

1. General Questions	Code	Requirement	Procedure	Verification	Corrective Action
1.1. Management Responsibility					
1.1.1. A policy statement shall outline a commitment to food safety and define the methods used to comply with and continually improve the food safety management system. The Policy Statement shall be signed by Senior Management and communicated in language understood by all employees.		A food safety policy shall be in place.	A written policy shall 1) outline a commitment to food safety, 2) in general terms, how it is implemented and how it is communicated to employees, and 3) be signed by Senior Management.	The auditor observes the food safety policy, observes that it is signed by Senior Management, and observes that it has been communicated to all employees in a manner that can be understood.	The operation creates or revises the policy, or its communication to employees, to be in compliance.
1.1.2. There shall be a policy that establishes consequences for employees who violate established food safety policies or procedures.	Place lower in checklist	There shall be a policy that establishes corrective actions for personnel who violate established food safety policies or procedures.		Auditor observes the policy and checks for examples of enforcement	The operation creates or revises the policy, or its communication to employees, to be in compliance.

<p>1.1.3. Management shall designate a qualified individual who has the responsibility and authority for food safety and provides adequate resources for management of the food safety plan, including a provision for the absence of key personnel. Twenty-four hour contact information shall be available for these individuals in case of food safety emergencies.</p>		<p>Management has designated individual(s) with roles and responsibilities for food safety functions.</p>	<p>The food safety plan shall designate who has the responsibility and authority for food safety, including a provision for the absence of key personnel. Twenty-four hour contact information shall be available for these individuals in case of food safety emergencies. These roles and responsibilities shall be communicated within the organization.</p>	<p>Auditor observes that the food safety plan has identified individual(s) for key food safety activities. Auditor verifies that procedures include provisions for when the identified individual is not present.</p>	<p>Operation identifies individual(s) for key food safety activities in the food safety plan. Operation identifies actions to be taken when the identified individual(s) are not present.</p>
<p>1.1.4. There shall be a description of the organization that identifies the job functions, responsibilities, and reporting relationships related to food safety. This shall be communicated within the organization.</p>	<p>Delete; redundant to 1.1.3</p>				
<p>1.1.5. There shall be programs in place to monitor the effectiveness and implementation of the food safety programs. This shall include the names and locations of</p>	<p>Delete. Redundant to 1.1.3 and scope of audit</p>				

farming operations and harvest crews.					
1.2. Food Safety Plan					
1.2.1. Each operation shall have a written food safety plan with a designated individual(s) responsible for food safety. The food safety plan shall address potential physical, chemical, and biological hazards and hazard control procedures for the following areas: water, soil amendments, field sanitation, environmental practices, and worker practices.	Review period?	There shall be a written food safety plan. The plan shall cover the operation. The operation and products covered shall be defined.	The food safety plan shall identify all locations of operation covered by the plan and shall address potential physical, chemical, and biological hazards and hazard control procedures, including monitoring, verification and recordkeeping, for the following areas: water, soil amendments, field sanitation, production environment, and worker practices.	Auditor shall observe the food safety plan and verify that the plan has considered potential biological, chemical and physical hazards and has identified preventive measures for hazards that may reasonably affect food safety.	Operation develops or completes a food safety plan for all locations of operation.
1.2.2. The plan shall include monitoring and verification procedures for all areas of the operation including but not limited to the following areas: List of components agreed by all to be part of the harmonized standard.	Delete. Redundant to 1.2.1				
1.2.3. The food safety plan shall cover all products produced, packed, sold, handled, and/or distributed by	Delete. Redundant to 1.2.1				

operation.					
1.3. Documentation & Recordkeeping					
1.3.1. Growers shall provide evidence of procedures and policies in place for meeting each of the food safety standards identified in a written Food Safety Plan. Names and contact information for individuals responsible for developing and implementing the food safety plan shall be established.		Documentation shall be kept that demonstrates the food safety plan is being followed.	Documents and records of procedures, standard operation procedures (SOPs) and policies shall be in place for meeting each of the food safety standards identified in the Food Safety Plan.	Auditor reviews food safety plan and verifies that all required documentation is available.	Operation develops missing documentation or recordkeeping procedures.
1.3.2. Documents may be maintained on-site or at an off-site location and shall be available for inspection within a reasonable time frame.		Documentation shall be readily available for inspection.	Documents and records may be maintained on-site or at an off-site location, or accessible electronically (e.g., MSDS), and shall be available for inspection in a reasonable timeframe or as required by prevailing regulation.	Auditor verifies that required documentation can be accessed in a reasonable timeframe.	Operation defines in food safety plan where and how documentation is maintained and expected retrieval time.
1.3.3. Documentation shall be maintained for a minimum period of two years, absent state or federal regulations to the contrary.		Documentation shall be retained for a minimum period of two years.	Document and record handling policy or procedures require that documentation required by the food safety plan shall be retained for a	Auditor reviews document handling procedures and verifies that required documentation is available for at least two years.	Operation revises documentation procedures.

			minimum of two years, or as required by prevailing regulation.		
1.4. SOPs and SSOPs					
1.4.1. Standard operating procedures (SOPs) shall be developed and documented, according to the food safety plan to provide specific instructions and procedures that describe a process that shall be performed.	Delete. Redundant to 1.3.1.				
1.4.2. These procedures (SOPs) also must provide a means by which employees shall be trained.	Delete. Redundant to 1.6				
1.5. Review Period					
1.5.1. The Company shall be responsible for reviewing their Food Safety Plan at least annually and documenting the review procedure.	Move to 1.2.2	The food safety plan shall be reviewed at least annually.	Operation shall be responsible for reviewing their Food Safety Plan at least annually, documenting the review procedure and revising the plan as necessary.	Auditor reviews last food safety plan review.	Operation reviews food safety plan and documents review.
1.6. Worker Education and Training					
1.6.1. All workers involved in growing operations shall receive training in food safety, sanitation, and/or personal hygiene appropriate to their assigned responsibilities		All personnel shall receive food safety training.	All personnel shall receive training in the food safety policy and plan, food safety procedures, sanitation and personal hygiene appropriate to their	Auditor reviews program of required training and examines training records for evidence of compliance.	Operation shall develop and deliver required training.

and supervisory level.			job responsibilities. Personnel shall receive training at hire and refresher training at prescribed frequencies. Documentation of training is available.		
1.6.2. [New]	PL	Personnel with food safety responsibilities shall receive training sufficient to their responsibilities.	The individual designated for food safety responsibilities demonstrates knowledge of food safety principles. Food safety designate has completed at least one formal food safety course/workshop or by job experience.	Auditor reviews the evidence of the individual's training relevant to produce food safety, such as a degree or course certificate or receipt, or attendance at a relevant food safety meeting, or company training record. If the operation passes the food safety audit, the food safety individual's training is deemed adequate.	Individual must obtain demonstrable food safety training.
1.6.3. Training material is documented and available for review. Documentation to include the name of the person delivering the training, date and individual names and signatures of attendees.	Delete. Redundant with 1.6.1				
1.6.4. Training programs shall educate workers of their responsibility in protecting food from intentional or	Delete. Redundant with 1.6.1				

unintentional microbial, chemical, and physical hazards.					
1.7. Traceability					
1.7.1. A documented traceability program shall be established.		A documented traceability program shall be established.	Records that enable reconciliation of product delivered to recipients (one step forward) shall be maintained except for direct to consumer sales. Records shall be maintained that link product with production inputs, e.g., soil amendments, seeds/transplants, agricultural chemicals (one step backward). Contents of records shall be consistent with applicable regulations.	Auditor reviews traceability program and verifies operation's ability to trace product accurately one step forward and one step back.	Operation establishes an effective traceability program.
1.7.2. Records that demonstrate recipients shall be maintained except for direct to consumer sales. (One step forward)	Delete. Included in 1.7.1				
1.7.3. Records that demonstrate product sources and associated finished packaging material shall be maintained. (One step backward).	Delete. Included in 1.7.1				
1.7.4. Contents of records	Delete.				

