

**Produce GAPs Harmonization Initiative**  
**Technical Working Group meeting**  
May 12-13, 2010  
Meeting Summary

Chairman Suresh DeCosta convened the meeting and the group was asked for self-introductions. Gombas also briefed the group with the results from the previous TWG meetings, noting that only 21 audit categories remained to be drafted.

DeCosta briefed the group on the April 19 joint meeting with the Steering Committee. With the potential for a successfully harmonized standard apparent, the Steering Committee had seriously considered the TWG's questions on whether the Steering Committee was still supportive of the initiative and, if so, how the Steering Committee would anticipate sustaining the initiative after the TWG completed its work.

To the first question, DeCosta reported that the 33 Steering Committee members in attendance had offered their resounding support, noting that the Steering Committee had congratulated the TWG on their progress so far. To the second question, the Steering Committee entertained several possible recommendations, which culminated in the commissioning of a new working group – an Operations Committee – to prepare and rank recommendations in a more deliberate format. The Steering Committee chose to commission a new working group, rather than assign the task to the TWG, because a different set of expertise might be needed and because they did not want to distract the TWG from completing the standard harmonization on time.

Gombas reported that a leader for the Operations Committee was in the process of being selected, and then an invitation would go out for volunteers to serve on the Operations Committee. A face-to-face meeting would be scheduled soon thereafter. While the tasks to be undertaken by the Operations Committee are critical to the eventual success of the initiative, those tasks could be completed after the TWG's October 1 deadline because the standard would be vetted, and likely modified, through the industry for a few months before being released for use. Steve Warshawer recommended that the vetting process include at least one trial audit.

The attendees again assembled into three breakout groups and each worked on compiled audit categories: Group 1 (Group leader Bill Pool) worked on and completed drafting harmonized standards for Packaging - Materials and Handling; Pest Control for Cooling, Packinghouse, and Produce Storage; and Equipment Sanitation and Maintenance for Transportation. Group 2 (Group leader Bob Mills) completed drafting harmonized standards for Microbiological Sampling/Testing for Cooling, Packinghouse and Produce Storage operations; Traceability for Cooling, Packinghouse and Produce Storage operations; Water/Ice standards for Packinghouse; and Maintenance and Sanitation expectations for Packinghouse (Facility, Equipment, Tools, Containers, Bins). Group 3 (Group leaders Sharan Lanini and Chris Christian) completed drafting harmonized standards for Worker Health/Hygiene and Toilet/Handwashing Facilities during Cooling and Packinghouse; Management Responsibility for Produce Storage and Packinghouse operations; Washing and Cleaning of Produce in Packinghouse; and Sanitation and Maintenance (Facility) during Produce Storage. Together with category drafts completed at previous meetings, the group completed drafts for all 60 audit categories in the standards matrix. Those drafts have been compiled, are attached to this summary and will be posted on the GAPs Harmonization webpage for review and comment by all interested stakeholders.

The TWG reviewed parking lot issues raised during the development of the first-draft standard. Those warranting further consideration are also attached to this summary.

The TWG discussed next steps for the review and revision of the harmonized standard.

Recommendations included:

- Making the draft available on the United Fresh website and actively soliciting comment from all stakeholders. Stakeholders should be asked to comment specifically on recommendations to improve the standard for applicability to the widest range of size operations, commodities, growing and handling regions, and production practices. Erin Grether will work with United Fresh IT to develop options for collecting comments.
- Issuing a News Release to notify stakeholders of the standard's availability for review, and to encourage as many as can to attend the next meeting at Sysco Headquarters in Houston, as we will begin final wordsmithing of the standard.
- Splitting the standard into two: field operations and post-harvest operations.
- At the remaining TWG meetings prior to September, the group will plan to meet together (not in breakouts) to wordsmith the standard. All opinions will be needed to assure no group or consideration is missed.

DeCosta and the TWG thanked Sarah Lockhart, Frank Ferko and US Foodservice for hosting the meeting.

Future meetings have been scheduled as follows:

- June 17-18, Sysco, Houston, TX
- July 13-14, California Strawberry Commission, San Jose, CA
- August 25-26, Produce Marketing Association, Philadelphia, PA
- September 13, The 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 June 17-18 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 June 17-18 meeting should contact Grether now ([egrether@unitedfresh.org](mailto:egrether@unitedfresh.org)).

Attendees:

Michael Bentel, Naturipe Farms  
Tom Bowman, Underwriters Laboratories  
Chris Christian, CA Strawberry Commission  
Suresh DeCosta, McDonald's  
Bob Elliott, Sunkist Growers, Inc.  
Kenyon Farley, Payson Fruit Growers  
Nigel Garbutt, GlobalGAP  
Edith Garrett, Danaco Solutions  
David Gombas, United Fresh Produce Association  
Erin Grether, United Fresh Produce Association  
Jean Hamil, A. Duda & Sons  
Valerie Hannig, The Oppenheimer Group  
Johnna Hepner, Produce Marketing Association  
Delia Hollbach, familyfarmed.org  
Mathilde J. Rivera T., Baja Growers  
Kent Killebrew, Ahold USA  
Sharan Lanini, Chiquita/Fresh Express

Sarah Lockhart, Monarch Foods Group  
Ben Marchant, NCSI Americas, Inc.  
Bob Mills, Misionero Vegetables  
Saul Morales, Sysco  
Ken Petersen, USDA  
Susan Pheasant, Washington State Horticulture  
Bill Pool, Wegmans  
Martha Roberts, University of Florida, IFAS  
Ricki Rowley, Payson Fruit Growers  
Sonia Salas, Western Growers  
Mark Seetin, U.S. Apple Association  
Jim Slama, familyfarmed.org  
Randy Sodoma, Grant County Foods  
Neda Vaseghi, Food Safety Net Services  
Mike Villaneva, LGMA  
Steve Warshawer, Wallace Center/National Good Food Network

## Parking Lot Issues (in no particular order)

- Food Allergen control – separate audit category needed?
- “Packing” audit category needed in Packinghouse?
- “Cross Contamination Prevention. Protective measures are provided in areas where iced product is stored above other produce in order to prevent melting ice from contaminating product below.” Needs to go in storage section
- Check to see if EQUIPMENT, TOOLS section can be made general to address: equipment and tools to deliver Ag Chemicals shall be maintained and calibrated at a frequency sufficient to assure accuracy of delivery. Maintenance and calibration records are maintained and, if calibration is not performed on-site, records made readily available for review.
- Check to see if waters sections mention Ag Chemicals-- Water used to mix pesticides meets EPA microbial standards; i.e., 40 CFR Part 141.63, or other prevailing regulation for drinking water. Operation has a written policy requiring foliar-application pesticides to be diluted only with water that meets microbial standards for drinking water. Operations will have documentation demonstrating compliance, such as test results for the water source used.
- Are drinking water standards needed for foliar contact sprays pre-harvest?
  - Tomato standards require drinking water standards
  - Leafy greens require recreational water standards
  - Should tree crops be exempt?
- Should category on microbiological testing be broadened to include all testing (chemical and otherwise)?
- Put in definitions that the terms personnel & employees also include supervisors and owners
- Define responsible party (custom harvesters, etc).
- Trash disposal in field
- Visitor definition includes: Visitors, Temporary personnel, Regulatory authorities, Outside contractors, Tour groups, Family and friends of personnel
- Specifications for contract services that impact on finished product safety and quality shall be documented, current, include a full description of the service to be provided and detail relevant training requirements of contract personnel.
- A register of all contract service specifications shall be maintained. Note: Contract Services include but are not limited to pest control contractors, harvesting contractors, spray contractors, crop protection plan development consultants, animal health plan development consultants and transport contractors.
- There shall be a written policy specifying the procedures for the handling/ disposition of any product or packaging materials contaminated by or in contact with blood and/or bodily fluids shall be segregated and disposed of immediately. All incidences are to be reported to supervisors and documented.
- “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. 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.” This may need to be someplace else such as Traceability.

