

Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain



2011

Open Field Harvest and Packing Checklist



Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain, 2011

Forward

Work on *Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain* (“Tomato Food Safety Protocol”) was initiated shortly after the successful completion of the *Commodity Specific Guidelines for the Fresh Tomato Supply Chain, 2nd Edition* (“2nd edition”), at the request of fresh tomato supply chain stakeholders who were concerned that the 2nd edition did not provide sufficiently auditable standards or “metrics”. The general omission of metrics from the 2nd edition was intentional, as the contributors believed that operations should establish food safety requirements for themselves, based on the considerations described in the 2nd edition. Nevertheless, both buyers and suppliers in the tomato supply chain expressed concern that they were unsure of what constituted “compliance”. Buyers were concerned that operations might interpret the considerations in the 2nd edition too loosely, allowing food safety risks to go uncontrolled. Suppliers were concerned that auditor interpretations of the 2nd edition would result in an unending spiral of ever increasing audit expectations, resulting in additional costs without improving food safety. Thus, the Tomato Food Safety Protocol was initiated in October 2008 in an effort to harmonize food safety audit standards for the fresh tomato supply chain.

To prevent the Tomato Food Safety Protocol from becoming just another standard, in addition to rather than replacing others, a critical mass of fresh tomato “buyers” (e.g., processors, foodservice and retail) were asked to participate and, if successful, be prepared to accept audits of their suppliers using this standard. In this way, the goal was ultimately to replace the multitude of similar but different audit standards with this one.

The Tomato Food Safety Protocol was developed during a series of open meetings. Invitations were extended to all participants in the 2nd edition – from industry, government and academia, Mexico and Canada – and additional participants welcomed as they were identified. In an effort to assure transparency, no one who asked to participate was excluded. The individuals and organizations participating in development of the Tomato Food Safety Protocol are listed below.

The Tomato Food Safety Protocol began with the 2nd edition as a basis, endeavoring to establish “requirements” that were as specific as possible, but keeping in consideration different needs based on region, sub-commodity (e.g., round vs. Roma vs. grape or cherry tomatoes), operation size and equivalent growing or handling practices. Every effort was made to base these requirements on current science, but the participants accepted that these requirements would likely change as future research provides better information.

Although the initial intention was to establish mandatory metrics (e.g., how often, how many, how far), the participants were, frankly, surprised to find that current science provided little basis for universal numerical standards. Consequently, requirements more often became performance expectations rather than numerical measurements.

The entire fresh tomato supply chain was considered in this effort, but the participants recognized that the goal of replacing other, existing audit standards with the Tomato Food Safety Protocol would only be successful in operations that are primarily handling tomatoes; e.g., open field operations, harvesting, field packing, greenhouses, packinghouses, tomato repackers, tomato distributors and warehouses. Other operations in the tomato supply chain, i.e., fresh-cut processors, retailers, and foodservice operations, while handling tomatoes, would also be handling a far greater diversity of foods. The participants considered tomato-specific standards for those operations but, since tomato-specific standards would not replace existing audit standards for such operations, ultimately decided not to establish stand-alone audits. Therefore, while the Tomato Food Safety Protocol may be informative to all operations that handle tomatoes, it is specifically targeted to operations that undergo tomato-specific audits.

Format of the Tomato Food Safety Protocol and Checklists and Their Use

Four sets of Tomato Food Safety Protocols were developed for use by operations and auditors: Open Field Production, Harvest and Field Packing; Greenhouse; Packinghouse; and Repacking and Distribution. Each set contains auditable requirements – “Items” – that the participants concluded should be attainable and in place for any North America fresh tomato operation, regardless of region, size, growing practice (e.g., organic) or sub-commodity handled. As appropriate to the type of operation, the Items were further divided into sections that the participants considered critical for a food safety program, such as management responsibility, facility and environmental assessment, raw materials and inputs including water, pest control and pesticide usage, tomato cleaning operations, sanitation, food contact containers, food contact tools and equipment, employee health and hygiene, education and training, and traceback and recall programs.

For each Item, the Tomato Food Safety Protocol contains a simply-stated Requirement, and a Procedure that restates the requirement in other words, in an effort to minimize misunderstanding. The Requirement and Procedure are instructions to the operation to clearly describe the programs that are expected to be in place and maintained, and that will be audited. Each Item also includes a Verification and Corrective Action/Disposition. The Verification is provided as instruction to the auditor how to verify whether the operation has complied with the Requirement. The Corrective Action/Disposition is provided as instruction to the operation if the audit determines that compliance has not been achieved. While each of these is not necessarily binding on the operation or the auditor – equivalent procedures and actions that meet the intent of

the Item are acceptable or, in some cases, not applicable – they are provided in an effort to minimize “standards creep”, which has led to the multitude of disparate and often conflicting standards.

