

USDA Good Agricultural Practices Explanation Document

David Robbins

The product of an audit is the written report. The completed checklist, scoresheet and corrective action reports are all part of the audit report. The audit report shall include an explanation to all questions for which a NO or N/A answer was noted in the checklist. If applicable, the audit team shall initiate a corrective action report. (For specific instructions, refer to the NON-CONFORMITY and CORRECTIVE ACTION POLICY section). A copy of the audit report shall be given to the auditee upon completion of the audit at the exit meeting. This multi-part form provides documentation that highlights the questions that were answered NO or N/A, and affords the auditee an opportunity to address them at the exit meeting.

A Corrective Action Report (CAR) is required for any GAP&GHP audit that fails because of non-conformities due to a specific “automatic unsatisfactory” or because a particular scope fails to meet the minimum passing score. This report must be submitted to the lead auditor or state audit program supervisor prior to a Federal or Federal-State auditor conducting a follow up audit of the farm/facility.

To create a Standard Operating Procedure (SOP), it is recommended to watch someone perform a task and writing down all the steps and tools that lead to the completion of the task. Reports should contain timestamps and necessary information required by each checklist item. Policies should directly address the specific topic of each checklist item and be clear to a reader of what should be done for the particular item.

Did the auditee participate in GAP & GHP training? Yes/No

GAP&GHP training for producers could include Cooperative Extension Service training, formalized classes attended, Good Agricultural or Manufacturing Practices seminars or other professional training that may include Water, Manure/Biosolids, Worker Health & Hygiene, Sanitary Facilities, Field Sanitation, Packing Facility Sanitation and/or Transportation issues.

Is there a map that accurately represents the farm operations? Yes/No/NA

Producers should have some type of map showing their growing areas. Large operations will have several maps of their operations. In many cases, the maps will show products being grown in specific locations. This information is always required when the scope covers Farm Review and Field Harvest & Field Packing Activities (Parts 1 & 2). It is also important to have accurate information available when reviewing Traceback.

Legal Description/GPS/Lat.&Long. of Location:

A legal description, such as a County issued parcel number (APN) or a Township and Range, may be available for the operation(s). If the audit site is different from the main address listed on the front of the scoresheet, the address of the audit site(s) shall be listed here. It may be useful to research for information about wells, locations of former landfills near or on the property, for future audits or for producer record for a particular audit.

Are all crop production areas located on this audit site? Yes/No/NA

Crop production areas may or may not be located on contiguous or adjacent acreage. This information is required in order to properly assess questions under Farm Review (Part 1) and Field Harvest and Field Packing Activities (Part 2). Sites which are separate will have to be separately visited in order to verify all aspects of the audit scope at each location. When the operation has production areas other than on the audit site, the auditor must review farming and/or harvesting practices and determine if different practices are followed at different sites. One site which fails to meet minimum audit requirements would be enough to disqualify the entire operation.

Total acres farmed (Owned, leased/rented, contracted, consigned):

This information is only required when the audit covers or includes Farm Review (Part 1). Knowing this information provides the auditor with information to determine what will need to be personally reviewed. This would include all acreage coming under the use of the company being audited.

Does the company have more than one packing facility? Yes/No/NA

Multiple packing facilities under the same name can be reviewed separately or all as one audit. The auditee must designate how they want to be audited prior to the start of the audit. However, where the audit covers all facilities, one failing facility would cause the remainder to fail. When separate audits cover each of the facilities, a problem in one facility would not affect the final audit of the other facilities. When listing the separate locations under multiple reports/audits, the normal street address or a different name must be used as the separating reference. This would include multiple growers or grower locations that may be contracted under an individual packing facility.

Is there a floor plan of the packing house facility(s) indicating flow of product, storage areas, cull areas, employee break rooms, restrooms, offices? Yes/No/NA

A floor plan of the facility will be useful for the auditor to locate and identify such areas listed and to help point out problem areas. This information should be obtained when the scope covers House Packing Facility (Part 3) and/or the Storage Facility (Part 4).

Is any product commingled prior to packing? Yes/No

It is common in some produce facilities and in some commodity programs to commingle product from different growers. This may occur at the storage level prior to packing, during a pre-grading and pre-sizing process or at the time of packing. The knowledge of commingling is important in order to properly answer questions regarding Traceback

Implementation of a Food Safety Program

Questions P-1 and P-2 must be answered YES in order to continue, if the questions cannot be answered YES, the audit will be reported as an “automatic unsatisfactory.”

P-1 A documented food safety program that incorporates GAP and/or GHP has been implemented.

Question P-1 requires that the auditor review documentation which indicates that, at a minimum, a GAP & GHP program has been established for the scope or scopes of the audit being completed. Documentation may include a Food Safety Manual or plan, various published Standard Operating Procedures (SOP's), and/or documentation that a program is implemented and being followed. It may also contain information or references pertaining to internal or self audits of the program (not a requirement). Other similar documentation may also be applicable and acceptable if it indicates that a formally established program is in place.

Sample SOP: <https://extension.umaine.edu/publications/wp-content/uploads/sites/52/2020/03/SOP-fillabel-form.pdf>

P-2 The operation has designated someone to implement and oversee an established food safety program

Question P-2 indicates that there is a person in the operation that will implement and oversee a food safety program. Operations which are serious about following established food safety programs will have a designated person whom is responsible for ensuring that the program is being followed. Auditors should interview the designee in order to determine their knowledge of the program. Designees should be able to show procedures and records and knowledgeably answer questions about the program they are responsible for.

Traceability

G-1 A documented traceability program has been established

All facilities or operations shall have a traceability program that, at a minimum, allows a traceback investigation to follow the product both forward and backward at least to the next level in the marketing chain. The program shall be used for all fresh produce listed in the audit and handled at the facility or operation. Documents may be paper or electronic and must be accessible both during the audit and in case of a traceback investigation. There are many commercially available traceability programs that auditees may utilize for their traceability program.

Sample: <https://gaps.cornell.edu/sites/gaps.cornell.edu/files/shared/documents/Traceability-SOP.docx>

G-2 The operation has performed a “mock recall” that was proven to be effective

The guide indicates that all facilities should work with their suppliers and customers to track the path the product takes from the farm to the consumer. This will provide a readily available trail in case there is a need to determine where product originates and to where it was shipped. A “recall” is a means to return marketed product to its origin; to remove it from the market place. A “mock recall” is a practice exercise that is used to determine where product is shipped and whether or not it can be returned to the origin or removed from the marketing chain.

Documents must indicate the customers contacted, the amount of product remaining from the original shipment and the disposition of product which could not be effectively recalled. Such disposition may include sales to customers, reshipment to a subsequent customer that could be contacted if a recall were necessary, or destruction of product. The auditor must review recall records and assess the practice.

Sample: <https://www.carolinafarmstewards.org/wp-content/uploads/2019/05/Mock-Recall-Record.docx>

Worker Health and Hygiene

G-3 Potable water is available to all workers.

It is intended that this question applies to water being used in the operation by workers to drink and wash hands or other body parts in order to reduce contamination. It will be necessary for auditors to review documentation, such as testing records, in order to verify that the water is potable. The water test does not need to specifically show “Meets Drinking Water Standards” or similar language in order to award points for this question. Water tests for drinking water should show that the microbial contents are within the EPA, State or local guidelines. If the permitted amounts are not shown on the water test, the auditors should familiarize themselves with what is permitted. The EPA “Total Coliform Rule” has a zero tolerance for coliforms, including E. coli.

Sample: <https://gaps.cornell.edu/sites/gaps.cornell.edu/files/shared/documents/Agricultural-Water-for-Production-Water-Sample-Water-Testing-Logsheet.docx>

G-4 All Employees and all visitors to the location are required to follow proper sanitation and hygiene practices

Fresh produce handling operations should stress that both visitors and employees must follow the established sanitation and hygiene practices, including hand washing. For visitors, establishments may require them to check-in and enter the premises through a specific door or through the office. There may be signs posted indicating that visitors must follow a specific policy or policies. Some companies may ask visitors to sign-in before entering. Each of these is an indication that the facility requires certain hygiene and sanitation policies. In addition, requirements must be continually stressed through periodic reviews of employee/visitor habits, training sessions, required attire/uniform dress code or other means. A minimal statement by company management at orientation, in an employee handbook or posting of signs in various locations and no continual review or follow-up will not be sufficient to be considered as a “required process.”

Sample policy: <https://gaps.cornell.edu/sites/gaps.cornell.edu/files/shared/documents/Worker-Health-Hygiene-and-Training-SOP-Visitor-Health.docx>

G-5 Training on proper sanitation and hygiene practices is provided to all staff

All personnel should understand the impact of poor personal cleanliness and unsanitary practices on food safety. Good hygiene not only protects the worker from illness, but it reduces the potential for contaminating fresh produce which, if consumed by the public, could cause a large number of illnesses. In 21 CFR, Part 110.10, subparagraphs B (1 through 9), there is information about GMP's which may be applicable to various situations in fresh produce packing operations.

Each operator should develop a sanitation training program for their employees. Depending on the situation, formal presentations, one-on-one instruction, or demonstrations (example, hand washing) may be appropriate. Depending on the workers' job requirements, periodic refresher or follow-up training sessions may be needed.

Sample Document: <https://gaps.cornell.edu/sites/gaps.cornell.edu/files/shared/documents/Worker-Health-Hygiene-and-Training-SOP-Handwashing.docx>

G-6 Employees and visitors are following good hygiene/sanitation practices.

This statement relates to the previous two statements. Auditors must observe various visitor and employee practices throughout the course of the audit. Observations can only be made on those people present at the site during the audit. Everyone must be following the acceptable or company required practices in order that this question be answered YES. This question cannot be answered N/A.

G-7 Employees who handle or package produce are washing their hand before beginning or returning to work

Thorough hand washing before commencing work with produce and after using the toilet is very important. Many of the diseases that are transmissible through food may be harbored in the employee's intestinal tract and shed in the feces. Contaminated hands, including poorly cleaned fingernails and cuticles, can also transmit infectious diseases. Food handling operations should stress that hand washing with soap and/or other sanitizing agent(s) is required. It should be noted that sanitizer use alone is not an acceptable practice and points should not be awarded for this question if this is

the case. This can be completed by regular and periodic reviews of employee habits, training sessions or other means. A minimal statement by company management at orientation, information printed in an employee handbook or a simple company policy statement, with no continual review or follow-up will not be sufficient to be considered as a “required process.”

