

Produce GAPs Harmonization Initiative
Technical Working Group meeting
June 17-18, 2010
Meeting Summary

David Gombas convened the meeting, noting that Chair Suresh DeCosta was unable to attend, and the group was asked for self-introductions. Sysco's Vice President Quality Assurance Mark Mignogna welcomed the group, thanking them for their efforts and emphasizing the importance of the harmonization effort both for produce food safety and for reducing unnecessary costs for suppliers and customers alike. Gombas briefed the group with the results from the previous TWG meetings, noting that the first draft had been completed and divided into pre- and post-farm gate modules as decided at the May meeting. Gombas reminded the group that the next phase was to review the harmonized draft to ensure that it met the requirements identified by the Steering Committee: i.e., focused on food safety; scalable to the widest range of operation sizes; appropriate for the widest range of fresh produce commodities, production regions in North America and production practices; flexible to accept equivalent practices; minimizing misunderstanding, misinterpretation and standards "creep"; risk-based, science-based, attainable, auditable and verifiable; and flexible to adapt as science reveals better practices and limits. He asked the group to avoid speculation, but to ensure that the standard is meaningful and practical for all operations that members of the TWG are familiar with.

Beginning with the pre-farm gate module, the group decided to begin with the format used by the Tomato Food Safety Audit Protocol; i.e., each audit line would have four columns: a briefly worded "requirement", a lengthier "procedure" to restate the requirement in other words to avoid misunderstanding, "verification" actions that would serve as instruction to the auditor in assessing compliance with the requirement, and "corrective actions" that the operation would likely need to implement if the auditor determined they are not in compliance. A "code" column was also added, to identify actions taken in revising the draft and the reasons why. Thus, the format for the standard was revised to landscape with six columns: the original draft harmonized audit line, Code, Requirement, Procedure, Verification, and Corrective Action.

The group decided to rename the first general category of the standard from "Compliance Plan" to "General Questions" and include in this category all audit questions that would be consistent regardless of the stage of pre-farm gate operation being audited, e.g., management responsibility. This would allow deletion of repetitive audit expectations in subsequent categories.

The group made good progress during the two days, redrafting 1/3 of the pre-farm gate standard, from audit lines 1.1 through 2.5. Efforts were made to retain the wording of the draft harmonized standard whenever practical. Twenty-six of the 64 original audit lines in this portion of the standard were deleted, either because they were redundant to or moved to be included in other audit lines. Two new audit lines (1.6.2 and 2.4.7) were added because the group concluded they were necessary for the credibility of the standard. Revisions to two audit lines (1.8 and 2.4.3) were put in a "parking lot" (Code = PL) for future reconsideration. A copy of the draft is attached to the end of this summary. The group will resume at the July meeting with audit line 2.6, Agricultural Water. Erin Grether reminded the group to promote the opportunity for all stakeholders to review and comment on the standard at <http://www.unitedfresh.org/blog>.

The TWG thanked Saul Morales, Mark Mignogna and Sysco for hosting the meeting. Future meetings have been scheduled as follows:

- July 13-14, California Strawberry Commission, San Jose, CA
- August 25-26, Produce Marketing Association, Philadelphia, PA
- September 13, Gaylord Resort and Convention Center, Washington, DC. This will be a joint meeting with the Steering Committee prior to The United Fresh, Washington Public Policy Conference, September 14-16.

TWG members expecting to attend the July 13-14 meeting should respond promptly on Erin Grether's [doodle link](#) so that meeting organizers can plan for sufficient "seats at the table". Members needing information about the July 13-14 meeting should contact Grether now (egrether@unitedfresh.org).

Attendees:

Ed Beckman, CA Tomato Farmers
 Bob Blakely, CA Citrus Mutual
 Megan Chedwick, Church Brothers
 Kenyon Farley, Payson Fruit Growers
 Nigel Garbutt, GlobalG.A.P
 David Gombas, United Fresh Produce Association
 Erin Grether, United Fresh Produce Association
 Melinda Hayman, Food Safety Net Services
 Jorge Hernandez, US Foodservice
 Andy Kesler, Jack in the Box
 Kent Killebrew, Stop and Shop, Ahold USA
 Sharan Lanini, Chiquita / Fresh Express
 Mike Letry, Darden
 Sarah Lockhart, Monarch Foods
 Tom Lovelace, McEntire Produce
 Ben Marchant, NCSI Americas, Inc.
 Drew McDonald, Taylor Farms
 Amy McLester, Winn-Dixie
 David Middleton, NCSI Americas, Inc.
 Bob Mills, Misionero Vegetables
 Saul Morales, Sysco
 Ken Petersen, USDA
 Matt Regusci, Azzule
 Eric Ritchie, McCain
 Martha Roberts, University of Florida - IFAS / FFVA
 Sonia Salas, Western Growers
 Mark Seetin, U.S. Apple Association
 Randy Sodoma, Grant County Foods
 Chato Valdes, River Ranch Fresh Foods
 Mike Villaneva, LGMA
 Steve Warshawer, Wallace Center / Good Food Network
 Tom Young, Del Monte Fresh Produce