	shall be consistent with applicable regulations.	Included in 1.7.1				
1.7.5.	Records are retained and readily retrievable for at least two years or as required by applicable regulation.	Delete. Included in 1.3.3				
1.7.6.	A trace back and trace forward exercise shall be performed at least annually.		A trace back and trace forward exercise shall be performed at least annually.	The trace back and trace forward exercise shall achieve accurate traceability within 1 day or as required by applicable regulations.	Auditor reviews records of most recent trace exercise. If no trace exercise was performed in the past year, the operation will perform the exercise during the audit.	Operation performs exercise and/or improves traceability program to achieve accurate reconciliation.
1.7.7.	The trace back and trace forward exercise shall achieve accurate reconciliation as stated in the program and in compliance to applicable regulations.	Delete. Included in 1.7.6				
1.8.	Recall Program	PL until after post-farm gate decided				
1.8.1.	A documented recall program, including written procedures, shall be established.					
1.8.2.	The recall program shall have a designated recall team.					
1.8.3.	A mock recall exercise					

shall be performed at least annually.					
1.8.4. The mock recall shall include the trace back and trace forward exercise and shall be completed as stated in the program and in compliance to applicable regulations.					
1.9. Corrective Actions					
1.9.1. A documented Corrective Action is required for an observation or audit that contains a written non-conformance.	Glossary item: observation	The operation shall have documented corrective action procedures.	A documented Corrective Action is required for an observation or audit that contains a non-conformance with food safety requirements. The responsibility, methods, and timelines to address Corrective Actions shall be documented and implemented.	Auditor reviews corrective action procedures and examines records for evidence of compliance.	Operation develops and implements corrective actions procedures.
1.9.2. The responsibility, methods, and timelines to address Corrective Actions shall be documented and implemented.	Delete. Included in 1.9.1				
1.10. Self-audits					
1.10.1. Self-audits will be conducted at a minimum annually by an assigned individual who is knowledgeable in this	Glossary item: self-audit and	The operation shall have documented self-audit procedures.	Internal audits will be conducted at a minimum annually by an assigned individual who is knowledgeable	Auditor reviews internal audit procedures and examines records for evidence of compliance.	Operation develops and implements internal audit procedures.

<p>standard, utilizing this standard to assist in the self-audit.</p>	<p>internal audit</p>		<p>in this standard, utilizing this standard to assist in the self-audit. All aspects of the GAP program will be audited and a written record of required corrective action will be documented.</p>		
<p>1.10.2. All aspects of the GAP program will be audited and a written record of required corrective action will be documented.</p>	<p>Delete. Included in 1.10.1</p>				
<p><b>2. Field Production</b></p>					
<p>2.1.1. Management authorizes and supports a qualified/trained person, staff or department to ensure farm and/or facility compliance to Food Safety Programs, and laws and regulations that apply to the product and its production in the country of its origin.</p>	<p>Delete. Redundant to 1.1.3</p>				
<p>2.1.2. The farm and/or facility has a current and accurate organizational chart/list that shows who is responsible for ensuring compliance to</p>	<p>Delete. Redundant to 1.1.3</p>				

regulatory laws and guidelines.					
2.2. Field History and Assessment					
2.2.1. The food safety plan shall evaluate and document the risks associated with land use history and adjacent land use, including structures and equipment. When land use history or adjacent land use indicates a possibility of physical, chemical or biological contamination, preventive measures shall be performed and documented to mitigate food safety risk.		The food safety plan shall, initially and at least annually thereafter, evaluate and document the risks associated with land use history and adjacent land use, including structures and equipment.	When land use history or adjacent land use indicates a possibility of physical, chemical or biological contamination, preventive measures shall be performed and documented to mitigate food safety risk. The assessment is re-performed, and documented, at least annually for environmental conditions or risk awareness that has changed since the last assessment.	Auditor reviews food safety plan to verify that risks associated with field history and adjacent land use have been evaluated at least annually and preventive measures implemented for identified risks.	Operation evaluates and documents risks associated with land use history and adjacent land use and implements preventive measures for identified risks.
2.2.2. The assessment is re-performed, and documented, for environmental conditions that have changed since the last assessment.	Delete. Included in 2.2.1				
2.3. Worker Health/Hygiene and Toilet/Handwashing Facilities					
2.3.1. Field sanitation units shall be designed, constructed, and located in a manner that minimizes the potential		Field sanitation units shall be designed, constructed,	Toilet facilities are situated during operation and servicing, and maintained so as not	Auditor visually and by records verifies that toilet facilities are not positioned, leaking or serviced in a manner	Toilet facility is replaced, repaired or repositioned to be compliant.

	risk for product contamination and are directly accessible for servicing.		and located in a manner that minimizes the potential risk for product contamination and are directly accessible for servicing.	to pose a hazard to the produce or other opportunity for contamination.	that poses a risk of produce contamination.	
2.3.2.	Toilet facilities shall be of adequate number, easily accessible to employees and in compliance with applicable regulation.		Toilet facilities shall be of adequate number, easily accessible to employees and in compliance with applicable regulation.	The operation will have verification that the number of toilet facilities and their location relative to employees meets the more stringent of federal, state or local regulations.	Auditor verifies that the number of available toilet facilities and their location is compliant with prevailing regulation for the number of employees.	Operation obtains a sufficient number of toilet facilities to be compliant.
2.3.3.	When appropriate, racks for protective clothing used by field employees shall be provided.	Combined with 3.3.4.5	When appropriate, racks and/or storage containers or designated storage area for protective clothing and tools used by field employees shall be provided.	When field employees wear protective clothing, such as aprons and gloves, the Operation shall have a policy that the clothing not be left on product, work surfaces, equipment or packaging material but hung on apron and glove racks provided. Racks shall be available and located so as to	If field employees wear protective clothing, auditor observes whether clothing rack and tool storage containers or designated storage areas are available and used.	Operation obtains and positions racks and storage containers as necessary.

			avoid potential contamination. In addition, storage containers or designated storage areas shall be provided to ensure tools used by field employees are properly stored prior to entering toilet facilities.		
2.3.4. Toilet and wash stations shall be maintained in a clean and sanitary condition. Toilets shall be sufficiently stocked with toilet paper. Wash stations shall be located with the field sanitation units and include hand wash basins with clean, microbially potable water, hand soap, disposable towels or hand drying device, towel disposal container, and a tank that captures used hand wash water for disposal. These stations shall be provided inside or adjacent to toilet facilities.		Toilet and wash stations shall be maintained in a clean and sanitary condition.	Toilet paper shall be available in toilet facility. Wash stations shall be located with the field sanitation units and include hand wash facilities with water that meets the microbial standard for drinking water, hand soap, disposable towels or other hand drying device, towel disposal container, and a tank that captures used hand wash water for disposal. These stations shall be provided inside or adjacent to toilet facilities.	Auditor observes toilet and handwashing facilities for compliance.	Toilet or handwashing facility is replaced, repaired or maintained to be compliant.
2.3.5. Signage in applicable languages and/or pictures shall be		Signage requiring handwashing	Signage in applicable languages and/or pictures shall be	Auditor verifies that signage is present adjacent to all hand	Operation obtains and posts signage to be compliant.

	provided adjacent to hand wash basins requiring people to wash their hands after each toilet visit.		is posted.	provided adjacent to hand wash facilities requiring people to wash their hands after each toilet visit.	wash facilities and is in appropriate language or pictures to clearly communicate requirements to all employees.	
2.3.6.	Employees and visitors shall follow all personal hygiene practices as designated by the company.	Better word for disposition?	Employees and visitors shall follow all personal hygiene practices as designated by the operation.	Operation's hygiene policies shall apply to all employees, contractors, visitors, buyers, product inspectors, auditors, and other personnel in the field. The operation shall designate competent supervisory personnel to ensure compliance by all workers, visitors, and field personnel with the requirements in this section.	Auditor observes personnel in field for evidence of compliance.	Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
2.3.7.	Each grower shall establish their own written policies for their specific operations, which shall be in compliance with appropriate regulations for Worker Health and Hygiene Practices. These policies shall cover the following:	Originally 3.3.1; Glossary item: "health"	Each operation shall establish written policies for their specific operations, which shall be in compliance with prevailing regulations for Worker	Operation shall have a policy for toilet, hygiene, and health.	Auditor ensures that policies for toilet, hygiene and health exist.	Operation develops written policies covering toilets, hygiene and health.