- Food Safety Plans shall be reviewed when an operational change may have an impact on the Producer's ability to deliver safe food. Section 24 requires an annual review of the OFFS Manual to update procedures; account for new equipment, buildings or processes; take stock of deviations, complaints, corrective actions and any changes in procedures that arose as a result; and evaluate the need for changes to the food safety system, including related policies and objectives.
- Food security (Management does due diligence) to restrict (unauthorized) personnel from farms and facilities. -- May be covered under adjacent land use or food security. Cross reference in Food Security plan.
- Cross reference MRL's for country of destination (see GlobalGAP).
- "All local, state and federal regulations concerning animal control shall be observed." Should this apply to all operations and not just animal control?
- The following documents are required for an effective program. Should they be captured in a separate records/documentation category or in their respective categories?
  1. Diagram of farm, which includes water source, adjacent land use, wildlife areas, and topography.
  2. A flow chart that describes each step of the growing process, from raw material receipt to shipment of products.
  3. Water source and frequency testing form.
  4. List of potentially hazardous chemicals.
  5. Toilet and hand washing station checklist.
  6. Worker training log.
  7. Truck inspection form.
  8. Documentation from suppliers of raw materials, soil amendments, and packaging materials.
  9. Documentation of soil amendment, fertilizer, and pesticide applications.
  10. Sanitation Standard Operating Procedures. This shall include a field equipment, tools, and containers cleaning schedule.
  11. SOPs
  12. Traceability and Recalls
  13. Log of Corrective Actions
  14. Product Security
  15. Self Inspections
  16. Description of the type of products, how they are packaged, and intended use.
- Visitor Policy...health and hygiene, handwashing, toilets. Should this (and other categories) apply to u-pick operations?
- Biosecurity /Food defense – is a separate audit category needed?
- Difference between workers and employees (contract labor, family, food handlers vs. non-food handlers)
- 5.7.14. Specifications for all packaging materials that impact on finished product safety and quality shall be provided and comply with the relevant legislation. The methods and responsibility for developing and approving detailed specifications and labels for all packaging shall be documented. NEEDS DISCUSSION...IS THIS A FOOD SAFETY ISSUE?
- 5.7.15. A register of packaging specifications and label approvals shall be maintained and kept current. NEEDS DISCUSSION...IS THIS A FOOD SAFETY ISSUE?

- 4.7.10. Pallets and other wooden surfaces are properly dried after being washed.  
NEEDS DISCUSSION
- “disposable single use towels” – are other drying tools acceptable?
- “microbially potable water” – need consistent language throughout the document

# Produce GAPs Harmonized Food Safety Standard

## DRAFT

All audit expectations in this version are draft, based only on an initial harmonization of existing standards, and will be revised during the further process of considering application to various regions, commodities and size operations.

### 1. Compliance Plan

#### 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.
- 1.1.2. There shall be a policy that establishes consequences for employees who violate established food safety policies or procedures.
- 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.
- 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.
- 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.

#### 1.2. Food Safety Plan or Risk Assessment

- 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.
- 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.
- 1.2.3. The food safety plan shall cover all products produced, packed, sold, handled, and/or distributed by 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.
- 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.
- 1.3.3. Documentation shall be maintained for a minimum period of two years, absent state or federal regulations to the contrary.

- 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.
  - 1.4.2. These procedures (SOPs) also must provide a means by which employees shall be trained.
- 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.
- 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.
  - 1.6.2. 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.
  - 1.6.3. Training programs shall educate workers of their responsibility in protecting food from intentional or unintentional microbial, chemical, and physical hazards.
- 1.7. Traceability
  - 1.7.1. A documented traceability program shall be established.
  - 1.7.2. Records that demonstrate recipients shall be maintained except for direct to consumer sales. (One step forward)
  - 1.7.3. Records that demonstrate product sources and associated finished packaging material shall be maintained. (One step backward).
  - 1.7.4. Contents of records shall be consistent with applicable regulations.
  - 1.7.5. Records are retained and readily retrievable for at least two years or as required by applicable regulation.
  - 1.7.6. A trace back and trace forward exercise shall be performed at least annually.
  - 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.
- 1.8. Recall Program
  - 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.
  - 1.9.2. The responsibility, methods, and timelines to address Corrective Actions shall be documented and implemented.
- 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.
- 1.10.2. All aspects of the GAP program will be audited and a written record of required corrective action will be documented.

## 2. Field Production

### 2.1. Management Responsibility

- 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.
- 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.

### 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, preventative measures shall be performed and documented to mitigate food safety risk.
- 2.2.2. The assessment is re-performed, and documented, for environmental conditions that have changed since the last assessment.

### 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.
- 2.3.2. Toilet facilities shall be of adequate number, easily accessible to employees and in compliance with applicable regulation.
- 2.3.3. When appropriate, racks for protective clothing used by field employees shall be provided.
- 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.
- 2.3.5. Signage in applicable languages and/or pictures shall be provided adjacent to hand wash basins requiring people to wash their hands after each toilet visit.
- 2.3.6. Employees and visitors shall follow all personal hygiene practices as designated by the company.
- 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.

- 2.3.8. Smoking, chewing, eating, drinking (other than water) or spitting is not permitted in any growing areas including on field preharvest equipment.
- 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.
- 2.3.10. If rubber or disposable gloves are used, they shall be used as stated in the company food safety plan.
- 2.3.11. Protective clothing shall be effectively maintained, stored, laundered and worn so as to protect product from risk of contamination.
- 2.3.12. The wearing of jewelry and other loose objects shall be in compliance to company policy and applicable regulation.
- 2.3.13. Provision shall be made to store employees' personal belongings away from crops and field equipment.
- 2.3.14. Areas for meal breaks shall be designated and located away from food contact/handling zones and field equipment.
- 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.
- 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.
- 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.
- 2.3.18. 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)
- 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.
- 2.4. Agricultural Chemicals (pesticide, herbicide)
  - 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.
  - 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.
  - 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.
  - 2.4.4. DOCUMENTATION: Ag Chemical uses shall be documented and this documentation shall meet applicable regulatory requirements

- 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).
- 2.4.6. TRAINING: Ag Chemicals shall be applied by trained, licensed or certified pesticide personnel, as required by regulation.
- 2.4.7. 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.
- 2.5. Seed/Transplant/Grafting
  - 2.5.1. The records of traceability for Seed/Transplant/Grafting of crops must be maintained.
  - 2.5.2. Planting trials and plantings must comply with all applicable legislation (e.g. GMO's, pesticides) in the country of production.
- 2.6. Agricultural Water
  - 2.6.1. Water System Description
    - 2.6.1.1. A water system description shall be prepared.
    - 2.6.1.2. Water sources and the production blocks they may serve shall be documented.
    - 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 water system (including holding systems, reservoirs or any water captured for re-use).
    - 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.
    - 2.6.1.5. All local, state and federal regulations concerning water source shall be observed.
    - 2.6.1.6. Water systems intended to convey untreated human or animal waste shall be separated from conveyances utilized to deliver agricultural water.
  - 2.6.2. Water System Risk Assessment
    - 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.
    - 2.6.2.2. 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.
    - 2.6.2.3. The risk assessment shall address potential physical, chemical, and biological hazards and hazard control procedures for the water distribution system.
    - 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 these conditions.