Each of the four Tomato Food Safety Protocols is accompanied by a Checklist, which provides an audit format that auditors can use to assess and record compliance. Each Checklist begins with a cover page that provides information about the auditor, the audited operation and the audit. That is followed by an Audit Summary in which the auditor will indicate the number of Items rated as C, CAN, IAR and NA (see below) as well as listing the Item numbers requiring corrective action; i.e., judged as CAN or IAR. The participants intentionally chose not to “score” the audit, indicating that audit scores tend to distract from auditor observations and judgments.

The body of the Checklist mirrors the associated Tomato Food Safety Protocol, with all of the Items and Requirements listed. The Checklist also includes, for each Item, an opportunity for the auditor to indicate the level of compliance observed. The possible “judgments” were left generally broad and include the following: C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk; and NA, not applicable or not needed. A judgment of C or NA is self-explanatory. A judgment of CAN, Corrective Action Needed to be compliant, is expected when the operation has clearly not complied with the intent of the Item, but that noncompliance is not reasonably likely to result in a food safety issue. A judgment of IAR, Immediate Action Required because of imminent food safety risk, is expected when a noncompliance may reasonably and directly result in an unacceptable food safety risk, and requires immediate corrective action to prevent the risk from continuing. IAR was not provided as a possible judgment for audit Items that the participants could not conceive of a noncompliance resulting in a food safety risk; e.g., Item 1.5 in the Greenhouse checklist, *Operation has a written procedure and timelines for implementing and documenting corrective actions*. The Checklist also has a space at each Item in which the auditor can provide Comments to explain the judgment. An Auditor Comment is required for all CAN and IAR judgments.

It was the intention in the development of these Tomato Food Safety Protocols for the *Commodity Specific Guidelines for the Fresh Tomato Supply Chain*, 2nd edition, to serve as a prerequisite reference to the use of this document. Each of the four Tomato Food Safety Protocols and their associated Checklists are intended for discrete segments of the fresh tomato supply chain, and it is the responsibility of the user to utilize the appropriate document. Throughout the documents, the term “shall” is used to indicate an action mandatory for compliance, while “should” indicates a recommended action that may not be necessary for some operations. In an operation’s food safety program that is compliant with the Tomato Food Safety Protocol, standard operating procedures (SOPs) may be designed to cover more than one requirement.

Performance of an audit to verify compliance with the Tomato Food Safety Protocol is expected to include reviews of pertinent policies and SOPs, official records demonstrating compliance, and visual observations of the operation to determine the current level of compliance. In order to demonstrate compliance, all required documentation shall be kept on file and made available for review by the auditor. Lot-specific records shall be retained for two (2) years or as required by prevailing laws or regulations. Observation of incomplete or otherwise noncompliant records required for compliance shall require a corrective action, such as retraining of the responsible individuals. The operation shall assess whether the noncompliant records indicate a potential food safety risk. Where training is required, it is expected that employees sign their training records, indicating that they understand and agree to follow the policy or procedure that is the subject of the training. Observations of noncompliances that may result in a risk of contamination of public health concern shall require an immediate corrective action and an assessment of the actual noncompliance and, if contamination is reasonably likely to have occurred, a corrective action shall be taken to prevent the affected product from being harvested or distributed into commerce. Such corrective actions shall be documented and those records shall be available for regulatory review, in compliance with prevailing laws and regulations. It is a violation of federal law (i.e., Federal Food, Drug and Cosmetic Act) to introduce or deliver for introduction into interstate commerce any food that is adulterated or misbranded. Foods, including fresh tomatoes, that are discovered to be adulterated and have been released into commerce should be recalled and the prevailing regulatory authorities notified.

2011 Revision

In late 2010, the tomato industry reconvened to review the performance of the Tomato Food Safety Protocol, and recommended several changes. In the Open Field Production, Harvest and Field Packing document that accompanies this Checklist, the Procedure and auditor Verification for item 2.1, the Verification for item 8.16 and the Procedure for item 10.3 were clarified, and a new item 2.2 was added. This Checklist document was also amended to include the new item 2.2. The changed sections are displayed in red.