The recommended hand washing procedure is as follows:

- Wet hands with clean, warm water, apply soap, and work up a lather.
- Rub hands together for at least 20 seconds (sing the ABC song to yourself – that takes about 20 seconds).
- Clean under the nails and between the fingers. Rub fingertips of each hand in suds on palm of opposite hand.
- Rinse under clean, running water.
- Dry hands with a single-use towel.

G-8 readily understandable signs are posted to instruct employees to wash their hand before beginning or returning to work

Many operations post signs in or near the bathrooms to remind/require employees to wash their hands after they use the toilet facility. Some operations post signs in various places and require washing before going/returning to work. GMP's under 21 CFR, Part 110.37 require the posting of signage instructing employees handling food or food containers to wash before going to work or after any activity away from the work site. Hand washing may also be stressed as a part of the employee orientation and/or regular safety meetings.

G-9 All toilet/restroom/field sanitation facilities are clean. They are properly supplied with single use towels, toilet paper, hand soap, or antibacterial soap and potable water for hand washing.

Hand washing facilities with soap and towels may be located within or outside of the toilet facility. They must be located near the toilet facility that food handling employees would have ample opportunity to wash before returning to work. Auditors should review all toilet/restroom facilities pertinent to the operation being audited. Any single toilet facility within the operation that does not meet minimum requirements would prevent this statement from being answered YES for the entire operation. Toilet facilities do not need to be sparkling clean with polished sinks and water supply fixtures in order to be considered clean. Auditors must consider the number of people using a facility, the time of day that the observation was made (just after a break/meal period vs. at the beginning of the work period), the cleaning schedule and the overall appearance of the facility. A few pieces of paper here and there would be acceptable, whereas a pile of used paper towels spilling out of a trash receptacle onto the floor or scattered about the floor would not be acceptable.

G-10 All toilet/restroom/field sanitation facilities are serviced and cleaned on a scheduled basis.

Records shall be examined to check the cleaning schedule of the toilet/restroom/field sanitation unit facilities. A cleaning schedule should be specified in the company's food safety plan. Many field sanitation units are contracted out and cleaning services are part of the contract.

Sample Report: <https://gaps.cornell.edu/sites/gaps.cornell.edu/files/shared/documents/Worker-Health-Hygiene-and-Training-Restroom-Monitoring-and-Cleaning-Logsheets.docx>

G-11 Smoking and eating are confined to designated areas separate from where product is handled.

Such activities must be separated from the area where food handling is being carried out. Contamination of food may occur in any step of the food handling operation. In field handling activities, smoking and eating shall be confined to vehicular drive areas away from the production/growing area. This would be at the edges of the field out of the harvesting zone or in the drive areas between fields. In a packing or storage facility, this would be a designated area

separate from the packing or receiving/loading product flow zones. This could be in the general area of 35 the packing or receiving/loading area, but would be located a sufficient distance from the flow zone area in order to minimize contamination. Such areas shall be designated and separated by painted lines or by partitions in order to encourage employees to confine the activities to the specifically designated area.

Policy must be provided:

G-12 Workers with diarrheal disease or symptoms of other infectious disease are prohibited from handling fresh produce.

Supervisors should be familiar with the symptoms of infectious diseases so that if symptoms are evident, the supervisor can take appropriate steps. Several microbial diseases are able to readily invade and multiply in the human body and to produce severe disease. Any worker showing symptoms of an active case of illness that may be caused by such pathogens shall be excluded from work assignments that involve direct or indirect contact with fresh produce. Workers with diarrheal disease and symptoms of other infectious diseases shall not work directly with fresh produce or the sorting and packing equipment in the packing facility. Operators shall instruct employees to report any active case of illness to their supervisor before beginning work.

Sample Policy: <https://gaps.cornell.edu/sites/gaps.cornell.edu/files/shared/documents/Worker-Health-Hygiene-and-Training-SOP-Visitor-Health.docx>

G-13 There is a policy describing procedures which specify handling/disposition of produce or food contact surfaces that have come into contact with blood or other body fluids.

Blood or body fluids, regardless of the source (human or animal), are possible sources of microbial contamination. Such fluids can contain several infectious microbial organisms. In some States or localities, blood or other body fluids are considered as hazardous substances and must be handled with special equipment and procedures. All food handling operations must have a written plan to properly handle and dispose of any food products and to properly clean/sanitize food contact surfaces that come into contact with blood or other body fluids.

Policy must be provided:

G-14 Workers are instructed to seek prompt treatment with clean first aid supplies for cuts, abrasions and other injuries.

GMP's under 21 CFR, 110.10 state: "(a) Disease control. Any person who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination by which there is a reasonable possibility of food, foodcontact surfaces, or food-packaging materials becoming contaminated, shall be excluded from any operations which may be expected to result in such contamination until the condition is corrected. Personnel shall be instructed to report such health conditions to their supervisors."

Food handling workers that have any of the above conditions or that are injured on the job, no matter how minor, must seek first aid help. Operators must instruct and stress that workers report any conditions or injuries that could contaminate food products or containers. Minor cuts or scrapes which are incident to a food production environment 37 are just as serious as major one. All must be properly covered before the person returns to handling food or working around food contact surfaces. Auditors may verify this statement by reviewing company documents, questioning supervisory personnel or food handlers in what they would do.

Policy must be provided

G-15 Company personnel or contracted personnel that apply regulated pre-harvest and/or post harvest materials are licensed. Company personnel or contracted personnel applying non-regulated materials have been trained on its proper use.

Pre-harvest materials include pesticides, growth regulators and fertilizers. Post harvest materials would include waxes, fumigants and fungicides. Personnel in each area being audited should have a working knowledge of the use of these materials, if they are using them. This would include what the application material would be used for (fertilizer, wax, fungicide, etc.), the appropriate strength level, and what to do if there is a spill or the strength is improperly mixed. Applicators who hold current Federal or State licenses will meet the requirements of this question. However, if there are no restricted use materials being used which require the auditee to hold a pesticide license, the auditor should review training documents that proves that the applicators have received training on the proper use of the materials. Auditors may consider the question as N/A only when no pre-harvest and/or post-harvest materials are used in the scope of the operation being audited.

Report Document must be provided

Part 1 Farm Review

1-1 What is the source of irrigation water? (Pond, Stream, Well, Municipal, Other) Specify:

The farm water source should be shown here. When there are multiple sources, all must be listed. If the irrigation source and the source of chemical application spray water is the same, one statement will be sufficient. If the sources are different, auditors must explain.

1-2 How are crops irrigated? (Flood, Drip, Sprinkler, Overhead, Other) Specify:

The irrigation method and the type of crop will have an effect on the potential for microbial contamination. In order to help assess the potential, auditors must list the irrigation method. Be specific and list all methods if the farm uses multiple methods.

1-3 A water quality assessment has been performed to determine the quality of water used for irrigation purposes on the crop(s) being applied.

Farming operations must have knowledge of their water quality in order to determine whether or not the product could become contaminated through irrigation or chemical spraying. Water which comes into contact with the product must not be contaminated with microbial organisms. Drip irrigation methods or those where the water does not touch the crop are less likely to promote potential contamination than flood irrigation methods. Irrigation with sprinkler methods where the water sprinkles or drenches the crop can be the most risky for causing contamination, especially if the water quality is unknown.

Provide

1-4 A water quality assessment has been performed to determine the quality of water used for chemical application or fertigation method.

Municipal water supplies are regulated by law and are generally required to be potable. Well water may or not be potable and may or may not be microbially safe. Surface water is subject to various uncontrollable influences and shall be considered non-potable without further testing or treatment to show that the water quality is adequate for its intended use. The following further discusses testing schedules for sources of farm water.

- Municipal water: Acquire test results from the local water authority annually.
- Well water: Test at a minimum annually and treat the well if fecal coliforms are present. If the well casing is secure and well-maintained, and if livestock and manure storages are excluded from the well recharge and pumping area, then the risk of contamination is greatly reduced.
- Surface water: Test quarterly in warm climates such as California, Florida, Texas and other southern states.

Test three times during the growing season in northern climates such as New York, Pennsylvania, and Michigan - first at planting, second at peak use, third at or near harvest

1-5 If necessary, steps are taken to protect irrigation water from potential direct and nonpoint source contamination.

Farms should look at the production areas in terms of their proximity to surrounding land uses that pose a potential for polluted runoff, and take steps to minimize the pollution from contaminating their water source, by use of berms, swales, diversions, etc. Back flow devices are generally required. Auditors should check for backflow prevention devices when required by code or evaluation. Testing the water until it is known to be adequate,

treatment of the water with filtration and/or chemical means or protection of the source from animals or other pollutant sources by fencing or other means may provide sufficient steps to maintain a quality source.

1-6 The farm sewage treatment system/septic system function properly and there is no evidence of leakage or runoff.

Most treatment systems consist of a simple septic tank system consisting of a holding tank for solids and leach lines for liquids. If it appears that the system is sealed and there are no leaks near the tank or within the leach field, then it will be considered as functioning properly. If a public sewage line is present, and the line shows no evidence of leakage, the points can be awarded for this question. This statement may be answered N/A with a proper explanation in the COMMENTS section if there is no sewage treatment system on the facility operation or sewage treatment is not required.

1-7 There is no municipal/commercial sewage treatment facility or waste material landfill adjacent to the farm.

This statement shall be answered YES if no municipal or commercial sewage treatment facility is adjacent to the farm. Adjacent means approximately 1/4 mile or closer.

1-8 Crop production areas are not located near or adjacent to dairy, livestock, or fowl production facilities unless adequate barriers exist.

Currently, there is not any conclusive science to validate the exact distance needed between crop production areas and sources of potential contamination. Auditors need to use their best judgment and be observant to the presence of dairy or livestock production facilities, including feedlots (beef, swine, chickens, etc.). Concentrated feeding operations are defined by EPA and will have bare ground not covered by vegetation. When these types of facilities are within approximately one to two miles of the crop production area, factors such as topography, wooded areas or other natural barriers shall be taken into consideration when answering this question.