2.6.2.5. Corrective actions will be documented.

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.

2.6.3.2. The water management plan shall include the following: preventive controls, monitoring and verification procedures, corrective actions, and documentation.

2.6.3.3. Water testing shall be part of the water management plan.

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, how the sample is collected, type of test and criteria.

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.

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.

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 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.

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. For example, a crop that will undergo repeat foliar applications within its crop cycle would require additional samples to establish sufficient data.

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 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.

2.7. Equipment, Tools (Sanitation)

2.7.1. Identify any field operations that may pose a food safety risk.

- 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.
- 2.7.3. Harvesting equipment and/or machinery which comes into contact with product is in good repair, and poses no food safety risk.
- 2.8. Animal Control
  - 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.
  - 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 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.
  - 2.8.3. 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.
  - 2.8.4. 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 feces.
  - 2.8.5. All local, state and federal regulations concerning animal control shall be observed.
- 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.
  - 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 accordance with applicable federal, state, or local regulations.
  - 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.
  - 2.9.4. If a soil amendment containing raw or incompletely treated manure is used, it shall be used in a manner so 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.
- 2.10. Vehicles and Equipment in Field

- 2.10.1. Identify equipment/vehicles used in farming operations that may pose a risk for cross-contamination.
- 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 safety plan.
- 2.11. Microbiological Sampling/Testing
  - 2.11.1. Where microbiological analysis is required in the food safety plan, testing shall be performed by a certified laboratory using official methods.
  - 2.11.2. Where tests are required, samples shall be in accordance with the established lab sampling SOP.
  - 2.11.3. Tests and their results must be documented.
- 3. Harvesting
  - 3.1. Management Responsibility
    - 3.1.1. 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.
    - 3.1.2. There shall be a policy that establishes consequences for employees who violate established food safety policies or procedures.
    - 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.
    - 3.1.4. 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.
    - 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.
  - 3.2. Preharvest Assessment
    - 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.
  - 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.
    - 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.
    - 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:

- 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.
  - 3.3.4.2. Toilet facilities shall be of adequate number, easily accessible to employees and be in compliance with applicable regulation.
  - 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 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.
  - 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 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.
- 3.3.5. Hygiene
  - 3.3.5.1. Employees and visitors shall follow all personal hygiene practices as designated by the company.
  - 3.3.5.2. 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 with a bandage and clean gloves.
  - 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.
  - 3.3.5.4. Urinating, defecating or spitting in the field is prohibited.
  - 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 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.
  - 3.3.5.7. Clothing, including footwear, shall be effectively maintained, stored, laundered and worn so as to protect product from risk of contamination.
  - 3.3.5.8. Aprons and gloves shall not be left on product, work surfaces, equipment or packaging material but 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.

- 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.
- 3.3.5.11. A designated area shall be identified to store employees' personal belongings away from crops and field equipment.
- 3.3.5.12. Areas for meal breaks shall be 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.
  - 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 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.
  - 3.3.6.4. [to be completed]
- 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 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.
  - 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 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.
  - 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.
  - 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 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.
- 3.4.7. Standard Operating Procedures (SOPs), including water-change schedules, shall be developed for all uses of water.
- 3.5. Containers, Bins
  - 3.5.1. Each grower shall establish their own written policies for their specific operations, which shall be in 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.
  - 3.5.3. Packaging materials should never have direct contact with the soil. They should be placed on a pallet or clean cardboard.
  - 3.5.4. Unused primary containers should be stored in an enclosed building or secure truck or trailer.
  - 3.5.5. Food-contact totes, bins, other harvest containers, and pallets 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.
  - 3.5.6. The types and construction of harvest containers shall be appropriate to the commodity being harvested and suited for their intended purpose.
  - 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.
  - 3.5.8. If washed, wooden pallets and other wooden surfaces shall be properly dried before use.
- 3.6. Facility, Equipment, Tools
  - 3.6.1. Equipment shall be 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.
  - 3.6.2. To minimize contamination of the produce, or the field, the equipment shall be properly calibrated, operated, maintained, and used as intended.
  - 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 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.

- 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.
- 3.6.5. Equipment cleaning and sanitizing operations shall be conducted away from the product and other equipment to reduce the potential for contamination.
- 3.6.6. The operation shall allow adequate distance for the turning and manipulation of harvest equipment to prevent contamination from adjacent areas.
- 3.7. Vehicles and Equipment in Field
  - 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).
  - 3.7.2. Equipment traffic flow is prevented from traveling through an untreated manure area into the harvesting field.
  - 3.7.3. The operation shall have a policy to ensure that materials that come in contact with the produce or the containers during transport, such as pallet covers, are clean and not a source of contamination.
  - 3.7.4. There shall be a written procedure for cleaning tanks on sprayer trucks used for dust control.
- 3.8. Field Packaging and Handling
  - 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.
  - 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 shall comply with all requirements of EPA registration and federal, state, and local regulations.
  - 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.
  - 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.
  - 3.8.5. Operation shall have a policy that cloths, towels, or other cleaning materials shall not be used to wipe produce.
  - 3.8.6. Raw materials and packaging materials shall be purchased from approved suppliers and are appropriate for type of produce growing and packing.
  - 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.

- 3.9. Postharvest Handling
  - 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.
  - 3.9.2. There shall be a policy prohibiting walking, stepping, or lying on 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 and tracked forward to the immediate customer.
  - 3.10.2. Records shall be retained and readily retrievable for at least two years or as required by prevailing regulation.
  - 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.