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Open Field Production, Harvest and Field Packing - Checklist

Company / Farm / Field Name or Number _____
Company Address _____
Audited Operation Address/GPS _____
Company Contact _____
Title _____
Phone _____ **Fax** _____ **Email** _____
Date of audit _____
Audit start time _____ **Audit end time** _____

Description of operation _____

Harvest Company Name (if applicable) _____
Other Contractors _____
Other Contractors _____
Other Contractors _____
Other Contractors _____

Audit Company / Agency _____
Auditor Name _____
Auditor Signature _____

Auditee Representative Name _____
Signature _____

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Audit Summary

		C	CAN	IAR	NA	Q# requiring corrective actions for CAN or IAR
1.	Management Responsibility					
2.	Farm History and Assessment					
3.	Soil Amendment Usage					
4.	Preharvest Agricultural Water					
5.	Pesticide Usage					
6.	Harvest, Transport and Product Containers					
7.	Field Packing of Tomatoes					
8.	Employees and Harvest Crews					
9.	Education and Training					
10.	Traceback and Recall Programs					

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1. Management Responsibility			
Q#	Requirement		Auditor Comments
1.1	Operation has designated an individual responsible for food safety.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> NA	
1.2	Responsible individual has evidence of training in food safety relevant to tomatoes.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> NA	
1.3	Operation has current copies of the <i>Commodity Specific Food Safety Guidelines for the Fresh Tomato Supply Chain, Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain</i> and additional food safety documents as required by state and/or federal regulation.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> NA	
1.4	Operation has procedures for conducting self-audits, and conducts self-audits to verify compliance with established internal policies and procedures.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> NA	
1.5	Operation has a written procedure and timelines for implementing and documenting corrective actions.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> NA	

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1.6	Operation has a “zero tolerance” policy for controllable practices and conditions that result in immediate food safety risks.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
2. Farm History and Assessment			
Q#	Requirement		Auditor Comments
2.1	An initial environmental assessment has been conducted of all production land.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
2.2	The environmental assessment shall consider domestic animal operations.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
2.3	A second environmental assessment in the form of a review based upon current conditions is conducted not more than five (5) days from the first scheduled harvest date.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
2.4	If the field is subject to flooding, operation has an established decision tree or corrective action plan in the event of flooding in the production area. Procedures prohibit harvest of product that has come into contact with flood waters.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	

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2.5	Operation has a policy that prohibits harvesting of tomatoes with evidence of being contaminated with animal/bird feces.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
2.6	Operation has an SOP addressing animal intrusion.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
3. Soil Amendment Usage			
Q#	Requirement		Auditor Comments
3.1	If fertilizers containing manures or composts are used, only properly treated (composted or heat treated) manures are allowed for use in fields. Biosolids are not permitted.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
4. Preharvest Agricultural Water			
Q#	Requirement		Auditor Comments
4.1	The source of irrigation water (pond, stream, well, municipal, other) is documented.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> NA	
4.2	The type of irrigation used (flood, drip, sprinkler overhead, others) is documented.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> NA	
4.3	A sanitary survey was completed for each water source.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	

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4.4	Water tests are conducted.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
4.5	If water is treated to bring it into compliance, records are maintained of treatments and testing	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
4.6	Non-Foliar The water test meets EPA recreational water standards for E. coli; i.e., 40 CFR Part 131.41(c).	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
4.7	Foliar The water test meets EPA microbial standards for drinking water; i.e., 40 CFR Part 141.63.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
5. Pesticide Usage			
Q#	Requirement		Auditor Comments
5.1	Pesticide chemicals and their use must comply with all requirements of national (e.g., EPA) registration and any federal, state or local regulations.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
5.2	Equipment used to apply pesticides shall be maintained and calibrated at a frequency sufficient to assure accuracy of delivery.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	

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5.3	Water used to mix pesticides meets EPA microbial standards for drinking water; i.e., 40 CFR Part 141.63.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
6. Harvest, Transport and Product Containers			
A. Produce Containers			
Q#	Requirement		Auditor Comments
6.1	All compounds used to clean or sanitize food contact containers, tools, utensils, equipment or other food contact surfaces are approved for that use by the US EPA, FDA or other prevailing agency. Actual use conforms to label directions.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
6.2	Harvest and other food contact implements, buckets and totes, are cleaned and sanitized as necessary according to SOP.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
6.3	Reusable product bins, trays and containers are made of impervious materials that can be cleaned and sanitized.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	

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6.4	Operation has a policy that requires bins trays and boxes made of corrugated cardboard are for single use only	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
6.5	SOP specifies that workers do not remove harvest buckets from the field.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
6.6	Bins, totes and containers intended for harvesting of product are staged and stored in designated locations.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
6.7	Bins, totes and containers intended for the harvesting of product shall be used only for that purpose.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
B. Food Contact Tools, Utensils and Equipment			
Q#	Requirement		Auditor Comments
6.8	Product contact tools, utensils and equipment are made of impervious, cleanable, sanitizable material.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
6.9	Product contact tools (harvesting aids) are clean and sanitary and there is a schedule for cleaning and sanitizing.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	

