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| | | LGMA General Requirements/California Verification Audit |
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The review was based on the Commodity Specific Food Safety Guidelines for the Production and Harvest of Lettuce and Leafy Greens dated August 20, 2020. The following information and/or observations were noted during the audit.

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| Page | Line # | General Requirements | Choose from dropdown |
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| 19 | 109-111 | <p>GR 01 - Is a written Leafy Greens Compliance Plan which specifically addresses the Best Practices of the LGMA available for review?</p> <p>GR 02 - Does it specifically address the following subjects consistent with the LGMA:</p> <p>GR 02a - Water</p> <p>GR 02b - Soil Amendments</p> <p>GR 02c - Environmental Factors</p> <p>GR 02d - Work Practices</p> <p>GR 02e - Field Sanitation</p> <p>Comments: <input type="text"/></p> | |
| 19 | 112 | <p>GR 03 - Is an up to date producers list with contact and location information available for review?</p> <p>Comments: <input type="text"/></p> | |
| 19 | 113-115 | <p>GR 04 - Is the shipper in compliance with the registration requirement of The Public Health Security and Bioterrorism Preparedness and Response Act of 2002?</p> <p>Comments: <input type="text"/></p> | |
| 19 | 113-115 | <p>GR 05 - Does the Shipper have a traceability process?</p> <p>GR 05a - Does it enable identification of immediate non-transporter source?</p> <p>GR 05b - Does it enable identification of immediate non-transporter subsequent recipient?</p> <p>Comments: <input type="text"/></p> | |
| 19 | 116-117 | <p>GR 06 - Has the Handler (or if applicable, the grower) designated someone to implement and oversee the food safety program?</p> <p>GR 06a - Is the name of the individual available?</p> <p>GR 06b - Is 24/7 contact information for the individual available?</p> <p>Comments: <input type="text"/></p> | |

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| Page | Line # | Records | Choose from dropdown |
|------|---------|---|----------------------|
| 19 | 121-128 | RE 01 – Do records required by the Leafy Greens Compliance Plan include (as applicable): | |
| | | RE 01a – farm name and location | |
| | | RE 01b – actual values and observations obtained during monitoring | |
| | | RE 01c – an adequate description of the leafy green product | |
| | | RE 01d – growing area location (i.e. production location, including block and/or lot) | |
| | | RE 01e – date and time of the activity being documented | |
| | | Comments: <input type="text"/> | |
| 20 | 130 | RE 02 – Do records indicate they were created at the time the activity was performed? | |
| | | Comments: <input type="text"/> | |
| 20 | 132-133 | RE 03 – Were the records signed and dated by the person performing the documented activity? | |
| | | Comments: <input type="text"/> | |
| 20 | 138-148 | RE 04 - Were all records readily available and accessible for inspection during the audit? (e.g. logs, checklist, spreadsheets, etc..) | |
| | | Comments: <input type="text"/> | |
| 20 | 149-153 | RE 05 – Do SOPs require documentation and records to be kept for 2 years? | |
| | | Comments: <input type="text"/> | |

| Page | Line # | Personnel Qualifications and Training | Choose from dropdown |
|------|---------|--|----------------------|
| 20 | 162-163 | <p>PE 01 – Do training records indicate all personnel receive training at hire and at least annually thereafter?</p> <p><i>Comments:</i> <input type="text"/></p> | |
| 21 | 171-178 | <p>PE 02 - Does the training provided to all personnel who work with leafy greens or supervise those who do include:</p> <p>PE 02a – the principles of food hygiene and safety?</p> <p>PE 02b – the importance of health and personal hygiene?</p> <p>PE 02c – the standards established in these best practices that are applicable to the employee’s job responsibilities?</p> <p><i>Comments:</i> <input type="text"/></p> | |
| 21 | 179-188 | <p>PE 03 - Do all harvest personnel receive additional training in:</p> <p>PE 03a – recognizing leafy greens that may be contaminated and therefore not be harvested?</p> <p>PE 03b – inspecting product containers, harvest equipment, and packaging materials to ensure they are working properly and do not pose a product contamination risk?</p> <p>PE 03c – how to correct problems with product containers, harvest equipment, and packaging materials or report problems to supervisors?</p> <p><i>Comments:</i> <input type="text"/></p> | |
| 21 | 189-191 | <p>PE 04 – Has a food safety professional / representative for each farm completed the Produce Safety Alliance, "Grower Training" or a standard curriculum recognized by the FDA?</p> <p>PE 04a – Grower</p> <p>PE 04b – Harvester</p> <p>PE 04c – Cooler/Holder</p> <p><i>Comments:</i> <input type="text"/></p> | |
| 21 | 192-194 | <p>PE 05 – Are there records of training events? Do they include:</p> <p>PE 05a - training date</p> <p>PE 05b - topics covered</p> <p>PE 05c - trainee name</p> <p>PE 05d - supervisor’s signature indicating a record review was performed within a week</p> <p><i>Comments:</i> <input type="text"/></p> | |

| Page | Line # | Pre-Season Environmental Assessments | Yes, No, N/A |
|--|-----------|---|--------------|
| 81 | 1090-1093 | <p>EA 01 - Did the Pre-Season Assessment indicate that the production area was free from evidence of animal intrusion?</p> <p><i>Comments:</i> <input type="text"/></p> | |
| If EA 01 is answered "NO" then answer EA 02-EA 04 will drop down | | | |
| 84 | Table 6 | <p>EA 02 - Was the animal hazard or potential risk of intrusion assessed by Food Safety professional?</p> <p><i>Comments:</i> <input type="text"/></p> | |
| 84 | Table 6 | <p>EA 03 - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"?</p> <p>EA 03a - If "YES" were corrective actions carried out according to company SOP?</p> <p><i>Comments:</i> <input type="text"/></p> | |
| 84 | Table 6 | <p>EA 04 - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"?</p> <p>EA 04a - If "YES" were corrective actions formulated?</p> <p>EA 04b - If "YES" is documentation available to show that actions were implemented?</p> <p>EA 04c - If "YES" are you periodically monitoring the effectiveness of any corrective actions?</p> <p><i>Comments:</i> <input type="text"/></p> | |
| 86 | Table 7 | <p>EA 05 - Was the adjacent land area free from compost operations within 400' of the crop edge?</p> <p>EA 05a - If "No" are there mitigation measures, topographical or climate features that indicate that the 400' recommendation should be modified?</p> <p>EA 05b - If "No" are mitigation measures in place and documented?</p> <p><i>Comments:</i> <input type="text"/></p> | |
| 22 | 219-232 | <p>EA 06 - Was the adjacent land area free from concentrated animal feeding operations (CAFO) within 1200' of the crop edge?</p> <p>EA 06a - If "No" are there mitigation measures, topographical or climate features that indicate that the 1200' recommendation should be modified?</p> <p>EA 06b - If "No" are mitigation measures in place and documented?</p> <p>EA 07 - Was a pre-season assessment done to understand the impact of the CAFO on the production location and did the assessment address the following?</p> <p>EA 07a - Information on the CAFOs Best Management Practices</p> <p>EA 07b - Number of animals within the CAFO?</p> <p>EA 07c - Water source and distribution system for the production location proximate to the</p> <p><i>Comments:</i> <input type="text"/></p> | |
| 86 | Table 7 | | |
| 22 | 219-232 | <p>EA 08 - Was the adjacent land area free from any CAFO with more than 80,000 animals within 1 mile of the crop edge?</p> | |
| 86 | Table 7 | <p>EA 08a - If "No" are there mitigation measures, topographical or climate features that indicate that the 1-mile recommendation should be modified?</p> <p>EA 08b - If "No" are mitigation measures in place and documented?</p> | |

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| | | <p>EA 09- Was a pre-season assessment done to understand the impact of the CAFO on the production location and did the assessment address the following?</p> <p>EA 09a- Information on the facility on their Best Management Practices?</p> <p>EA 09b - Number of animals within the CAFO?</p> <p>EA 09c - Water source and distribution system source for the production location proximate to the CAFO? (e.g. Appendix A)</p> <p>Comments: <input type="text"/></p> | |
| 87 | Table 7 | <p>EA 10 - Is the adjacent land area free from non-synthetic soil amendments stored within 400' of the edge of the crop?</p> <p>EA 10a - If "No" has the non-synthetic crop treatment been treated using a validated process and no closer than 30' from the edge of the crop?</p> <p>EA 10b - If "No" are there mitigation measures or topographical features that indicate that the 400' recommendation should be modified?</p> <p>EA 10c - If "No" are mitigation measures in place and documented?</p> <p>Comments: <input type="text"/></p> | |
| 87 | Table 7 | <p>EA 11 - Is the adjacent land area free from grazing lands/domestic animals within 30' from the edge of the crop?</p> <p>EA 11a - If "No" are there topographical or climate features that indicate that 30' recommendation should be modified?</p> <p>EA 11b - If "No" are mitigation measures in place and documented?</p> <p>Comments: <input type="text"/></p> | |
| 87 | Table 7 | <p>EA 12 - Is the adjacent land area free from any septic leach fields (home or other building) within 30' of the edge of the crop?</p> <p>EA 12a - If "No" are there mitigation measures, topographical or climate features that indicate that 30' should be modified is too short a distance?</p> <p>EA 12b - If "No" are mitigation measures in place and documented?</p> <p>Comments: <input type="text"/></p> | |
| 88 | Table 7 | <p>EA 13 - Are all well heads at least 200' from untreated manure?</p> <p>EA 13a - If "No" are there topographical or climate features that indicate that 200' is too short a distance?</p> <p>EA 13b - If "No" are mitigation measures in place and documented?</p> <p>Comments: <input type="text"/></p> | |
| 88 | Table 7 | <p>EA 14 - Does documentation justify the buffer zone distance for all surface water sources on the ranch and their separation from untreated manure (raw manure and partially composted manure) as follows?</p> <p>EA 14a - 100' for sandy soil with a slope <6%</p> <p>EA 14b - 200' for loamy or clay soil with a slope <6%</p> <p>EA 14c - 300' for all slopes >6%</p> | |