		Health and Hygiene Practices.			
2.3.8.	Personnel with exposed cuts, sores or lesions shall not be engaged in handling product. Minor cuts or abrasions on exposed parts of the body shall be covered.	Personnel with exposed cuts, sores or lesions shall not be engaged in handling product.	Minor cuts or abrasions on exposed parts of the body are acceptable if covered with a non-permeable covering, bandage or glove. Bandages on hands shall be covered with gloves in compliance with operation's glove policy.	Auditor observes personnel in field for evidence of compliance.	Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
2.3.9.	Smoking, chewing, eating, drinking (other than water) or spitting is not permitted in any growing areas including on field preharvest equipment.	Smoking, chewing, eating, drinking (other than water), urinating, defecating or spitting is not permitted in any growing	Operation shall have policy prohibiting smoking, eating, chewing gum or tobacco, drinking other than water except in designated areas. Such areas shall be designated so as not to provide a source of contamination.	Auditor observes personnel in field for evidence of compliance.	Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

		areas.	Operation shall have policy prohibiting urinating or defecating in any growing area		
2.3.10. Personnel shall wash their hands after each visit to a toilet, after using a handkerchief/tissue, after handling dirty or contaminated material, after smoking, eating or drinking and at any other time when their hands may have become a source of contamination.		Personnel shall wash their hands before beginning or returning to work, after each visit to the toilet and whenever their hands may have become a source of contamination .	Personnel shall wash their hands prior to start of work, after each visit to a toilet, after using a handkerchief/tissue, after handling contaminated material, after smoking, eating or drinking, after breaks and prior to returning to work and at any other time when their hands may have become a source of contamination.	Auditor observes personnel in field for evidence of compliance.	Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
2.3.11. If rubber or disposable gloves are used, they shall be used as stated in the company food safety plan.		If gloves are used, the operation shall have a glove use policy.	If rubber, disposable, cloth or other gloves are used in contact with product, the operation shall have a glove use policy that specifies how and when gloves are to be used, cleaned, replaced and stored. Policy shall be in compliance with current industry practices or regulatory requirements for that commodity.	If gloves are used, auditor observes glove use for compliance with the operation's policy and current industry practices or regulatory requirements.	Operation develops or revises glove policy. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

<p>2.3.12. Protective clothing shall be effectively maintained, stored, laundered and worn so as to protect product from risk of contamination.</p>	<p>Glossary item: "protective clothing"</p>	<p>Protective clothing, when required, shall be maintained, stored, laundered and worn so as to protect product from risk of contamination.</p>	<p>If protective clothing is used in proximity to product, the operation shall have a policy or procedures for how and when protective clothing are to be used, cleaned, replaced and stored. Policy shall be in compliance with current industry practices or regulatory requirements for that commodity.</p>	<p>If protective clothing is used, auditor observes use for compliance with the operation's policy and current industry practices or regulatory requirements.</p>	<p>Operation develops or revises protective clothing policy or procedures. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.</p>
<p>2.3.13. The wearing of jewelry and other loose objects shall be in compliance to company policy and applicable regulation.</p>		<p>The wearing of jewelry, body piercings and other loose objects (e.g. false nails) shall be in compliance to company policy and applicable regulation.</p>	<p>Operation shall have a policy to minimize risk for jewelry or loose objects to be a source of product contamination. Policy shall be in compliance with current industry practices or regulatory requirements for that commodity.</p>	<p>Auditor observes personnel in field for evidence of compliance.</p>	<p>Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.</p>
<p>2.3.14. Provision shall be made to store employees' personal belongings away from crops and field equipment.</p>		<p>Employees' personal belongings shall be stored in designated areas.</p>	<p>Operation shall have a policy for when and how employee's personal belongings shall be stored so as not to be a source of product contamination.</p>	<p>Auditor observes personnel in field for evidence of compliance.</p>	<p>Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.</p>
<p>2.3.15. Areas for meal breaks</p>		<p>Break areas</p>	<p>Operation shall have a</p>	<p>Auditor observes break</p>	<p>Retraining is</p>

		shall be designated and located away from food contact/handling zones and field equipment.	shall be designated and located away from food contact/handling zones and field equipment.	written policy that break areas are located so as not to be a source of product contamination.	areas for evidence of compliance with operation policy.	performed and documented. Affected product is evaluated for potential contamination and disposition.
2.3.16.		Potable drinking water shall be available to all field employees. Drinking water stations shall be easily accessible to employees and in compliance with the company's Food Safety Plan and applicable regulation.	Drinking water shall be available to all field employees.	Drinking water, which meets drinking water standards, shall be easily accessible to field personnel and in compliance with applicable regulation. Potable drinking water stations with single-use cups and a trash receptacle shall be available to all field employees.	Auditor observes evidence of drinking water accessibility and operation's evidence that water supplied to personnel meets drinking water standards.	Operation makes drinking water available to field employees, in compliance with prevailing regulation.
2.3.17.		First aid kits shall be present at all permanent sites and in the vicinity of field work. The kits shall be maintained in accordance with local and national standards and/or recommendations.	First aid kits shall be accessible to all personnel.	The kits shall be readily available in the vicinity of field work and maintained in accordance with prevailing regulation. The kit materials shall be kept in a sanitary and usable condition.	Auditor observes that provisions exist for first aid kit to be readily available in vicinity of field work and is stocked in accordance with prevailing regulation.	Operation obtains and stocks a first aid kit and ensures it is readily accessible near field personnel.
2.3.18.	Is this sufficient restriction	Workers and field personnel who show signs of illness (e.g., vomiting, jaundice,	Workers and field personnel who show	Operation shall have a policy that restricts personnel who show signs of illness (e.g.,	Auditor reviews policy and observes field personnel for evidence of compliance.	Operation develops and implements policy. Retraining is performed and

diarrhea) shall be restricted from direct contact with produce or food-contact surfaces.	on to prevent risk of contamination?	signs of illness shall be restricted from direct contact with produce or food-contact surfaces.	vomiting, jaundice, diarrhea) from contact with product or food contact surfaces.		documented. Affected product is evaluated for potential contamination and disposition.
2.3.19. Workers shall receive health and safety training as specified in the company's food safety plan. (Note: This may already be covered under worker training)	Delete. Redundant to 1.6.1				
2.3.20. There shall be a written policy specifying the procedures for the handling/ disposition of food or product contact surfaces that have been in contact with blood or other bodily fluids.		Blood or other bodily fluids shall not contact food or product contact surfaces.	There shall be a written policy specifying the procedures for the handling/ disposition of food or product contact surfaces that have been in contact with blood or other bodily fluids.	Auditor reviews policy and observes operation for evidence of compliance.	Operation develops and implements policy. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
2.4. Agricultural Chemicals /Plant Protection Products					
2.4.1. DEFINITION: Ag chemicals include: pesticides and other IPM chemicals, plant protection products, and other hazardous chemicals or compounds used in crop production.	delete				

<p>2.4.2. REGULATION: Ag Chemicals and their use must comply with all requirements of national (e.g., SARAPA, Environment Canada, EPA) registration and any federal, provincial, ciudad, state or local regulations.</p>	<p>Delete. Included in 2.4.3</p>				
<p>2.4.3. LABELING AND USE: Ag Chemicals must be appropriately registered for such use and must be used in accordance with label directions including application rates, worker protection standards, personal protection equipment, container disposal, storage, and all requirements specified for the chemical or compound.</p>		<p>Use of agricultural chemicals shall comply with label directions and prevailing regulation.</p>	<p>Agricultural chemicals must be registered for such use as required by prevailing regulation, and used in accordance with label directions including application rates, worker protection standards, personal protection equipment, container disposal, storage, and all requirements specified for the chemical or compound. Records of agricultural use are maintained.</p>	<p>Auditor reviews agricultural chemical use records for evidence of compliance with approved uses or label directions.</p>	<p>Operation develops and maintains agricultural chemical use records and maintains evidence of proper use of each chemical use. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.</p>
<p>2.4.4. DOCUMENTATION: Ag Chemical uses shall be documented and this documentation shall meet applicable regulatory requirements</p>	<p>Delete. Included in 2.4.3</p>				
<p>2.4.5. Procedures shall be in place to demonstrate</p>		<p>If product is intended for</p>	<p>The operation shall have procedures, such</p>	<p>Auditor reviews operation's procedure</p>	<p>Operation develops procedures, and</p>

	that the product use meets the standard of the country of production and of the countries in which the product is intended to be traded (documentation and MRLs).		export, agricultural chemical use shall consider requirements in the intended country of destination.	as pre-harvest interval and application rate, sufficient to meet the entry requirements of the country(ies) in which the product is intended to be traded, if known during production.	for complying with agricultural chemical restrictions in countries of destination. If the country of destination is unknown during production, this item is not applicable.	diverts non-compliant product to a market in which the product meets standards.
2.4.6.	TRAINING: Ag Chemicals shall be applied by trained, licensed or certified pesticide personnel, as required by regulation.		Agricultural chemicals shall be applied by trained, licensed or certified application personnel, as required by prevailing regulation.	Operation maintains records demonstrating that all personnel responsible for chemical applications are trained and/or licensed in compliance with prevailing regulation.	Auditor reviews records demonstrating that application personnel are licensed and/or trained in compliance with prevailing regulation.	Operation utilizes application personnel who are appropriately licensed and/or trained.
2.4.7.	[New]		Agricultural chemical disposal shall not be a source of product or field contamination	Operation shall have procedures for disposal of waste agricultural chemicals and for cleaning of application equipment that protects against contamination of product and growing areas.	Auditor reviews procedures and observes chemical handling records for evidence of compliance.	Operation develops and implements procedures. Steps are taken to mitigate any contamination events.
2.4.8.	CORRECTIVE ACTION: There shall be a standard operating procedure or instructions on what	Delete. Covered in 1.8 and 2.4.3				