#### 4. Cooling

- 4.1. Management Responsibility
  - 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.
  - 4.1.2. There shall be a policy that establishes consequences for employees who violate established food safety policies or procedures.
  - 4.1.3. Management shall designate a qualified individual who has the responsibility and authority for food safety at the cooler 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. 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.
- 4.2. Water/Ice
  - 4.2.1. If water or ice directly contacts the produce 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 be traded. Ice shall be manufactured, transported, and stored under sanitary conditions.
- 4.2.2. Document water source and delivery system. The description shall include the type of water source(s) and the transfer and transport of the water where applicable.
  - 4.2.3. Documented scheduled assessment of water system including delivery equipment shall be performed. Water installations and equipment are constructed and maintained to prevent back siphonage and backflow. Back siphonage and backflow prevention units are identified in a Preventive Maintenance Program. Routine checks verify that back siphonage and backflow prevention units are functioning properly. Results are documented.
  - 4.2.4. The sewage disposal system is adequate for the process and maintained to prevent direct or indirect product contamination.
  - 4.2.5. 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.
  - 4.2.6. Microbial and or physical/ chemical testing shall be performed, as appropriate to the specific operation, to demonstrate that acceptance criteria have been met.
  - 4.2.7. 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 an unsanitary condition.
  - 4.2.8. For produce demonstrated as being susceptible to microbial infiltration from wash water, wash water temperature during immersion shall be considered.
  - 4.2.9. Standard Operating Procedures (SOPs), including water-change schedules, shall be developed for all uses of water.
- 4.3. Containers, Bins
- 4.3.1. Each grower shall establish their own written policies for their specific operations, which shall be in compliance with appropriate regulations for Packaging Materials, (bins, boxes etc.) These policies shall include:
  - 4.3.2. 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. .
  - 4.3.3. Packaging materials should never have direct contact with the soil. They should be placed on a pallet or clean cardboard.
  - 4.3.4. Unused primary containers should be stored in an enclosed building or secure truck or trailer.
  - 4.3.5. Food-contact totes, bins, other harvest containers, and pallets 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.
  - 4.3.6. The types and construction of harvest containers shall be appropriate to the commodity being harvested and suited for their intended purpose.

- 4.3.7. 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.
- 4.3.8. If washed, wooden pallets and other wooden surfaces shall be properly dried before use.
- 4.4. Facility, Equipment, Tools
  - 4.4.1. General
    - 4.4.1.1. Facility shall be designed, constructed and maintained in a manner that prevents contamination of produce during cooling and storage.
    - 4.4.1.2. Floors shall be constructed of smooth, dense impact resistant material that is impervious to liquid and easily cleaned. Floors shall be graded, to allow the removal of overflow or waste water under normal conditions.
    - 4.4.1.3. Wall, ceilings, doors, frames and hatches shall be of a solid construction. Internal surfaces shall be smooth and impervious with a light colored finish. Roof leaks shall be promptly identified, controlled and repaired. Fixtures, ducts, pipes and overhead structures shall be installed and maintained so that drips and condensation do not contaminate produce, raw materials or food contact surfaces.
    - 4.4.1.4. Adequate lighting shall be provided in all areas. Lighting shall be provided with protective covers.
    - 4.4.1.5. Chilling and cold storage facilities shall be fitted with temperature monitoring equipment or suitable temperature monitoring device that is located so as to monitor the warmest part of the room and is fitted with a temperature gauge that is easily readable and accessible. Temperature measuring devices shall be monitored on a frequent basis and calibrated as needed.
    - 4.4.1.6. Chill and cold storage loading dock areas shall be appropriately sealed, drained and graded.
    - 4.4.1.7. Evaporators, cooling coils, drip pans, drains, drain lines and reservoirs shall be included in a Master Cleaning and Sanitation Schedule. Water from refrigeration drip pans shall be drained and disposed of away from product and product contact surfaces. Drip pans and drains shall be designed and maintained to assure condensate does not become a source of contamination.
    - 4.4.1.8. Cooling equipment (e.g. hydrocoolers, air coolers), shall be inspected, all debris removed, and cleaned and sanitized according to written sanitation SOPs.
    - 4.4.1.9. Air intakes shall not be located near sources of contamination.
    - 4.4.1.10. Transporting equipment, including pallet jacks, carts, trolleys and forklifts, shall be maintained to prevent contamination of products being transported and are listed on the Preventive Maintenance and/or Master Cleaning Schedules for cleaning and follow up.
  - 4.4.2. Materials Storage
    - 4.4.2.1. Storage areas shall be clean, well ventilated, and dry.

- 4.4.2.2. Materials shall be stored off the floor on pallets, slip-sheets or stands and covered where applicable.
- 4.4.2.3. Materials shall be stored away from walls and ceilings.
- 4.4.2.4. Adequate space shall be maintained between rows of stored materials to allow cleaning and inspection. Written procedures shall be followed to guarantee the proper cleaning, inspection and monitoring for pest activity in storage areas.
- 4.4.2.5. Materials and packaging materials shall be protected from condensate, sewage, dust, dirt, chemicals or other contaminants.
- 4.4.2.6. All chemicals, including cleaning and maintenance compounds, and non-product materials, including equipment and utensils, shall be stored in a secure separate area.
- 4.4.2.7. Packaging shall be stored away from produce in a designated area.
- 4.4.3. Foreign Material
  - 4.4.3.1. Foreign material control devices are inspected and maintained as part of a Preventive Maintenance (PM) Program or other program to ensure effective operation.
- 4.4.4. Waste Material
  - 4.4.4.1. Waste materials and their removal are managed to avoid contamination.
- 4.4.5. Cross Contamination
  - 4.4.5.1. Protective measures are provided in areas where iced down product is stored over like or dissimilar items in order to prevent melting ice from contaminating product below.
- 4.4.6. Outside Grounds
  - 4.4.6.1. Equipment stored outside is placed to prevent pest harborage, to make the inspection process easier, and to protect equipment from deterioration and contamination.
  - 4.4.6.2. Waste containers and compactors are closed or covered, and located on a concrete pad or in a manner to minimize pest attraction and harborage.
- 4.4.7. Glass Control
  - 4.4.7.1. Only essential glass shall be present in the facility. If glass must be used, there shall be a written glass control policy.
  - 4.4.7.2. Light bulbs, fixtures, windows, mirrors, skylights and other glass suspended over exposed product, such as produce and recoup areas, shall be of the safety type, or shall be otherwise protected to prevent breakage.
  - 4.4.7.3. All light bulbs, fixtures, windows, mirrors, skylights and other glass used in storage areas where there is no product exposure shall be protected against breakage unless managed under the glass control policy.
- 4.4.8. Leaks/Lubrication
  - 4.4.8.1. Leaks and lubrication are managed so they do not contaminate food products.