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| | | Comments: | |
| 22 | 233-235 213-218 | EA 15 - Is the adjacent land free from uses or conditions that pose a food safety risk to crops? EA 15a - If "No" has a risk assessment been conducted to evaluate the risk? EA 15b - If "No" have corrective measures been put in place and documented? | |
| | | Comments: | |

| Page | Line # | ENVIRONMENTAL ASSESSMENTS: Recent Field History | Yes, No, N/A |
|------|---------|--|--------------|
| 22 | 236-238 | EA 16 - Are production blocks free from all of the following: EA 16a - History of flooding within the last 60 days | |
| 22 | 233-235 | EA 16b - History of grazing on the crop land within the last 1 year EA 16c - History of hazardous activity including but not limited to CAFO, municipal waste, toxic waste, landfill, etc.? Comments: | |

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| | | EA 16a - EA 16c are answered "NO", then answer 16d | |
| 81 | 1090-1093 | EA 16d - Were specific actions implemented and documented to mitigate the issue(s)? Comments: | |

| Page | Line # | ENVIRONMENTAL ASSESSMENTS: Pre-Harvest Assessment | Yes, No, N/A |
|-------------|--------------------|--|--------------|
| 21 | 201-205 | EA 17 - Was a Pre-Harvest Assessment conducted within 7 days for each harvested lot and did it address the following areas? Comments: | |
| 84 | Table 6 | EA 17a - Intrusion by animals Comments: | |
| 22 | 236-238 | EA 17b- Flooding Comments: | |
| 21-22 | 201-205 213-218 | EA 17c - Potential contamination materials Comments: EA 17d - Condition of water source and distribution system Comments: | |
| 22 | 213-218 | EA 17e - Unexpected adjacent land activity that will pose a risk to food safety Comments: | |
| 75-76 76 | 884-900 918-952 | EA 17f - Worker hygiene and sanitary facilities Comments: | |

| Page | Line # | ENVIRONMENTAL ASSESSMENTS: Animal Intrusion | Yes, No, N/A |
|------|---------|---|--------------|
| 84 | Table 6 | EA 18 - Did the assessment indicate that the production area was free from evidence of animal intrusion? | |
| | | Comments: | |

| If EA 18 is answered "NO" then answer EA 18a - EA 18f. | | | |
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| 83 | Figure 9 | EA 18a - Was the animal hazard or potential risk of intrusion assessed by food safety professional or food safety personnel? | |
| 84 | Table 6 | EA 18b - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"? | |
| | | EA 18c - If "YES" were corrective actions carried out according to company SOP? | |
| | | EA 18d - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"? | |
| | | EA 18e - If "YES" were corrective actions carried out per the LGMA requirements? | |
| | | EA18f - If "YES" is documentation available to show that actions were implemented? | |
| | | Comments: | |

| Page | Line # | ENVIRONMENTAL ASSESSMENTS: Unusual Events | Yes, No, N/A |
|------|-----------|--|--------------|
| 78 | 979-1010 | EA 19 - Do the records indicate that fields were flooded at any time during the crop cycle? | |
| 80 | 1023-1048 | EA 19a - If production blocks were flooded, is there documentation to indicate the extent of flooding and the area of crop impacted? | |
| | | EA 19b - Was the product left un-harvested? | |
| 79 | Table 5 | EA 19c - If product was harvested, was a 30' (min) "no harvest" buffer from the high water mark established? | |
| | | EA 19d - Are these remedial activities documented? | |
| | | Comments: | |

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| 21 | 201-205 209-224 | EA 20 - Is the pre-harvest lot free from all evidence of any other type of potential source of human pathogen contamination AND the food safety status of the adjacent land remains unchanged since the pre-season assessment was conducted? | |
| | | Comments: | |

| If EA 20 is answered "NO" then answer EA 20a - EA 20h. | | | |
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| 83 | Figure 9 | EA 20a - If "No", was a food safety assessment completed? | |
| | | EA 20b - Is the individual who conducted the assessment identified? | |
| | | EA 20c - Is the date of the assessment documented? | |
| 84 | Table 6 | EA 20d - Were remedial actions formulated? | |
| | | EA 20e - If "No", was the field harvested? | |
| | | EA 20f - If "No", is there documentation to show the remedial actions were followed? | |
| 86 | Table 7 | EA 20g - Did the remedial action include creation of "no harvest" buffer or separation zones around the potentially contaminated area(s)? | |

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| | | EA 20h - Is documentation which fully delineates the potential contamination available for review? | |
| | | Comments: | |
| 81 | 1061-1070 | EA 21 - Are there environmental sources of contamination (i.e. CAFO), dairy, hobby farms and manure or livestock compost facility proximate the production location? | |
| | | EA 21a - If "Yes", did the assessment indicate that the production area had a change of weather (e.g., severe wind, hail, freeze, excessive rain or have consecutive weather events) and/or discharge/drainage events since the pre-season assessment | |
| | | EA 21b - If "Yes", were corrective actions carried out according to Company SOP? | |
| | | Comments: | |

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| Page | Line # | Assessment of Agricultural Water System Water sources, irrigation methods, conveyance systems, and best practices | Yes, No, N/A | |
| 23 | 259-265 | <p>WU 01: Has a water system description that indicates the source, storage and conveyance of the system been completed and is it available for review? This description can use maps, photographs, drawings or other means to communicate the location of permanent fixtures and the flow of the water system.</p> <p><i>Comments:</i></p> | | |
| 28-29 | 416-443 | <p>WU 02: Is there an SOP outlining best practices to avoid contamination of water sources, storage, and conveyance system within your control and does the SOP include corrective actions?</p> <p><i>Comments:</i></p> | | |
| 28-29 | 416-443 | <p>WU 03: Is there a SOP for the maintenance of ancillary equipment, water storage, and conveyance components of each agricultural water system used in your operations, to ensure the condition of irrigation equipment does not pose a food safety risk and does the SOP include corrective actions?</p> <p><i>Comments:</i></p> | | |
| 23 | 280-282 259-265 Appdx. A | <p>WU 04: Prior to using water in any leafy green operation, was an agricultural water system assessment (including source, storage, and conveyance as described in Appendix A) performed?</p> <p><i>Comments:</i></p> | | |
| 23 | 280-282 259-265 Appdx. A | <p>WU 05: Were corrective actions identified during the agricultural water system assessment? Describe below in comments.</p> <p><i>Comments:</i></p> | | |
| 23 | 280-282 259-265 | <p>WU 06: If "YES", were corrective actions carried out according to the SOP?</p> <p><i>Comments:</i></p> | | |
| 23 | 280-282 259-265 Appdx. A | <p>WU 07: If "YES", is documentation available to show that actions were implemented?</p> <p><i>Comments:</i></p> | | |
| 24 | 283-315 | <p>WU 08: What types of irrigation water sources are being used? Check all that apply and answer related questions in Checklist Section indicated.</p> <p>a. Type A Agricultural Water Systems Sourced from Public or Private Providers (Answer questions in Checklist Section B)</p> <p>b. Type A Agricultural Water Systems Sourced from Private Wells or Regulated Tertiary Treated Recycled Water Supplies (Answer questions in Checklist Section C)</p> <p>c. Treated Type B -> A Agricultural Water Systems (Answer questions in Checklist Section D)</p> | | |