	measures should be taken in the case of product contamination by ag chemicals.					
2.5.	Seed/Transplant/Grafting					
2.5.1.	The records of traceability for Seed/Transplant/Grafting of crops must be maintained.	Delete. Redundant to 1.7.1				
2.5.2.	Planting trials and plantings must comply with all applicable legislation (e.g. GMO's, pesticides) in the country of production.	Delete. Not a food safety issue				
2.6.	Agricultural Water					
2.6.1.	Water System Description					
2.6.1.1.	A water system description shall be prepared.		A water system description shall be prepared.	Water sources and the production blocks they may serve shall be documented and current. The description shall include one or more of the following: maps, photographs, drawings (hand drawings are acceptable) or other means to communicate the location of water source(s), permanent fixtures and the flow of the water system	Auditor reviews water system description or map, and verifies accuracy during field inspection.	Operation develops or corrects the water system description or map.

			(including holding systems, reservoirs or any water captured for re-use). Permanent fixtures include wells, gates, reservoirs, valves, returns and other above ground features that make up a complete irrigation system shall be documented in such a manner as to enable location in the field.		
2.6.1.2. Water sources and the production blocks they may serve shall be documented.	Delete. Covered in 2.6.1.1				
2.6.1.3. The description shall include one or more of the following: maps, photographs, drawings (hand drawings are acceptable) or other means to communicate the location of water source(s), permanent fixtures and the flow of the	Delete. Covered in 2.6.1.1				

<p>water system (including holding systems, reservoirs or any water captured for re-use).</p>					
<p>2.6.1.4. Permanent fixtures include wells, gates, reservoirs, valves, returns and other above ground features that make up a complete irrigation system shall be documented in such a manner as to enable location in the field.</p>	<p>Delete. Covered in 2.6.1.1</p>				
<p>2.6.1.5. All local, state and federal regulations concerning water source shall be observed.</p>	<p>PL</p>				
<p>2.6.1.6. Water systems intended to convey untreated human or</p>		<p>Agricultural water systems shall not be cross-connected</p>	<p>Water systems intended to convey untreated human or animal waste shall be separated from</p>	<p>Auditor reviews water system for cross-connections with human or animal waste conveyances.</p>	<p>Operation discontinues use of the system until they are separated.</p>

<p>animal waste shall be separated from conveyances utilized to deliver agricultural water.</p>		<p>with human or animal waste systems.</p>	<p>conveyances utilized to deliver agricultural water.</p>		
<p>2.6.2. Water System Risk Assessment</p>					
<p>2.6.2.1. An initial risk assessment shall be performed that takes into consideration the historical testing results of the water source, the characteristics of the crop, the stage of the crop, and the method of application.</p>		<p>An initial risk assessment shall be performed and documented that takes into consideration the historical testing results of the water source, the characteristics of the crop, the stage of the crop, and the method of application.</p>	<p>A review or new assessment shall be conducted seasonally and any time there is a change made to the system or a situation occurs that could introduce an opportunity to contaminate the system. The risk assessment shall address potential physical, chemical, and biological hazards and hazard control procedures for the water distribution system.</p>	<p>Auditor reviews the risk assessment for completeness of consideration of potential hazards.</p>	<p>Operation develops or updates the risk assessment.</p>
<p>2.6.2.2. A review or new assessment shall be conducted seasonally and any time there is a change</p>	<p>Delete. Covered in 2.6.2.1</p>				

<p>made to the system or a situation occurs that could introduce an opportunity to contaminate the system.</p>					
<p>2.6.2.3. The risk assessment shall address potential physical, chemical, and biological hazards and hazard control procedures for the water distribution system.</p>	<p>Delete. Covered in 2.6.2.1</p>				
<p>2.6.2.4. The risk assessment shall be used to develop a water management plan. In the event that the assessment identifies hazards or conditions likely to result in contamination, actions shall be taken to correct</p>	<p>Delete. Covered in 2.6.2.1</p>				

these conditions.					
2.6.2.5. Corrective actions will be documented.	Delete. Covered in 2.6.2.1				
2.6.3. Water Management Plan					
2.6.3.1. There shall be a water management plan to identify and mitigate risks associated with the water system on an ongoing basis.		There shall be a water management plan to mitigate risks associated with the water system on an ongoing basis.	The water management plan shall include the following: preventive controls, monitoring and verification procedures, corrective actions, and documentation.	Auditor reviews the water management plan for accuracy and completeness relative to the risk assessment.	Operation develops or updates the water management plan.
2.6.3.2. The water management plan shall include the following: preventive controls, monitoring and verification procedures, corrective actions, and documentation.	Delete. Covered in 2.6.3.1				
2.6.3.3. Water testing shall be part of the water management plan.		Water testing shall be part of the water management plan.	There shall be an SOP for water testing during the production and harvest season, which includes	Auditor verifies that a water testing program is included in the water management plan and is in compliance with the	Operation develops a testing program consistent with risks identified in the risk assessment and with

			frequency of sampling, who is taking the samples, where sample is taken, how the sample is collected, type of test and acceptance criteria. The frequency of testing and point of water sampling shall be determined based on the risk assessment and current industry standards for commodities being produced.	risk assessment and current industry standards.	current industry standards for the commodities being produced.
2.6.3.4. As part of the monitoring and verification procedures for crops using water in the production of the crop, there shall be an SOP for ongoing water testing during the production and harvest season, which includes frequency of sampling, who is taking the samples, where sample is taken,	Delete. Covered in 2.6.3.3				

<p>how the sample is collected, type of test and criteria.</p>					
<p>2.6.3.5. The frequency of testing and point of water sampling shall be determined based on the water source, its particular history, and the outcome of the risk assessment.</p>	<p>Delete. Covered in 2.6.3.3</p>				
<p>2.6.3.6. The monitoring and verification schedule shall be decided by the risk assessment, best practices within country of production, or applicable legislation.</p>	<p>Delete. Covered in 2.6.3.3</p>				
<p>2.6.3.7. As part of the water system plan, the water shall be tested prior to initial use. For water already in use, water sampling shall be conducted and</p>	<p>Delete. Covered in 2.6.3.3</p>				

<p>a testing regime shall be established and in place. Water sampling should be done to establish the baseline for identifying control limits and action levels. If prior test results are available, they can be used to establish the baseline. If previous test results are not available, a testing regime shall be implemented to establish the baseline.</p>					
<p>2.6.3.8. The testing regime shall be consistent with the water testing SOP. Subsequent tests may be necessary depending on the crop characteristics.</p>		<p>The testing program shall be consistent with the water management plan.</p>	<p>Testing shall be performed and documented according to procedures described in the water management plan.</p>	<p>Auditor reviews testing records for compliance with the written plan.</p>	<p>Operation shall revise testing to be in compliance with the written plan. The corrective actions noted in the water management plan shall be followed until the conditions have been mitigated and the non-</p>

<p>For example, a crop that will undergo repeat foliar applications within its crop cycle would require additional samples to establish sufficient data.</p>					<p>conformity has been resolved.</p>
<p>2.6.3.9. Testing shall be performed and documented using established food safety risk criteria. The criteria shall be based on the results of the risk assessment or as defined in existing commodity specific guidance. When monitoring shows that the water meets the criteria for the intended use, then water from the source may</p>	<p>Delete. Covered in 2.6.3.8</p>				

<p>be used. When monitoring shows that water does not meet established criteria or standards, the corrective actions noted in the water management plan shall be followed until the conditions have been mitigated and the non-conformity has been resolved.</p>					
<p>2.7. Equipment, Tools (Sanitation)</p>					
<p>2.7.1. Identify any field operations that may pose a food safety risk.</p>	<p>Delete. Covered in 2.7.3</p>				
<p>2.7.2. Develop appropriate means for cleaning and sanitation to minimize the possible transfer of contaminants directly from the equipment that may directly contact product.</p>	<p>Delete. Covered in 2.7.3</p>				
<p>2.7.3. Harvesting equipment and/or machinery which comes into contact with</p>	<p>Moved to 2.10.3</p>	<p>Production or harvesting equipment,</p>	<p>Operation utilizes appropriate means for repair, cleaning and</p>	<p>Auditor observes production and harvest equipment which may</p>	<p>Operation paints its tractor to buyer specs</p>