- 4.4.8.2. Only food-grade lubricants are used on food processing and packaging equipment, or on any other equipment where incidental food contact may occur.
- 4.4.8.3. Lubricants are labeled, segregated and stored in a designated, secure area. Food-grade and non food-grade lubricants are kept separate from each other.
- 4.4.9. Equipment and Utensil Construction
  - 4.4.9.1. All utensils are designed and made of materials that are easily cleaned and maintained.
  - 4.4.9.2. Ingredient, product-holding, packaging, conveying, processing and bulk equipment are designed and made of materials that are easily cleaned, inspected, and maintained.
  - 4.4.9.3. Equipment is installed in a way that provides access for cleaning.
  - 4.4.9.4. Catwalks above product zones located after the final wash are protected to prevent produce or packaging contamination.
- 4.4.10. Temporary Repairs
  - 4.4.10.1. If used in a recoup or other operation, temporary repairs are sometimes needed or unavoidable. Procedures to ensure that they do not become a contamination hazard are defined. Any temporary repairs on food contact surfaces are constructed of food-grade material.
- 4.5. Worker Health/Hygiene and Toilet/Handwashing Facilities
  - 4.5.1. 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--Cooler. These policies shall cover the following:
    - 4.5.2. Toilet
      - 4.5.2.1. Restrooms shall be designed, constructed, and located in a manner that minimizes the potential risk for product contamination.
      - 4.5.2.2. Toilet facilities shall be of adequate number, easily accessible to employees and be in compliance with applicable regulation.
      - 4.5.2.3. The practice of disposing of used toilet tissue on the floor, in trash receptacles, or in boxes is prohibited.
      - 4.5.2.4. Toilet and wash stations shall be maintained in a clean and sanitary condition. Toilets shall be sufficiently stocked with toilet paper. Wash stations shall include hand wash basins with clean, microbially potable water, hand soap, disposable single use towels or hand drying device, and trash receptacle. These stations shall be provided inside or adjacent to toilet facilities.
      - 4.5.2.5. Signage in applicable languages and/or pictures shall be provided adjacent to hand wash basins requiring people to wash their hands after each toilet visit.
      - 4.5.2.6. When appropriate, racks and storage containers for protective clothing and tools used by employees shall be provided to ensure employees remove and properly store prior to entering toilet facilities.
  - 4.5.3. Hygiene

- 4.5.3.1. Employees and visitors shall follow all personal hygiene practices as designated by the company.
  - 4.5.3.2. 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 with a bandage and clean gloves.
  - 4.5.3.3. Eating, drinking (other than water), chewing gum and using tobacco shall be prohibited except in clearly designated areas.
  - 4.5.3.4. 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 become a source of contamination. Hand sanitizers shall not be used as a substitute for hand washing.
  - 4.5.3.5. If rubber or disposable gloves are used, they shall be used as stated in the company food safety plan.
  - 4.5.3.6. Clothing, including footwear, shall be effectively maintained, stored, laundered and worn so as to protect product from risk of contamination.
  - 4.5.3.7. Aprons and gloves shall not be left on product, work surfaces, equipment or packaging material but hung on apron and glove racks provided.
  - 4.5.3.8. The use of hair coverings (e.g., hair nets, beard nets, caps) shall be in compliance to company policy and applicable regulation.
  - 4.5.3.9. 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.
  - 4.5.3.10. A designated area shall be identified to store employees' personal belongings and inspected at a defined frequency.
  - 4.5.3.11. Designated break areas shall be located away from food contact/handling zones.
- 4.6. Temperature Control
- 4.6.1. When produce is cooled, it is cooled to temperatures appropriate to the commodity according to current established regulatory or industry standards. Based on risk assessment or industry guidelines steps should be taken to minimize temperature increases and the time between harvest and cooling point.
  - 4.6.2. When applicable, the product temperature and equipment control mechanisms are monitored at a defined frequency and temperatures are kept appropriate to the commodity. Records are maintained.
  - 4.6.3. There is documented process for checking temperature, equipment controls, and temperature measuring devices including frequency. Temperature monitoring devices are checked for accuracy and records are available for review.
- 4.7. Packaging and Handling
- 4.7.1. Packing containers and equipment should be stored in a manner so as not to become a source of contamination with pathogens.

- 4.7.2. The types and construction of packing containers and equipment should be appropriate to the commodity being packed and their condition maintained so as not to serve as a source of contamination with pathogens.
  - 4.7.3. The Operation has a written policy requiring that food-contact totes, bins, other packing containers and packing equipment shall be clean and sanitary prior to use.
  - 4.7.4. There shall be documentation verifying that this policy is being followed. When in use, containers and packing equipment shall be maintained so as not to become a source of contamination with pathogens.
  - 4.7.5. Food-contact totes, bins and other packing containers and equipment that are no longer cleanable shall not be used for packing but can be used for other non-food uses if clearly marked/labeled.
  - 4.7.6. Food-contact totes, bins and other packing containers and equipment designated for use for packing shall not be used for other purposes.
  - 4.7.7. Pallets shall be kept clean and in good condition as appropriate for their intended use.
  - 4.7.8. Adequate space is maintained between rows of stored materials to allow cleaning and inspection. Procedures are followed to guarantee the proper cleaning, inspection and monitoring for pest activity in storage areas, where an 18 in or 45 cm inspection perimeter cannot be provided.
  - 4.7.9. All toxic chemicals, including cleaning and maintenance compounds, and non-product materials, including equipment and utensils, are stored in a separate area.
  - 4.7.10. Pallets and other wooden surfaces are properly dried after being washed.
  - 4.7.11. The written procedures are readily available to facility personnel.
  - 4.7.12. If applicable, the facility has a written Allergen Control Program that lists the allergens in storage at the facility specific to country regulations.
  - 4.7.13. If applicable, procedures address identification and segregation of allergens during storage and handling as based on a risk assessment conducted by the facility
  - 4.7.14. Specifications for all packaging materials that impact on finished product safety and quality shall be provided and comply with the relevant legislation. The methods and responsibility for developing and approving detailed specifications and labels for all packaging shall be documented.
  - 4.7.15. A register of packaging specifications and label approvals shall be maintained and kept current.
- 4.8. Pest Control
- 4.8.1. The responsible party shall exclude pests to the extent possible and appropriate to the facility. Operation has a written pest control program, performed by a trained pest control operator. The written program includes policies and procedures applicable to that operation, such as storage of outside equipment or other factors dealing with pest harborages.
  - 4.8.2. The responsible party shall minimize the availability of food items and water to animals and pests. Perimeter surrounding facility is maintained so as not to provide pest harborage.

- 4.8.3. The responsible party shall establish a pest-control program, which shall include regular and frequent monitoring to assess and ensure the program's effectiveness.
- 4.8.4. It is important to have maps of the location of pest traps outside and inside the pack house.
- 4.8.5. The responsible party shall maintain a pest-control log that includes dates of inspection, inspection reports and steps taken to eliminate any problems. Applications of pesticides (e.g., insecticides, rodenticides) shall be performed in compliance with local, state, and federal pesticide regulations.
- 4.8.6. List the chemicals used (they are required to be approved by the relevant authority and their Material Safety Data Sheets (MSDS) made available or prevailing chemical information sheets); Outline the methods used to make employees aware of the bait control program and the measures to take when they come in contact with a bait station; and Outline the requirements for employees awareness and training in the use of pest and vermin control chemicals and baits.
- 4.8.7. Domestic animals are prohibited from pack house, cooling, and storage facilities. Procedures are in place to exclude wild animals to the degree practical.
- 4.8.8. When using pesticides, protect against the contamination of the produce, food contact surfaces and packaging materials. All procedures should be written and all agrichemicals must be registered for use in food handling establishments per the prevailing authority. Use only non-toxic traps and pest control devices inside the packing house or storage facility.
- 4.8.9. Make sure that bug zappers are located so as to not contaminate produce or food handling surfaces.
- 4.9. Microbiological Sampling/Testing
  - 4.9.1. Where microbiological analysis is required in the food safety plan, testing shall be performed by a certified laboratory using official methods.
  - 4.9.2. Where tests are required, samples shall be in accordance with the established lab sampling SOP.
  - 4.9.3. Tests and their results must be documented.
- 4.10. Traceability
  - 4.10.1. There shall be a documented identification and traceability system that allows produce to be traced back to the farm and tracked forward to the next immediate recipient.
  - 4.10.2. Records shall be retained and readily retrievable for at least two years or as required by prevailing regulation.
  - 4.10.3. Records may include the date of cooling, quantities, cooler identification, transporter and non-transporter. Additional information may be included.