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| | | d. Type B Agricultural Water Systems - For example: Sources used as B, Untreated and exposed to the environment (open sources and/or delivery systems) (Answer question in Section E) | | |
| | | e. Natural (IE: Rain) (No additional questions) | | |
| | | f. Other (Please describe in comment section) | | |
| | | Comments: | | |
| 26 | Table 1 372 | WU 09: How is the agricultural water system being used? Check all that apply and answer related questions. | | |
| | | a. Treated Aerial Non-Irrigation within 21 days of scheduled harvest (sprayer, aircraft) (Answer questions in Checklist Section A) | | |
| | | b. Untreated Aerial Non-Irrigation greater than 21 days of scheduled harvest (sprayer, aircraft) | | |
| | | c. Untreated Aerial Irrigation within 21 days of scheduled harvest (overhead sprinklers) | | |
| | | d. Treated Aerial Irrigation within 21 days of scheduled harvest (overhead sprinklers) | | |
| | | e. Ground (furrow, drip) and/ or untreated aerial irrigation greater than 21 days of scheduled harvest. | | |
| | | f. Harvest (Answer questions in Checklist F) | | |
| | | g. Other (please describe in comment section) | | |
| | | Comments: | | |
| 25 | 323-335 | WU 10: What is the system type? Check all that apply. | | |
| | | a. Closed delivery system | | |
| | | b. Open delivery system | | |
| | | Comments: | | |
| 25-26 | 351-371 | WU 11: When is your agricultural water system being used? Check all that apply. | | |
| | | a. Greater than 21 days until the scheduled harvest date? This would always be both before and after 21 days? | | |
| | | b. Within 21 days of scheduled harvest date? | | |
| | | Comments: | | |
| Page | Line # | Section A Overhead Chemical Applications within 21 Days of Scheduled Harvest (This section does NOT apply to chemical applications made through the distribution system, i.e. sprinkler) | Yes, No, N/A | |
| 30 | 483-501 | WU 12: Is there an SOP for all of the parts of the ag water system used in overhead chemical application and does the SOP include corrective actions? | | |
| | | Comments: | | |
| 30-31 | 502-515 | WU 13: Is there an SOP for each unique application process to treat water that will be used in an overhead application within 21 days of a scheduled harvest and does the SOP include corrective actions? | | |

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| | | | <i>AUDIT ID:</i> | 0 |
| | | <i>Comments:</i> | | |
| 31 | 516-520 | WU 14: Is there a baseline for each unique application process to treat water that will be used in an overhead application within 21 days of a scheduled harvest and are there a minimum of 3 (100mL) samples, from different batches, per baseline? | | |
| | | <i>Comments:</i> | | |
| 31 | 520 | WU 15: Are all 3 samples, for each baseline, non-detect for generic E.coli? | | |
| | | <i>Comments:</i> | | |
| 31 | 522-523 | WU 16: Is there minimum of one (100 mL) microbiological sample taken each month from a representative agricultural water system or at the next application event? | | |
| | | <i>Comments:</i> | | |
| 31 | 524 | WU 17: Are all routine microbiological sample non-detect for generic E.coli? | | |
| | | <i>Comments:</i> | | |
| 31 | 526-528 | WU 18: If microbiological testing shows that the water did not meet generic E. coli acceptance criteria within 21 days of a scheduled harvest was a root cause analysis performed and the concern corrected? And was the grower/producer notified? | | |
| | | <i>Comments:</i> | | |
| 31 | 529-530 | WU 19: If microbiological testing shows that the water did not meet generic E. coli acceptance criteria within 21 days of a scheduled harvest was the product tested for pathogens before harvest following the product testing requirements outlined in Table 2F? | | |
| | | <i>Comments:</i> | | |
| 31 | 532-533 | WU 20: Are there monitoring records kept that verify that each application event is conducted following the parameters established during the initial setup? | | |
| | | <i>Comments:</i> | | |
| 31 | 535-540 | WU 21: Did corrective actions get completed if monitoring shows that the water treatment parameters were not being met? | | |
| | | <i>Comments:</i> | | |
| 31 | 536-537 | WU 22: Was a microbiological sample taken to verify that the corrective action was effective and is the result part of the corrective action documentation? | | |
| | | <i>Comments:</i> | | |

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| 31 | 538-540 | <p>WU 23: If verification microbiological samples did not meet acceptance criteria was a root cause analysis performed and the treatment process corrected?</p> <p><i>Comments:</i></p> | | |
| 31 | 538-540 | <p>WU 24: If verification microbiological samples did not meet acceptance criteria was product tested for pathogens before harvesting following the product testing requirements outlined in Table 2F?</p> <p><i>Comments:</i></p> | | |
| 31 | 541-543 | <p>WU 25: Are records maintained that demonstrate the water used for chemical applications meets Type A source water requirements?</p> <p><i>Comments:</i></p> | | |
| Page | Line # | Section B: Irrigation Water from TYPE A Agriculture Water Systems Sourced from Public or Private Providers | Yes, No, N/A | |
| 36 | 580 TABLE 2B-B1 Baseline Microbial Assessment | <p>WU 26: Was Type A water sourced from public or private providers used in any overhead application within 21 days of schedule harvest?</p> <p>(If answer is yes then proceed to the following questions. If answer is no then proceed to Section C).</p> <p><i>Comments:</i></p> | | |
| 36 | 581 TABLE 2B-B1 Baseline Microbial Assessment | <p>WU 27: In lieu of a baseline microbial assessment, is the supplier's most current Certificate of Analysis (COA) available to review? (Note: Supplier annual water quality report is acceptable.)</p> <p><i>Comments:</i></p> | | |
| 36 | 581 TABLE 2B-B1 Baseline Microbial Assessment | <p>WU 28: Is water quality acceptable for Type A per COA & Per Table 2B in Metrics (If answer is NO, or COA is not available, water is considered Type B and go to Section C)</p> <p><i>Comments:</i></p> | | |
| 37 | 581 TABLE 2B-B2 Initial Microbial Water Quality Assessment | <p>WU 29: Were three samples collected for testing with at least one sample at the end of the delivery system before the 21-day to scheduled harvest period began?</p> <p><i>Comments:</i></p> | | |
| 37 | 581 TABLE 2B-B2 Initial Microbial Water Quality Assessment | <p>WU 30: Did the water testing show that at least 2 of the 3 samples did not have detectable levels of generic E. coli, and the third sample had ≤ 10 MPN generic E. coli?</p> <p><i>Comments:</i></p> | | |

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| 37 | 581 TABLE 2B-B2 Initial Microbial Water Quality Assessment | <p>WU 31: If the initial microbial water quality assessment did not meet Type A water quality standards was a root cause analysis and an agricultural water system assessment (as described in Appendix A) completed and follow up testing conducted to use the system as Type A?</p> <p>Comments:</p> | | |
| 37 | 581 TABLE 2B-B2 Initial Microbial Water Quality Assessment | <p>WU 32: If "YES" did follow up test results show that at least 4 out of 5 samples did not have detectable generic E. coli, and that the final sample had ≤ 10 MPN generic E. coli?</p> <p>Comments:</p> | | |
| 37 | 581 TABLE 2B-B2 Initial Microbial Water Quality Assessment | <p>WU 33: If No was the system used as Type B?</p> <p>Comments:</p> | | |
| 38 | 581 TABLE 2B- B3 Routine Microbial water testing | <p>WU 34: Was routine verification water testing performed at least once at each distinct irrigation system during the season with at least one sample at the end of the delivery system?</p> <p>Comments:</p> | | |
| 38 | 581 TABLE 2B- B3 Routine Microbial water testing | <p>WU 35: Did the test show that at least 2 of 3 samples did not have detectable levels of generic E. coli, and the final sample had less than or equal to 10 MPN generic E. coli?</p> <p>Comments:</p> | | |
| 55 | Line 616 TABLE 2F Routine Microbial water testing Remedial Action | <p>WU 36: If No, were corrective actions taken and did the re-test show that 4 of 5 samples did not have detectable levels of generic E. coli and the final sample had ≤ 10 MPN generic E. coli?</p> <p>Comments:</p> | | |
| 55 | 616 Table 2F Routine Microbial water testing Remedial Action | <p>WU 37: If No, were all affected lots (i.e., lots that have been irrigated with this water within the ≤ 21 days-to-scheduled-harvest window) tested for STEC (including E.coli O157:H7) and Salmonella prior to harvesting and after the last irrigation event?</p> <p>Comments:</p> | | |
| 55 | 616 TABLE 2F Routine Microbial water testing Remedial Action | <p>WU 38: If pathogens were present, from positive test results, did the crop NOT get harvested for the fresh market and human consumption?</p> <p>Comments:</p> | | |
| 36-37 | 581 Table 2B-B2 Initial Microbial Water Quality | <p>WU 39: Was the water system classified as type B?</p> <p>Comments:</p> | | |

| | | | AUDIT ID: | 0 |
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| 36 | 581 Table 2B-B2 Initial Microbial Water Quality Assessment | <p>WU 40: Were there any material (significant) changes to the system after the initial microbial water quality assessment and/or routine microbial water testing?</p> <p>Comments:</p> | | |
| 36 | 581 Table 2B-B2 Initial Microbial Water Quality Assessment | <p>WU 41: If YES, was another initial system microbial water assessment conducted? (If yes auditor to re-answer questions dealing with initial system microbial water assessments. WU15 to WU19)</p> <p>Comments:</p> | | |
| Page | Line # | <p>Section C</p> <p>Irrigation Water from Type A Agricultural Water Systems Sourced from Private Wells or Regulated Tertiary Treated Recycled Water Supplies</p> | Choose from dropdown | |
| 41 | 592 Table 2C-C1 Baseline Microbial Assessment | <p>WU 42: Was water used in any overhead application within 21 days of schedule harvest? (If answer is yes then proceed to the following questions. Otherwise skip this section.)</p> <p>Comments:</p> | | |
| 41 | 592 Table 2C-C1 Baseline Microbial Assessment | <p>WU 43: Was baseline microbial assessment established using one of the following options? Choose all that apply.</p> <p style="padding-left: 40px;">a. Most recent historical water test data with one test taken within the last 6 months</p> <p style="padding-left: 40px;">b. New water test data via sampling</p> <p>Comments:</p> | | |
| 41 | 592 Table 2C-C1 Baseline Microbial Assessment | <p>WU 44: For each source did the data establish that the water quality meets Type A acceptance criteria?</p> <p>*For chronological historical test results (with one being within the last 6 months), 4 out of 5 samples did not have detectable generic E. coli, and that the final sample had ≤ 10 MPN generic E. coli?</p> <p>*For new water test data 5 out of 6 samples did not have detectable generic E. coli, and that the final sample had ≤ 10 MPN generic E. coli? The 6 samples were taken during 2 sampling events (3 samples per event) at least 7 days apart.</p> <p>(If answer is NO, water is considered Type B and go to Section C)</p> <p>Comments:</p> | | |
| 42 | 592 Table 2C-C2 Initial Microbial Water Quality Assessment | <p>WU 45: Were three samples collected for testing during 1 irrigation event with at least one sample taken at the end of the delivery system before the 21-day to scheduled harvest period began?</p> <p>Comments:</p> | | |

