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

2 0 11

Repacking and Distribution Checklist

United Fresh
PRODUCE ASSOCIATION

Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain, 2009

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. While some of the Tomato Food Safety Protocol documents were formally amended in April 2011, no changes were recommended for this document and so this 2009 version remains current.

Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain, 2009
Repacking and Distribution - 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 _____

C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk;
NA, not applicable or not needed.   Version 23Nov09

Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain, 2009
Repacking and Distribution - Checklist

Audit Summary

		C	CAN	IAR	NA	Q# requiring corrective actions for CAN or IAR
1.	Management Responsibility					
2.	Packinghouse Condition and Equipment					
3.	Pest Control					
4.	General Sanitation					
5.	Raw Material Sourcing					
6.	Produce Containers and Packaging Materials					
7.	Primary Packaging Boxes					
8.	Produce Cleaning and Produce Wash Water					
9.	Facility Supplies and Equipment					
10.	Quarantine or On-hold Materials					
11.	Transportation					
12.	Employee Hygiene					
13.	Education and Training					
14.	Product Traceability and Recall Procedures					
15.	Food Defense Awareness					

* Tomato handling at facilities that primarily redistribute tomatoes, whether or not they repack, wash, sort or otherwise change the contents in the container, are also required to follow the recommendations in these guidelines, as appropriate to their specific operation.

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Repacking and Distribution - Checklist

1. Management Responsibility			
Q#	Requirement		Auditor Comments
1.1	Operation has designated an individual responsible for food safety.	□ C □ CAN □ NA	
1.2	Responsible individual has evidence of training in food safety relevant to tomatoes.	□ C □ CAN □ NA	
1.3	Operation has current copies of the *Commodity Specific Food Safety Guidelines for the Fresh Tomato Supply Chain, Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain* and additional food safety documents as required by state and/or federal regulation.	□ C □ CAN □ NA	
1.4	Operation has been registered or permitted as a food handling establishment as required by state or federal regulation	□ C □ CAN □ NA	

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NA, not applicable or not needed.   Version 23Nov09

1.5	Operation has procedures for conducting self-audits, and conducts self-audits to verify compliance with established internal policies and procedures.	□ C □ CAN □ NA	
1.5	Operation has a written procedure and timelines for implementing and documenting corrective actions.	□ C □ CAN □ NA	
1.6	Operation has a "zero tolerance" policy for controllable practices and conditions that result in immediate food safety risks.	□ C □ CAN □ IAR □ NA	

2. Packinghouse Condition and Equipment

A. General Building

Q#	Requirement		Auditor Comments
2.1	Grounds are reasonably free of litter, debris and standing water.	□ C □ CAN □ IAR □ NA	
2.2	Facility is constructed/ arranged to allow separation of incoming, in-process and finished products.	□ C □ CAN □ IAR □ NA	
2.3	System for removing waste materials from product handling area works efficiently.	□ C □ CAN □ IAR □ NA	

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2.4	Outside garbage receptacles/dumpsters are covered or are located away from facility entrances, and areas around such sites are reasonably clean.	□ C □ CAN □ IAR □ NA	
2.5	Proper maintenance of roof is done.	□ C □ CAN □ IAR □ NA	
2.6	Operation has procedures that minimize the accumulation of standing water.	□ C □ CAN □ IAR □ NA	
2.7	Floors are in good repair and easily cleaned.	□ C □ CAN □ IAR □ NA	

B. Facility and Equipment

Q#	Requirement		Auditor Comments
2.8	All food contact surfaces are made of material and designed to be easily cleaned and sanitized, and are maintained in good condition.	□ C □ CAN □ IAR □ NA	
2.9	Wood is not used as a food contact surface.	□ C □ CAN □ IAR □ NA	

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2.10	Glass and brittle plastic items are excluded to the extent practical from and/or protected in packing or processing areas. Lights have shatterproof bulbs or covers in all areas where tomatoes or packaging are handled or held.	□ C □ CAN □ IAR □ NA	
2.11	Where workers walk over product contact surfaces, those walkways are protected by kick plates, catch trays, product covers or other barriers.	□ C □ CAN □ IAR □ NA	
2.12	Motors and gear boxes above food handling areas have drip pans under them and use food grade lubricants.	□ C □ CAN □ IAR □ NA	
2.13	Goods in all storage areas are kept off the floor and away from walls to allow cleaning and inspection for pest activity.	□ C □ CAN □ IAR □ NA	
C. Cooling Systems			
Q#	**Requirement**		**Auditor Comments**

C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk; NA, not applicable or not needed.