1-9 Manure lagoons located near or adjacent to crop production areas are maintained to prevent leaking/overflowing, or measures have been taken to stop runoff from contaminating the crop production areas.

Where it is possible that manure lagoons from adjacent or close dairy or livestock facilities can be a possible source of contamination, operations must take some measures to prevent the contamination. Lagoons must be of sufficient construction to prevent leaking or overflowing or operations must protect the crop growing area. Measures might include physical barriers, such as ditches, mounds, grass/sod waterways or diversion berms. In locations where the farming operation is on higher elevation ground than the lagoon, there will be little need for such barriers, as the elevation is a barrier itself. This statement shall be answered N/A, when there are no near or adjacent manure lagoons.

1-10 Manure stored near or adjacent to crop production areas is contained to prevent contamination of crops.

Manure is a major source of potential contamination. Manure storage areas should be constructed to contain any potential leaching and runoff from entering the crop production areas.

1-11 Measures are taken to restrict access of livestock to the source or delivery system of crop irrigation water.

In certain cases, it is possible that livestock may have access to the source of the water supply (wellhead area or pond/stream) or to the delivery system (canal/ditch). Where this is the case, operators should take measures to keep such livestock away. Where there are only a few head of livestock and access is random, they should not come within approximately 200 feet of the water source. This statement shall be answered N/A, when there are no livestock present or dairy/livestock production facilities are not adjacent or nearby.

1-12 Crop production areas are monitored for the presence or signs of wild or domestic animals entering the land.

Regularly completed "notes," "scouting lists," or "crop maintenance reports" may include this information. This task does not need to be completed on a daily basis, but a regular schedule that shows the producer has an awareness of the animal populations in the production areas. This question may only be answered N/A for fully enclosed greenhouses.

Requires a report:

1-13 Measures are taken to reduce the opportunity for wild and/or domestic animals from entering the crop production areas.

Farming operations are never going to be able to completely exclude wild and/or domestic animals from entering crop production areas. However, every effort should be made to limit the access to the production areas. Ideally, when there are only a few animals on adjacent land, there is a low risk of contamination. Occasional entry by normally seldom seen animals is tolerable. When needed, measures should be taken to reduce the entry into crop production areas by wild and domestic animals, including poultry and pets. This can be accomplished many ways, which can include such items as noise cannons or scare balloons to scare away birds and migratory water fowl, or fencing or other barriers to limit wildlife access. Auditors should understand that federal, state, or local environmental laws or policies may regulate certain species of animals, and that producers may have limited options for their control.

Requires a report

Please choose one of the following options as it relates to the farm operation:

- _____ Option A. Raw manure or a combination of raw and composted manure is used as a soil amendment.
_____ Option B. Only composted manure/treated municipal biosolids are used as a soil amendment.
_____ Option C. No manure or municipal biosolids of any kind are used as a soil amendment.

Option 1: Raw Manure

1-14 When raw manure is applied, it is incorporated at least 2 weeks prior to planting and a minimum of 120 days prior to harvest.

If it is necessary to apply manure or slurry to vegetable or fruit soil, incorporate it at least two weeks prior to planting and observe the 120-day pre-harvest interval. If the 120-day waiting period is not feasible, such as for short season crops like lettuce or leafy greens, apply only properly composted manure. Auditors must assess whether or not raw manure is properly used, according to the recommendations. They must review manure application records in order to adequately answer this question.

Report is required

1-15 Raw manure is not used on commodities that are harvested within 120 days of planting.

Report is required

1-16 If both raw and treated manure are used, the treated manure is properly treated, composted or exposed to reduce the expected levels of pathogens.

In a farming operation that uses both raw and composted manure, it will be necessary to review documentation to verify that the manure has been properly treated to kill pathogens. See question 1-18 for specific composting information. This question may be answered N/A if no composted/treated manure is used.

Requires a report

1-17 Manure is properly stored prior to use.

Any untreated manure that is stored at the facility must be stored in a way that ensures that it does not leach or runoff into adjacent crop production areas. The auditor should investigate to verify that raw manure cannot contaminate treated manure.

Option B: Composted Manure

1-18 Only composted manure and/or treated biosolids are used as a soil amendment.

Records shall be reviewed to verify that only composted manure or biosolids are used. If any raw manure is used, the auditor shall not use this option and use the questions for option A.

Requires a report

- 1-19 Composted manure and/or treated biosolids are properly treated, composted, or exposed to environmental conditions that would lower the expected level of pathogens.

There are various methods used to treat manure so that it is safer as a fertilizer than raw manure.

Passive Treatments:

Passive treatments rely primarily on the passage of time, in conjunction with environmental factors, such as natural temperature and moisture fluctuations and ultraviolet (UV) irradiation, to reduce pathogens. To minimize microbial hazards, growers relying on passive treatments should ensure manure is well aged and decomposed before applying to fields. Holding time for passive treatments will vary depending on regional and seasonal climatic factors and on the type and source of manure.

Active Treatments:

Active treatments generally involve a greater level of intentional management and a greater input of resources compared with passive treatments. Active treatments include pasteurization, heat drying, anaerobic digestion, alkali stabilization, aerobic digestion, or combinations of these. Composting is an active treatment commonly used to reduce the microbial hazards of raw manure.

This would include time charts for passive type treatment or time and temperature charts, process explanations and microbial testing reports for active treatment methods.

Requires Documentation

- 1-20 Composted manure and/or treated biosolids are properly stored and are protected to minimize recontamination.

Products used to fertilize fruit or vegetable crops may or may not be stored at the production/application site prior to use. In some cases, they may be brought directly from the treatment site and applied from the same conveyance at the time of delivery. When they are delivered to the production site and stored for future application, they must be properly stored to reduce recontamination and the likelihood of contaminating the production area or adjacent fields. Consider barriers or physical containment to secure manure storage or treatment areas where contamination from runoff, leaching, or wind spread is a concern.

- 1-21 Analysis reports are available for composted manure/treated biosolids.

Natural fertilizers, such as composted manure, and fertilizers containing natural components, should be processed and handled in a manner to reduce the likelihood of introducing pathogens into produce production areas. Growers and manure suppliers should apply good agricultural practices that ensure that all materials receive an adequate treatment, such as thorough mixing and turning outside edges into the center of a compost pile.

Growers treating or composting their own manure should have some type of procedure to follow. Growers purchasing manure should obtain a specification sheet from the manure supplier for each shipment of manure containing information about the method of treatment.

Requires a report

Option C: No Manure/Biosolids are Used

- 1-22 No animal manure or municipal biosolids are used.

This option shall only be used if no manure (raw or treated) or biosolids are used on the farm.

Policy required

- 1-23 A previous land use risk assessment has been performed.

Auditors should review the previous land use history with the operator.

Report required

- 1-24 When previous land use history indicates a possibility of contamination, preventative measures have been taken to mitigate the known risks and soils have been tested for contaminants and the land use is commensurate with test results.

In most cases the land will have been used as crop land or fallow land for many previous years. There is a minimum risk of contamination if there is no recent dumping, use as a dairy, livestock, or poultry feedlot or no evidence of improper use of animal wastes. Auditor should visually look for evidence of old building sites or other risk factors when on site. Recent land use history may indicate that the land was used as a dairy, feedlot or other waste site. Operators should have the soil tested for microbial contaminants and adjust their use of the land for crops that will have minimal contact with the soil.

Report Required

- 1-25 Crop production areas that have been subjected to flooding are tested for potential microbial hazards.

Flood waters can carry potential contamination from areas outside the crop production areas and spread it over a wide area. Fields that have been flooded should be tested for harmful pathogens prior to use to determine the suitability of its use. In answering this question, auditors should consider whether the crop is an annual that will be planted and harvested in the same season, or a perennial that will be planted but not harvested for several seasons, as the annual crops are at greater risk than perennial crops. Auditors should observe site for signs of flooding or locations where flooding could easily occur such as along stream beds, swamps, etc., and ask if/when flooding last occurred. This question may be answered N/A if no flooding has occurred on the farm.

Report Required

- 1-26 Each production area is identified or coded to enable traceability in the event of a recall.

A map or record that shows the crops grown in each field or production area should be available. The record should allow traceability of the product forward or back to the next step in the marketing chain.

Report Required

Part 2: Field Harvest and Field Packing Activities

- 2-1 A documented pre-harvest assessment is made on the crop production areas. Risks and possible sources of crop contamination are noted and assessed.

The farm operation must have completed a pre-harvest assessment on each production area prior to harvesting any crop being certified by the audit.

The assessment may include statements which address the following items that are applicable.

- Are toilet and wash facilities properly located?
- Is potable water available for workers?
- Are harvest containers available, clean, well located and protected?
- Is harvest equipment available and in good condition?
- Is there evidence of unauthorized entry in the crop area and if so, has it been investigated?
- Is there evidence of domestic or wild animal crop damage?
- Is there evidence of physical contamination in the crop area?
- Are fuel and chemicals which might contaminate crop areas isolated?
- If areas are contaminated are they isolated for "no-harvest"?
- Are there any other notable sources of biological or physical contamination such as dump sites, manure, burning debris, water that may affect food safety?
- Is transportation equipment clean and available?
- The assessment may include other information such as condition of the weather and or crops.

Documentation required

2-2 The number, condition, and placement of field sanitation units comply with applicable state and/or federal regulations

Operators should manage their facilities or farms in accordance with the laws and regulations that describe field and facility sanitation practices. The field sanitation laws prescribed under the Federal Occupational Safety and Health Act (OSHA) part 29 CFR 1928.110 describe such regulations and practices. The following is quoted, in part, from the Act:

(a) Scope. This section shall apply to any agricultural establishment where eleven (11) or more employees are engaged on any given day in hand-labor operations in the field.

(2) Toilet and hand washing facilities.

(i) One toilet facility and one hand washing facility shall be provided for each twenty (20) employees or fraction thereof, except as stated in paragraph (c)(2)(v) of this section

(ii) Toilet facilities shall be adequately ventilated, appropriately screened, have self-closing doors that can be closed and latched from the inside and shall be constructed to insure privacy.

(iii) Toilet and hand washing facilities shall be accessibly located and in close proximity to each other. The facilities shall be located within a one-quarter-mile walk of each hand laborer's place of work in the field.

