taken away by the waste management company in Brooklyn Park. (Exhibit 2)
2. BCS is no longer importing "bony fish." We are purchasing our fish in the United States from the following vendors.

Product Name	Point of Purchase	Vendor
Canned Sardines	Morocco	Nourhan Trading Group, New Jersey
Croaker Fish	Bought in USA __New Jersey	1. Global Food Trading Corp, New Jersey fish from Guayana 2. Mirasco International Food Machant, Atlanta, fish from Uruguay and Brazil 3. Nutuno Inc, Pembroke Pines, Florida, fish from India.
Red Snapper Fish	Bought in USA __New Jersey	Global Food Trading Corp, New Jersey. Netuno Inc. Pembroke Pines, Florida.
Barracuda	Bought in USA __New Jersey	Global Food Trading Corp, New Jersey
Pike	Bought in USA __New Jersey	Global Food Trading Corp, New Jersey
Smoked Fish	Brought in USA_ Minneapolis	Trin Jam Distributors, in New Jersey, Produced in U.S.
Stockfish	Brought in USA_ Minneapolis	Olsen Fish Company, in

Product Name	Point of Purchase	Vendor
		Minneapolis, fish from Norway

3. The only fish we are directly importing is the Tilapia Fish, which comes frozen from China. Enclosed is the approved FDA HACCP and SSOP. (See Exhibit 3)
  
4. We are monitoring the eight areas of sanitation conditions and practices during packaging of bulk items in accordance with good manufacturing practices (GMP)
  - The condition and cleanness of food contact surfaces. It was found that the metal saw used to portion fish had debris on it.  
We are now removing the saw from the mounting and following good practice procedures, we wash it with bleach and high temperature water to kill all bacteria, and then we rinse it three times using the three sinks in the processing area.
  - Hand sink in processing area was clogged—the issue has been resolved. The report from the Department of Agriculture (May 20, 2010) records the issue has been resolved to your satisfaction and BCS in compliance with the issue. (See Exhibit 4).
  - Several gaskets on freezer were missing or damaged, and there were debris along the walls.  
The issue has been resolved. See work orders and performance from Sears. (See exhibit 5)
  - On 3/31/2010 there was a large crack on between the floor and the wall on the East wall of the facility and several insects and rodent droppings were behind pallets.  
All cracks have been sealed. In addition, we have pest control contract with Adam Pest Control in order to monitor this problem closer with an expert party. (See Exhibit 6). The Department of Agriculture report n May 20 2010, also states the problem has been resolve to that agency’s satisfaction.(See Exhibit 4).
  - Sanitation of contact surfaces. The palm oil drums used the rebottling of palm oil had food buildup inside and outside the drums.  
Palm oil bottling area has been surface with washable walls, ceiling, and flooring. Palm oil drums are now cleaned in accordance to Department of Agriculture recommendations. This issue has been resolved and we are in compliance with the Department of Agriculture. See report issued April 7, 2010. (See exhibit 7).  
In addition, BCS has stainless still counters which we disinfect after each use in order to avoid cross contamination of products.

BCS is currently working on a thorough HACCP (Hazard Analysis and Critical Control Point) for all our seafood items.

Rebecca, if you have any questions on my response to you, please don't hesitate to contact me at **612 281 2542**, or via e-mail at [skymint@comcast.net](mailto:skymint@comcast.net).

Sincerely,  
 Adebayo Mafe  
 BCS African Foods

# Exhibit 1

August 3<sup>rd</sup>, 2010.

Ms Caulfield, as discussed with you over the phone, here is the letter to show how far we have gone in correcting most citations from your office and USDA respectively.

Our processing area for repackaging has been put in more sanitary status which will not give room for adulteration of products as mentioned. Sanitation of surface area is carefully practiced.

This will stop any form of health issues you might be concern with. This area was re-inspected 5/20/2010.

To understand our product more, pike fish, jack cavalla, herrings bloaters, barracuda and cat smoked fish are all eviscerated before they are smoked except for Bony and Kangbe fish which was dumped in trash by David Seipel and Valerie Gamble both with department of agriculture on 4/7/2010. Both witnessed this product being taking away by waste management. We discontinue the importation of those kind of Bony and Kangbe fish for now.

① Palm oil surface area has been refaced with washable walls, ceiling and floor, palm oil drums are now properly cleaned see comment on re-inspection. 4/7/2010.

Haccp plan and analysis has been contracted to a certified manager with the state of Minnesota who will be contacting your office for further discussion.

We have also put in place the eight areas of sanitation with sufficient frequency of monitoring in getting our work place in good and perfect working condition.