Q#	Requirement		Auditor Comments
2.14	Evaporators, cooling coils, drip pans, drains, drain lines and reservoirs are cleaned and sanitized on a scheduled basis.	□ C □ CAN □ IAR □ NA	
2.15	Water from refrigeration drip pans is drained and disposed of away from product and product contact surfaces.	□ C □ CAN □ IAR □ NA	
2.16	Operation has a program to maintain and monitor temperature in process and storage rooms where temperature control is required.	□ C □ CAN □ IAR □ NA	
3. Pest Control			
Q#	**Requirement**		**Auditor Comments**
3.1	Operation has a written pest control program, performed by a trained pest control operator. Pest control operators are licensed where required by prevailing regulation or law.	□ C □ CAN □ IAR □ NA	
3.2	There is a clear area surrounding the facility to deter pest infestation.	□ C □ CAN □ IAR □ NA	

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3.3	There is no evidence of significant pest populations (birds, rodents, insects) reasonably likely to contaminate tomatoes.	□ C □ CAN □ IAR □ NA	
3.4	There are no bait stations containing toxic baits inside the facility.	□ C □ CAN □ IAR □ NA	
3.5	Traps do not contain toxic bait and are placed at the interval and location recommended by the pest control operator. Traps must be labeled with a number or other identifier and their locations are documented on a map.	□ C □ CAN □ IAR □ NA	
3.6	Bug zappers and insect attractant devices, if used, are not placed in a location where product or food handling equipment or food packaging materials may become adulterated.	□ C □ CAN □ IAR □ NA	

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3.7	Operation has a written policy prohibiting domestic animals in the packinghouse.	□ C □ CAN □ IAR □ NA	
4. General Sanitation			
Q#	**Requirement**		**Auditor Comments**
4.1	A Master Cleaning and Sanitation Schedule for the facility is in place for daily, weekly, monthly and seasonal/yearly cleaning and maintenance tasks including all areas.	□ C □ CAN □ IAR □ NA	
4.2	All compounds used to clean and sanitize finished product containers, food contact surfaces, or food contact tools are approved for that use by the US EPA, FDA or appropriate agency and used according to label instructions.	□ C □ CAN □ IAR □ NA	
4.3	All chemicals, cleaning compounds and solvents are stored in a secure and locked location.	□ C □ CAN □ IAR □ NA	

C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk; NA, not applicable or not needed.

4.4	There are written cleaning and sanitation procedures for all food contact surfaces (SSOPs).	□ C □ CAN □ IAR □ NA	
4.5	There are written cleaning and, if required, sanitizing procedures for all non-food contact surfaces and areas of the facility including floors, drains, walls, ceilings and other surfaces that may pose a source of product contamination.	□ C □ CAN □ IAR □ NA	
4.6	Cleaning equipment and tools are clean, in working order and stored properly away from food handling areas.	□ C □ CAN □ IAR □ NA	
5. Raw Material Sourcing			
Q#	**Requirement**		**Auditor Comments**
5.1	Operation has an Approved Supplier program for all incoming materials, including packaging.	□ C □ CAN □ IAR □ NA	

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			Auditor Comments
5.2	The operation has a policy and takes affirmative steps to ensure that all fresh tomatoes that are packed or stored in the facility are grown following requirements in *Tomato Metrics Audit - Open Field Production, Harvest and Field Packing*.	□ C □ CAN □ IAR □ NA	
5.3	Operation has procedures to ensure that the tomato staging area and staging practices do not pose a risk of tomato contamination.	□ C □ CAN □ IAR □ NA	
6. Produce Containers and Packaging Materials			
Q#	**Requirement**		**Auditor Comments**
6.1	Tomato-contact bulk bins, gondolas, totes and trays shall be constructed of impervious materials that can be easily cleaned and sanitized.	□ C □ CAN □ IAR □ NA	
6.2	Bulk bins, gondolas, totes and trays are stored and maintained in designated locations.	□ C □ CAN □ IAR □ NA	

C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk; NA, not applicable or not needed.