(iv) Where due to terrain it is not feasible to locate facilities as required above, the facilities shall be located at the point of closest vehicular access.

(3) Maintenance. Potable drinking water and toilet and hand washing facilities shall be maintained in accordance with appropriate public health sanitation practices, including the following:

(ii) Toilet facilities shall be operational and maintained in clean and sanitary condition.

2-3 When question 2-2 is answered "NA," (sanitation units are not required), a toilet facility is readily available for all workers

For small farm operations that are not required by applicable local, state, or federal regulations to have field sanitation units on site, a toilet facility and hand washing station is readily available for any workers. Home toilet facilities may need to be observed. When sanitation units are not required, but are provided, this question may be answered yes.

2-4 Field sanitation units are located in a location that minimizes the potential risk for product contamination and are directly accessible for servicing.

The field sanitation units or toilet facilities should not be so located in the field as to contaminate product that will be harvested or product that already is harvested and/or packed. Units should not be located close to where product is harvested or stored, or where there is a possibility of spilled sewage running down hill into the production area or into a packed product storage area.

2-5 A response plan is in place for the event of a major spill or leak of field sanitation units or toilet facilities.

The operator should have a documented emergency clean-up procedure to follow in case contamination occurs. The procedure should include what will be done to contain the spill and to prevent additional contamination, what will be done to clean it up and what will be done with contaminated product. This question may be answered as N/A when field sanitation units or toilet facilities are not present.

Policy is required

2-6 All harvesting containers and bulk hauling vehicles that come in direct contact with product are cleaned and/or sanitized on a scheduled basis and kept as clean as practicable

Keep harvest containers as clean as practicable to prevent cross-contamination of fresh produce. Harvest containers used repeatedly during a harvest should be cleaned after each load is delivered and prior to reuse. If the containers are stored outside, they should be cleaned and sanitized before being used to haul fresh produce. Workers should not stand inside bins. Bulk hauling vehicles carrying unwashed crops should be swept out on a regular basis.

Assign responsibility for equipment to the person in charge of the harvesting crews or designated person. The person with assigned responsibility needs to know how equipment is being used during the day, ensure that it is functioning properly, and take steps to ensure proper cleaning and sanitizing of equipment when needed.

Under no conditions should buckets, bags, or other containers that have held hazardous chemicals be used for food contact. Any reused containers should be clean and free from debris. Dirty packing containers that cannot be cleaned should not be used.

Containers, such as picking bins, used as refuse receptacles must be prominently marked for this use and workers must not use these for picking and transporting produce.

For some commodities, containers are not used repeatedly because they are the final shipping containers. Where applicable, the containers should be clean at time of harvest and steps should indicate an attempt to protect final product contact surfaces. This does not require that new containers be intentionally cleaned and sanitized before use. They should be considered clean as arrived from the supplier.

Documentation is required

2-7 All hand harvesting equipment and implements (knives, pruners, machetes, etc.) are kept as clean as practical and are disinfected on a scheduled basis

Any hand harvesting implements should be kept as clean as possible, and cleaned on a scheduled basis. It is understandable that these implements are going to get dirty from constant, repeated use during the course of a harvesting day and auditors should not answer NO in this section just because a harvester is using a dirty knife. However, the points should not be given if there is no documented procedure for a scheduled cleaning of the implements.

Auditors should determine if the facility has a policy for cleaning equipment and harvesting aids. This may be verified through questioning of the workers, through a written policy or records of the cleaning process.

Documentation is required

2-8 Damaged containers are properly repaired or disposed of

Repair or discard damaged containers. Inspect containers for damage on a regular basis. Because damaged container surfaces may harbor pathogenic microorganisms and cause damage to the surface of fresh produce, they should not be used.

New, unused containers are the lowest risk; however, if containers are reused, they shall be clean and or sanitized, and air-dried before use. Buckets, bags, or other containers that have held hazardous chemicals should not be used for food contact. Any reused containers should be clean and free from debris. Dirty packing containers that cannot be cleaned should not be used.

This question applies both to harvesting containers such as bins, packing containers and the bulk container part of vehicles when the product is placed directly into them during harvest.

2-9 Harvesting equipment and/or machinery which comes into contact with product is in good repair.

Field equipment and/or machinery shall be kept in good repair. Field equipment/machinery that is leaking fluids or has loose or damaged parts can be a source of physical contamination.

2-10 Light bulbs and glass on harvesting equipment are protected so as not to contaminate produce or fields in the case of breakage.

Any exposed glass fixtures (including flood lights or brake/driving lights) on harvesting equipment should be protected to reduce the potential for contamination of the crop. This question is meant to cover mechanical harvesters for root crops, or machinery that sits directly over the un-harvested crop. Protection can include such practices as using plastic or wire covers, or enclosed fixtures.

2-11 There is a standard operating procedure or instructions on what measures should be taken in the case of glass/plastic breakage and possible contamination during harvesting operations.

The auditee food safety plan should outline an SOP or instructions documenting the procedures that will take place in the case of glass/plastic breakage contaminating the crop. This question is most relevant for crops that are mechanically harvested, although it can apply to any commodity.

Policy is required

2-12 There is a standard operating procedure or instructions on what measures should be taken in the case of product contamination by chemicals, petroleum, pesticides or other contaminating factors.

There is a standard operating procedure or instructions on what measures should be taken in the case of product contamination by chemicals, petroleum, pesticides or other contaminating factors.

Policy is required

2-13 For mechanically harvested product, measures are taken during harvest to inspect for and remove foreign objects such as glass, metal, rocks, or other dangerous/toxic items

For products that are mechanically harvested, measures should be taken to inspect for non produce ending up in the product. Auditors should either observe the harvesting process or interview harvesters to determine if these inspections are taking place.

2-14 Harvesting containers, totes, etc. are not used for carrying or storing non-produce items during the harvest season; farm workers are instructed in this policy.

Workers shall not carry personal food items or other non-produce items in their harvesting containers. Auditors should verify this through observation and questioning. The question would be answered NO if it is determined that any equipment used to haul garbage, manure, or other potentially contaminating items is used to hold fresh produce.

Policy is required

2-15 Water applied to harvested product is microbially safe.

Washing fresh produce (also known as surface treatment) can reduce the overall potential for microbial food safety hazards. This is an important step since most microbial contamination is on the surface of fruits and vegetables. If pathogens are not removed, inactivated, or otherwise controlled, they can spread to surrounding produce, potentially contaminating a greater proportion of the produce.

Water quality needs may vary depending on where the water use falls within the series of processes and whether a particular process is followed by additional cleaning processes. For example, water quality needs may be greater for water used for a final rinse before packaging compared with water in a dump tank where field soil from arriving produce quickly mixes with the water. The Environmental Protection Agency (EPA) established a standard for reclaimed water (treated effluent) used on non-processed fresh produce of less than 2.2 fecal coliforms per 100 milliliters (mls) of water.

Municipal water supplies are regulated by law and are required to be potable. Well water may or may not be potable but should be microbially safe. Surface water is subject to various uncontrollable influences and should be considered unsafe without further testing. Surface water should not be applied to the finished product.

Report is required

2-16 Efforts have been made to remove excessive dirt and mud from product and/or containers during harvest.

Every effort should be made to keep the crop and containers as clean as possible. In the event that the crop or containers are covered with excessive dirt and/or mud, efforts are taken to remove the excess dirt/mud from the products and containers to prevent the spread of potential contamination to other areas of the farming operation.

2-17 Transportation equipment used to move product from field to storage areas or storage areas to processing plant which comes into contact with product is clean and in good repair.

It is wise to prevent unnecessary contamination. If using an open truck bed to haul unprotected produce, line it and cover the food with clean washable covers. Truck beds should be washed or otherwise cleaned whenever they become dirty.

Ensure that transportation vehicles are clean. Dirty vehicles can contaminate produce with harmful microbes. Auditors should review equipment in order to verify this factor. Some operations may establish standard procedures and logs in order to ensure clean equipment. Auditors should review records and documentation to verify that a schedule is being followed.

2-18 There is a policy in place and has been implemented that harvested product being moved from field to storage areas or processing plants are covered during transportation.

Products that are transported in bulk from the field or from storage for further packing may be contaminated during this time. Steps should be taken to reduce the possible contamination by other vehicles on the roads, overhead contamination from overpasses, from birds or other means. Using tarps, enclosed trailers or other means to cover loads are examples of good practices. Products being moved in enclosed containers (boxes, cartons, etc.) would not be considered covered.

Policy is required

2-19 In ranch or field pack operations, only new or sanitized containers are used for packing the product.

Packers that use new containers to package products are taking the highest possible means to reduce microbial contamination provided they are stored properly. The use of new containers eliminates the possibility of cross contamination of produce from used containers. Some operations are packing directly into reusable plastic containers (RPC) to meet buyer specifications. These containers are meant to be reused. In the case of RPCs, they should be sanitized prior to each reuse in the field. A cleaning log or record from either the producer or RPC management company shall be reviewed to verify they have been sanitized. This question shall be answered N/A if no field packing occurs.

Documentation is required

2-20 Packaging materials used in ranch or field pack operations are properly stored and protected from contamination.

Packing containers and other packing materials that are not used right away should be stored in a way that protects them from contamination by pests (such as rodents), dirt and water. Packing containers stored outside should be covered in some manner to protect against rain, bird droppings, etc. if necessary. Using the top container in a pile for a cover is not sufficient.

2-21 Product moving out of the field is uniquely identified to enable traceability in the event of a recall.

The Bioterrorism Act of 2002 requires certain handlers of foods to keep records that allow the handler to keep trace of produce “one step forward” and “one step back” within the food chain. For producers, keeping records and uniquely identifying product moving out of the field to its next destination (packing house, storage cellars, end user, etc.) is an important component of a traceability program. For product moving in bulk from the field to a packing house or storage facility, records such as load tickets, field harvest records that move with the load or other similar records that identify where the product originated are examples of identification. For products that are field packed, the individual cartons or master containers needs to be clearly identified with the company information including company name and address and other identifying marks as outlined in the company’s traceability program.

Documentation is required

Part 3 House Packing Facility

3-1 Product delivered from the field which is held in a staging area prior to packing or processing is protected from possible contamination.