We hope we have been able to touch all areas of your concern, if there be any further question, please fill free to contact me at 612-281-2542.

Sincerely,

Bayo Mafe.

Exhibit 2(a)



Exhibit 2 (b)

**DO NOT PARK OR BLOCK**  
 NO HAZARDOUS WASTES ACCEPTED

**CAUTION CAUTION**

NO PUBLIC DUMPING \$500.00 FINE

**WMM**  
 WASTE MANAGEMENT  
 952-890-1100  
 WWW.WMM.COM



Exhibit 2(c)





中华人民共和国出入境检验检疫  
ENTRY-EXIT INSPECTION AND QUARANTINE  
OF THE PEOPLE'S REPUBLIC OF CHINA

正本 ORIGINAL

健康证书  
HEALTH CERTIFICATE

编号 No.: 442500209027437

Exhibit 3

发货人名称及地址 Name and Address of Consignor	GUANGZHOU LUYE FISHERIES CO.,LTD. 88 FURONG RESORT SPECIAL ROAD SHILING TOWN, HUADU DISTRICT GUANGZHOU GUANGDONG CHINA		
收货人名称及地址 Name and Address of Consignee	BCS AFRICAN WHOLESALE FOOD SUPPLY LLC. 7340 BROOKLYN BOULEVARD, BROOKLYN PARK, MINESOTA 55443		
品名 Description of Goods	FROZEN WHOLE TILAPIA		
加工种类或状态 State or Type of Processing	***	标记及号码 Mark & No. N/M	
报检数量/重量 Quantity/Weight Declared	**1200CTNS,**21773KGS		
包装种类及数量 Number and Type of Packages	CARTON,**1200CTNS		
贮藏和运输温度 Temperature during Storage and Transport	-18° C		
加工厂名称、地址及编号(如果适用) Name, Address and approval No. of the approved Establishment ( if applicable )	GUANGZHOU LUYE FISHERIES CO.,LTD. FURONG RESORT SPECIAL ROAD,SHILING TOWN,HUADU DISTRCT.GUANGZHOU,CHINA CIQ REGISTRATION NUMBER:4400/02168 FDA REGISTRATION NUMBER:11917607034		
启运地 Place of Despatch	HUADU GUANG DONG	到达国家及地点 Country and Place of Destination	USA
运输工具 Means of Conveyance	BY SHIP	发货日期 Date of Despatch	08 JAN., 2010

检验结果:

Results of inspection

1. THE PRODUCTS HAVE BEEN PROCESSEN BY ESTABLISHMENTS WHICH HAVE IMPLEMENTED HACCP PROGRAMS AND SANITATION PROCEDURES AS OUTLINED IN FDA'S PROCEDURES FOR SAFE AND SANITARY PROCESSING

2. THE GOODS ARE FIT FOR HUMAN CONSUMPTION

\*\*\*\*\*



印 Official Stamp 签证地点 Place of Issue HUADU GUANGZHOU 签证日期 Date of Issue 11 JAN., 2010

授权签字人 Authorized Officer ZHAN LANGSHENG 签名 Signature

*(Handwritten signature)*

Dairy and Food Inspection Division, Ph: 651-201-6027

# Food Establishment Inspection Report

REPORT #: 148 DATE 5/20/10

ESTABLISHMENT BCS African Wholesale	LIC. #/TYPE 20087687 WFH	COUNTY Hennepin
LIC. HOLDER	PURPOSE reinspection FDA	
ADDRESS 7340 Brooklyn Blvd	CITY Brooklyn Park	ZIP 55443
		PHONE 763-561-597

## OBSERVATIONS AND CORRECTIVE ACTIONS

ITEM # Violations cited in this report must be corrected within the inspector's specified time frames.

This was a reinspection done under FDA contract by D. Seipel and V. Gamble. J. Mittechalse, was also present for meat from unapproved sources follow up. Initial FDA inspection was conducted on 3/31/10 and 4/9/10.

This inspection was conducted with Mr. Bayo Mafe, CFO mainly.

Orders:

1) Finish the hazard analysis for seafood items carried by this firm. (Mr. Bayo Mafe has made significant progress towards completing his hazard analysis. Discussed the possibility of getting a consultant to assist in the process.) Comply by June 3, 2010

2) Provide documentation of suppliers HACCP controls. (Discussed receiving letters of guarantee from importers.) Comply by June 3, 2010

3) Finish sanitary operating procedures to include all eight areas required by Seafood HACCP program. (Sanitation records are in place (but missing several areas.) Comply by June 3, 2010

2nd/4) Repair or replace all freezer seals that are no longer attached to the freezer lids. (Several seals still unattached, one lid is in order to be replaced.) Comply by 5/30/10.