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.
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		Management has designated individual(s) with roles and responsibilities for food safety functions.	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	Auditor observes that the food safety plan has identified individual(s) for key food safety activities. Auditor verifies that procedures include	Operation identifies individual(s) for key food safety activities in the food safety plan. Operation identifies actions

	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.			shall be available for these individuals in case of food safety emergencies. These roles and responsibilities shall be communicated within the organization.	provisions for when the identified individual is not present.	to be taken when the identified individual(s) are not present.
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.	Delete; redundant to 1.1.3				
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 farming operations and harvest crews.	Delete. Redundant to 1.1.3 and scope of audit				
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	Review period ?	There shall be a written food safety plan. The plan shall cover the operation. The operation	The food safety plan shall identify all locations of operation covered by the plan and shall address potential physical, chemical, and biological	Auditor shall observe the food safety plan and verify that the plan has considered potential biological,	Operation develops or completes a food safety plan for all locations of operation.

	potential physical, chemical, and biological hazards and hazard control procedures for the following areas: water, soil amendments, field sanitation, environmental practices, and worker practices.		and products covered shall be defined.	hazards and hazard control procedures, including monitoring, verification and recordkeeping, for the following areas: water, soil amendments, field sanitation, production environment, and worker practices.	chemical and physical hazards and has identified preventive measures for hazards that may reasonably affect food safety.	
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 operation.	Delete. Redundant to 1.2.1				
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		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.

	and implementing the food safety plan shall be established.					
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 minimum of two years, or as required by prevailing regulation.	Auditor reviews document handling procedures and verifies that required documentation is available for at least two years.	Operation revises documentation procedures.
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)	Delete.				

	also must provide a means by which employees shall be trained.	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 and supervisory level.		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 job responsibilities. Personnel shall receive training at hire and refresher training at prescribed frequencies. Documentation of training is available.	Auditor reviews program of required training and examines training records for evidence of compliance.	Operation shall develop and deliver required training.
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	Auditor reviews the evidence of the individual's training relevant to produce food safety, such as a degree or course certificate or receipt, or	Individual must obtain demonstrable food safety training.

			course/workshop or by job experience.	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.	
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 unintentional microbial, chemical, and physical hazards.	Delete. Redundant with 1.6.1				
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.	Auditor reviews traceability program and verifies operation's ability to trace product accurately one step	Operation establishes an effective traceability program.

			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.	forward and one step back.	
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 shall be consistent with applicable regulations.	Delete. 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		A trace back and trace forward exercise shall be	The trace back and trace forward exercise shall achieve accurate	Auditor reviews records of most recent trace Operation performs exercise and/or improves

annually.		performed at least annually.	traceability within 1 day or as required by applicable regulations.	exercise. If no trace exercise was performed in the past year, the operation will perform the exercise during the audit.	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.		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 standard, utilizing this standard to assist in the self-audit.		The operation shall have documented self-audit procedures.	Internal audits will be conducted at a minimum annually by an assigned individual who is knowledgeable 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	Auditor reviews internal audit procedures and examines records for evidence of compliance.	Operation develops and implements internal audit procedures.

			corrective action will be documented.		
1.10.2. All aspects of the GAP program will be audited and a written record of required corrective action will be documented.	Delete. Included in 1.10.1				
2. Field Production					
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.	Delete. Redundant to 1.1.3				
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 regulatory laws and guidelines.	Delete. Redundant to 1.1.3				
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		The food safety plan shall, initially and at least annually thereafter, evaluate and document the	When land use history or adjacent land use indicates a possibility of physical, chemical or biological contamination, preventive measures shall be performed and	Auditor reviews food safety plan to verify that risks associated with field history and adjacent land use have been evaluated at least	Operation evaluates and documents risks associated with land use history and adjacent land use and