Product which is delivered to the house packing facility may or may not be immediately processed depending on the operational capacity to process the product. In many cases, incoming product is kept in a staging area until it is ready to be sent through the packing house. This staging area may be a permanent structure such as a pole barn, or a designated area where the full bins of product are placed, usually in an area not directly in the sun so the product isn’t damaged by sunburn or will build up field heat. Some acceptable scenarios may be pulling wagons under a pole barn, tarping the bulk bins, or keeping the product in an enclosed trailer.

3-2 Prior to packing, product is properly stored and/or handled in order to reduce possible contamination.

Harvested product should be properly stored after delivery to the packing house. Product that will be packed in a short amount of time should be located or covered so as to prevent contamination from birds or other pests. Mesh type coverings discussed under question 3-1 are not considered adequate cover.

Product that will be packed several hours to a day or more after harvest should be properly stored appropriate to the commodity to protect from contamination.

3-3 Source water used in the packing operation is potable.

Source water used in the packing of fresh fruits and vegetables should be potable. Municipal water supplies are regulated by law and are required to be potable. Well water may or may not be potable. Surface water is subject to various uncontrollable influences and is generally considered non-potable for use in a repacking operation. Auditors must review documentation that indicates source water meets the microbial requirements of the EPA Drinking Water Standard in order for an auditee to show they are meeting the requirements for water used in the postharvest process

Report is required

3-4 If applicable, the temperature of processing water used in dump tanks, flumes, etc., is monitored and is kept at temperatures appropriate for the commodity.

For commodities which are susceptible to water infiltration, special attention to the water temperature in the dump tank and flumes and the temperature of the product is required. Water temperature should be maintained within 10 degrees F of incoming product pulp temperature to minimize water infiltration. If contaminated water infiltrates the product, it is very difficult if not impossible to remove the contamination. The water may need to be heated or cooled and/or the product heated or cooled to equalize the temperature.

Examples of commodities which are susceptible to water infiltration are Tomatoes, Cantaloups, Peppers, Apples, Potatoes and Pears.

Documentation is required

3-5 Processing water is sufficiently treated to reduce microbial contamination.

Water used during the post-harvest handling of fruits and vegetables often involves a high degree of water-to-produce contact. Although water is a useful tool for reducing potential contamination, it may also serve as a source of contamination or cross-contamination. Re-using processing water may result in the build-up of microbial loads, including undesirable pathogens. Consider practices that will ensure and maintain water quality. Such practices may include:

- Perform periodic water sampling and microbial testing.
- Change water as necessary to maintain sanitary conditions.
- Consider developing SOPs (standard operating procedures or sanitary operating plans), including water change schedules.
- For all processes that use water; clean and sanitize water contact surfaces, such as dump tanks, flumes, wash tanks, and hydro coolers, as often as necessary to ensure the safety of produce.
- Install backflow devices and legal air gaps, as needed, to prevent contamination of clean water with potentially contaminated water (such as between potable water fill lines and dump tank drain lines).
- Routinely inspect and maintain equipment designed to assist in maintaining water quality, such as chlorine injectors, filtration systems, and backflow devices, to ensure efficient operation.

Documentation is required

3-6 Water-contact surfaces, such as dump tanks, flumes, wash tanks and hydro coolers, are cleaned and/or sanitized on a scheduled basis.

Operations with poor sanitation in the packing environment can significantly increase the risk of contaminating fresh produce and water used on produce. Pathogenic microorganisms may be found on the floors and in the drains in the packing facility and on the surfaces of sorting, grading, and packing equipment. Without good sanitary practices, any of these surfaces that come in contact with fresh produce could be a potential source of microbial contamination. Packers should employ good sanitation practices as a standard operating procedure to maintain control throughout the packing operation. Clean packing areas at end of each day. As necessary, clean and sanitize the washing, grading, sorting, and the packing lines to reduce the potential for microbial contamination of fresh produce.

Documentation is required

3-7 Water treatment (strength levels and pH) and exposure time is monitored and the facility has demonstrated it is appropriate for product.

Prevention of contamination is preferred over corrective action(s) once contamination has occurred. However, antimicrobial chemicals in processing water are useful in reducing microbial build-up in water and may reduce microbial load on the surface of produce. Thus, antimicrobial chemicals may provide some assurance in minimizing the potential for microbial contamination. The strength and acidity of the treated water must be appropriate for the commodity. If these are not, the process may not be effective in reducing the microbe population or may create problems for the produce, such as burning. Although there has been a lot of research on this aspect of packing, not all commodities have established and recommended levels.

Documentation is required

3-8 Food contact surfaces are in good condition; cleaned and/or sanitized prior to use and cleaning logs are maintained.

Many operations have located stainless steel tables or benches upon which packing processes are completed. Other operations may have established a mechanized system. Brushes may be a part of the packing system to clean the product. Conveyors, such as belts, are very commonly used to move product through the packing system. These parts of the system can be easily contaminated from produce, workers or from other equipment in the packing system. Brushes or conveyors that physically touch the produce should be regularly cleaned, as needed. Conveyors

that transport containers of packed product should be reasonably clean, but there is less possibility of contamination from this source.

Documentation is required

3-9 Product flow zones are protected from sources of contamination.

The flow zone is that area through which the product moves from unloading to the storage and from storage to that point where it is loaded again for further shipment. As product moves through flow zone areas, it can become contaminated by substances not intended to be put on the product. Areas of possible contamination would include open mesh steel cat-walks, motors without shields, overhead dripping/leaking pipes or ceilings from condensation, box conveyors to second floor storages/palletizing areas, etc. Product in flow zones running under these mentioned areas could be subject to contamination from dirty shoes (catwalks), dripping lubricants (non-food grade in motors), cobwebs or dust hanging from ceilings or on light fixtures, etc.

3-10 The water used for cooling and/or making ice is potable.

Ice or cold water (hydro-cooling) is often used by some commodity packers to reduce product temperature. Source water for this procedure should be potable to reduce the risk of food contamination.

Auditors must investigate the source of the water/ice and review records to verify that there is no indication of microbial contamination of the water source. In some cases, ice may be manufactured on-site. In other cases, it may be provided by another entity. In either case, the water must meet the microbial requirements of the EPA Drinking Water Standard. The EPA "Total Coliform Rule" has a zero tolerance for coliforms including E. coli.

Report is required

3-11 Any ice used for cooling produce is manufactured, transported and stored under sanitary conditions.

Ice making facilities may be located on the site of the operation or may be contracted out and supplied by another operation. In either case, the facility must provide records that indicate there is a regular schedule to sanitize the ice production and storage facility and any means of transportation to reduce the microbial population. This would include augurs, conveyors and shovels used to transport the ice from one part of the facility to another.

Report is required

3-12 Employee facilities (locker rooms, lunch and break areas, etc.) are clean and located away from packing area.

Facilities used by employees to take breaks, prepare to go to work, eat lunches, etc. must be clean and separate from the packing area. Some operators will have a separate room designed and identified for eating, others will identify an area in a corner of the packing house building or somewhere outside of the immediate packing area and supply it with tables. All of these are acceptable. The intent is that workers do not eat or take breaks within the packing area.

3-13 When there is a written policy regarding the use of hair nets/beard nets in the production area, it is being followed by all employees and visitors.

Hair nets and beard nets are worn in order to keep stray hair from entering the food and food containers being packed. In addition, wearing of hairnets when the hair is very long reduces the risk of catching hair in machinery. Operations that have a written policy must follow the policy.

Policy is required

3-14 When there is a written policy regarding the wearing of jewelry in the production area, it is being followed by all employees and visitors.

Jewelry can be both a safety and a food safety hazard. It can become dislodged from the person wearing it and fall into the food item or the container. It can get caught on machinery and injure the worker. Operations that have a written policy must follow the policy.

Policy is required

3-15 Only food grade approved and labeled lubricants are used in the packing equipment/machinery.

Food grade approved lubricants should be used in areas where lubricating agents may come into contact with produce. Containers are normally marked. Auditors should ask to see containers of the food grade lubricants that are being used. If the lubricant is indeed food grade, the label is normally so marked. The container may also include a reference to meeting the applicable standards for FDA or other government agencies, regarding food grade lubricants. If the auditor is not shown either the containers of food grade lubricants being used, or recent receipts for the food grade lubricants, this question must be answered NO.

Report is required

3-16 Chemicals not approved for use on product are stored and segregated away from packing area.

Non-food grade chemicals may be used in the packing operation. Non-food grade approved chemicals must be stored outside the packing area or be physically separated by storage in a room or behind a physical barrier. This is to reduce the possibility of chemical contamination of the produce. Food grade and non-food grade lubricants/chemicals should be stored separately from each other, either in separate rooms or separated and segregated within the same room. The intent is that the two are sufficiently separated and prominently marked in order to prevent cross-contamination or misuse of non-food grade for food grade.

3-17 The plant grounds are reasonably free of litter and debris.

Grounds in the immediate vicinity of all packing areas should be kept clear of waste, litter and improperly stored garbage. Keep all grasses cut to discourage the breeding, harboring and feeding of pests, such as rodents and reptiles.

Piles of wood, such as pieces of broken pallets, garbage or waste collected or scattered along the grounds, food products, food wrappers, cigarette butts or soda or drink containers scattered across the grounds, are all examples of possible reasons to answer this question NO.

3-18 The plant grounds are reasonably free of standing water.

Maintain adequate surface drainage to reduce breeding places for pests. Auditors should consider weather conditions (rain vs. dry) and standing water incident to receiving or storage operations when answering this question. These conditions would not be considered as detrimental unless there is indication that the water will not properly drain.

3-19 Outside garbage receptacles/dumpsters are closed or are located away from packing facility entrances and the area around such sites is reasonably clean.

Open garbage receptacles/dumpsters attract pests such as birds, vermin, flies and wildlife because of odors and discarded food products. All containers with lids should be kept closed whenever they are not in use or should be so located that they are a reasonable distance from the storage facility entrances in order that pests will not be drawn to the facility. They should be emptied regularly. This question must be answered NO when open or un-lidded receptacles or dumpsters are close to the facility entrances and it is likely pests will enter the facility.

3-20 Packing facilities are enclosed.

Not all facilities will be fully enclosed to keep out pests. Some facilities are open pole barns with no walls; others may be closed on three sides, but have an open side or have four perimeter walls, but the bottom portion of several walls is open to facilitate cleaning and washing the floors. Enclosed means that all doorways are capable of being closed or shut and will effectively exclude pests, especially during non-work hours.