6.3	The operation has written procedures for cleaning and sanitizing of produce food contact containers, requiring that bulk bins, gondolas, totes and trays are cleaned and sanitized periodically and is documented.	□ C □ CAN □ IAR □ NA	
6.4	Bins, totes and cartons intended for product not used for any other purposes.	□ C □ CAN □ IAR □ NA	
6.5	Packaging materials and finished product containers are stored in a clean and orderly manner and prohibited from direct contact with the floor. Pallets, slip sheets, and supports used to keep product containers off the floor are clean and in good condition.	□ C □ CAN □ IAR □ NA	
7. Primary Packaging Boxes			
Q#	**Requirement**		**Auditor Comments**

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7.1	The repacker must label the container as being repacked. The box contains information on the commodity, repacker identification and provide lot identification.	□ C □ CAN □ IAR □ NA	
7.2	Operation has a process to ensure that inaccurate information on previously used boxes is obliterated, or otherwise made clear that original information no longer applies, to prevent misidentification.	□ C □ CAN □ IAR □ NA	
7.3	Primary packaging boxes are clean and sanitary.	□ C □ CAN □ IAR □ NA	
7.4	Used boxes may be used as secondary shipping containers, provided that the original identification information on the box has been obliterated or otherwise made clear that it is no longer accurate.	□ C □ CAN □ IAR □ NA	
8. Produce Cleaning and Produce Wash Water			

C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk; NA, not applicable or not needed.

A. Cleaning Materials Including Cloths

Q#	Requirement		Auditor Comments
8.1	Operation shall have a policy that cloths, towels, or other cleaning materials shall not be used to wipe tomatoes.	□ C □ CAN □ IAR □ NA	

B. Debris Removal and Removal of Injured Tomatoes

Q#	Requirement		Auditor Comments
8.2	Debris is not allowed to collect in wash areas/dump tanks.	□ C □ CAN □ IAR □ NA	
8.3	Damaged tomatoes are removed to the degree possible.	□ C □ CAN □ IAR □ NA	

C. Water Quality Management

Q#	Requirement		Auditor Comments
8.4	Only water that meets the microbial standards for potable water is used in the packinghouse for handwashing, food or food contact surface use.	□ C □ CAN □ IAR □ NA	

8.5	Cross connections between water that may contact food and food contact surfaces and non-potable water systems are prohibited.	□ C □ CAN □ IAR □ NA	
8.6	All water lines are protected against back flow siphonage.	□ C □ CAN □ IAR □ NA	
8.7	All water lines and fixtures are in proper repair.	□ C □ CAN □ IAR □ NA	
D. Product Wash Water Management			
Q#	**Requirement**		**Auditor Comments**
8.8	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.	□ C □ CAN □ IAR □ NA	

C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk;
NA, not applicable or not needed.

8.9	Wash water sanitizer, used in dump, flume or other multipass wash system, is used in accordance with operational procedure, manufacturer instructions, and regulatory requirements. Records are kept.	□ C □ CAN □ IAR □ NA	
8.10	In systems where tomatoes are submerged or dwell in water, water temperature is monitored and controlled. Water temperature should be at least 10ºF above highest measured pulp temperature of tomatoes when entering the water. If operation can demonstrate retention times are never more than two minutes and water submersion does not exceed 1 ft, water temperature shall be controlled to be not less than highest measured pulp temperature.	□ C □ CAN □ IAR □ NA	

C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk;
NA, not applicable or not needed.