<p>product is in good repair, and poses no food safety risk.</p>		<p>machinery, tools and/or utensils which come into contact with product is in good repair, and poses no food safety risk.</p>	<p>sanitation to minimize the possible transfer of contaminants from equipment or tools to product and maintains records of implementation.</p>	<p>come into contact with produce for evidence of food safety risks, and records for maintenance, cleaning and sanitation.</p>	
<p>2.8. Animal Control</p>	<p>Animals happen</p>				
<p>2.8.1. There shall be a seasonal written assessment of the growing fields and adjacent land focusing on domestic and wild animal activity including grazing, noting crop characteristics, type and number of animals, proximity to the growing field, water sources, and other relevant factors.</p>		<p>The operation has a written risk assessment on animal activity in and around the production area.</p>	<p>There shall be a written assessment of the growing fields and adjacent land, prior to each growing season, focusing on domestic and wild animal activity including grazing and feeding operations, noting crop characteristics, type and approximate number of animals, proximity to the growing field, water sources, and other relevant factors.</p>	<p>Auditor reviews the written assessment to ensure it has been performed for this season and is complete.</p>	<p>Operation performs and documents the assessment.</p>
<p>2.8.2. There shall be scheduled monitoring of growing fields and adjacent land for evidence of animal activity and appropriate actions shall be taken to</p>	<p>Corrective actions addressed in 2.8.4</p>	<p>The operation routinely monitors for animal activity in and around the growing area during</p>	<p>There shall be scheduled monitoring of growing fields and adjacent land for evidence of animal activity. A frequency of monitoring and</p>	<p>Auditor reviews monitoring records to ensure the frequency of monitoring is consistent with the schedule.</p>	<p>Operation develops and implements a monitoring schedule.</p>

	<p>prevent or minimize the potential for contamination of produce with pathogens from animal feces. There shall be a written procedure for monitoring and a written record of any mitigation or corrective actions.</p>		<p>the growing season.</p>	<p>assessment shall be established based on production factors, which include but are not limited to the crop, geography, and other conditions.</p>		
2.8.3.	<p>A frequency of monitoring and assessment shall be established based on production factors, which include but are not limited to the crop, geography, and other conditions.</p>	<p>Delete. Included in 2.8.2</p>				
2.8.4.	<p>Based on the assessment, there shall be measures to exclude domestic animals from growing fields, packinghouses, and all storage areas. Whenever domestic animals are used in farming operations, measures shall be put in place to prevent or minimize the potential for contamination of produce with pathogens from animal urine and</p>		<p>Based on the assessment, there shall be measures to exclude domestic animals and wild animals, to the extent practical, from growing fields, packinghouses, and all storage areas.</p>	<p>The operation shall have risk-appropriate actions to prevent or minimize the potential for contamination of produce with pathogens from animal feces, including from domestic animals used in farming operations. There shall be a written record of any mitigation or corrective actions. Preventive measures and corrective actions</p>	<p>Auditor reviews preventive measures and corrective action plans.</p>	<p>Operation develops and implements risk-appropriate corrective actions for animal intrusions reasonably likely to contaminate produce in the field.</p>

feces.			shall comply with all local, state and federal regulations concerning animal control and natural resource conservation.		
2.8.5. All local, state and federal regulations concerning animal control shall be observed.	Delete. Included in 2.8.4				
2.9. Soil Amendments					
2.9.1. Soil amendments, such as properly treated manure or biosolids, can be an effective and safe fertilizer. Untreated, improperly treated, or recontaminated manure or biosolids may contain pathogens of public health significance that can contaminate produce.	Delete. Not a food safety standard				
2.9.2. The food safety plan shall address soil amendment risk, preparation, use, and storage. Soil amendment preparation and use shall be based on scientific principles that reduce risk of contamination by potentially harmful microorganisms, and in	Check whether anyone accepts biosolids. Glossary item: biosolids	The food safety plan shall address soil amendment risk, preparation, use, and storage.	If animal-based soil amendments or biosolids are used, records of composition, dates of treatment, methods utilized and application dates must be documented. Evidence of processing adequate to eliminate pathogens of human concern,	Auditor reviews soil amendment records for completeness and evidence of compliance with prevailing regulations. If biosolids are used, it shall be noted.	Operation discontinues use of untreated, partially treated or undocumented animal-based soil amendments or biosolids. Operation develops and implements policies to obtain treatment information for all

<p>accordance with applicable federal, state, or local regulations.</p>			<p>such as letter of guarantee, certificate of analysis (COA) or any test results or verification data (e.g., time and temperature) demonstrating compliance with process or microbial standards, shall be documented. Such soil amendments must be produced and applied in accordance with applicable federal, state, or local regulations.</p>		<p>animal-based soil amendments.</p>
<p>2.9.3. If treated soil amendments are used, records of composition, dates of treatment, methods utilized, application dates and letter of guarantee, certificate of analysis (COA) or any test results or verification data demonstrating compliance with process or microbial standards must be documented.</p>	<p>Delete. Included in 2.9.2</p>				
<p>2.9.4. If a soil amendment containing raw or incompletely treated manure is used, it shall be used in a manner so</p>		<p>If a soil amendment containing raw or incompletely</p>	<p>If such a product is used, there shall be documentation of the composition, and time and method of</p>	<p>Auditor reviews records for any soil amendment use that may contain raw or incompletely treated manure.</p>	<p>Operation discontinues use, or develops and implements policies to safely use animal-</p>

<p>as not to serve as a source of contamination of produce. If such a product is used, there shall be documentation of the composition, and time and method of application.</p>		<p>treated manure is used, it shall be used in a manner so as not to serve as a source of contamination of produce.</p>	<p>application.</p>		<p>based soil amendments that may contain raw or incompletely treated manure. Produce grown without such controls are either diverted to thermal-processed products or destroyed.</p>
<p>2.10. Vehicles, Equipment, Tools and Utensils</p>					
<p>2.10.1. Identify equipment/vehicles used in farming operations that may pose a risk for cross-contamination.</p>		<p>Equipment, vehicles, tools utensils and other items or materials used in farming operations that may contact produce are identified.</p>	<p>Operation maintains a list of equipment, vehicles, tools, utensils and other items or materials that may pose a risk of produce contamination during normal use.</p>	<p>Auditor reviews the list for completeness.</p>	<p>Operation develops a list of equipment, vehicles, tools and utensils that may pose a risk of produce contamination during normal use.</p>
<p>2.10.2. A program shall be developed and documented with appropriate means of reducing and controlling the risks of possible transfer of physical, chemical or biological contaminants to growing area, agricultural water sources, and product as identified in the food</p>	<p>Delete. Included in 2.10.3</p>				

safety plan.					
2.10.3. Harvesting equipment and/or machinery which comes into contact with product is in good repair, and poses no food safety risk.	Coordinate with 3.6	Equipment, vehicles, tools and utensils used in farming operations which come into contact with product are in good repair, and pose no food safety risk.	The operation shall develop, implement, and schedule cleaning, sanitizing, storage and handling procedures of all food contact surfaces to reduce and control the potential for contamination. As necessary for food safety, vehicles and equipment shall be properly calibrated, operated, maintained, and used as intended. Equipment traffic flow is prevented from traveling through an untreated manure area into the harvesting field. These procedures shall be documented. Product contact tools, utensils and equipment shall be made of materials that can be cleaned and sanitized. Procedures include equipment and vehicles that are in the field infrequently. Operation shall have a written procedure to address the spills and leaks (fuel, oil,	Auditor observes production and harvest vehicles, equipment, tools and utensils which may come into contact with produce for evidence of food safety risks. Auditor reviews maintenance, cleaning and sanitation records that demonstrate compliance with procedures.	Operation develops maintenance, cleaning and sanitation procedures for equipment, vehicles, tools and utensils that may pose a risk for produce contamination.

			hydraulic fluids) which might occur during equipment operation in the field. Light bulbs and glass on harvesting equipment and in growing area shall be protected so as not to contaminate produce or fields in the case of breakage. Inspection shall be documented. Operation shall have written procedure to exclude foreign objects (glass, plastic, metal or other debris) from the harvesting equipment.		
2.10.4. Equipment cleaning and sanitizing operations shall be conducted away from the product and other equipment to reduce the potential for contamination.		Cleaning and sanitizing procedures do not pose a risk of product contamination .	Equipment cleaning and sanitizing operations shall be conducted away from the product and other equipment to reduce the potential for contamination.	Auditor reviews cleaning and sanitizing procedures for steps to prevent contamination of produce, and observes operation's evidence of compliance.	Operation develops and implements procedures. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
2.10.5. There shall be a written procedure for cleaning tanks on sprayer trucks used for dust control.		Water tanks are cleaned at a sufficient frequency so as not to be a source of contamination	There shall be a written procedure for cleaning water tanks, such as those used for dust control, the water from which may contact produce in the	Auditor reviews water tank cleaning procedures for steps to prevent contamination of produce, and observes operation's evidence of compliance.	Operation develops and implements procedures. Retraining is performed and documented. Affected product is