3-21 The packing facility interior is clean and maintained in an orderly manner.

Remove as much as practicable all visible debris, soil, dirt and unnecessary items from product storage areas on an ongoing basis. These areas must be cleaned on a regularly scheduled and "as needed" basis and steps taken to minimize free-floating dust and other airborne contaminants. For some commodities such as onions, it may not be possible to maintain the area at the same level of cleanliness as it would be for a fruit or a leafy vegetable commodity.

3-22 Floor drains appear to be free of obstructions.

Operators should maintain adequate surface drainage to reduce breeding places for pests and to reduce product contamination. Auditors must look into the drain (or lift a drain cover if applicable) to see if there is any debris or are

obstacles impeding the flow through the drain. A build-up of fruits or vegetables, sludge or dirt or anything else that may be considered as an obstruction will cause this question to be answered NO.

3-23 Pipes, ducts, fans and ceilings which are over food handling operations are clean.

Pipes, ducts, fans, and ceilings over the food handling or storage operation need to be clean. In addition, paint chips, loose screws, exposed insulation, or anything that stands out as a possible contamination factor must also be considered. Operations are not intended or expected to be meticulously clean. However, any readily noticeable build up of dust, dirt, debris, cobwebs or other contaminants that could fall onto product being packed is sufficient to answer this question NO.

3-24 Glass materials above product flow zones are contained in case of breakage.

This question pertains to glass light-bulbs and any other glass-made products that may be located above the product flow zone. Overhead lighting, regardless of height above the product, that may be susceptible to breakage should be protected from falling onto conveyor lines or into product containers such as bins or final packages. Other glass items, either in whole or broken form, must be contained or prevented from falling into product.

3-25 Possible wastewater spillage is prevented from contaminating any food handling area by barriers, drains or a sufficient distance.

Waste water from toilets and hand washing sinks or other sources not intended to be used to wash or rinse product must not be permitted to run into the packing or storage area if a spill occurs. Waste water spillage sources that are a reasonable distance from the packing area and product flow zone are acceptable. Drains which are in place must drain away from the packing and storage area. Sanitary sewer lines and drains should not leak.

3-26 There is a policy describing procedures which specify handling/disposition of finished product which is opened, spilled or comes into contact with the floor.

Auditors should review the SOPs for the facility to identify if there is a procedure in place which identifies how product that spilled or comes in contact with the floor is handled. Spilled product that comes in contact with the floor can become contaminated and should not be used without some sort of corrective action such as washing or disposing of the product.

Policy is required

3-27 Only new or sanitized containers are used for packing the product.

Packers that use new containers to package products are taking the highest possible means to reduce microbial contamination. The use of new containers eliminates the possibility of cross contamination of produce from used containers. Some operations are packing directly into reusable plastic containers (RPC) to meet buyer specifications. These containers are meant to be reused. In the case of RPCs, they should be sanitized prior to each reuse in the field.

Documentation is required

3-28 Pallets and containers are clean and in good condition.

Auditors must review the condition of pallets and containers being used and those stored for future use. Auditors must question the operator to determine what is done with broken or dirty pallets or containers.

3-29 Packing containers are properly stored and protected from contamination (birds, rodents, and other pests).

Packing containers and other packing materials that are not ready for immediate use should be stored in a way that protects them from contamination by any source (pests, rodents, dirt, and water condensation, etc.) Packing containers stored outside should be covered in some manner to protect against contamination. Using the top container in a pile is not sufficient.

3-30 Measures are taken to exclude animals or pests from packing and storage facilities.

All packing and storage facilities should establish a pest control program to reduce the risk of contamination by rodents and other animals, including pets. This program should include regular and frequent monitoring of affected and treated areas to accurately assess the program's effectiveness. The auditee should consider the use of screens, wind curtains, bird deterrent tape and traps to minimize risk of product contamination. Pet dogs, cats or other animals should not be allowed in the packing and storage facilities.

Documentation is required

3-31 There is an established pest control program for the facility.

A pest control log must be maintained that includes inspection dates, inspection reports, and procedures implemented to eliminate any problems. Frequent monitoring of affected and treated areas must take place to determine the effectiveness of the treatment applied. Generally, all traps and bait stations will be marked and flagged by numbers or some type of coding system. It is likely that there will also be a map of the premises that shows the location of such bait stations and traps. All bait stations containing poison attractants must be located outside the facility. Traps or other non-poison methods should be the only control program located within a structure.

Documentation is required

3-32 Service reports for the pest control program are available for review

Generally, traps and bait stations will be regularly checked and have documentation showing when this was completed. This documentation may consist of a report or inspection log for all stations or may be a sticker or other marking on individual stations throughout the facility.

Report is required

3-33 Interior walls, floors and ceilings are well maintained and are free of major cracks and crevices.

Potential entryways for pests into the facility must be eliminated by blocking/repairing areas such as holes in walls, doors, flooring, vents, etc. The facility should be well maintained to repair or eliminate problem areas. There should be no loose insulation materials protruding from the walls or hanging from the ceiling

3-34 Records are kept recording the source of incoming product and the destination of outgoing product which is uniquely identified to enable traceability.

The Bioterrorism Act of 2002 requires certain handlers of foods to keep records that allow the handler to keep trace of produce "one step forward" and "one step back" within the food chain. For packing facilities, storage and transportation facilities and wholesale distribution/terminal warehouses, record keeping that keeps trace of the source of incoming produce and the destination of outgoing produce is a critical component of a documented traceability program. Traceability markings shall be at the container/master container level, and shall include other identifying marks as outlined in the company's traceability program.

Documentation is required

Part 4: Storage and Transportation

4-1 The storage facility is cleaned and maintained in an orderly manner

Remove as much as practicable all visible debris, soil, dirt and unnecessary items from product storage areas on an ongoing basis. These areas must be cleaned on a regularly scheduled and "as needed" basis. For some commodities such as onions, it may not be possible to maintain the area at the same level of cleanliness as it would be for a fruit or a leafy vegetable commodity.

4-2 Bulk storage facilities are inspected for foreign material prior to use and records are maintained.

This question is specifically intended for bulk storage areas used for products such as potatoes or onions. It may include warehouses, cellars or areas where piles of product are to be stored and does not apply to product in containers.

Report is required

4-3 Storage rooms, buildings, and/or facilities are maintained and sufficiently sealed or isolated to be protected from external contamination.

Storage areas shall be sufficiently sealed or isolated to protect stored product from windblown contaminants, rodents, rainwater, etc.

4-4 Storage grounds are reasonably free of litter and debris.

Grounds in the immediate vicinity of all storage areas should be kept clear of waste, litter and improperly stored garbage. The area around the facility should be maintained in a way to discourage the breeding, harboring and feeding of pests, such as rodents and reptiles.

4-5 Floors in storage areas are reasonably free of standing water.

Maintain adequate surface drainage to reduce breeding places for pests. Auditors should consider weather conditions (rain vs. dry) and standing water incident to receiving or storage operations when answering this question. These conditions would not be considered as detrimental unless there is indication that the water will not properly drain.

4-6 Possible wastewater spillage is prevented from contaminating any food handling area by barriers, drains or a sufficient distance.

Wastewater from toilets and hand washing sinks or other sources not intended to be used to wash or rinse product must not be permitted to run into the storage or transportation area if a spill occurs. Distance or other barriers should protect the storage areas and flow zones. Drains which are in place must drain away from the storage and transportation area. Sanitary sewer pipes and drains should not leak.

4-7 There is a policy describing procedures which specify handling/disposition of finished product which is opened, spilled or comes into contact with the floor.

Auditors should review the SOPs for the facility to identify if there is a procedure in place which identifies how product that spilled or comes in contact with the floor is handled. Spilled product that comes in contact with the floor can become contaminated and should not be used without a corrective action such as washing or disposing of the product.

Policy is required

4-8 Packing containers are properly stored and sufficiently sealed to be protected from contamination (birds, rodents, pests and other contaminants)

Packing containers and other packing materials which are not ready for immediate use should be stored in a way that protects them from contamination by any source (pests, dirt and water condensation, etc.). Packing containers stored outside should also be covered in some manner to protect against contamination.

4-9 Pallets, pallet boxes, tote bags and portable bins, etc. are clean, in good condition and do not contribute foreign material to the product.

It is not uncommon to see an area in the receiving yard specifically designated for cleaning containers and pallets. Containers used for ready-to-eat fresh produce should be cleaned and/or sanitized. If produce is field packed, care must be taken to prevent contamination of containers or bins by exposure to soil and manure.

4-10 Product stored outside in totes, trucks, bins, other containers or on the ground in bulk is covered and protected from contamination.

4-11 Non-food grade substances such as paints, lubricants, pesticides, etc., are not stored in close proximity to the product.

Non-food grade chemicals shall not be stored in close proximity to stored product. Close proximity in this instance means close enough to the product that the chemicals, if leaked or spilled, would reach the product. Ideally, these types of chemicals shall be stored in a separate secured area or storage cabinet which would prevent any possible spillage from entering the product storage area.

4-12 Mechanical equipment used during the storage process is clean and maintained to prevent contamination of the product.

Any equipment used in the storage facility shall be clean and properly maintained. If equipment becomes soiled due to normal use during the production day, the auditor should not consider this as failing to meet the cleanliness requirement. Equipment shall be maintained to prevent leaking fluids that could potentially contaminate the product, and loose or broken parts must be repaired to prevent foreign objects from contaminating the product. Any equipment or portions of equipment that directly touches raw product must be maintained in a higher degree of cleanliness.

Documentation is required

4-13 Measures are taken to exclude animals or pests from storage facilities

All packing and storage facilities should establish a pest control program to reduce the risk of contamination by rodents and other animals, including pets. This program should include regular and frequent monitoring of affected and treated areas to accurately assess the program's effectiveness. The auditee should consider the use of screens, wind curtains, bird deterrent tape and traps to minimize risk of product contamination. Pet dogs, cats or other animals should not have free run of the facility.