8.11	Operations utilizing spray systems in place of whole tomato immersion shall design the line so that the entire tomato surface is rinsed.	□ C □ CAN □ IAR □ NA	
8.12	Re-circulated and re-used water is changed at least daily, and records of changes are kept.	□ C □ CAN □ IAR □ NA	
8.13	If water quality is based upon a chlorine-based sanitizer and Oxidation Reduction Potential (ORP), the process shall be targeted to be at least 800 mV. ORP levels shall not be less than 650 mV, measured at the exit of the product from the water system, unless validation data are available to demonstrate a lower ORP is effective under operating conditions.	□ C □ CAN □ IAR □ NA	
8.14	If an ORP system is used, an independent measurement is used to verify compliance.	□ C □ CAN □ IAR □ NA	

C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk;
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8.15	If water quality is based upon an aqueous chlorine dioxide sanitizer, chlorine dioxide levels shall not be less than 1 ppm, measured at the exit of the product from the water system, unless validation data are available to demonstrate a lower level is effective under operating conditions.	□ C □ CAN □ IAR □ NA	
8.16	If water quality is based upon a peroxyacetic, peracetic or peracid system, levels shall not be less than 30 ppm, measured at the exit of the product from the water system, unless validation data are available to demonstrate a lower level is effective under operating conditions.	□ C □ CAN □ IAR □ NA	

C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk;
NA, not applicable or not needed.

8.17	If a sanitizer system other than aqueous chlorine dioxide, peracid, or hypochlorous and ORP is used, the system shall be operated and controlled to levels of equivalent efficacy of pathogen cross-contamination control in tomato wash systems.	□ C □ CAN □ IAR □ NA	
8.18	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.	□ C □ CAN □ IAR □ NA	
8.19	Instruments, test methods or test strips used to monitor requirements shall be appropriate to their use and sufficiently sensitive to their intended purpose.	□ C □ CAN □ IAR □ NA	

9. Facility Supplies and Equipment

Q#	Requirement		Auditor Comments

C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk; NA, not applicable or not needed.

9.1	MSDS are on file for all chemicals used in the facility, and readily accessible.	□ C □ CAN □ NA	
9.2	All waxes, coatings and other chemicals applied to product are approved by the US EPA, FDA or prevailing authority for their designated use and used according to label instructions.	□ C □ CAN □ IAR □ NA	

10. Quarantine or On-hold Materials

Q#	Requirement		Auditor Comments
10.1	Materials placed on hold, quarantined or rejected are clearly identified and segregated from other products and packaging materials.	□ C □ CAN □ IAR □ NA	

11. Transportation

Q#	Requirement		Auditor Comments
11.1	Shipping unit is clean, functional and free of objectionable odors before loading. A responsible individual signs the completed checklist.	□ C □ CAN □ IAR □ NA	

C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk; NA, not applicable or not needed.

Q#	Requirement		Auditor Comments
11.2	Vehicles and containers used to transport produce shall not be used to transport trash, animal carcasses or raw animal products that may be a source of microbial contamination unless cleaned and sanitized by a procedure sufficient to ensure that microbial contamination of produce does not occur.	□ C □ CAN □ IAR □ NA	

12. Employee Hygiene

A. Toilet Facilities

Q#	Requirement		Auditor Comments
12.1	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.	□ C □ CAN □ IAR □ NA	
12.2	The number of toilet facilities meets state and federal requirements.	□ C □ CAN □ NA	

C, Compliant with requirement; CAN, Corrective Action Needed to be compliant; IAR, Immediate Action Required because of imminent food safety risk; NA, not applicable or not needed.

12.3	Toilets are located within a five minute walk of work areas.	□ C □ CAN □ IAR □ NA	
12.4	All toilet facilities contain toilet paper.	□ C □ CAN □ IAR □ NA	
12.5	There is a program for the sanitary disposal of used toilet paper.	□ C □ CAN □ IAR □ NA	
12.6	Hand washing facilities, with soap, water and disposable hand-drying towels, or air blowers, and refuse containers are provided.	□ C □ CAN □ IAR □ NA	
12.7	If permanent handwashing facilities are not used, gray water is captured and disposed of away from the packing area.	□ C □ CAN □ IAR □ NA	
12.8	If portable hand wash water tanks are used, they are cleaned and sanitized and the water is changed periodically.	□ C □ CAN □ IAR □ NA	