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6.10	Harvest tools, utensils and knives are stored in a way that minimizes contamination.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
C. Vehicles and Equipment in the Field			
Q#	Requirement		Auditor Comments
6.11	Vehicles used in tomato production, harvest and transport are not a source of contamination.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
7. Field Packing of Tomatoes			
Q#	Requirement		Auditor Comments
7.1	Operation has written policy that damaged, soft and decayed tomatoes are not harvested to the degree possible.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
7.2	Operation shall have a policy that cloths, towels, or other cleaning materials shall not be used to wipe tomatoes.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
7.3	If tomatoes are washed in the field, operation shall have written procedures regarding the quality of wash water and use of wash water sanitizing chemicals.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
7.4	Packing containers shall be labeled as to their source, and to identify that the product has been field packed.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	

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8. Employees and Harvest Crews			
A. Toilet and Handwashing Facilities			
Q#	Requirement		Auditor Comments
8.1	Clean and sanitary toilet facilities are provided for all employees and toilets are made from cleanable materials and are cleaned and sanitized daily or sufficiently often to be maintained in a clean and sanitary manner.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.2	The number of toilet facilities meets state and federal requirements.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> NA	
8.3	Toilet facilities are located within ¼ mile (400 m) or a five minute walk of work areas.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.4	Toilet facilities are located, serviced and maintained in a manner to not be a source of contamination of produce.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.5	A response plan is in place in the event of a major spill or leak of field sanitation units.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.6	All toilet facilities contain toilet paper.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	

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8.7	There is a program for the sanitary disposal of used toilet paper.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.8	Hand washing facilities, with soap, water and disposable hand-drying towels, or air blowers, and refuse containers are provided	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.9	Gray water is captured and disposed of away from the harvest/packing area so that there is no evidence of runoff into production areas.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.10	If hand wash water tanks are used, they are cleaned and sanitized and the water is changed periodically.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.11	The source of water used to fill hand washing tanks meets the microbial standard for potable water and is documented.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.12	Toilet and hand washing facilities are inspected by a designated individual at a sufficient frequency during use to assure cleanliness, condition and adequate supplies.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	

B. First Aid Policies

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Q#	Requirement		Auditor Comments
8.13	There is a written policy describing procedures which specify handling/disposition of produce or treatment of food contact surfaces that have come into contact with blood or other bodily fluids.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.14	There is a written policy instructing workers to seek prompt treatment for cuts, abrasions and other injuries and first aid supplies are provided.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
C. Habits and Conditions			
Q#	Requirement		Auditor Comments
8.15	There is a written Hygiene Practices policy including, but not limited to, policies and procedures on hand washing, prohibiting urinating or defecating in the field, and prohibiting handling produce after using the washroom without washing their hands, for all employees and visitors.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	

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8.16	Policies shall require hand washing with soap and potable water at the appropriate time, such as before starting work, after use of toilet facilities, after breaks and when hands may have become contaminated. Policy shall apply to employees, outside contractors, inspectors, and visitors. Compliance is emphasized by management.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.17	There are signs, in the appropriate language or pictorially, reminding workers to wash their hands after using the toilet.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> NA	
8.18	If gloves are used, there must be a written SOP regarding their use.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	

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8.19	SOPs establishing the operation's illness policy provide that workers who show signs of illness (vomiting, jaundice, diarrhea) or open or exposed sores or lesions on their hands are not permitted to perform job duties where they will come in direct contact with raw product or food contact surfaces.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.20	There is a written policy regarding jewelry, nail polish and false nails in the workplace	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> NA	
8.21	Food and tobacco products are only in designated areas as specified in company SOP.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
8.22	Drinking water shall be provided in fountains or single use containers. Drinking water containers shall be handled in a manner that prevents them from becoming sources of contamination.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	

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8.23	There is a written policy prohibiting the storage and use of personal items outside of designated areas.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
9. Education and Training			
Q#	Requirement		Auditor Comments
9.1	Employees shall receive mandatory safe product handling and personal hygiene education at time of hire with reinforcements as detailed in company SOP.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
9.2	Individuals shall be trained on all food safety requirements specific to their assigned duties.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
9.3	Workers are trained and follow the policy that product that has dropped on the ground is discarded.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
9.4	Supervisors are trained to look for, recognize and react to symptoms of potentially infectious illness.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
10. Traceback and Recall Programs			
Q#	Requirement		Auditor Comments

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10.1	Operation maintains adequate record of the sale or disposition of product (One step forward)	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
10.2	Operation maintains adequate record of the source of all products used in the farm. (One step back)	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> IAR <input type="checkbox"/> NA	
10.3	Operation has a recall procedure in place.	<input type="checkbox"/> C <input type="checkbox"/> CAN <input type="checkbox"/> NA	

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