| | | | AUDIT ID: | 0 |
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| 42 | 592 Table 2C-C2 Initial Microbial Water Quality Assessment | <p>WU 46: Did the water testing show that at least 2 of the 3 samples did not have detectable levels of generic E. coli, and the third sample had less than or equal to 10 MPN generic E. coli?</p> <p>Comments:</p> | | |
| 42 | 592 Table 2C-C2 Initial Microbial Water Quality Assessment Remedial Action | <p>WU 47: If the initial microbial water quality assessment did not meet Type A water quality standards, was a root cause analysis and an agricultural water system assessment (as described in Appendix A) completed and follow up testing conducted to use the system as Type A?</p> <p>Comments:</p> | | |
| 43 | 592 Table 2C-C2 Initial Microbial Water Quality Assessment Remedial Action | <p>WU 48: If "YES" did follow up test results show that at least 4 out of 5 samples did not have detectable generic E. coli, and that the final sample had less than or equal to 10 MPN generic E. coli?</p> <p>Comments:</p> | | |
| 43 | 592 Table 2C-C2 Initial Microbial Water Quality Assessment | <p>WU 49: If "NO" was system used as Type B?</p> <p>Comments:</p> | | |
| 43 | 592 Table 2C-C3 Routine Verification of Microbial Water Quality | <p>WU 50: Was a routine verification water testing performed at least once at each distinct irrigation system during the season with at least one sample at the end of the delivery system?</p> <p>Comments:</p> | | |
| 43 | 592 Table 2C-C3 Routine Verification of Microbial Water Quality | <p>WU 51: Did the test show that at least 2 of 3 samples did not have detectable levels of generic E. coli, and the final sample had less than or equal to 10 MPN generic E. coli?</p> <p>Comments:</p> | | |
| 55 | Line 616 TABLE 2F Routine Microbial water testing Remedial Action | <p>WU 52: If No, were corrective actions taken and did the re-test show that 4 of 5 samples did not have detectable levels of generic E. coli and the final sample had ≤ 10 MPN generic E. coli?</p> <p>Comments:</p> | | |
| 55 | 616 Table 2F Routine Microbial water testing | <p>WU 53: If No were all affected lots (i.e., lots that have been irrigated with this water within the <21 days-to-scheduled-harvest window) tested for STEC (including E. coli O157:H7) and Salmonella prior to harvesting and after the last irrigation event?</p> <p>Comments:</p> | | |
| 55 | 616 Table 2F Routine Microbial water testing Remedial Action | <p>WU 54: If pathogens were present, from positive test results, did the crop NOT get harvested for the fresh market and human consumption?</p> <p>Comment:</p> | | |

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| 55 | 616 Table 2F Routine Microbial water testing Remedial Action | WU 55: Was the system classified as Type B? | | |
| | | Comments: | | |
| 42 | Line 592 TABLE 2C-C2 Initial Microbial Water Quality Assessment | WU 56: Were there any material (significant) changes to the system after the initial microbial water quality assessment? | | |
| | | Comments: | | |
| 42 | 592 Table 2C-C2 Initial Microbial Water Quality Assessment | WU 57: If YES, was another initial system microbial water assessment conducted? (If yes auditor to re-answer questions dealing with initial system microbial water assessments. WU45 to WU49) | | |
| | | Comments: | | |
| Page | Line # | Section D Irrigation Water from Treated Type B to A Agricultural Water Systems: Water from canals, rivers or reservoirs (Type B) or water from Sections A&B that did not meet Type A standard. | | Yes, No, N/A |
| 48 | Table 2D 604 | WU 58: Has any water been treated from Type B to A. If yes answer the following questions. | | |
| | | Comment: | | |
| | Appendix A Pg 22 Table 9 Initial Irrigation Water Treatment Assessment | WU 59: Was an Initial Irrigation Water Treatment Assessment conducted and an SOP established outlining the water baseline quality, treatment method, mitigations used, dose, and methods for verification of treatment to change water from Type B to A per Appendix A guidance? | | |
| | | Comments: | | |
| | Appendix A Pg 22 Table 9 Initial Irrigation Water Treatment Assessment | WU 60: Are antimicrobial treatments used and managed in a manner that meets all federal, state and local regulations and label requirements? | | |
| | | Comments: | | |
| | Appendix A Pg 23 Table 10 Initial Microbial Water Quality Assessment | WU 61: Did the Initial Microbial Water Quality Assessment collect at least three (3) 100 mL samples during one irrigation event with at least one sample collected at the end of the delivery system and each collected at a different sprinkler head? | | |
| | | Comments: | | |

| | | | AUDIT ID: | 0 |
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| | Appendix A Pg 23 Table 10 Initial Microbial Water Quality Assessment | WU 62: Did the Initial Microbial Water Quality Assessment water testing show that at least 2 of the 3 samples did not have detectable levels of generic E. coli, and the third sample had ≤ 10 MPN generic E. coli and for total coliform a monitoring maximum level of 99 MPN in 100mL in all water samples or an adequate log reduction per Appendix A guidance? | | |
| | | Comments: | | |
| | Appendix A Pg 23 Table 10 Initial Microbial Water Quality Assessment | WU 63: If the initial microbial water quality assessment did not meet Type A water quality standards, was a root cause analysis and an agricultural water system assessment (as described in Appendix A) completed and follow up testing conducted to use the system as Type A? | | |
| | | Comments: | | |
| 55 | Line 616 TABLE 2F Routine Microbial water testing Remedial Action | WU 64: If "YES" did follow up test results show that at least 4 out of 5 samples did not have detectable generic E. coli, that the 5th sample had ≤ 10 MPN generic E. coli, and all samples met the Total Coliform monitoring requirement of a max value of 99 MPN or an adequate log reduction? | | |
| | | Comments: | | |
| | Appendix A Pg 23 Table 10 Initial Microbial Water Quality Assessment | WU 65: If "NO" was system used as Type B? | | |
| | | Comments: | | |
| 48 | 604 Table 2D-D1 Routine Verification of Microbial Water Quality | WU 66: Was routine water testing performed on a monthly frequency (or at the next irrigation event if longer than monthly) with at least three (3) 100 mL samples collected during one irrigation event with at least one sample at the end of the delivery system and if the irrigation treatment system is being used within the 21 days to scheduled harvest window was each distinct system sampled on at least 2 occasions separated by at least 3 days? | | |
| | | Comments: | | |
| 48 | 604 Table 2D-D1 Routine Verification of Microbial Water Quality | WU 67: Did water testing show that at least 2 of the 3 samples did not have detectable levels of generic E. coli, and the third sample had ≤ 10 MPN generic E. coli and for Total Coliform a monitoring maximum level of 99 MPN in 100 mL in all water samples or an adequate log reduction per Appendix A guidance? | | |
| | | Comments: | | |

| | | | AUDIT ID: | 0 |
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| 55 | 616 Table 2F Routine Microbial water testing Remedial Action | <p>WU 68: If the answer is No, were corrective actions taken and 4 of 5 samples did not have detectable levels of generic E. coli and < 10 MPN as the single sample maximum for one (1) sample and were all samples at a level ≤ 99 MPN for Total coliform or an adequate log reduction?</p> <p>Comments:</p> | | |
| 55 | 616 Table 2F Routine Microbial water testing Remedial Action | <p>WU 69: For generic E. coli re-test failure if the water from the initial sampling to the last round of sampling has been applied to leafy greens, was the crop tested from all affected lots (i.e., lots that have been irrigated with this water within the <21 days-to-scheduled-harvest window) for STEC (including E. coli O157:H7) and Salmonella per Table 2F?</p> <p>Comments:</p> | | |
| 55 | 616 Table 2F Routine Microbial water testing Remedial Action | <p>WU 70: For Total Coliforms re-test failure was a root cause analysis performed to evaluate the irrigation treatment system and corrections made per Table 2F?</p> <p>Comments:</p> | | |
| 49 | 604 Table 2D-D2 Routine Water Treatment Monitoring | <p>WU 71: For each irrigation event are treatment monitoring records available?</p> <p>Comments:</p> | | |
| 49 | 604 Table 2D-D2 Routine Water Treatment Monitoring | <p>WU 72: Do the records show that the monitoring requirements are being met? If yes skip to question WU79.</p> <p>Comments:</p> | | |
| 49 | Line 604 Table 2D-D2 Routine Water Treatment Monitoring | <p>WU 73: If monitoring records show that treatment parameters weren't met, in accordance to the monitoring SOP, were remedial actions conducted including taking microbial verification water samples in accordance to Table 2D section D2?</p> <p>Comments:</p> | | |
| 48 | Line 604 Table 2D-D1 Routine Verification of Microbial Water Quality | <p>WU 74: Did verification sample results show that at least 2 of the 3 samples did not have detectable levels of generic E. coli, and the third sample had ≤ 10 MPN generic E. coli and for Total Coliform a monitoring maximum level of 99 MPN in 100 mL in all water samples or an adequate log reduction per Appendix A guidance?</p> <p>Comments:</p> | | |
| 55 | 616 Table 2F Routine Microbial water testing Remedial Action | <p>WU 75: If the answer is No, were corrective actions taken and were 4 of 5 samples non-detect for generic E. coli and < 10 MPN as the single sample maximum for one (1) sample and were all samples at a level ≤ 99 MPN for Total coliform or an adequate log reduction?</p> <p>Comments:</p> | | |