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Q#	Requirement		Auditor Comments
12.9	The source of water used to fill hand washing tanks meets the microbial standard for potable water and is documented.	□ C □ CAN □ IAR □ NA	
12.10	Toilet and hand washing facilities are inspected by a designated individual at a sufficient frequency during use to assure cleanliness, condition and adequate supplies.	□ C □ CAN □ IAR □ NA	
B. First Aid Policies			
Q#	**Requirement**		**Auditor Comments**
12.11	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.	□ C □ CAN □ IAR □ NA	
12.12	There is a written policy instructing workers to seek prompt treatment for cuts, abrasions and other injuries and first aid supplies are provided.	□ C □ CAN □ IAR □ NA	
C. Habits and Conditions			
Q#	**Requirement**		**Auditor Comments**

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12.13	There is a written Hygiene Practices policy including, but not limited to, policies and procedures on hand washing, toilet use, and requiring handwashing at beginning of shift and prior to returning to production line, for all employees and visitors.	□ C □ CAN □ NA	
12.14	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.	□ C □ CAN □ IAR □ NA	
12.15	There are signs, either in the appropriate language or pictorially, reminding workers to wash their hands after using the toilet.	□ C □ CAN □ NA	

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12.16	If gloves are used, there must be a written SOP regarding their use.	□ C □ CAN □ IAR □ NA	
12.17	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.	□ C □ CAN □ IAR □ NA	
12.18	There is a written policy regarding the use of hair restraints.	□ C □ CAN □ NA	
12.19	There is a written policy regarding jewelry, nail polish and false nails in the workplace.	□ C □ CAN □ NA	
12.20	Food and tobacco products are only in designated areas as specified in company SOP.	□ C □ CAN □ IAR □ NA	

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| 12.21 | 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. | □ C
□ CAN
□ IAR
□ NA | |
| 12.22 | There is a written policy prohibiting the storage and use of personal items outside of designated areas. | □ C
□ CAN
□ IAR
□ NA | |

13. Education and Training

Q#	Requirement		Auditor Comments
13.1	Employees shall receive mandatory safe product handling and personal hygiene education at time of hire with reinforcements as detailed in company SOP.	□ C □ CAN □ IAR □ NA	
13.2	Individuals shall be trained on all food safety requirements specific to their assigned duties.	□ C □ CAN □ IAR □ NA	

Q#	Requirement		Auditor Comments
13.3	Workers are trained and follow the policy that product dropped on the floor is discarded.	□ C □ CAN □ IAR □ NA	
13.4	Supervisors are trained to look for, recognize and react to symptoms of potentially infectious illness.	□ C □ CAN □ IAR □ NA	
14. Product Traceability and Recall Procedures			
Q#	**Requirement**		**Auditor Comments**
14.1	All levels of the tomato supply chain shall maintain adequate traceability to a minimum of immediate next recipient and immediate previous supplier.	□ C □ CAN □ IAR □ NA	
14.2	Establish procedures to maintain lot identity of tomatoes, including setbacks and primary containers, throughout the repacking process.	□ C □ CAN □ IAR □ NA	
14.3	Establish procedures for reconciliation of incoming tomato lots to usage	□ C □ CAN □ IAR □ NA	

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14.4	Documentation maintained for each lot received shall include sufficient information about the source to allow for the appropriate tracing of product.	□ C □ CAN □ IAR □ NA	
14.5	Documentation maintained for each lot shipped shall include sufficient information about the customer receiving the product to allow for the appropriate tracing of product.	□ C □ CAN □ IAR □ NA	
14.6	Traceability records shall be readily available.	□ C □ CAN □ IAR □ NA	
14.7	Effectiveness of these procedures shall be tested at least annually. A record of this test shall be kept on file.	□ C □ CAN □ NA	
14.8	A successful mock recall test has been performed in the last 12 months	□ C □ CAN □ NA	
15. Food Defense Awareness			
Q#	**Requirement**		**Auditor Comments**

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15.1	The facility is registered with FDA as required by the Public Health Security and Bioterrorism Preparedness and Response Act of 2002.	□ C □ CAN □ NA	
15.2	There are procedures in place that readily identify employees, and those with specific access privileges, e.g., to chemical storage, to the water system.	□ C □ CAN □ IAR □ NA	

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