	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.		risks associated with land use history and adjacent land use, including structures and equipment.	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.	annually and preventive measures implemented for identified risks.	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 risk for product contamination and are directly accessible for servicing.		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.	Toilet facilities are situated during operation and servicing, and maintained so as not to pose a hazard to the produce or other opportunity for contamination.	Auditor visually and by records verifies that toilet facilities are not positioned, leaking or serviced in a manner that poses a risk of produce contamination.	Toilet facility is replaced, repaired or repositioned to be compliant.
	2.3.2. Toilet facilities shall be of adequate number, easily accessible to employees		Toilet facilities shall be of adequate	The operation will have verification that the number of toilet facilities	Auditor verifies that the number of available toilet	Operation obtains a sufficient number of toilet

	and in compliance with applicable regulation.		number, easily accessible to employees and in compliance with applicable regulation.	and their location relative to employees meets the more stringent of federal, state or local regulations.	facilities and their location is compliant with prevailing regulation for the number of employees.	facilities to be compliant.
	2.3.3. When appropriate, racks for protective clothing used by field employees shall be provided.		When appropriate, racks for protective clothing used by field employees shall be provided.	When field employees wear protective clothing, racks shall be available and located so as to avoid potential contamination.	If field employees wear protective clothing, auditor observes whether clothing rack is available and used.	Operation obtains and positions racks as necessary.
	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		Signage requiring	Signage in applicable	Auditor verifies that	Operation obtains

	languages and/or pictures shall be provided adjacent to hand wash basins requiring people to wash their hands after each toilet visit.		handwashing is posted.	languages and/or pictures shall be provided adjacent to hand wash facilities requiring people to wash their hands after each toilet visit.	signage is present adjacent to all hand wash facilities and is in appropriate language or pictures to clearly communicate requirements to all employees.	and posts signage to be compliant.
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 and other personnel in the field.	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.	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.
2.3.8.	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) or spitting is not permitted in any growing areas.	Operation shall have policy prohibiting smoking, eating, chewing gum or tobacco, drinking other than water except in designated areas. Such areas shall be	Auditor observes personnel in field for evidence of compliance.	Retraining is performed and documented. Affected product is evaluated for potential contamination

			designated so as not to provide a source of contamination.		and disposition.
2.3.9. 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.
2.3.10. 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.
2.3.11. Protective clothing shall be effectively maintained, stored, laundered and		Protective clothing, when required, shall be	If protective clothing is used in proximity to product, the operation	If protective clothing is used, auditor observes	Operation develops or revises protective

worn so as to protect product from risk of contamination.		maintained, stored, laundered and worn so as to protect product from risk of contamination.	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.	use for compliance with the operation's policy and current industry practices or regulatory requirements.	clothing policy or procedures. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
2.3.12. The wearing of jewelry and other loose objects shall be in compliance to company policy and applicable regulation.		The operation shall have a policy regarding the wearing of jewelry and other loose objects.	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.	Auditor observes personnel in field for evidence of compliance.	Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
2.3.13. Provision shall be made to store employees' personal belongings away from crops and field equipment.		Employees' personal belongings shall be stored in designated areas.	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.	Auditor observes personnel in field for evidence of compliance.	Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
2.3.14. Areas for meal breaks shall be designated and located away from food contact/handling zones and field equipment.		Break areas shall be designated and located away from food contact/handling zones and field	Operation shall designate where break areas are located so as not to be a source of product contamination.	Auditor observes break areas for evidence of compliance with operation policy.	Retraining is performed and documented. Affected product is evaluated for potential

		equipment.			contamination and disposition.
2.3.15. 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.	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.
2.3.16. 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.	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.
2.3.17. Workers and field personnel who show signs of illness (e.g., vomiting, jaundice, diarrhea) shall be restricted from direct contact with produce or food-contact surfaces.		Workers and field personnel who show signs of illness shall be restricted from direct contact with produce or food-contact surfaces.	Operation shall have a policy that restricts personnel who show signs of illness (e.g., vomiting, jaundice, diarrhea) from contact with product or food contact surfaces.	Auditor reviews policy and observes field personnel for evidence of compliance.	Operation develops and implements policy. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
2.3.18. Workers shall receive health and safety training	Delete. Redun				

as specified in the company's food safety plan. (Note: This may already be covered under worker training)	dant to 1.6.1				
2.3.19. 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				
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.	Delete. Included in 2.4.3				

<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>PL discuss when more auditors are available</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.</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 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).</p>		<p>If product is intended for export, agricultural chemical use shall consider requirements in the intended country of destination.</p>	<p>The operation shall have procedures, such 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.</p>	<p>Auditor reviews operation's procedure for complying with agricultural chemical restrictions in countries of destination.</p>	<p>Operation diverts product to a market in which the product meets standards.</p>

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 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 measures should be taken in the case of product contamination by ag chemicals.	Delete. Covered in 1.8 and 2.4.3				
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	Delete. Not a				

with all applicable legislation (e.g. GMO's, pesticides) in the country of production.	food safety issue				
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