		.	field.		evaluated for potential contamination and disposition.
2.11. Microbiological Sampling/Testing	Move to section 1				
2.11.1. Where microbiological analysis is required in the food safety plan, testing shall be performed by a certified laboratory using official methods.		Where microbiological analysis is required in the food safety plan, testing shall be performed by a GLP laboratory using validated methods.	Operation utilizes laboratories that have, at minimum, passed a Good Laboratory Practices (GLP) audit or participates in a Proficiency Testing program, and utilizes BAM, AOAC International or testing methods that have been validated for detecting or quantifying the target organism(s).	Auditor reviews Operation's evidence that only GLP laboratories and validated methods are used.	Operation discontinues using non-GLP laboratory and non-validated testing methods.
2.11.2. Where tests are required, samples shall be in accordance with the established lab sampling SOP.		Where microbiological analysis is required in the food safety plan, samples shall be in accordance with an established sampling procedure.	Operation utilizes a written sampling protocol when collecting samples for microbiological testing.	Auditor observes that the Operation has a sampling protocol for each type of microbiological testing required in the Operation's food safety plan.	Operation develops or obtains written sampling protocols for each type of microbiological testing required in their food safety plan.
2.11.3. Tests and their results		Tests, their	All results for	Auditor reviews	Operation maintains

must be documented.		results and actions taken must be documented.	microbiological testing required in the Operation's food safety plan shall be recorded and the records maintained for two years.	Operation's recordkeeping of microbiological test results.	for at least two years test records for all required microbiological tests.
2.11.4. [New]		All required testing shall include test procedures and actions to be taken based on the results.	For all microbiological testing required by the food safety plan, Operation has a written testing procedure that includes test frequency, sampling, test procedures, responsibilities and actions to be taken based on results. Operation's procedures require finished product that is tested for pathogens or other adulterants to be held until product safety is confirmed by the test results.	Auditor reviews the Operation's microbiological testing procedures for completeness.	A positive always trumps a negative.
<b>3. Harvesting</b>					
3.1. Management Responsibility	Delete. Redundant with 1.1				
3.1.1. A policy statement shall outline a commitment to food safety and define the methods					

<p>used to comply with and continually improve the food safety management system. The Policy Statement shall be signed by Senior Management and communicated in language understood by all employees.</p>					
<p>3.1.2. There shall be a policy that establishes consequences for employees who violate established food safety policies or procedures.</p>					
<p>3.1.3. Management shall designate a qualified individual who has the responsibility and authority for food safety and provides adequate resources for management of the food safety plan, including a provision for the absence of key personnel. Twenty-four hour contact information shall be available for these individuals in case of food safety emergencies.</p>					
<p>3.1.4. There shall be a description of the</p>					

<p>organization that identifies the job functions, responsibilities, and reporting relationships related to food safety. This shall be communicated within the organization.</p>					
<p>3.1.5. There shall be programs in place to monitor the effectiveness and implementation of the food safety programs. This shall include the names and locations of farming operations and harvest crews.</p>					
<p>3.2. Preharvest Assessment</p>					
<p>3.2.1. Prior to harvest, the production environment shall be evaluated for changes in conditions that may be reasonably likely to result in physical, chemical, or biological contamination of the produce. Results of the evaluation shall be documented.</p>	<p>Glossary item: preharvest</p>	<p>A preharvest risk assessment shall be performed.</p>	<p>The Operation shall have a preharvest assessment procedure, which describes when the assessment is performed and that it includes an evaluation of conditions that may be reasonably likely to result in physical, chemical, or biological contamination of the produce, and demonstrates that the operation is in compliance with the food safety plan.</p>	<p>Auditor reviews most recent preharvest assessment for completeness and consistency with the food safety plan.</p>	<p>Operation develops and implements a preharvest assessment procedure.</p>

			Results of the evaluation shall be documented.		
3.3. Worker health/hygiene and Toilet/Handwashing Facilities					
3.3.1. The responsible party shall ensure that visitors, including buyers, product inspectors, and auditors, comply with all established Worker Health and Hygiene Practices.	Delete. Included in 2.3.7				
3.3.2. The responsible party shall designate competent supervisory personnel to ensure compliance by all workers, visitors, and field personnel with the requirements in this section.	Delete. Included in 2.3.6				
3.3.3. Each grower shall establish their own written policies for their specific operations, which shall be in compliance with appropriate regulations for Worker Health and Hygiene Practices. These policies shall cover the following:	Not an audit item				

3.3.4. Toilet					
3.3.4.1. Field sanitation units shall be designed, constructed, and located in a manner that minimizes the potential risk for product contamination and are directly accessible for servicing.	Delete. Included in 2.3.1				
3.3.4.2. Toilet facilities shall be of adequate number, easily accessible to employees and be in compliance with applicable regulation.	Delete. Included in 2.3.2				
3.3.4.3. Toilet and wash stations shall be maintained in a clean and sanitary condition. Toilets shall be sufficiently stocked with toilet paper. Wash stations shall be located	Delete. Included in 2.3.4				

<p>with the field sanitation units and include hand wash basins with clean, microbially potable water, hand soap, disposable single use towels or hand drying device, towel disposal container, and a tank that captures used hand wash water for disposal. These stations shall be provided inside or adjacent to toilet facilities.</p>					
<p>3.3.4.4. Signage in applicable languages and/or pictures shall be provided adjacent to hand wash basins requiring people to wash their hands after each toilet</p>	<p>Delete. Included in 2.3.5</p>				

visit.					
3.3.4.5. When appropriate, racks and storage containers for protective clothing and tools used by field employees shall be provided to ensure employees remove and properly store prior to entering toilet facilities.	Delete. Included in 2.3.3				
3.3.5. Hygiene					
3.3.5.1. Employees and visitors shall follow all personal hygiene practices as designated by the company.	Delete. Included in 2.3.6				
3.3.5.2. Personnel with exposed cuts, sores or lesions shall not be engaged in handling product. Minor cuts or abrasions on	Delete. Included in 2.3.8				

<p>exposed parts of the body shall be covered with a bandage and clean gloves.</p>					
<p>3.3.5.3. Eating, drinking (other than water), chewing gum and using tobacco shall be prohibited except in clearly designated areas separate from production and harvest fields including field harvest equipment.</p>	<p>Delete. Included in 2.3.9</p>				
<p>3.3.5.4. Urinating, defecating or spitting in the field is prohibited.</p>	<p>Delete. Included in 2.3.9</p>				
<p>3.3.5.5. Workers shall be required to wash their hands properly before starting work, after using the toilet, after each break, and at any other time when their hands may have</p>	<p>Delete. Included in 2.3.10</p>				

become a source of contamination. Hand sanitizers shall not be used as a substitute for hand washing.					
3.3.5.6. If rubber or disposable gloves are used, they shall be used as stated in the company food safety plan.	Delete. Included in 2.3.11				
3.3.5.7. Clothing, including footwear, shall be effectively maintained, stored, laundered and worn so as to protect product from risk of contamination.	Move to 2.3	Clothing, including footwear, shall be effectively maintained and worn so as to protect product from risk of contamination .	Operation shall have a policy that employee clothing shall be clean and appropriate for the operation.	Auditor reviews policy and observes compliance with operation's policy.	Operation develops or revises clothing policy. Retraining is performed and documented.
3.3.5.8. Aprons and gloves shall not be left on product, work surfaces, equipment or packaging material but	Delete. Included in 2.3.3				

hung on apron and glove racks provided.					
3.3.5.9. The use of hair coverings (e.g., hair nets, beard nets, caps) shall be in compliance to company policy and applicable regulation.	Move to 2.3	The use of hair coverings shall be in compliance to company policy and applicable regulation.	The Operation shall have a policy that addresses use of hair coverings (e.g., hair nets, beard nets, caps), which is in compliance with prevailing regulation.	Auditor reviews the Operation's policy and observes employees for compliance.	Operation develops policy. Retraining is performed.
3.3.5.10. The wearing of jewelry, body piercings and jewelry, and other loose objects (i.e. false nails) shall be in compliance to company policy and applicable regulation.	Delete. Included in 2.3.13				
3.3.5.11. A designated area shall be identified to store employees' personal belongings away from crops and field equipment.	Delete. Included in 2.3.14				
3.3.5.12. Areas for meal breaks shall be	Delete. Included in 2.3.15				