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| 55 | 616 Table 2F Routine Microbial water testing Remedial Action | <p>WU 76: For generic E. coli re-test failure if the water from the initial sampling to the last round of sampling has been applied to leafy greens, was the crop tested from all affected lots (i.e., lots that have been irrigated with this water within the <21 days-to-scheduled-harvest window) for STEC (including E. coli O157:H7) and Salmonella per Table 2F?</p> <p>Comments:</p> | | |
| 55 | 616 Table 2F Routine Microbial water testing Remedial Action | <p>WU 77: For Total Coliforms re-test failure was a root cause analysis performed to evaluate the irrigation treatment system and corrections made per Table 2F?</p> <p>Comments:</p> | | |
| | Appendix A Pg 23 Table 10 Initial Microbial Water Quality | <p>WU 78: Was the water classified as Type B?</p> <p>Comments:</p> | | |
| | Appendix A Pg 23 Table 10 Initial Microbial Water Quality Assessment | <p>WU 79: Were there any material (significant) changes to the system after the initial microbial water quality assessment?</p> <p>Comments:</p> | | |
| | Appendix A Pg 23 Table 10 Initial Microbial Water Quality Assessment | <p>WU 80: If YES, was another initial system microbial water assessment conducted? (If yes auditor to re-answer questions dealing with initial system microbial water assessments.)</p> <p>Comments:</p> | | |
| Page | Line # | Section E Irrigation Water from Type B Agricultural Water Systems | Yes, No, N/A | |
| 32 & 52 | 563 Table 2A 609 Table 2E | <p>WU 81: Was a source water quality microbiological test conducted for each source of water within 60 days of first use on post germinated fields?</p> <p>Comments:</p> | | |
| 32 & 52 | 563 Table 2A 609 Table 2E | <p>WU 82: Are records available to demonstrate that One (1) 100 mL water sample has been collected from each water distribution system on a monthly basis (or at the next irrigation event if longer than monthly)?</p> <p>Comments:</p> | | |
| 32 & 52 | 563 Table 2A 609 Table 2E | <p>WU 83: Do Records show that the water samples are taken no less than 18 hours apart?</p> <p>Comments:</p> | | |
| 32 & 52 | 563 Table 2A | <p>WU 84: Is the geometric mean less than or equal to 126 MPN/100 mL?</p> | | |

| | | | AUDIT ID: | 0 |
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| | 609 Table 2E | Comments: | | |
| 32 & 52 | 563 Table 2A 609 Table 2E | WU 85: Are all individual samples less than or equal to 235MPN/100 ml (foliar) or 576 MPN/100mL (non-Foliar)? | | |
| | | If no answer the applicable questions below: Non-foliar: WU 86 to WU 91 Foliar: WU 92 to WU 98 | | |
| | | Comments: | | |
| 32& 34 | 563 Table 2A 565 Figure 1 Non-Foliar | WU 86: Was an agricultural water system assessment conducted and were samples for the required water re-testing taken at the previous sampling point? | | |
| | | Comments: | | |
| 34 | 565 Figure 1 Non-Foliar Remedial Actions Metrics | WU 87: Was one (1) 100 mL water test taken daily (not less than 18 hours apart) for 5 days? | | |
| | | Comments: | | |
| 34 | 565 Figure 1 Non-Foliar Remedial Actions Metrics | WU 88: Were these 5 test results meeting the acceptance criteria: average less than 126 MPN/100mL (based on rolling geometric mean=5) and no sample exceeded 576 MPN/100 mL (non-foliar)? | | |
| | | Comments: | | |
| 34 | 565 Figure 1 Non-Foliar Remedial Actions Metrics | WU 89: Do records show the water system was not used while the water quality was inadequate? | | |
| | | Comments: | | |
| 34 | 565 Figure 1 Non-Foliar Remedial Actions Metrics | WU 90: If no, was product sampled for STEC (including E. coli O157:H7) and Salmonella? | | |
| | | Comments: | | |
| 34 | 565 Figure 1 Non-Foliar Remedial Actions Metrics | WU 91: Do records show that the crop was not harvested for human consumption when the tests were positive for STEC (including E. coli O157:H7) and Salmonella? | | |
| | | Comments: | | |
| 54 | 612 Figure 5 Foliar Remedial Actions | WU 92: If the water source is a well was an agricultural system assessment and/or treatment performed? | | |
| | | Comments: | | |
| 54 | 612 Figure 5 Foliar Remedial Actions | WU 93: Were samples for the required water re-testing taken at the previous sampling point? | | |
| | | Comments: | | |
| 54 | 612 Figure 5 Foliar Remedial | WU 94: Were (3) 100 mL water test taken (not less than 18 hours apart)? | | |
| | | Comments: | | |
| 54 | 612 Figure 5 Foliar Remedial | WU 95: If yes, were these (3) test results meeting the acceptance criteria? (all less than 126 MPN/100mL?) | | |
| | | Comments: | | |

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| | | | AUDIT ID: | 0 |
| | Foliar Remedial Actions | Comments: | | |
| 54 | 612 Figure 5 Foliar Remedial Actions | WU 96: If no, was the water source discontinued for use until brought back within acceptance criteria? Comments: | | |
| 54 | 612 Figure 5 Foliar Remedial Actions | WU 97: If crop was contacted by the water exceeding the acceptance criteria was product sampled for STEC (including E. coli O157:H7) and Salmonella? Comments: | | |
| 54 | 612 Figure 5 Foliar Remedial Actions | WU 98: Do records show that the crop was not harvested for human consumption when the tests were positive for STEC (including E. coli O157:H7) and Salmonella? Comments: | | |
| | | | | |
| Page | Line # | Section F Harvest Water used on Product, Food Contact Surfaces and for Hand Washing | | Yes, No, N/A |
| 57 | Line 618 TABLE 2G | WU 99: Was water used during harvest application to the edible portion of the crop or food contact surfaces or hand washing? (If answer is yes, then proceed to following questions otherwise stop here). Comments: | | |
| 57 | Line 618 TABLE 2G | WU 100: Is there an SOP prepared to make sure that water used for harvest direct product contact, food contact surfaces, and hand washing is sourced from municipal, well, or Reverse Osmosis water sources. Does this water meet the Maximum Contaminant Level Goal for generic E.coli as specified by U.S. EPA or contains an approved disinfection method at sufficient concentration or of sufficient wavelength to prevent cross-contamination? Comments: | | |
| 57 | Line 618 TABLE 2G | WU 101: Did water quality meet microbial standards? <ul style="list-style-type: none"> • Single pass use – Water must have non-detectable levels of generic E. coli or breakpoint disinfectant present at point of entry • Multi-pass use – Water must have non-detectable levels of generic E. coli and/or sufficient disinfectant to ensure returned water has no detectable E. coli Chlorine ≥ 1 ppm free chlorine after application and pH 5.5 – 7.5 If no, answer the questions below | | |
| 57 | Line 618 TABLE 2G | WU 102: Is there an SOP that determines what corrective actions are required when harvest water does not meet acceptance criteria? Comments: | | |