2nd/1) Clean and maintain in a clean condition non-food contact surfaces. (freezer seals need to be cleaned and sanitized. Food and dirt build up present.) Comply by 5/30/10.

Bayo Mafe	[Signature]	5/20/10
PERSON IN CHARGE (PRINT NAME)	SIGNATURE	DATE
Daniel [Signature]	[Signature]	5-20-10
INSPECTOR (PRINT NAME)	SIGNATURE	DATE



Dairy and Food Inspection Division, Ph: 651-201-6027

### Food Establishment Inspection Report

REPORT #: 1486 DATE 5/20/10

ESTABLISHMENT <u>BCS African Wholesale</u>		LIC. #/TYPE <u>20087687 WFH</u>	COUNTY <u>Hennepin</u>
LIC. HOLDER		PURPOSE	
ADDRESS		CITY <u>Brooklyn Park</u>	ZIP
			PHONE

**OBSERVATIONS AND CORRECTIVE ACTIONS**

ITEM #	Violations cited in this report must be corrected within the inspector's specified time frames.
	<u>Comments:</u>
1)	<u>Discussed the hazard analysis and whether or not a HACCP plan will be needed.</u>
2)	<u>5 orders previously issued have been satisfactorily complied with.</u>
3)	<u>Pest control appeared satisfactory.</u>
4)	<u>Frozen product appeared frozen during inspection.</u>

PERSON IN CHARGE (PRINT NAME) <u>Boip Mafe</u>	SIGNATURE 	DATE <u>5/20/10</u>
INSPECTOR (PRINT NAME) <u>Valerie Gamble</u>	SIGNATURE 	DATE <u>5/20/10</u>

5-20-10

Exhibit 5

RETURN

SEARS HOME CENTRAL PARTS AND REPAIR CENTER  
1277 BROOKDALE CENTER  
BROOKLYN CENTER MN 55430

15:51 07/08/10

TRANS 5000 UNIT 07462 REG 900 ASSOC 916999

01 46 253 5303917276  
02 46 253 216912900

INSULATION-D  
LID

QTY	-PRICE	EXTENSION
1	107.16	107.16--
1	63.88	63.88--

SUBTOTAL 171.04--

TAX 12.45--

REFUND TOTAL 183.49--

RETURNED MERCHANDISE

CUSTOMER INFO:

S JIDE  
8048 JAMES AVE N  
BROOKLYN PARK MN 55444  
(612) 414-6229

ACCOUNT NUMBER 7211

CREDITED TO ACCOUNT 183.49

APPROVED BY:

CUSTOMER SIGNATURE

NO RETURN ON ELECTRIC PARTS  
THANK YOU FOR SHOPPING AT SEARS  
PLEASE RETAIN THIS RECEIPT

RETURN  
074629005000

561-0086



# ADAM'S PEST CONTROL, INC.

Main Office: PO Box 233  
922 Hwy 55 Suite 100 • Medina MN 55340-9649  
1-800-227-2214 • Fax 763-478-6715

Info, Account Access, & More:  
[www.adamspestcontrol.com](http://www.adamspestcontrol.com)

Invoice/Service Order Number




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[1699261]  
BCS African Wholesale Food Supply  
7340 Brooklyn Boulevard  
Brooklyn Park, MN 55443

MAP CODE N/A  
SCHEDULE 6/25/10  
LAST SERVICE Brian Weeber  
TECHNICIAN 20081691/20087534  
LICENSE

Phone: 612-414-6229

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[1699261]  
BCS African Wholesale Food Supply  
7340 Brooklyn Boulevard  
Brooklyn Park, MN 55443

**NOW SERVING THE BRAINERD LAKES AREA!**

From our Nisswa Office  
866-284-7767  
Where we also offer a suite of services  
for your cabin or home.  
Visit [www.totalcabin.com](http://www.totalcabin.com) for more info.

Phone: 612-414-6229

SERVICE(S) AND/OR PRODUCT(S)	1	PRICE
101 Monthly Service - Commercial		\$60.00
SUBTOTAL		\$60.00
TAX		\$4.37
TOTAL		\$64.37

**TERMS ARE NET 30** (unless otherwise agreed to in writing)  
A service charge of 1.5% per month (18% per year) will be added to your unpaid balance after 30 days.

Comment:  
Checked rodent equipment exterior, added bait where needed. Checked interior equipment no activity as of today. No insects sighted or reported at this time.