	designated and located away from food contact/handling zones and field equipment.					
3.3.6.	Health					
	3.3.6.1. Potable drinking water stations with single-use cups and a trash receptacle shall be available to all field employees. Drinking water stations shall be easily accessible to employees and in compliance with the company policy and applicable regulation.	Delete. Included in 2.3.16				
	3.3.6.2. First aid kits shall be present at all permanent and working sites and readily available during harvest work. The kit materials shall be kept in a sanitary and	Delete. Included in 2.3.17				

	usable condition. The kits shall be maintained in accordance with local and national standards.					
	3.3.6.3. Workers, field personnel, and visitors who show signs of illness (e.g., vomiting, jaundice, diarrhea) shall be restricted from contact with produce, equipment, or food-contact surfaces.	Delete. Included in 2.3.18				
3.4. Water/Ice						
	3.4.1. If water or ice directly contacts the harvested crop or is used on food-contact surfaces, the water or ice when applied meets the microbial standards for drinking water according to standard of the country of production and of the countries in which the product is intended to		Water use SOPs address the microbial quality of water or ice that directly contacts the harvested crop or is used on food-contact surfaces.	If water or ice directly contacts the harvested crop or is used on food-contact surfaces, operation's water use SOP requires that water or ice when applied meets the microbial standards for drinking water, as defined by prevailing regulation. Water may be treated (e.g., with	Auditor reviews operation's policy regarding water quality and its transport, and observes evidence that water or ice that contacts harvested crop or food contact surfaces meets the microbial standards for drinking water.	Operation discontinues using water or ice that does not meet the microbial standards of drinking water. Retraining is performed and documented. Affected product is evaluated for potential contamination and

<p>be traded. Ice shall be manufactured, transported, and stored under sanitary conditions. Special considerations or variances may be appropriate for some crops, such as cranberries and watercress, where deliberate flooding of the field is part of production and harvest practices.</p>			<p>chlorine) to achieve the microbial standards or to prevent cross-contamination. Ice and water shall be sourced/manufactured , transported, and stored under sanitary conditions. Special considerations or variances may be appropriate for some crops, e.g. cranberries and watercress, where deliberate flooding of the field is part of production and harvest practices.</p>		<p>disposition.</p>
<p>3.4.2. Document water source and delivery system. The description shall include one or more of the following...maps, photographs, drawings (hand drawings are acceptable) or other means to communicate the location of water source(s) and the transfer and transport of the water where applicable. Documented scheduled assessment of water system including</p>	<p>Delete. Included in 3.4.1</p>				

	delivery equipment shall be performed.					
3.4.3.	Re-circulated water or water from a source whose condition requires it shall be treated using an approved disinfectant at sufficient concentration to prevent cross contamination to achieve those standards and monitored appropriately according to standard of the country of production and of the countries in which the product is intended to be traded.		Water use SOPs address treatment of re-circulated water, if used.	Operation's water use SOPs require re-circulated water to be treated using an approved antimicrobial to prevent it from becoming a source of contamination, according to prevailing regulation or industry specific standards for the commodity.	Auditor reviews water use SOP for completeness, and observes water treatment records for adequacy and consistency of treatment.	Operation discontinues using re-circulated water that is not treated sufficiently to prevent contamination of the produce. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
3.4.4.	Microbial and or physical/ chemical testing shall be performed, as appropriate to the specific operation, to demonstrate that acceptance criteria have been met.	Delete. Inherent in 3.4.1				
3.4.5.	The water-delivery system shall be maintained so as not to serve as a source of contamination of produce, water supplies or equipment with pathogens, or to create		Water use SOPs address condition and maintenance of water-delivery system.	The water-delivery system shall be maintained so as not to serve as a source of contamination of produce, water supplies or equipment with pathogens, or to	Auditor reviews the SOP for inclusion of condition and maintenance of water-delivery system, and observes maintenance records for evidence of compliance.	Operation revises SOP and implements maintenance procedures.

	an unsanitary condition.			create an unsanitary condition.		
3.4.6.	For produce demonstrated as being susceptible to microbial infiltration from wash water, wash water temperature during immersion shall be considered.	PL. Are any susceptible produce items washed or immersed in the field?	If applicable to the specific commodity, water use SOPs address control of wash water temperature.	For produce demonstrated as being susceptible to microbial infiltration from wash water, wash water temperature during immersion shall be considered.	If applicable to the commodity being washed, auditor reviews the SOP for inclusion of water temperature control, and observes monitoring records for evidence of compliance.	Operation revises SOP to address and control wash water temperature.
3.4.7.	Standard Operating Procedures (SOPs), including water-change schedules, shall be developed for all uses of water.	Move to top of 3.4	Operation has procedures for water used in contact with product or food contact surfaces.	Standard Operating Procedures (SOPs), including water-change schedules, shall be developed for all uses of water. Microbial and/or physical/chemical (e.g., test strips) testing shall be performed, as appropriate to the specific operation, to demonstrate that acceptance criteria have been met.	Auditor observes evidence of existence of water use SOPs.	Operation develops the SOPs.
3.5.	Containers, Bins and Packaging Materials					
3.5.1.	Each grower shall establish their own written policies for their specific operations, which shall be in	Delete. Included in 3.5.3				

	compliance with appropriate regulations for Packaging Materials, (bins, boxes etc.) These policies shall include:					
3.5.2.	Harvesting and packing containers shall be stored in a manner so as not to serve as a source of contamination to the extent feasible and appropriate.		Operation has written policy regarding storage of harvesting and packing containers.	Harvesting and packing containers shall be stored in a manner so as not to serve as a source of contamination to the extent feasible and appropriate.	Auditor observes whether operation has a policy regarding storage of harvesting and packaging materials used in the field. Auditor observes current practices for compliance with policy.	Operation develops the policy. Retraining is performed and documented.
3.5.3.	Packaging materials should never have direct contact with the soil. They should be placed on a pallet or clean cardboard.		Operation has written policy regarding whether packaging materials are permitted in direct contact with the soil.	If produce is packed in field, operation has considered and developed written policies regarding placement of packaging materials directly on the soil, or whether a physical buffer (e.g., buffer bin or slip sheet) is required. Policy shall be consistent with industry standards.	Auditor observes whether operation has a policy regarding placement of packaging materials used in the field in direct contact with soil. Auditor observes current practices for compliance with policy.	Operation develops the policy. Retraining is performed and documented.
3.5.4.	Unused primary containers should be stored in an enclosed building or secure truck or trailer.	Delete. Included in 3.5.2				
3.5.5.	Food-contact totes, bins, other harvest containers, and pallets		Operation has written policy regarding	Food-contact totes, bins, other harvest containers, and pallets	Auditor observes whether operation has a policy regarding	Operation develops the policy. Retraining is

	shall be visually inspected, clean, intact and free of any foreign materials prior to use. Containers shall be sufficiently maintained so as not to become a source of contamination.		inspection of food contact containers prior to use.	shall be visually inspected, clean, intact and free of any foreign materials prior to use. Containers shall be sufficiently maintained so as not to become a source of contamination.	inspection of food contact containers and observes current practices for compliance with policy.	performed and documented.
3.5.6.	The types and construction of harvest containers shall be appropriate to the commodity being harvested and suited for their intended purpose.		Operation has written policy regarding acceptable harvesting containers.	The types and construction of harvest containers shall be appropriate to the commodity being harvested and suited for their intended purpose.	Auditor observes whether operation has a policy regarding what types of containers are acceptable for use during harvest, and observes current practices for compliance with the policy.	Operation develops the policy. Retraining is performed and documented.
3.5.7.	Food-contact totes, bins and other harvest containers designated for harvesting shall not be used for other purposes unless clearly marked or labeled for that purpose.		Operation has written policy prohibiting use of harvest containers for non-harvest purposes.	Food-contact totes, bins and other harvest containers designated for harvesting shall not be used for other purposes unless clearly marked or labeled for that purpose.	Auditor observes whether operation has a policy prohibiting use of harvest containers for other uses unless otherwise labeled, and observes current practices for compliance with the policy.	Operation develops the policy. Retraining is performed and documented.
3.5.8.	If washed, wooden pallets and other wooden surfaces shall be properly dried before use.	Delete. Included in 3.5.5				
3.6.	Facility, Equipment, Tools	Delete. Included in 2.10				
3.6.1.	Equipment shall be					