| | | | AUDIT ID: | 0 |
|----|----------------------|--|-----------|---|
| 57 | Line 618 TABLE 2G | WU 103: Are there records demonstrating that the water was no longer used until corrective actions were complete? | | |
| | | <i>Comments:</i> | | |
| 58 | Line 618 TABLE 2G | WU 104: If the water source is a well was an agricultural system assessment and/or treatment performed? | | |
| | | <i>Comments:</i> | | |
| 58 | Line 618 TABLE 2G | WU 105: Was the distribution line and source inlet examined as described in Appendix A and retested from the same point of use? | | |
| | | <i>Comments:</i> | | |
| 58 | Line 618 TABLE 2G | WU 106: Were all samples non-detect less than or equal to 2 MPN/100mL for generic E.coli? | | |
| | | <i>Comments:</i> | | |
| 59 | Line 622 Figure 6 | WU 107: If crop, or food contact surfaces, were contacted by the water exceeding the acceptance criteria was product sampled for STEC (including E. coli O157:H7) and Salmonella? | | |
| | | <i>Comments:</i> | | |
| 59 | Line 622 Figure 6 | WU 108: Do records show that the crop was not distributed for human consumption when the tests were positive for STEC (including E. coli O157:H7) and Salmonella? | | |
| | | <i>Comments:</i> | | |
| | | | | |
| | | | | |
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| Page | Line # | Soil Amendments | Yes, No, N/A |
|--|----------------|---|--------------|
| All soil amendments are free from raw or partially composted animal manure and solids | | | |
| 60 | 646-648 | SA 01 - Were raw or partially composted animal manure, animal by-products or biosolids applied in the last 1 year? | |
| | | SA 01a - If "YES" to the above were any of these fields used in the production of leafy greens? | |
| | | Comments: | |
| 62 | 689 TABLE 3 | SA 02 - Were any soil amendments containing fully composted animal manure applied to the field within the last year? | |
| | | Comments: | |
| If SA 02 is answered "YES" then answer SA 02a - SA 02u | | | |
| 62 | 689 Table 3 | SA 02a - Are Process Validation records available for review? | |
| | | Comments: | |
| | | SA 02b - If the Enclosed or Within-Vessel Composting method is used, do the records show: | |
| | | SA 02c - that the active compost was maintained for a minimum of 131°F for 3 days? | |
| | | SA 02c(1) - that there is a Letter of Guarantee or other comparable documentation available that verifies that the soil amendment has been adequately cured? | |
| | | Comments: | |
| | | SA 02d - If the Windrow Composting method is used do the records show: | |
| | | SA 02e - that the active compost maintained aerobic conditions for a minimum of 131°F or higher for 15 days or longer? | |
| | | SA 02f - a minimum of five turnings during this period? | |
| | | SA 02f (1) - that there is a Letter of Guarantee or other comparable documentation available that shows the soil amendment has been adequately cured? | |
| | | Comments: | |
| | | SA 02g - If the Aerated Static Pile Composting method is used do the records show that: | |
| | | SA 02h - the active compost was covered with 6 to 12 inches of insulating materials? | |
| | | SA 02i - the pile was maintained for a minimum of 131°F for 3 days? | |

| | | | |
|--|--|---|--|
| | | SA 02i (1) - that there is a Letter of Guarantee or other comparable documentation available that shows the soil amendment has been adequately cured? | |
| | | Comments: | |
| | | SA 02j - Has each lot of composted material that is equal to or less than 5000 cubic yards been tested as required? | |
| | | Comments: | |
| | | SA 02k - Has each lot of composted material been applied to the production location more than 45 days before harvest? | |
| | | SA 02k(1) – For on-farm compost, are process control monitoring records reviewed, dated and signed by supervisor or responsible party within a week after records were made? | |
| | | Comments: | |

Records must be available to document that the following criteria have been meet for each lot of compost containing animal material used.

| | | | |
|----|-----------|---|--|
| 62 | 689 | a. Acceptance criteria | |
| | Table 3 | SA 02l - Fecal coliforms: <1000 MPN/gram | |
| | | SA 02m - <i>Salmonella</i> : Negative per sample size of the prescribed test | |
| 66 | Figure 7A | SA 02n - <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test | |
| | | b. Recommended test methods | |
| | | SA 02o - Fecal coliforms: U.S. EPA Method 1680; multiple- tube MPN | |
| | | SA 02p - <i>Salmonella</i> spp: U.S. EPA Method 1682 | |
| | | SA 02q - <i>E. coli</i> O157:H7: Any laboratory validated method for compost | |
| | | SA 02r - Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate. | |
| | | c. Sampling plan | |
| | | SA 02s - A composite sample shall be representative and random and obtained as described in the California state regulations. | |
| | | SA 02t - Sample may be taken by the supplier if trained by a testing laboratory or state authority. | |
| | | SA 02u - Laboratory must be certified/accredited for microbial testing by a certification or accreditation body. | |
| | | Comments: | |

| | | | |
|----|---------|--|--|
| 54 | 611-620 | SA 03 - Is a Letter of Guarantee or other comparable documentation (ingredient statement, agricultural label, etc.) available that shows the soil amendment does not contain animal manure or is composed of a single ingredient? | |
| | | SA 03a - Is the name of the authority issuing the Letter of Guarantee or other comparable document shown? | |
| | | Comments: | |

Soil Amendments that contain animal manure that are heat treated or processed to equivalent methods

| | | | | |
|---|---|--|--|--|
| 64-67 690 Table 3 697 Figure 7B | SA 04 - Have soil amendments containing animal manure that has been heat treated or processed by other equivalent methods been applied in the field within the last year? | | | |
| | Comments: | | | |
| | If SA 04 is answered "YES" then answer SA 04a-SA 04m | | | |
| | SA 04a - Are process records or other comparable documentation available that show the lethality of the process? | | | |
| | SA 04b - Is the name of the process authority issuing the Letter of Guarantee or other comparable document shown? | | | |
| | Records must be available to document the following criteria have been met for each lot of heat treated or processed by other equivalent method compost containing animal material used. | | | |
| | a. Acceptance criteria | | | |
| | SA 04c - Fecal coliforms: Negative MPN/gram | | | |
| | SA 04d - <i>Salmonella spp.</i> : Negative per sample size of the prescribed test | | | |
| | SA 04e - <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test | | | |
| | SA 04e (1) – <i>Listeria monocytogenes</i> : Negative per sample size of the prescribed test | | | |
| | b. Recommended test methods | | | |
| | SA 04f - Fecal coliforms: 9 tube MPN | | | |
| | SA 04g - <i>Salmonella spp.</i> : U.S. EPA Method 1682 | | | |
| | SA 04h - <i>E. coli</i> O157:H7: Any laboratory validated method for compost | | | |
| | SA 04i - Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate. | | | |
| | SA 04i(1) - <i>Listeria monocytogenes</i> : Any laboratory validated method for testing soil amendments | | | |
| | c. Sampling plan | | | |
| SA 04j - Take at least 12 equi-volume samples from 12 or more separate locations or 12 samples from 12 individual bags, if bagged individually. | | | | |
| SA 04k - Sample may be taken by the supplier if trained by a testing laboratory or state authority. | | | | |
| SA 04l - Laboratory must be certified/accredited by a certification or accreditation body. | | | | |
| SA 04m - If testing records are NOT available is a Certificate of Process Validity as defined by the "Guidelines" available for review? | | | | |
| Comments: | | | | |

Soil amendments that are Non-Synthetic Treatments (compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc.) Table 4 and Figure 8

| | | | |
|----|---------|---|--|
| 69 | 731-733 | SA 05 - Have non-synthetic crop treatments been applied to the crop? | |
| | Table 4 | Comments: | |

| | | If SA 05 if answered "YES" then answer SA 05a - SA 05v | |
|----|---------|---|--|
| 69 | 731 | SA 05a - If "YES" to the above, was the product (non-synthetic soil amendment) applied to the edible portion of the crop? | |
| | Table 4 | SA 05b - Is a letter of compliance or comparable document outlining the actual conditions of use and conformance to standards available for review (including presence of animal products or manure)? | |
| | | Comments: | |
| 68 | 709-710 | SA 05b (1) – If compost / treated agricultural tea containing nutrients intended to increase microbial biomass (e.g. molasses, yeast extract, algal powder) is applied to edible portion of the crop, do records indicate that the nutrients were added prior to treatment? | |
| | | Comments: | |

Records must be available to document that the following criteria have been met for each lot of non-synthetic crop treatment used.

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| 69, 71 | Table 4 Figure 8 | SA 05c - Did each lot/batch used meet the microbial criteria identified below? | |
| | | SA 05c (1) - Fecal coliforms: Negative MPN/gram | |
| | | SA 05d - <i>Salmonella</i> : Negative per sample size of the prescribed test | |
| | | SA 05e - <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test | |
| | | SA 05e (1) - <i>Listeria monocytogenes</i> : Negative per sample size of the prescribed test | |
| | | SA 05f - If this treatment is applied as a liquid, was the solution made with water that meets the quality standards for harvest water listed in Table 1? | |
| | | Application intervals were met: | |
| | | SA 05g - Was this non-synthetic crop treatment produced using a validated process for pathogen control? | |
| | | SA 05h - If "No" to the above, was the treatment applied at least 45 days before harvest? | |
| | | SA 05i - If "Yes", are process validation records and documentation available to show that the process is capable of reducing pathogens of human health significance to acceptable levels? | |
| | | Acceptable testing methods were followed?: | |
| | | SA 05i(1) - Fecal coliforms: Negative MPN/gram | |
| | | SA 05j - <i>Salmonella</i> spp: U.S. E.P.A. Method 1682 | |
| | | SA 05k - <i>E. coli</i> O157:H7: Any laboratory validated method for compost sampling | |
| SA 05l(1) – <i>Listeria monocytogenes</i> : Negative per sample size of the prescribed test | | | |
| SA 05l - Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate | | | |
| The proper sampling plan was followed?: | | | |
| SA 05m - Solid: 12 point sampling plan composite sample | | | |
| SA 05n - Liquid: Single well-mixed sample per lot | | | |
| SA 05o - Sample may be taken by the supplier if trained by the testing laboratory | | | |

