

Primus Standard Audits - Questions and Expectations - v20.06

Farm
Good Agricultural Practices Requirements

FOOD SAFETY MANAGEMENT - SECTION 1				
Section	**Q #**	**Question**	**Total Points**	**Expectations**
General	**1.1.1**	**Was the operation free from any significant threat to the safety of the product that may be considered critical and warrants an automatic failure? Explain. ANY DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.**	**15**	**There should be no observation of any issue that the auditor considers a significant threat to the safety of the product. Issues include critical food safety situations that may not be considered in the audit template questions and conformance criteria; where a question and conformance criteria cover the topic of the issue within the audit, but the situation discovered warrants an automatic failure - the issue is noted in this question; an issue that is a serious threat to food safety (as opposed to a pre-requisite) and corrective actions are not being implemented are scored here.**
Control of Documents and Records	1.2.1	Is there a documented and implemented procedure that requires all records to be stored for a minimum period of 24 months (or greater if legally required) or for at least the shelf life of the product if it is greater than 24 months?	5	Food safety related records should be retained for auditing purposes and in case there are legal issues, customer queries, etc. There should be a procedure in place and all monitoring and process control records should be held for a minimum of 24 months regardless of the production item's shelf life. Any records required by law to be kept longer than 24 months should be kept for the legally mandated period. Any records pertaining to long life product should be kept at least for the duration of the shelf life of the product.
Control of Documents and Records	1.2.2	Are both paper and electronic food safety related documents and records created, edited, stored and handled in a secure manner?	5	Both paper and electronic documents and records that are part of the food safety program (e.g., procedures, policies, training records, testing results, monitoring records, etc.), should be created, edited, stored and handled in a secure manner that deters theft and prevents tampering when not in use. In the case of paper files, they should be generated using ink (not pencil), and if changes are made to records after initial entry, changes should be clearly legible and tracked, avoiding the use of corrective fluid. For electronic records, there should be access control and a back up of all files. When electronic records are amended, they should show what was amended, by whom and when (editing history). Records should be legible and accurate.
Control of Documents and Records	1.2.3	Are records maintained in an organized and retrievable manner?	3	All food safety records and documents should be stored in an organized manner, to allow for quick retrieval of records. This will aid in the detection of issues, the isolation of problems, and the identification of trends where attention is needed. Records should be accessible, even if the operation is seasonal.
Procedures and Corrective Actions	1.3.1	Is there an incident reporting system, also known as a Notice(s) of Unusual Occurrence and Corrective Actions Log (NUOCA) ?	5	This record documents unusual and infrequent events, remedial actions and preventive actions. These might include incidents like foreign object findings, chemical spills, power outages, packaging issues, glass breakage, fires, etc., as well as any other serious incidents such as natural disasters (e.g., hurricanes, flooding, earthquakes, etc.).
Internal and External Inspections	1.4.1	Are there records of regulatory inspections and/or contracted inspections, company responses and corrective actions, if any?	5	Reports of previous inspections are on file and any deficiencies noted have been responded to (date of response, action taken, and signature). Inspections include regulatory (e.g., Federal and State) and third-party audits.
Internal and External Inspections	1.4.2	Are there documented calibration and/or accuracy verification procedures for measuring and monitoring devices used in the operations that are related to the safety of the product?	10	Equipment used for measuring and monitoring processes related to food safety and/or verification of ingredient label requirements (e.g., for weight or volume of ingredients) should be identified (i.e., catalog, roster, list)and SOPs should be available. Scales/weight or volume measuring devices should have verification of accuracy and/or calibration regularly to ensure correct and accurate operation. Calibration procedures should describe the frequency of testing, the testing method and the acceptable range of variation. Corrective actions should be detailed when applicable. Legal requirements, manufacturer recommendations, best practice and experience of equipment drift help to determine the frequency.
Internal and External Inspections	1.4.3	Are calibration and/or accuracy verification records maintained and are they consistent with the requirements outlined in the SOP(s) for instruments and measuring devices requiring calibration?	5	Calibration and/or accuracy verification records should be available for all applicable equipment and show equipment identification, date, frequency of testing, the testing method and the acceptable range of variation. Corrective actions should be recorded.