<p>designed and constructed to facilitate cleaning and sanitation of food-contact surfaces. Product contact tools, utensils and equipment shall be made of materials that can be cleaned and sanitized. The operation shall develop, implement, and schedule cleaning, sanitizing, storage and handling procedures of all food contact surfaces to reduce and control the potential for contamination. These procedures shall be documented.</p>					
<p>3.6.2. To minimize contamination of the produce, or the field, the equipment shall be properly calibrated, operated, maintained, and used as intended.</p>					
<p>3.6.3. Equipment shall be inspected to ensure that it is functioning properly, and that all food-contact surfaces are clean and sanitary prior to use, and maintained during use</p>					

<p>in a manner so as not to become a source of contamination.  Operation shall have a written procedure to address the spills and leaks (fuel, oil, hydraulic fluids) which might occur during equipment operation in the field.  Light bulbs and glass on harvesting equipment shall be protected so as not to contaminate produce or fields in the case of breakage.  Inspection shall be documented. Operation shall have written procedure to exclude foreign objects (glass, plastic, metal or other debris) from the harvesting equipment.</p>					
<p>3.6.4. Harvest tools, utensils and knives shall be stored in a way that minimizes contamination. A procedure shall be established for the proper storage of harvest tools and handling when not in use, e.g., during breaks.</p>					
<p>3.6.5. Equipment cleaning and</p>					

<p>sanitizing operations shall be conducted away from the product and other equipment to reduce the potential for contamination.</p>					
<p>3.6.6. The operation shall allow adequate distance for the turning and manipulation of harvest equipment to prevent contamination from adjacent areas.</p>					
<p>3.7. Vehicles and Equipment in Field</p>	<p>Delete. Included in 2.10</p>				
<p>3.7.1. The operation shall have a policy to ensure that all vehicles used for transport of harvested produce are cleaned and maintained, and a cleaning schedule to prevent produce contamination is in place (i.e. soil, dirt, organic fertilizer, spills).</p>					
<p>3.7.2. Equipment traffic flow is prevented from traveling through an untreated manure area into the harvesting field.</p>					
<p>3.7.3. The operation shall have a policy to ensure that materials that come in contact with the</p>					

<p>produce or the containers during transport, such as pallet covers, are clean and not a source of contamination.</p>					
<p>3.7.4. There shall be a written procedure for cleaning tanks on sprayer trucks used for dust control.</p>					
<p>3.8. Field Packaging and Handling</p>					
<p>3.8.1. Operation shall have a written policy that damaged, soft and decayed produce is not harvested or is culled before packing. Harvested product that contacts the ground shall not be packed unless the product normally grows in contact with the ground.</p>					
<p>3.8.2. When produce is cored, topped, or semi-processed in the field, only food grade materials shall be used on harvest machinery and tool food contact surfaces. Only water that meets microbial standards for potable water shall be used. Sanitizing chemicals</p>					

<p>shall comply with all requirements of EPA registration and federal, state, and local regulations.</p>					
<p>3.8.3. Measures shall be taken during harvest to inspect for and remove foreign objects such as glass, metal, rocks, or other dangerous/toxic items. There shall be a standard operating procedure or instructions on what measures are taken in the case of glass/plastic breakage and possible contamination during harvesting operations.</p>					
<p>3.8.4. There shall be a standard operating procedure or instructions on what measures are taken in the case of product contamination by chemicals, petroleum, pesticides or other contaminating factors.</p>					
<p>3.8.5. Operation shall have a policy that cloths, towels, or other cleaning materials shall not be used to wipe produce.</p>					

<p>3.8.6. Raw materials and packaging materials shall be purchased from approved suppliers and are appropriate for type of produce growing and packing.</p>					
<p>3.8.7. Packaging storage facilities shall be constructed and designed to maintain packaging dry, clean and free from any dirt or residues so it remains fit for the purpose. Particular care shall be taken to prevent packaging becoming a harborage for rodents and other vermin. Packaging shall be stored separately from farm machinery and hazardous chemicals and toxic substances.</p>					
<p>3.9. Postharvest Handling</p>					
<p>3.9.1. The responsible party shall ensure that harvested produce is handled in a manner such that it is not likely to become contaminated.</p>					
<p>3.9.2. There shall be a policy prohibiting walking, stepping, or lying on</p>					

produce, food contact surfaces or packaging materials.					
3.9.3. Pallets, produce bins, and totes shall be clean and in good repair. Materials that come in contact with the produce or the containers during transport, such as pallet covers, shall be clean and not be a source of contamination.					
3.9.4. Where possible, plastic produce bins shall be used for produce.					
3.9.5. Transportation vehicles shall be clean so that they do not become a source of contamination.					
3.9.6. All chemicals, including cleaning and maintenance compounds shall be stored in an area separate from harvested produce.					
3.10. Traceability					
3.10.1. There shall be a documented identification and traceability system that allows produce to be traced back to the farm					

<p>and tracked forward to the immediate customer.</p>					
<p>3.10.2. Records shall be retained and readily retrievable for at least two years or as required by prevailing regulation.</p>					
<p>3.10.3. Records may include the date of harvest, quantities, farm identification (field or block), transporter and non-transporter. Additional information may be included.</p>					
<p><b>4. Transportation (Field to Packinghouse)</b></p>					
<p>4.1. Management Responsibility</p>					
<p>4.1.1. A policy statement shall outline a commitment to food safety and define the methods used to comply with and continually improve the food safety management system. The Policy Statement shall be signed by Senior Management and communicated in language understood by all employees.</p>					
<p>4.1.2. There shall be a policy that establishes consequences for employees who violate</p>					

	established food safety policies or procedures.				
4.1.3.	Management shall designate a qualified individual who has the responsibility and authority for food safety and provides adequate resources for management of the food safety plan, including a provision for the absence of key personnel. Twenty-four hour contact information shall be available for these individuals in case of food safety emergencies.				
4.1.4.	There shall be a description of the organization that identifies the job functions, responsibilities, and reporting relationships related to food safety. This shall be communicated within the organization.				
4.1.5.	The operation shall have a policy and take affirmative steps to ensure that all produce that is packed or stored				

<p>in the facility is grown following GAP requirements.</p>					
<p>4.1.6. Operation shall have an Approved Supplier program for all incoming materials, including packaging. Operation shall maintain a current list of approved raw material suppliers. Approved Supplier program shall include a procedure for accepting materials from alternate sources.</p>					
<p>4.1.7. There shall be programs in place to monitor the effectiveness and implementation of the food safety programs.</p>					
<p>4.2. Temperature Control (When refrigerated transport is required for food safety)</p>					
<p>4.2.1. There is a written policy for transporters and conveyances to maintain a specified temperature(s) during transit.</p>					
<p>4.2.2. Prior to loading the vehicle shall be pre-cooled. The proper temperature for pre-cooling should be appropriate to the type</p>					

<p>of produce and as specified by documented protocol.</p>					
<p>4.2.3. During transport the vehicle cargo area is maintained at temperatures appropriate for the particular type of produce and as specified by a documented protocol. The refrigerated transport vehicles shall have properly maintained and fully functional refrigeration equipment. This equipment shall be controlled by a thermostatic device as necessary to maintain temperatures in the cargo area for the particular type of produce being transported and as specified by documented protocol.</p>					
<p>4.2.4. Where required, temperatures of product are taken and recorded prior to or upon loading.</p>					
<p>4.3. Equipment Sanitation and Maintenance</p>					

<p>4.3.1. The operation shall have a policy, written procedures, and a checklist to verify cleanliness and functionality of shipping units (e.g., trailer). Shipping units shall be clean, functional and free of objectionable odors before loading. Refrigeration units must be in working order. Unless dedicated vehicles are used, procedure requires transport history for immediate past 3 loads, or that trailer must first be cleaned and sanitized and accompanied by a wash ticket.</p>					
<p>4.3.2. A responsible individual shall sign the completed checklist. Checklist includes prohibition of raw animal or animal product transport, or other materials that may be a source of contamination with pathogens. Results of these inspections, and any corrective actions, shall be documented.</p>					
<p>4.3.3. Personnel responsible</p>					

<p>for the loading and unloading of produce shall take steps to minimize the potential of physical damage to produce, which can introduce and/or promote the growth of pathogens.</p>					
<p>4.3.4. Forklifts and other motorized transport vehicles shall be clean and well maintained and of suitable type to avoid contamination through emissions.</p>					
<p>4.3.5. Trash removed from field packing operations shall be transported out of the field in a separate vehicle. Trash shall not come in contact with cases of fresh produce.</p>					