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| | | SA 05p - Laboratory must be certified/accredited by annual review of laboratory protocols based on GLPs by a certification or accreditation body | |
| | | Testing Frequency protocols followed?: | |
| | | SA 05q - Each lot before application to production fields | |
| | | SA 05r - Identify the crop treatment | |
| | | SA 05s - Show the name of the laboratory completing the testing | |
| | | SA 05t - Show date of application | |
| | | SA 05u - Show the date of harvest | |
| | | SA 05v - Show the supplier name | |
| | | Comments: | |

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| 60 | 652-653 | SA 06 - Is there a written policy implementing management plans (e.g. timing of applications, storage location, source and quality, transport, etc.) that significantly reduces the likelihood that soil amendments and/or crop treatments being used contain human pathogens and does it assure to the greatest degree practicable that the use of crop treatments does not pose a significant pathogen contamination hazard? | |
| | | Comments: | |

| Page | Line# | WORKER PRACTICES: General Requirements | Yes, No, N/A |
|---------------------------------------|---------|--|--------------|
| 75-76 | 878-931 | WP 01 - Is there a written policy that addresses the following points for all employees and all visitors to the field location which describes the required hygiene rules? | |
| | | WP 01a - Sanitary Facilities | |
| | | WP 01b - Field Worker Practices (GMP's, GHP's, etc.) | |
| | | WP 01c - Worker Health Practices | |
| | | Comments: | |
| WORKER PRACTICES: Sanitary Facilities | | | |
| 76 | 918-952 | WP 02 - Is there a documented field sanitary facility program that addresses the following? | |
| | | WP 02a - The number, condition, type, placement, and location of cleaning of field sanitation units (field permanent vs harvest placement) complies with applicable state and/or federal regulations. | |
| | | WP 02b - Sanitary facilities are readily accessible (proximate) to the work area. | |
| | | WP 02c - Sanitary facilities are regularly maintained according to schedule. | |
| | | WP 02d - Sanitary facilities have sufficient consumable supplies (i.e.: hand soap, water that meets the acceptance criteria for hand washing, paper towels, toilet paper, etc.). | |
| | | WP 02e - Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work. | |
| | | WP 02f - Field sanitation facilities are cleaned and serviced with waste disposed of on a scheduled basis and at a location that minimizes the potential risk for product contamination. Gray water is not released in production areas. | |
| | | WP 02g - Field sanitation cleaning tools are segregated and properly labeled, (i.e., color code, tool description) to prevent misuse or cross-contamination (i.e., tools used for bathroom cleaning) . | |
| | | WP 02h - If applicable, cleaning tools used for sanitary units shall only be used for sanitary unit cleaning and shall be stored in a manner to prevent contamination when not in use. | |
| | | WP 02i - Address the placement of the sanitary facility in order to minimize any impact on the crop in the field and roads including: | |
| | | WP 02j- Minimize the impact on the crop from leaks and/or, spills, and the cleaning and servicing of the sanitary facility. | |
| | | WP 02j - Ability to access the unit for service | |
| | | WP 02k - storage of harvest units when not in use and cleaning procedures prior to placing back into service before transporting to harvest or field location. | |
| | | WP 02l - Documented response plan in the event of a major leak and/or spill. | |

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| | | WP 02m-The availability of servicing records (either contracted or in-house) to verify the program is occurring according to SOP. Comments: | |
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| 75-77 | 875-900 944 | <p>WP 03 - Is there a written worker practices program that establishes employee work rules that address the following:</p> <p>WP 03a - Training on proper sanitation and hygiene practices</p> <p>WP 03b - Requirement for workers to wash their hands with soap and water before beginning or returning to work, and any other time when hands may have become contaminated, and that prohibits using hand sanitizer as a substitute for hand washing?</p> <p>WP 03c - Confine smoking, eating and drinking (except water) to designated areas.</p> <p>WP 03d - Storage requirements for personal items in/or adjacent to the field?</p> <p>WP 03e- The appropriate use and sanitation of gloves and that prevents the use of personal gloves and prevents gloves from being taken home?</p> <p>WP 03f- Avoid contact with animals</p> <p>WP 03g - When applicable training on portable unit cleaning procedures.</p> <p>Comments:</p> | |
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| 76 | 901-907 | <p>WP 04 - For materials targeted for further processing, is there a written physical hazard prevention program which includes the following?</p> <p>WP 04a - The proper wearing of head and facial hair restraints.</p> <p>WP 04b- The proper wearing of apron and other food safety apparel.</p> <p>WP 04c - Removal of visible jewelry (rings, bracelets, necklaces, body piercings, etc.) or covering of hand jewelry prior to the start of work.</p> <p>WP 04d - Removal of all objects from upper pockets.</p> <p>WP 04e - Prohibitions on spitting, urinating or defecating in the field.</p> <p>Comments:</p> | |
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| WORKER PRACTICES: Worker Health Practices | | |
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| 76 | 908-917 | <p>WP 05- Is there a written worker health practices program that establishes employee work rules which address the following?</p> <p>WP 05a - Workers with diarrheal disease or symptoms of other infectious disease are prohibited from being in the field or handling fresh produce or food-contact surfaces?</p> <p>WP 05b- Workers with open cuts or lesions are prohibited from handling fresh produce.</p> <p>WP 05c - Actions for employee to take in the event of injury or illness (e.g. notifying supervisor).</p> <p>WP 05d - A policy describing procedures for handling/disposition of produce or food contact surfaces that have come into contact with blood or other body fluids.</p> <p>WP 05e - A policy describing return to work procedures when an employee had an illness or injury preventing them from working with food.</p> <p>Comments:</p> | |
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| Page | Line# | FIELD SANITATION: General Requirements | Yes, No, N/A |
|-------|---------|--|--------------|
| 75-76 | 875-900 | FS 01 - Is there a written policy for all employees and all visitors in the field location which describes the required field sanitation SOPs? <i>Comments:</i> <input type="text"/> | |

| FIELD SANITATION: Field Activities | | | |
|------------------------------------|---------|---|--|
| 75 | 881-882 | FS 02 - Does the written field activity SOP address the following: FS 02a - is a specific individual assigned the food safety responsibility for growing operations? | |
| 77-78 | 955-978 | FS 02b - Cross contamination by farming equipment and tools that comes into contact with, uncovered produce, raw manure, untreated compost, waters of unknown quality, animal hazards or other potential sources. FS 02c - If "Yes" does it appropriately restrict the use or require a documented cleaning and sanitation program of the equipment? FS 02d - If cleaning and sanitation is required, are records of the cleaning/sanitation available for review. <i>Comments:</i> <input type="text"/> | |

| FIELD SANITATION: Harvest Activities | | | |
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| 75 | 881-882 | FS 03 - Does the written harvest activity SOP address the following: FS 03a - Is a specific individual assigned the food safety responsibility for harvesting? | |

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| 84-85 | 1150 Table 6 | FS 03b - Is a documented daily food safety harvest assessment available for review? | |
| | | FS 03c - Is the assessment dated? | |
| | | FS 03d - Is the individual who conducted the assessment identified? | |
| | | FS 03e - Are the specific growing blocks associated with the assessment clearly identified? | |
| | | FS 03f - Is the Harvester name and contact information documented? | |
| | | <i>Comments</i> : | |
| | | FS 04 - Did the assessment indicate that there was evidence of animal intrusion in the production area ? | |
| | | <i>Comments:</i> <input type="text"/> | |

| If FS 04 is answered "YES" then answer FS 04a - FS04f. | | | |
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| 84 | 1150 Table 6 | FS 04a- Was the animal hazard or potential risk of intrusion assessed by food safety professional or food safety personnel? | |
| | | FS 04b - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"? | |

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| | | FS 04c- If "YES" were corrective actions carried out according to company SOP? | |
| | | FS 04d- Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"? | |
| | | FS 04e- If "YES" were corrective actions carried out per the LGMA requirements? | |
| | | FS 04f - If "YES" is documentation available to show that actions were implemented? | |
| | | Comments: | |
| 81 | 1064-1066 | FS 05 - If an environmental source of contamination is proximate, was the production area assessed for changes associated to weather (e.g. severe wind, hail, freeze, excessive rain or consecutive weather events) and/or discharge/drainage events? | |
| | | Comments: | |
| 72-74 | 746-824 | FS 06 - Is there a Sanitation SOP (SSOP) for food-contact surfaces of harvest equipment, and tools addressing the following: | |
| | | FS 06a - Method and frequency of cleaning and sanitation | |
| | | FS 06b- Are the food contact surfaces on harvest equipment cleaned and sanitized at the end of each daily harvest? | |
| | | FS 06c- Prior to beginning harvest, is a daily inspection of equipment conducted that addresses cleaning and sanitation or noticeable change in condition (i.e., accumulation of dirt, debris, dust, droppings, etc.) since prior sanitation? | |
| | | FS 06d - Does the daily inspection indicate a change in condition (i.e., accumulation of dirt, debris, dust, droppings, etc.) of the food contact surfaces on harvest equipment necessitating that it need to be rinsed and sanitized? | |
| | | FS 06e - Are food contact surfaces on harvest equipment cleaned and sanitized before moving to the next commodity and/or field and when there is excessive soil build up? | |
| | | FS 06f - Prior to harvest and when crews are exiting for breaks, harvest tools are placed in a receptacle containing water of adequate sanitary quality. | |
| | | FS 06g- The design, and maintenance, of harvest equipment and tools will ensure effective cleaning for the life of the equipment. | |
| | | FS 06h - Are harvester sanitation personnel utilizing PPE equipment such as gloves, aprons, boots, face shields, respirators (if required) in such a way as to prevent cross-contamination of harvest equipment, tools, etc? | |
| | | FS 06i - Chemical usage and record keeping (e.g. soap, detergent, sanitizer, etc.) | |
| | | FS 06j - Equipment specific cleaning instructions | |
| 72 | 761 | FS 06k - Secure chemical storage | |