## 5. Packinghouse

### 5.1. Management Responsibility

- 5.1.1. 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.
- 5.1.2. There shall be a policy that establishes consequences for employees who violate established food safety policies or procedures.
  - 5.1.3. 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.
  - 5.1.4. 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.
  - 5.1.5. The operation shall have a policy and take affirmative steps to ensure that all produce that is packed or stored in the facility is grown following GAP requirements.
  - 5.1.6. 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.
  - 5.1.7. There shall be programs in place to monitor the effectiveness and implementation of the food safety programs.
- 5.2. Water/Ice
- 5.2.1. If water or ice directly contacts the produce 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 be traded. Ice shall be manufactured, transported, and stored under sanitary conditions.
  - 5.2.2. Document water source and delivery system. The description shall include the type of water source(s) and the transfer and transport of the water where applicable.
  - 5.2.3. Documented scheduled assessment of water system including delivery equipment shall be performed (i.e. Water Management Plan). Water installations and equipment are constructed and maintained to prevent back siphonage and backflow. Back siphonage and backflow prevention units are identified in a Preventive Maintenance Program. Routine checks verify that back siphonage and backflow prevention units are functioning properly. Results are documented.
  - 5.2.4. The sewage disposal system is adequate for the process and maintained to prevent direct or indirect product contamination.
  - 5.2.5. 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.

- 5.2.6. Microbial and or physical/ chemical testing shall be performed, as appropriate to the specific operation, to demonstrate that acceptance criteria have been met.
  - 5.2.7. 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 an unsanitary condition.
  - 5.2.8. For produce demonstrated as being susceptible to microbial infiltration from wash water, wash water temperature during immersion shall be considered.
  - 5.2.9. Standard Operating Procedures (SOPs), including water-change schedules and testing frequency, shall be developed for all uses of water.
  - 5.2.10. 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 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.
- 5.3. Washing/Cleaning of produce
- 5.3.1. If produce is washed, an initial risk assessment of the washing process shall be performed that takes into consideration the commodity, type of wash system, type of sanitizer, and water quality. The facility shall control the wash-water temperature for certain produce to prevent internalization of microorganisms from the water into produce tissue.
  - 5.3.2. Only water that meets the microbial standards for drinking water shall be used for washing or contact with produce and to clean any surfaces that may come in contact with produce or that could contribute to contamination.
  - 5.3.3. Debris and damaged produce shall be removed from wash areas/dump tanks to the extent possible.
  - 5.3.4. Only sanitizers or sanitizer systems registered or approved by EPA or the prevailing regulatory agency for their specific intended use may be used in the dump tank wash water, on the spray line or other food contact purposes.
  - 5.3.5. If wash water sanitizer is used it shall be used in accordance with operational procedure, manufacturer instructions, and regulatory requirements. Records shall be kept. Operation shall have a procedure that includes minimum limits for sanitizer in wash water for food safety. Procedure shall include how to control, monitor and record use of wash water sanitizer as needed to assure compliance with minimum limits. Operation shall have a procedure as to what corrective actions are taken if criteria are not met.
  - 5.3.6. All instruments used to measure temperature, pH, sanitizer levels and or other important devices used to monitor requirements in this section shall be calibrated at a frequency sufficient to assure continuous accuracy. Records shall be kept. If an ORP system is used, an independent measurement shall be used to verify compliance. Test methods or test strips used to monitor requirements shall be appropriate to their use and sufficiently sensitive to their intended purpose.

- 5.3.7. All water lines and fixtures shall be in proper repair, protected against back flow, siphonage, and cross connections.
- 5.4. Worker health/hygiene and Toilet/Handwashing Facilities
  - 5.4.1. Each facility (operation) shall establish their own written policies for their specific operations, which shall be in compliance with appropriate regulations. These policies shall cover the following:
    - 5.4.1.1. Restrooms shall be designed, constructed, and located in a manner that minimizes the potential risk for product contamination.
    - 5.4.1.2. Toilet facilities shall be of adequate number, easily accessible to employees and be in compliance with applicable regulation.
    - 5.4.1.3. There shall be a plan for immediate control and treatment of any effluent in the event of leakage or a spill. Leakages or spills shall be managed and disposed of in accordance with applicable federal, state and local laws and regulations, and in a manner that prevents or minimizes contamination of the packing facility or produce with pathogens.
    - 5.4.1.4. The practice of disposing of used toilet tissue on the floor, in trash receptacles, or in boxes is prohibited.
    - 5.4.1.5. Toilet and wash stations shall be maintained in a clean and sanitary condition. Toilets shall be sufficiently stocked with toilet paper. Wash stations shall include hand wash basins with clean, microbially potable water, hand soap, disposable single use towels, and trash receptacle. These stations shall be provided inside or adjacent to toilet facilities.
    - 5.4.1.6. Signage in applicable languages and/or pictures shall be provided adjacent to hand wash basins requiring people to wash their hands after each toilet visit.
    - 5.4.1.7. When appropriate, racks and storage containers for protective clothing (including gloves where applicable) and tools used by employees shall be provided to ensure employees remove and properly store prior to entering toilet facilities.
    - 5.4.1.8. Employees and visitors shall follow all personal hygiene practices as designated by the company.
    - 5.4.1.9. Workers and visitors who show signs of illness (e.g. vomiting, jaundice, diarrhea) shall be restricted from direct contact with produce or food-contact surfaces.
    - 5.4.1.10. 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 with a bandage and clean gloves.
    - 5.4.1.11. First aid supplies shall be provided to treat minor injuries.
    - 5.4.1.12. Eating, drinking chewing gum and using tobacco shall be prohibited except in clearly designated areas. Operation has a policy to permit employee personal items (e.g. employee lunches, drinks, clothing) only in designated, non-production and non-product storage areas.