PRODUCT	CODE (see back)	%	AMOUNT	TARGET PEST	AREAS TREATED
Conrac Bait Blox	12455-79	0.0000	12.00 EA	Mice	

Service Date: 7/24/10  
Time Out: 11:02 AM/PM  
Time Out: \_\_\_\_\_ AM/PM

*Brian Weeber*

ADAM'S SIGNATURE

Work Has Been Completed In A Satisfactory Manner

*[Customer Signature]*

CUSTOMER SIGNATURE



# ADAM'S PEST CONTROL, INC.

Exhibit 6cb)

Info, Account Access, & More:  
[www.adamspestcontrol.com](http://www.adamspestcontrol.com)

Main Office: PO Box 233  
922 Hwy 55 Suite 100 • Medina MN 55340-9649  
1-800-227-2214 • Fax 763-478-6715

Invoice/Service Order Number  
578809



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[1699261]  
BCS African Wholesale Food Supply  
7340 Brooklyn Boulevard  
Brooklyn Park, MN 55443

MAP CODE  
SCHEDULE N/A  
LAST SERVICE 5/26/10  
TECHNICIAN Brian Weeber  
LICENSE 20081691/20087534

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[1699261]  
BCS African Wholesale Food Supply  
7340 Brooklyn Boulevard  
Brooklyn Park, MN 55443

Phone: 612-414-6229

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for your cabin or home.

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Phone: 612-414-6229

SERVICE(S) AND/OR PRODUCT(S)	PRICE
101 Monthly Service - Commercial	1 \$60.00
SUBTOTAL \$60.00 TAX \$4.37 TOTAL \$64.37	

TERMS ARE NET 30 (unless otherwise agreed to in writing)

A service charge of 1.5% per month (18% per year) will be added to your unpaid balance after 30 days.

**Comment:**

Checked rodent equipment added bait where needed. replaced smashed trap. No insects sighted at this time.

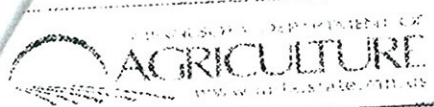
PRODUCT	CODE (see back)	%	AMOUNT	TARGET PEST	AREAS TREATED
Final Blox	12455-89	0.0000	6.00 EA	Mice	
Katch-All Multi Catch Mouse Trap		0.0000	1.00 EA	Mice	

Service Date: 6/25/10  
Time Out: 12:40 AM/PM  
Time Out: AM/PM

*Brian Weeber*  
ADAM'S SIGNATURE

Work Has Been Completed In A Satisfactory Manner

*[Signature]*  
CUSTOMER SIGNATURE



Dairy and Food Inspection Division, Ph: 651-201-6027

# 93 DATE 4/7/2010

# Food Establishment Inspection Report

ESTABLISHMENT BCS African Wholesale	2008-087	WFH	Hennepin
CC HOLDER	Routine: FDA Contract/Seafood HACCP		
340 Brooklyn Blvd.	Brooklyn Park	763-501-1597	

ITEM # Violations noted in this report must be corrected within the inspector's specified time frames.

4-7

- 8. Clean and maintain in a clean condition the meat saw located in the processing room. (Meat saw had dried food in inner cracks and crevices and behind the upper saw wheel. Wheel removal was demonstrated and the wheel was washed, rinsed and sanitized on site.) Comply immediately.
- 9. Properly wash, rinse and sanitize all food contact surfaces and utensils. (Discussed and demonstrated proper use of the three compartment sink. Discussed developing a recipe or method for checking proper sanitization levels, and discussed washing, rinsing and sanitizing of sections of the meat saw that could not be removed.) Complied on site.
- 10. Provide hand towels at all hand sinks to include restrooms and food packaging room. (No hand towels present during inspection.) Comply immediately, 4/7/2010.

### Comments:

- 1. Three orders from the inspection started on 3/31/2010 were complied with and are continuing to be in compliance.
- 2. The palm oil refilling area has been refaced with washable walls, ceiling and floor. The oil drums were removed and thoroughly cleaned in the processing room. Photos were taken to document the cleaned state of the drums as well as the refilling area condition.
- 3. No pest activity was noted during this inspection.
- 4. HACCP contact information was collected during the previous inspection.
- 5. Discussed the use of safe handling stickers for products requiring bagging at customer's facility, specifically the cold cuts, deli meats and cut pieces of tripe.
- 6. Discussed proper handling for fresh frozen fish as well as smoked fish products.
- 7. All frozen product was noted frozen during this inspection and discussed firm's temperature monitoring procedures.
- 8. All temperature control records were reviewed.

BARTO MARE  
 Valerie C Gamble  
 Dawn M Seipe

*[Signature]*  
 Valerie Cleambl  
 Dawn M Seipe

4/7/10  
 DATE  
 4/7/10  
 DATE  
 4-7-10