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| 75 | 883 | FS 06l - All chemical storage containers are labeled appropriately | |
| 73 | 778 | FS 06m - Sanitation Procedures Verification | |
| 73 | 784 | FS 06n - Daily inspection | |
| | | Comments : | |
| 72 | 764-769 | FS 07- Documentation (logs or records) must be maintained daily for each harvest equipment (e.g., container, equipment, tools, etc.) cleaning and sanitation event. This documentation must be reviewed, dated, and signed by a supervisor within a reasonable, designated, maximum amount of time. | |
| | | Comments: | |
| 74 | 815-824 | FS 08 - Is there an SOP for non-food-contact surfaces of harvest equipment and tools addressing the following: | |
| | | FS 08a – Method and frequency of cleaning | |
| | | FS 08b- Chemical usage and record keeping? (e.g. soap, detergent, sanitizer, etc.) | |
| | | FS 08c - Equipment-specific cleaning instructions? | |
| | | FS 08d - Cleaning verification? | |
| 84 | Table 6 | FS 08e - Daily inspection? | |
| | | Comments : | |
| 73 | 783-791 | FS 09 - Is there an SOP for handling and storage of product containers which addresses the following: | |
| | | FS 09a- Overnight storage | |
| | | FS 09b - Contact with the ground | |
| | | FS 09c - Container assembly (RPC, fiber bin, plastic bin, etc.) | |
| | | FS 09d - Damaged containers | |
| | | FS 09e - Use of containers only as intended | |
| | | Comments: | |
| 73 | 792-798 | FS 10 - Is there an SOP for sanitary operation of equipment? | |

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| | | FS 10a - Are spills and leaks addressed? | |
| | | FS 10b - Harvest equipment protection? | |
| | | FS 10c - Overnight equipment and tool storage | |
| | | FS 10d- Procedures for when the equipment is not being used which including the removal of equipment from the work area. | |
| | | FS 10e - Does the SOP for Sanitary Operation of Equipment, address remedial actions taken as necessary? | |
| | | Comments: | |
| 73 | 796-797 | FS 11 - Is there an SOP for water tanks, containers, and equipment used for hydration, that includes the maintenance, cleaning, and sanitation for equipment used for hydration. | |
| | | Comments: | |
| 74 | 825-827 | FS 12- Are packing materials or containers cleanable or designed for single use and adequate for their intended use? | |
| | | Comments : | |
| 74 | 830 | FS 13- Are reusable packing materials or containers cleaned and sanitized or fitted with a clean liner? | |
| | | Comments: | |
| 74 | 828 | FS 14- Are reusable packing materials and containers kept off the floor or ground and protected from possible contamination? | |
| | | Comments: | |
| 73 | 802-806 | FS 15 - Are instruments or controls used to measure, regulate, or record temperature, hydrogen ion concentration, pH, sanitizer concentration or other conditions: | |
| | | FS 15a - Accurate and precise as necessary and appropriate for their intended use? | |
| | | FS 15b - Adequately maintained? | |
| | | FS 15c- Adequate in number for their intended use? | |
| | | Comments: | |
| 73 | 807-810 | FS 16- Is waste, trash, and other debris conveyed, stored, and disposed of in a manner that protects product and production area from contamination? | |

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| | | <i>Comments:</i> | |
| 74 | 837-847 | FS 17 – Are there any buildings used to store packing material? | |
| | | FS17a – Does the building design and use prevent food contact surface contamination? | |
| | | FS 17b – Are packaging materials and other food-contact surfaces kept separate from contamination sources by partition, time, location, enclosed system, or other effective means and have proper drainage and protection from condensate or drips to keep food-contact surfaces from getting wet? | |
| | | <i>Comments:</i> | |
| 84 | 1150 Table 6 | FS 18- Is there a written SOP which addresses corrective actions for "Low Hazard" animal intrusion? | |
| 83 | 1146 Figure 9 | <i>Comments:</i> | |
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| Page | Line# | FIELD OBSERVATIONS: Water Use | Yes, No, N/A |
|--|---------------------|--|--------------|
| 17 | Appendix A, Table 8 | FO 01 - Are all active and/or inactive water sources recorded in the Water Use Audit? | |
| 23 | 259-272 | Comments: | |
| 23 | 266-268 | FO 01a - From visual inspection, is there evidence that the water sources and distribution systems may pose a contamination risk (damage, inadequately maintained, evidence of animal activity, connection with effluent systems)? | |
| | | FO 01b - Are there other observations of improper use of water? | |
| | | Comments: | |
| FIELD OBSERVATIONS: Soil Amendments | | | |
| 60-61 | 644-688 | FO 02 - Is there evidence of undocumented use of soil amendments? | |
| | | FO 02a - Is there evidence of improperly applied soil amendments? | |
| | | FO 02b - Is there evidence of improperly stored soil amendments? | |
| | | FO 02c - Are there other observations of improper use of soil amendments? | |
| | | Comments: | |
| FIELD OBSERVATIONS: Environmental Factors | | | |
| 86-87 | Table 7 | FO 03 - Is there evidence of fecal contamination in the field? | |
| | | FO 03a - Is there evidence of animal hazard in the field? | |
| | | FO 03b - Is there evidence of non-compliance with distances as outlined in the Environmental Assessment? | |
| | | FO 03c - Is there evidence that remedial actions such as animal barriers (fences, gates, grates, etc.) are not in good repair and/or not operational? | |
| | | FO 03d - Is there evidence that worker hygiene rules have been violated during the crop cycle? | |
| | | FO 03e - Are there other observations of environmental risk factors? | |
| | | Comments: | |
| FIELD OBSERVATIONS: Worker Practices | | | |
| 75-76 | 875-900 | FO 04 - Were any employees observed eating, drinking (except water), chewing tobacco or smoking in crop production actively harvested areas? | |
| | | FO 04a - Were all employees observed to have washed their hands after restroom usage, work breaks or any returning to work occasion? | |
| | | Comments: | |
| 76 | 919-920 | FO 04b - Is there evidence that sanitary facilities are not routinely clean and operational? | |
| | | Comments: | |
| 76 | 908-917 | FO 04c - Is there evidence that worker hygiene rules have been violated during the crop cycle? | |

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| | | Comments : | |
| 76 | 927-928 | FO 04d - Is there evidence that sanitary facilities are not adequately stocked with disposable supplies? | |
| | | Comments: | |
| 76 | 901-907 | FO 04e - Were improperly stored personal items observed in the field? | |
| | | Comments: | |
| 75 | 876-877 | FO 04f - Is there evidence or observations that employees are not using the restrooms? | |
| | | Comments: | |
| 76 | 911-912 | FO 04g - Were any employees with observed with uncovered wounds, boils or cuts? | |
| 76 | 909-910 | FO 04h - Were any employees observed with symptoms of infection or contagious disease? | |
| | | Comments: | |
| | | FO 04i - Were there any other observations of improper work practices? | |
| | | Comments: | |
| FIELD OBSERVATIONS: Field Sanitation | | | |
| 75 | 867-868 | FO 05 - Is there evidence of excessive non-vegetative debris in the field? | |
| 72 | 761 | FO 05a - Is there evidence of open and/or unsupervised chemicals in the field? | |
| 73 | 792-793 | FO 05b -Is there evidence of leaks and spills on and/or from equipment in the field? | |
| 78 | 970-971 | FO 05c - Is there evidence of the use of non-sanitized farm equipment that may have come in contact with raw manure, untreated compost, waters of unknown quality, wildlife or domestic animals? | |
| 75 | 855-857 | FO 05d - Is there evidence of cross-contamination of the product cut end or potential cross contamination of product and/or product contact surfaces, and packaging? | |
| | | FO 05e - Are there any other observations of improper field sanitation? | |
| | | Comments: | |

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| Page | Line# | SOIL FERTILITY | Yes, No, N/A |
|------|-----------|---|-----------------|
| 90 | 1165-1175 | SF 01: Have all production blocks intended for spinach been evaluated for the presence of cadmium? | |
| | | Comments: | |
| | | SF02: Has a soil fertility program been developed? | |
| | | Comments: | |

AUDIT ID: 0

| Page | Line # | TRANSPORTATION | Yes, No, N/A |
|------|-----------|--|-----------------|
| 90 | 1177-1185 | TR 01 - Is there an inspection program for equipment and shipping containers used to transport leafy greens from the farm and on the farm? | |
| | | TR 01a - Are shipping units and equipment used to transport leafy greens on the farm or from the farm to a cooling, packing, or processing facility part of an inspection program? | |
| | | TR 01b - Is the condition of shipping units and equipment checked for cleanliness before being used to ship leafy greens? | |
| | | Comments: | |