Documentation is required

4-14 There is an established pest control program for the facility

A pest control log must be maintained that includes inspection dates, inspection reports, and procedures implemented to eliminate any problems. Frequent monitoring of affected and treated areas must take place to determine the effectiveness of the treatment applied. Generally, all traps and bait stations will be marked and flagged by numbers or some type of coding system. It is likely that there will also be a map of the premises that shows the location of such bait stations and traps.

Documentation is required

4-15 Service reports for the pest control program are available for review.

Generally, traps and bait stations will be regularly checked and have documentation showing when this was completed. This documentation may consist of a report or inspection log for all stations or may be a sticker or other marking on individual stations throughout the facility.

Report is required

4-16 Interior walls, floors and ceilings are well maintained and are free of major cracks and crevices.

Potential entryways for pests into the facility must be eliminated by blocking/repairing areas such as holes in walls, doors, flooring, vents, etc. To assess this question, auditors must look closely at the inside walls, doors, floors and ceilings of an operation. Small cracks or crevices incident to structure age should be disregarded, unless it is obvious that pests are in the area. Cracks and crevices do not necessarily need to lead to the outdoors for infestation to occur. Certain pests can easily use areas inside walls as a living space and the food products within the facility provide a food source. The facility should be well maintained to repair or eliminate problem areas. There should be no loose insulation materials protruding from the walls or ceiling.

4-17 The water used for cooling and/or making ice is potable.

Ice or cold water (hydro-cooling) is often used by some commodity packers to reduce product temperature. Source water for this procedure should be potable to reduce the risk of food contamination. Auditors must investigate the source of the water/ice and review records to verify that there is no indication of microbial contamination of the water source.

Report is required

4-18 Manufacturing, storage and transportation facilities used in making and delivering ice used for cooling the product have been sanitized.

Ice making facilities may be located on site or contracted out and supplied by an outside source. To reduce microbial risks in either case, the auditee must provide records indicating there is a sanitizing schedule for the ice production and storage facilities including any means of necessary transportation. This should also include equipment (conveyors, belts, augers, etc.) used to move ice within the facility or into trucks.

Report is required

4-19 Climate controlled rooms are monitored for temperature and logs are maintained.

Climate control systems must be working properly to minimize the survival and replication of food borne microbes. Although there are some microbes that will live and reproduce under cold or freezing temperatures, the majority do not.

Documentation is required

4-20 Thermometer(s) are checked for accuracy and records are available for review.

Thermometers used in cold storage areas and for determining product temperatures should be regularly checked for accuracy and operators must maintain records to validate this procedure. In some cases, thermometers are computerized with operation checked from a computer terminal. In other cases, a computer automatically verifies the temperature of the room on an ongoing basis.

Documentation is required

4-21 Refrigeration system condensation does not come in contact with produce.

The majority of refrigeration equipment is located inside the storage rooms. It is not uncommon for the equipment to drip liquid, usually water and whatever other substances that might be on the equipment. This condensation is a result of the combination of temperature and humidity within the room. In some cases, it is possible for product to be stored underneath the refrigeration equipment. Whenever it is likely that produce would come into contact with the dripping condensation, the produce must be protected from the likelihood of contamination.

4-22 Refrigeration equipment (condensers, fans, etc.) is cleaned on a scheduled basis.

Refrigerated storages should be cleaned on a regular basis. This will reduce the amount of dust and dirt build-up and further reduce the possibility of contamination. Auditors should review the cleaning schedule documentation.

Documentation is required

4-23 Iced product does not drip on pallets of produce stored below.

Many vegetable products are frequently packed with ice or crushed ice put on the tops of the cartons or pallets to keep them cold. This would include broccoli, sweet corn and cantaloups. In storages where pallets are stacked more than one high or when there are racks to stack pallets one above the other, the iced product should be stored on the bottom. If a product is stored beneath an iced product, it must be protected from the dripping of melting ice.

4-24 Prior to the loading process, conveyances are required to be clean, in good physical condition, free from disagreeable odors, and from obvious dirt/debris.

All parties involved in the transport of fresh produce should help ensure that sanitation requirements for conveyances are maintained throughout the transportation chain. Trucks and transport containers must be inspected for cleanliness, odors, and debris before the loading process begins. Drivers and operators should be aware of the contents of previously carried loads and consider this information when determining current usage. For example, trucks recently

used to transport animals or animal products would increase the risk of contaminating fresh produce if not properly cleaned prior to produce loading. Auditors should not expect to see conveyances in like-new or sterilized condition. Conveyances should be acceptably clean.

Policy is required

4-25 Produce items are not loaded with potentially contaminating products.

The Guide recommends that produce items should only be shipped with other produce items. They should definitely not be shipped with fertilizers, meats, poultry, or fish products. There may be times when produce must be shipped with non-produce items other than those mentioned. Shippers should adequately protect produce items from cross contamination by segregating and separating these items in the conveyance by a physical barrier.

Policy is required

4-26 Company has a written policy for transporters and conveyances to maintain a specified temperature(s) during transit.

The auditee must work with transporters to ensure adequate control of transport temperatures from loading to receiving. Transporters should be aware of the temperature requirements for produce being hauled and avoid delivery of mixed loads with incompatible refrigeration requirements.

Policy is required

4-27 Conveyances are loaded to minimize damage to product.

All fresh produce should be carefully packed and loaded to minimize physical damage and to reduce the potential for contamination during transport. A shipper should have an SOP describing the use of acceptable safe loading practices. Produce which is damaged during harvesting, packing or transportation is more susceptible to microbial contamination than undamaged product. Precautions should be taken to minimize or prevent shifting of the load during transit. Load bracing, straps/belts and pallet wrapping are examples designed to keep containers in place. Shippers should strive to organize each load with a realistic attempt at securing packages and preventing spillage during transit.

Policy is required

4-28 Employee facilities (locker rooms, lunch and break areas, etc.) are clean and located away from storage, shipping and receiving areas.

Facilities used by employees to take breaks, prepare to go to work, eat lunches, etc. must be clean and separate from the storage, shipping and receiving areas. Some operators will have a separate room designed and identified for eating, others will identify an area in a corner of the packing house building or somewhere outside of the immediate packing area and supply it with tables. All of these are acceptable. The intent is that workers do not eat or take breaks within the packing area.

4-29 When there is a written policy requiring the use of hair/beard nets in the storage and transportation areas, it is being followed by all affected employees and visitors.

Hair nets and beard nets are worn in order to keep stray hair from entering the food and food containers. In addition, wearing of these when the hair is very long reduces the risk of catching hair in machinery. Operations that have a written policy must follow the policy. Auditors must review the policy and observe to determine if it is being followed.

Policy is required

4-30 When there is a written policy restricting the wearing of jewelry in the storage and transportation areas, it is being followed by all affected employees and visitors.

Jewelry can be both a safety and a food safety hazard. It can become dislodged from the person wearing it and fall into the food item or the container. It can get caught on machinery and injure the worker. Jewelry, especially watchbands if not cleaned properly, can harbor microorganisms. Operations that have a written policy must follow the policy. Auditors must review the policy and observe to determine if it is being followed.

Policy is required

4-31 Records are kept recording the source of incoming product and the destination of outgoing product which is uniquely identified to enable traceability.

The Bioterrorism Act of 2002 requires certain handlers of foods to keep records that allow the handler to keep trace of produce “one step forward” and “one step back” within the food chain. For packing facilities, storage and transportation facilities and wholesale distribution/terminal warehouses, record keeping that keeps trace of the source of incoming produce and the destination of outgoing produce is a critical component of a documented traceability program. Traceability markings shall be at the container/master container level, and shall include other identifying marks as outlined in the company’s traceability program.

Part 6: Wholesale Distribution Center/Terminal Warehouse

Part 7: Preventive Food Defense Procedures

7-1 The company has a documented food defense plan and a person has been designated to oversee it.

A documented food defense plan is critical to the implementation of a successful food defense plan. Documentation may include a Food Defense Manual, various published SOP’s, and/or documentation that a program is implemented and being followed. If performed, it will also contain information or references pertaining to internal or self audits of the program. Other similar documentation may also be applicable and acceptable if it indicates that a formally established program is in place. It is recommended that the lead auditor inform the auditee that all applicable documentation be gathered prior to the audit. This not only ensures that the auditee verifies that all records are available, but also saves time on the day of the audit. The Food Defense plan shall also indicate that there is a person in the operation that has implemented and will oversee the food defense program. Operations which are serious about following established food defense programs will have a designated person whom is responsible for ensuring that the program is being followed.

Documentation is required

7-2 Food defense training has been provided to all employees.

Food defense training should be given to all employees and should cover potential threats and vulnerabilities of the food supply and how they apply to the produce industry. Training should also include who employees should contact if they observe a potential food defense issue. Auditors should look for training instructions and training documents that each employee has signed.

Documentation is required

7-3 Employees are aware of whom in management they should contact about potential security problems/issues. Name of management representative:

As part of food security plan, each company should designate a contact person who is responsible for overseeing the plan. This person(s) should be the point of contact for employees to point out potential security problems or issues. This person can also designate another person, for example shift supervisors, who can be the contact person for employees.

Documentation is required

7-4 Visitors are required to check in (showing proof of identity) and out, when entering/leaving the facility.

A comprehensive food security plan should address access procedures to identify who has access to sensitive areas of the facility. This includes verifying the identity of visitors to the facility and the purpose for the visit. Check in procedures can vary from a formal sign in/sign out procedure in enclosed facilities to visitors checking in with the owner/manager (or designated person) of a small operation. The auditor shall look for the documented procedure and verify that the procedure is being followed.

If an auditor is able to gain access to an enclosed packing house or wholesale warehouse facility without showing ID and signing in or checking in with an owner/supervisor, this is a sign that their visitor check-in policy is not working

7-5 The purpose of visitation to site is verified before admittance to the facility.

Documentation is required

7-6 Visitors are prohibited from the packing/storage areas unless accompanied by an employee.

Limiting access to packing/storage areas by unauthorized personnel is one of the foremost procedures that can be taken to reduce the risk of intentional contamination. Visitors should be accompanied by an employee. A facility can designate exceptions to this for frequent visitors to the facility such as USDA inspectors, health department inspectors, the pest control contractor, etc., as long as a documented list of exempted people is maintained.

Documentation is required

7-7 Incoming and outgoing employee and visitor vehicles to and from the site are subject to inspection.