- 5.4.1.13. 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 become a source of contamination. Hand sanitizers shall not be used as a substitute for hand washing.
  - 5.4.1.14. If gloves are used, they shall be used as stated in the company food safety plan.
  - 5.4.1.15. Clothing, including footwear, shall be effectively maintained, stored, laundered and worn so as to protect product from risk of contamination.
  - 5.4.1.16. Aprons and gloves shall not be left on product, work surfaces, equipment or packaging material but hung on apron and glove racks provided.
  - 5.4.1.17. The use of hair coverings (e.g., hair nets, beard nets, caps) shall be in compliance to company policy and applicable regulation.
  - 5.4.1.18. The wearing of jewelry, body piercings, and other loose objects (i.e. false nails) shall be in compliance to company policy and applicable regulation.
  - 5.4.1.19. Designated break areas shall be located away from food contact/handling zones.
- 5.5. Sanitation (Facility, Equipment, Tools, Containers, Bins)
- 5.5.1. Facility
    - 5.5.1.1.A Master Cleaning and Sanitation schedule, with related SSOPs, shall be established.
    - 5.5.1.2.All cleaning agents shall be approved for their intended use on food contact surfaces.
    - 5.5.1.3.Cleaning equipment and tools are clean, in working order and stored properly away from product handling areas.
    - 5.5.1.4.Prior to use, the lines used for washing, grading, sorting, or packing shall be cleaned and sanitized as appropriate per risk assessment. When in use, the lines shall be maintained so as not to be a source of contamination with pathogens.
    - 5.5.1.5.Waste materials and their removal are managed to avoid contamination with non-waste product.
  - 5.5.2. Equipment and Tools
    - 5.5.2.1.All tools are designed and made of materials that are easily cleaned, inspected, and maintained.
    - 5.5.2.2.Ingredient, product-holding, packaging, conveying, and bulk equipment are designed, installed and made of materials that are easily cleaned, inspected, and maintained.
    - 5.5.2.3.Catwalks above product zones are protected to prevent produce or packaging contamination.
  - 5.5.3. Containers and Bins
    - 5.5.3.1.Written policies which shall be in compliance with appropriate regulations for Packaging Materials, (bins, boxes etc.) These policies shall include:

- 5.5.3.2. 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.
- 5.5.3.3. Packaging materials should never have direct contact with the soil.
- 5.5.3.4. Food-contact totes, bins, other harvest containers, and pallets shall be visually inspected, clean, intact and free of any foreign materials prior to use.
- 5.5.3.5. Containers shall be sufficiently maintained so as not to become a source of contamination.
- 5.5.3.6. Food-contact totes, bins and other containers shall not be used for other purposes unless clearly marked or labeled for that purpose.
- 5.6. Maintenance (Facility, Equipment, Tools, Containers, Bins)
  - 5.6.1. Facility, Equipment, Tools
    - 5.6.1.1. Packinghouse facilities and/or field sheds shall be designed, located, constructed and maintained so as to minimize damage and/or contamination to incoming produce.
    - 5.6.1.2. Maintain equipment and tools in a manner that protects against contamination of the product, food contact surfaces and packaging materials.
    - 5.6.1.3. A Master Preventive Maintenance schedule, with related SOPs, shall be established.
  - 5.6.2. Containers, Bins
    - 5.6.2.1. Containers and bins shall be sufficiently maintained so as not to become a source of contamination.
    - 5.6.2.2. The types and construction of containers and bins shall be appropriate to the commodity being packed and suited for their intended purpose.
- 5.7. Packaging (Materials and Handling)
  - 5.7.1. Packing containers and equipment should be stored in a manner so as not to become a source of contamination with pathogens.
  - 5.7.2. The types and construction of packing containers and equipment should be appropriate to the commodity being packed and their condition maintained so as not to serve as a source of contamination with pathogens.
  - 5.7.3. The Operation has a written policy requiring that food-contact totes, bins, other packing containers and packing equipment shall be clean and sanitary prior to use.
  - 5.7.4. There shall be documentation verifying that this policy is being followed. When in use, containers and packing equipment shall be maintained so as not to become a source of contamination with pathogens.
  - 5.7.5. Food-contact totes, bins and other packing containers and equipment that are no longer cleanable shall not be used for packing but can be used for other non-food uses if clearly marked/labeled.
  - 5.7.6. Food-contact totes, bins and other packing containers and equipment designated for use for packing shall not be used for other purposes.
  - 5.7.7. Pallets shall be kept clean and in good condition as appropriate for their intended use.

- 5.7.8. Adequate space is maintained between rows of stored materials to allow cleaning and inspection. Procedures are followed to guarantee the proper cleaning, inspection and monitoring for pest activity in storage areas, where an 18 in (45 cm) inspection perimeter cannot be provided.
  - 5.7.9. All toxic chemicals, including cleaning and maintenance compounds, and non-product materials, including equipment and utensils, are stored in a separate area.
  - 5.7.10. Pallets and other wooden surfaces are properly dried after being washed.
  - 5.7.11. The written procedures are readily available to facility personnel.
  - 5.7.12. If applicable, the facility has a written Allergen Control Program that lists the allergens in storage at the facility specific to country regulations.
  - 5.7.13. If applicable, procedures address identification and segregation of allergens during storage and handling as based on a risk assessment conducted by the facility
  - 5.7.14. Specifications for all packaging materials that impact on finished product safety and quality shall be provided and comply with the relevant legislation. The methods and responsibility for developing and approving detailed specifications and labels for all packaging shall be documented. A register of packaging specifications and label approvals shall be maintained and kept current.
- 5.8. Pest Control
- 5.8.1. The responsible party shall exclude pests to the extent possible and appropriate to the facility. Operation has a written pest control program, performed by a trained pest control operator. The written program includes policies and procedures applicable to that operation, such as storage of outside equipment or other factors dealing with pest harborages.
  - 5.8.2. The responsible party shall minimize the availability of food items and water to animals and pests. Perimeter surrounding facility is maintained so as not to provide pest harborage.
  - 5.8.3. The responsible party shall establish a pest-control program, which shall include regular and frequent monitoring to assess and ensure the program's effectiveness.
  - 5.8.4. It is important to have maps of the location of pest traps outside and inside the pack house.
  - 5.8.5. The responsible party shall maintain a pest-control log that includes dates of inspection, inspection reports and steps taken to eliminate any problems. Applications of pesticides (e.g., insecticides, rodenticides) shall be performed in compliance with local, state, and federal pesticide regulations.
  - 5.8.6. List the chemicals used (they are required to be approved by the relevant authority and their Material Safety Data Sheets (MSDS) made available or prevailing chemical information sheets); Outline the methods used to make employees aware of the bait control program and the measures to take when they come in contact with a bait station; and Outline the requirements for employees awareness and training in the use of pest and vermin control chemicals and baits.

- 5.8.7. Domestic animals are prohibited from pack house, cooling, and storage facilities. Procedures are in place to exclude wild animals to the degree practical.
- 5.8.8. When using pesticides, protect against the contamination of the produce, food contact surfaces and packaging materials. All procedures should be written and all agrichemicals must be registered for use in food handling establishments per the prevailing authority. Use only non-toxic traps and pest control devices inside the packing house or storage facility.
- 5.8.9. Make sure that bug zappers are located so as to not contaminate produce or food handling surfaces.
- 5.9. Microbiological Sampling/Testing
  - 5.9.1. Where microbiological analysis is required in the food safety plan, testing shall be performed by a certified laboratory using official methods.
  - 5.9.2. Microbial testing shall be performed, as appropriate to the specific operation, to demonstrate that acceptance criteria have been met.
  - 5.9.3. Where tests are required, samples shall be in accordance with the established lab sampling SOP.
  - 5.9.4. Tests and their results must be documented.
- 5.10. Traceability
  - 5.10.1. There shall be a documented identification and traceability system that allows produce to be traced back to the farm and tracked forward to the immediate customer.
  - 5.10.2. Records shall be retained and readily retrievable for at least two years or as required by prevailing regulation.
  - 5.10.3. The methods and responsibility for identifying product during all stages of production and storage shall be documented and implemented. The product identification system shall be implemented to ensure that product is clearly identifiable during all stages of receipt, packing, storage, transport and in compliance with prevailing regulation.
- 6. Transportation (may be divided into Field to Packinghouse and Packinghouse to Customer)
  - 6.1. Management Responsibility
    - 6.1.1. 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.
    - 6.1.2. There shall be a policy that establishes consequences for employees who violate established food safety policies or procedures.
    - 6.1.3. 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.
    - 6.1.4. 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.