Traceability and Recall	1.5.1	Is there a document that indicates how the company product tracking system works, thereby enabling trace back and trace forward to occur in the event of a potential recall issue?	10	The tracking system should be shown in writing or in the form of a flow diagram and demonstrate the product tracking system that is used by the operation. The system should be able to show that it can trace back to the supplier(s) of materials including commodities, packaging, ingredients, processing aids, work in progress, etc., and also show that the system can trace forward and indicate which customer(s) received products. This is usually accomplished by lot coding materials throughout a process and recording these lot codes at different points in the process. The traceability system should be in evidence when touring the operation and also when checking paperwork, and should also include any product that goes through an outsourced process. The auditor should choose a finished product lot code to test the traceability system and have the auditee demonstrate how the code traces back to raw material supplier(s) and traces forward to the customer(s).
Traceability and Recall	1.5.2	Does the organization have a documented recall program including procedures, recall team roles and contact details, external contact listings, requirement for recall effectiveness checks, explanation of different recall classes and handling of recalled product?	15	There should be a written procedure describing how to perform a product recall, a list of recall team members and their contact details, responsibilities and alternates, a referral to customer and supplier contact details, handling of recalled product, explanations of relevant laws (e.g., product withdrawal, recall classes if USA is involved as a country of production or destination, etc.).
Traceability and Recall	1.5.3	Is testing of recall procedures (including trace back) performed and documented at least every six months, and the company can demonstrate the ability to trace materials (one step forward, one step back) effectively?	10	Testing of recall procedures should be performed at least every six months. (For short season crops where the operation runs 6 months or less throughout the year, only one mock recall is required.) Where two mock recalls per year are required, one of the mock recalls should include the primary packaging as part of the exercise. The steps taken to conduct the mock recall as well, as the records utilized to demonstrate the program, is effective and should be consistent with the scenario identified. Documentation should indicate the date and time the mock recall was initiated, the product or material chosen, the scenario, amount of product produced, affected lot ID's (date code(s), lot code(s), etc.), amount located, and percent located. Mock recall documentation should include copies of documentation that support the trace (forward and back depending on the scenario) from the affected finished good lot through to the production run(s) affected, and therefore, showing if other lots are affected and which other customers might have received affected lot(s). Checks should be carried out to ensure that contact details exist for the affected customers. Documentation should also include any "lessons learned" from the process.
Food Defense	1.6.1	Are visitors and contractors to the company operations required to adhere to food defense procedures?	3	Visitors and contractors should be required to adhere to food defense procedures. This can be evidenced by having them sign a log when arriving to the operation, where they are agreeing to meet the company visitor and contractor food defense requirements.
Food Defense	1.6.2	Is there a current list of emergency contact phone numbers for management, law enforcement and appropriate regulatory agencies?	3	The operation should have a current list of emergency contact phone numbers available for company management, law enforcement and appropriate regulatory agencies.
GOOD AGRICULTURAL PRACTICES - SECTION 2				
Section	**Q #**	**Question**	**Total Points**	**Expectation**
General	2.1.1	Is there a designated person responsible for the operation's food safety program?	10	There should be a designated person/persons responsible for the operation's food safety program that has been trained accordingly. They should have documented formal training or trained by someone that has formal credentials that is documented. This training should meet all state and federal requirements.
General	2.1.2	If the operation is growing under organic principles, is there written documentation of current certification by an accredited organic certification organization? Informational Gathering Question.	0	Current certification by an accredited organic certification organization (national/local) should cover the audited crops, be on file and available for review. N/A if not growing under organic principles. Information gathering question.
General	2.1.3	Does the operation have a written food safety hygiene and health policy covering at least worker and visitor hygiene and health, infants and toddlers, animal presence in growing and storage areas, fecal matter, dropped product, blood and bodily fluids?	15	There should be written food safety policy rules regarding worker and visitor personal hygiene, GAPs and health requirements. All workers and visitors should be issued a list of rules in the relevant languages and confirm by signing they understand and agree to abide. Training provided and associated records should meet local and national regulations.
General	2.1.4	Are the necessary food defense controls implemented in the operation?	10	The operation should have implemented the necessary controls for preventing intentional contamination. These measures should be based on the risk(s) associated with the operation, as is detailed in the food defense plan (1.9.2). Some high risk areas could be water sources, storage areas for chemicals, equipment, packaging, utensils or other items used, personnel, visitors, etc. Unprotected water sources are scored here.