All vehicles should be subject to inspection to look for any obvious sources of contamination. Auditors shall look for documentation that vehicles are being searched and/or evidence that vehicles are subject to search.

Documentation is required

7-8 Parked vehicles belonging to employees and visitors display a decal or placard issued by the facility.

All vehicles on the facility should be able to be traced to the owner of the vehicle. This can be accomplished by a decal or placard that is clearly visible that allows auditee management to identify that a vehicle is allowed access to the facility and who it belongs to. If the operation is considered a small farm or facility and management/supervisors can readily identify each employees vehicle by sight, placards or decals shall not be required and this question shall be answered N/A.

7-9 Staff is prohibited from bringing personal items into the handling or storage areas.

A policy should be in place that prohibits workers from bringing personal items into the production, handling, or storage areas. This reduces the possibility of an insider from contaminating product. Many packing facilities will allow workers to bring water to the packing line. This is an acceptable practice as long as the water is supplied by the facility and is not brought from outside sources.

Typically farm worker crews will bring their lunch bag/cooler with them out to the field. This is an acceptable practice only if there is a policy in place that excludes them from bringing their personal items into the actual field. The lunch bag/cooler must remain in an area outside the perimeter of the field such as a lunch wagon or designated eating area (i.e. picnic benches, etc.). The only exception to the personal item rule would be water jugs that the workers use to drink from during the course of the day, as long as the water is supplied by the facility and not from outside sources.

Documentation is required

7-10 Staff access in facility is limited to the area of their job function and unrestricted areas.

Management should determine if any staff should have limited access to certain areas of the operation. The food security plan should address those jobs and the details of how staff will be limited to areas of the operation that are related to their job function, and to general access areas (break rooms, locker rooms, etc.). This type of scenario usually

applies to larger packing house facilities or wholesale warehouses. In the case of small operations that only have a limited number of employees who perform all job functions, this question may be answered N/A.

Documentation is required

7-11 Management is aware of which employee should be on the premises, and the area they are assigned to.

Employees should not be allowed to loiter around the grounds and facility after their work hours, especially in sensitive areas of the operation. A work schedule outlining employee's hours and area the employee is assigned to work should be available to all management.

Documentation is required

7-12 A system of positive identification of employees has been established and is enforced.

A form of identification should be worn by employees while on duty. This system should be appropriate for the nature of the workforce (uniforms, name tags, photo ID, etc.). If the farm/facility meets the criteria for a small operation and the owner/manager can positively identify each employee by site this question can be answered as N/A.

7-13 Uniforms, name tags, or identification badges are collected from employees prior to the termination of employment.

All items that identify a person as an employee of the company shall be returned to the company upon completion of employment. If an employee does not turn over these items, there is a procedure in place for management/security to be notified that the employee is not allowed access to the facility. A sign in/sign out log of equipment should be kept as documentation. If the facility is considered a small farm/operation and does not have a requirement for name tags/badges, uniforms, etc. this question may be answered as N/A.

Documentation is required

7-14 The mailroom is located away from the packing/storage facilities.

Facility should implement procedures to ensure the security of incoming mail and packages. The mailroom should not be located in the food packing or food storage areas to prevent potential contamination from the mail or packages. For small farms/operations this question may be answered N/A.

7-15 Computer access is restricted to specific personnel.

The company's computer network should be restricted so that sensitive information is only accessed by authorized personnel. This restricted access will help to assure that packing labels, invoices, and shipping records are not accessed by people that do not need that information. This question may be answered N/A if there is not a computer used in the farm/operation.

Documentation is required

7-16 A system of traceability of computer transactions has been established.

All electronic transactions (bills of lading, purchase orders, etc.). are traceable to the person who initiated them. For larger operations, there may be several people that are assigned the responsibility to generating transactions. In small operations only one person may be responsible for generating transactions, in this case this question may be answered N/A.

7-17 A minimum level of background checks has been established for all employees.

Management is required by law to verify the employment eligibility of all new hires in accordance with the Immigration and Nationality Act. In addition, management should outline in the food safety plan what level of background checks

they will perform. This can be a procedure as simple as a reference check, or more detailed such as a credit check for financial personnel.

Farms that employ farm workers through an outside contractor should stipulate in their contract that the contractor perform a minimum level of background checks as well.

Documentation is required

7-18 Routine security checks of the premises are performed for signs of tampering, criminal or terrorist action.

Scheduled checks of the operation should be performed and documented that they were performed. On a farm, critical areas such as the storage barns, pesticide storage areas, and any product storage areas should be checked routinely. For packing sheds and wholesale warehouses that have a more permanent structure, the entire facility should be routinely checked.

Documentation is required

7-19 Perimeter of facility is secured by fencing or other deterrent.

Obviously it is very difficult, if not impossible to fence an entire farm operation. This question specifically deals with packing facilities and other buildings on the operation. The buildings should have some sort of deterrent such as fencing, locked doors, or similar items that will deter potential intruders from entering the facility. In the case of a farm this question may be answered N/A.

7-20 Checklists are used to verify the security of doors, windows, and other points of entry.

In performing the routine security checks from question 7-18, a checklist should be used to verify the points of entry into buildings, either on the farm or packing house/wholesale warehouse.

Documentation is required

7-21 All keys to the establishment are accounted for.

There shall be an accountability log showing who is in possession of any keys to enter the facility. Lost keys are documented on the accountability log, and steps are taken if keys to sensitive areas such as chemical storage areas are reported lost or stolen. These steps may include changing the lock or adding additional security measures.

Documentation is required

7-22 The facility has an emergency lighting system.

If necessary, the facility should be equipped with emergency lighting. This question may be answered N/A if the operation has no permanent buildings, or the packing facility is not enclosed.

7-23 The facility is enclosed.

Not all packing facilities will be fully enclosed. Some facilities are open pole barns with no walls; others may be closed on three sides, but have an open side or have four perimeter walls, but the bottom portion of several walls is open to facilitate cleaning and washing the floors. In some operations that are fully enclosed, there may be doors that are always left open, regardless of usage or there are doorways that have had the door removed. None of these would meet the test of being enclosed and the question must be answered NO.

Those that are fully enclosed can easily exclude or reduce the possibility of unauthorized entry. Enclosed means that all doorways are capable of being closed or shut and will effectively exclude unauthorized entry. Any doors that are open during packing operations for passage of fork lift traffic, employee entrance, etc., should be considered as a part of the operation and the question will be answered YES.

7-24 Storage or vehicles/containers/ trailers/railcars that are not being used are kept locked.

Any storage or transport vehicles used in the movement of product should be kept locked when not in use to prevent unauthorized access and potential contamination. If the only transportation used on the farm are tractors and flatbed wagons, this question can be answered as N/A.

7-25 Delivery schedules have been established.

Any incoming products or supplies are known to the auditee, and should be accepted during designated times as outlined in the food safety plan. If a delivery is excessively late, there is a procedure to spot check the product for signs of obvious tampering or contamination.

7-26 The off-loading of incoming materials is supervised.

Unless the incoming material is being delivered by an employee of the operation, or a designated person outlined in the food safety plan, all incoming product should be unloaded under the supervision of an auditee employee. Truck drivers and other delivery personnel should not have unrestricted access to the facility.

7-27 The organization has an established policy for rejecting deliveries.

The company should outline the policy for rejecting loads. The policy should include a list of criteria for why the product doesn't meet specified requirements as well as food safety requirements such as evidence of container tampering, evidence of suspicious foreign objects, etc.

Documentation is required

7-28 Unauthorized deliveries are not accepted.

The receiving department/facility shall never accept incoming product that is from an unknown source. All deliveries should be listed on the delivery schedule, and only deliveries from that schedule should be accepted.

Documentation is required

7-29 The company does not accept returned (empty) containers for packing of product unless they are sanitized containers that are intended for reuse.

Used containers shall not be accepted and reused to pack product. If cardboard, wood, styrofoam, or similar type of container is accepted and reused this question shall be answered "NO." However, the use of CHEP or other types of reusable plastic containers is becoming more prevalent in the produce industry. These types of containers are specifically meant to be returned and reused to pack product. It is acceptable to allow these containers as long as they are washed or sanitized prior to use, and stored in a manner that will reduce the chance of intentional contamination.

Documentation is required

7-30 The facility has a program in place to inspect product returned to the facility for tampering.

Auditors should check to see if the food security plan and/or there is a procedure for inspection of any returned product. The returned product should be inspected for obvious signs of tampering or intentional contamination. Many operations will not reuse returned product.

Documentation is required

7-31 The company has identified the individual(s), with at least one backup, who are responsible for recalling the product.

Documentation is required

7-32 The company has performed a successful mock recall of product to the facility.

The Guide indicates that all facilities should work with their suppliers and customers to track the path the product takes from the farm to the consumer. This will provide a readily available trail in case there is a need to determine where product originated and to where it was shipped. Operations must have some documented evidence of completing at least one practice recall within the 6 months previous to the audit and have assigned a person(s) to be responsible to implement any recalls. Documents must indicate the customers contacted, the amount of product remaining from the original shipment and the disposition of product which could not effectively be recalled. Such disposition may include sales to customers, reshipment to a subsequent customer that could be contacted if a recall were necessary or destroyed product.

Documentation is required

7-33 Product imported from outside the United States is segregated from domestic product.

USDA Commodity Procurement purchases require that all domestic products be segregated from any foreign product (Exhibit D). Additionally, because foreign product has the potential to be targeted for intentional contamination and shipped to the United States, it should be kept segregated from domestic product.

Documentation is required

7-34 Allergens handled by the facility are segregated from products to avoid cross contamination.

Products that are known allergens, such as peanuts should be segregated for several reasons. First to avoid inadvertent cross contamination with other products, and secondly to minimize the potential for an insider to simply “reach across the aisle” and purposely contaminate other product stored in the same area.

Documentation is required

7-35 Floor plans, product flow plans, and/or segregation charts are in a secure location.

A map of the facility showing the floor plans, flow plans, and segregation areas should not be left in an unsecured location. If an aggressor was able to get a copy of this information, it would serve as a “blueprint” to analyze weaknesses of the facility.

Documentation is required

7-36 The organization has registered with the FDA and has been issued a registration number (do not record the number on checklist).

Only Food Handlers need to register with the FDA, grower/packers are exempt from this provision.

Documentation is required