- 6.1.5. The operation shall have a policy and take affirmative steps to ensure that all produce that is packed or stored in the facility is grown following GAP requirements.
- 6.1.6. 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.
- 6.1.7. There shall be programs in place to monitor the effectiveness and implementation of the food safety programs.
- 6.2. Temperature Control (When refrigerated transport is required for food safety)
  - 6.2.1. There is a written policy for transporters and conveyances to maintain a specified temperature(s) during transit.
  - 6.2.2. Prior to loading the vehicle shall be pre-cooled. The proper temperature for pre-cooling should be appropriate to the type of produce and as specified by documented protocol.
  - 6.2.3. 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.
  - 6.2.4. Where required, temperatures of product are taken and recorded prior to or upon loading.
- 6.3. Equipment Sanitation and Maintenance
  - 6.3.1. 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.
  - 6.3.2. 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.
  - 6.3.3. Personnel responsible 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.
  - 6.3.4. Forklifts and other motorized transport vehicles shall be clean and well maintained and of suitable type to avoid contamination through emissions.
  - 6.3.5. 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.

## 7. Produce Storage

### 7.1. Management Responsibility

- 7.1.1. 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.
- 7.1.2. There shall be a policy that establishes consequences for employees who violate established food safety policies or procedures.
- 7.1.3. 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.
- 7.1.4. 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.
- 7.1.5. The operation shall have a policy and take affirmative steps to ensure that all produce that is packed or stored in the facility is grown following GAP requirements.
- 7.1.6. 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.
- 7.1.7. There shall be programs in place to monitor the effectiveness and implementation of the food safety programs.
- 7.2. Temperature Control
  - 7.2.1. Produce is held or stored at temperatures appropriate to the commodity according to current established regulatory or industry standards. Freezers and coolers have vinyl strip doors, self-closing devices, or other methods to maintain temperatures. Temperature controlled staging and/or storage areas must be monitored. Results must be documented. There is documented process for checking temperature and temperature measuring devices including frequency. Temperature monitoring devices are checked for accuracy and records are available for review.
- 7.3. Sanitation and Maintenance (Facility)
  - 7.3.1. Fresh produce storage facilities, equipment, and tools shall be cleaned, maintained and sanitized on a scheduled basis to protect against contamination of the product. Documentation shall be available.
  - 7.3.2. Produce shall only be stored in clean and sanitary containers.
  - 7.3.3. Containers and bins shall be sufficiently maintained so as not to become a source of contamination.
  - 7.3.4. The types and construction of containers and bins shall be appropriate to the commodity being packed and suited for their intended purpose
  - 7.3.5. Label, handle, and store cleaning compounds, sanitizers/pesticides and other sanitation tools in a manner that does not pose a risk of contamination to the produce, food contact surfaces and packaging materials. These products must be used in accordance with manufacturers' label instructions and all federal, state and local requirements.

- 7.3.6. There is a written cleaning and sanitation schedule for all food and non-food contact surfaces including floors, drains, walls, ceilings and other surfaces that may pose a source of product contamination. A Master Preventive Maintenance schedule, with related SOPs, shall be established.
- 7.3.7. Outside garbage receptacles/dumpsters are closed or are located away from facility entrances and the area around such sites is reasonably clean.
- 7.3.8. The plant grounds are reasonably free of litter, debris and standing water.
- 7.4. Pest Control
  - 7.4.1. The responsible party shall exclude pests to the extent possible and appropriate to the facility. Operation has a written pest control program, performed by a trained pest control operator. The written program includes policies and procedures applicable to that operation, such as storage of outside equipment or other factors dealing with pest harborages.
  - 7.4.2. The responsible party shall minimize the availability of food items and water to animals and pests. Perimeter surrounding facility is maintained so as not to provide pest harborage.
  - 7.4.3. The responsible party shall establish a pest-control program, which shall include regular and frequent monitoring to assess and ensure the program's effectiveness.
  - 7.4.4. It is important to have maps of the location of pest traps outside and inside the pack house.
  - 7.4.5. The responsible party shall maintain a pest-control log that includes dates of inspection, inspection reports and steps taken to eliminate any problems. Applications of pesticides (e.g., insecticides, rodenticides) shall be performed in compliance with local, state, and federal pesticide regulations.
  - 7.4.6. List the chemicals used (they are required to be approved by the relevant authority and their Material Safety Data Sheets (MSDS) made available or prevailing chemical information sheets); Outline the methods used to make employees aware of the bait control program and the measures to take when they come in contact with a bait station; and Outline the requirements for employees awareness and training in the use of pest and vermin control chemicals and baits.
  - 7.4.7. Domestic animals are prohibited from pack house, cooling, and storage facilities. Procedures are in place to exclude wild animals to the degree practical.
  - 7.4.8. When using pesticides, protect against the contamination of the produce, food contact surfaces and packaging materials. All procedures should be written and all agrichemicals must be registered for use in food handling establishments per the prevailing authority. Use only non-toxic traps and pest control devices inside the packing house or storage facility.
  - 7.4.9. Make sure that bug zappers are located so as to not contaminate produce or food handling surfaces.
- 7.5. Microbiological Sampling/Testing
  - 7.5.1. Where microbiological analysis is required in the food safety plan, testing shall be performed by a certified laboratory using official methods.

- 7.5.2. Where tests are required, samples shall be in accordance with the established lab sampling SOP.
- 7.5.3. Tests and their results must be documented.
- 7.6. Traceability
  - 7.6.1. There shall be a documented identification and traceability system that allows produce to be traced back to the farm and tracked forward to the immediate customer.
  - 7.6.2. Records shall be retained and readily retrievable for at least two years or as required by prevailing regulation.
  - 7.6.3. The methods and responsibility for identifying product during all stages of production and storage shall be documented and implemented. The product identification system shall be implemented to ensure that product is clearly identifiable during all stages of receipt, packing, storage, transport and in compliance with prevailing regulation.

## 8. Other

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Standards considered in this harmonization and used with permission:

- AFDO Model Code for Produce Safety
- AIB International
- Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain
- California Leafy Green Handlers Marketing Agreement
- California Strawberry Commission Food Safety Plan
- CanadaGAP Combined Vegetables On-Farm Food Safety Manual
- Community Alliance with Family Farmers
- GlobalGAP Fruit and Vegetables
- SENASICA
- Silliker GAP Audit
- SQF 1000
- USDA GAP Audit
- USDA Mushroom Production Audit