Site	2.2.1	Is there a map that accurately shows all aspects of the operation, including water sources and fixtures used to deliver water used in the operation?	5	There is a map or similar document (photograph, drawing) that accurately shows the growing area(s), adjacent land use features location of permanent water fixtures and the flow of the water system, including any holding tanks and water captured for re-use. Permanent fixtures include wells, gates, reservoirs, returns and other above ground features. Septic systems, effluent lagoons or ponds, surface water bodies are also identified. Document should enable location of the water sources and the production blocks they serve.
Site	2.2.2	Are growing areas adequately identified or coded to enable trace back and trace forward in the event of a recall?	15	Coding details (e.g. farm name or reference code, blocks of the growing area(s), or numbers) should be in sufficient detail to enable trace back and trace forward through the distribution system. Details of the coding need to be tied to the record keeping system (e.g., pesticide, fertilizer records, microbiological testing reports). There should be field maps available demonstrating the coding details used in the operation(s).
Site	2.2.3	Is the exterior area immediately outside the growing area, including roads, yards and parking areas, free of litter, weeds and standing water?	5	Litter, waste, refuse, uncut weeds or grass and standing water within the immediate vicinity of the growing area may constitute an attractant or breeding place for rodents, insects or other pests, as well as microorganisms that may cause contamination.
Site	2.2.4	Are control measures being implemented for the outside storage of equipment, pallets, tires, etc. (i.e. out of the mud/pooled water, stacked to prevent pest harborage, away from the growing area)?	5	Incorrectly stored pallets and equipment can provide areas for pest harborage and/or cross contamination. Equipment should be stored at least 4" (10 cm) off the ground. Growers should check the stored equipment (e.g., irrigation pipes) periodically to ensure that it has not become a pest harborage area or dirty due to rains and pooled water. Inventory checks should occur in order to ensure that these storage areas do not become full of unnecessary items.
Site	2.2.5	Are garbage receptacles and dumpsters kept covered or closed?	5	All dumpsters and garbage receptacles should have a cover and be kept covered to prevent the attraction of insects, rodents and other pests. Fine mesh lids are acceptable. Just having the lids is not acceptable i.e. when not in use, the dumpsters and garbage receptacles should be closed. Dumpsters that are only used for dry non-food waste (e.g., paper, cardboard, etc.) are exempt from this requirement.
Site	2.2.6	Where soil, substrates or fertilizer (e.g., compost) are stored or handled, are measures in place to ensure seepage and runoff is collected or diverted and does not reach growing areas, product, or any of the water sources? **A ZERO POINT DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Soil, substrates and fertilizer (e.g., compost, compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc.) are stored in a manner to prevent contamination to the growing areas, product, or water sources. Containers should be structurally sound and not a source of runoff or contamination. There should be appropriate and effective barriers, coverings, soil berms, pits or lagoons to divert or collect potential run-off or threats from wind, as applicable. A ZERO POINT DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.
Site	2.2.7	Where there are fill stations for fuel or pesticides, is it evident that the location and/or use is not a risk of contamination to the product, water sources, growing areas, equipment, packaging materials, etc.?	15	Fill station area should not be a risk of contamination to the product, water sources, production areas, equipment, packaging materials, etc.
Site	2.2.8	Is the audited area free from evidence of animal presence and/or animal activity (wild or domestic)? If Yes, go to 2.2.9.	15	Animals can represent potential contamination to the growing area, to the crop, to the field equipment, etc., and therefore, should not be present in the operations. Evidence of animal presence can include tracks, fecal matter, feathers, etc. Note: This includes any packaging or equipment storage areas (e.g., equipment, agronomic inputs, chemicals).
Site	2.2.8a	Is the audited area free from any evidence of animal fecal matter? **A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	Fecal matter is a potential contaminant to the product being grown. Produce that has come into direct contact with fecal matter is not to be harvested. A "no harvest zone" of approximately 5ft (1.5 m) radius should be implemented unless or until adequate mitigation measures have been considered. If evidence of fecal matter is found, a food safety risk assessment should be conducted by qualified worker and include appropriate corrective and preventative measures. Consideration of the maturity stage and type of crop involved is required. Any evidence of human fecal matter in the growing area is an automatic failure (score under 2.2.8b).
Site	2.2.8b	Is the audited area free from any evidence of human fecal matter? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Human fecal matter is a potential contaminant to the product being grown. Any evidence of human fecal matter in the growing area is an automatic failure. ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.
Site	2.2.9	Is the audited area free from evidence of infants or toddlers?	10	Infants and toddlers can represent potential contamination to the growing area, to the crop, to packaging and should not be present in the operations, including chemical or equipment storage areas.
Ground History	2.3.1	Were growing area(s) used for growing food crops for human consumption last season?	0	Informational Gathering Question. Land should be purchased or leased that has previously been successfully utilized for growing produce for human consumption, without incidence.

Ground History	2.3.2	Has the growing area(s) been used for any non-agricultural functions? If No, go to 2.3.3.	0	Information gathering question. Purchase or lease of ground previously used for non-agricultural functions (e.g., toxic waste site, landfill, mining, extraction of oil or natural gas) should be avoided. Land should be purchased or leased that has previously been successfully utilized for growing produce for human consumption without incidence. http://www.epa.gov/superfund/health/index.htm.
Ground History	2.3.2a	If the growing area has been used previously for non-agricultural functions, have soil tests been conducted showing soil was negative or within an appropriate regulatory agency's approved limits for contaminants?	15	If the growing area has been used previously used for non-agricultural functions soil testing should be conducted to determine if the soil is free of contaminants (e.g. heavy metals, residues of persistent organic contaminants) that may still be present in the soil.
Ground History	2.3.3	Has the growing area(s) been used for animal husbandry or grazing land for animals in the last 12 months? If No, go to 2.3.4.	0	Information gathering question. If the land was used previously for animal husbandry or grazing land for livestock, there should be a sufficient buffer time before growing a crop for human consumption.
Ground History	2.3.3a	If the land was used previously for animal husbandry or grazing land for livestock, has a risk assessment been performed?	10	A risk assessment should be documented that includes recording the details of the animal grazing (commercial or domestic) and any risk reduction steps.
Ground History	2.3.4	Has flooding from uncontrolled causes occurred on the growing area(s) since the previous growth cycle? If No, go to 2.3.5.	0	Information gathering question. This would be the case of: the flowing or overflowing of a field with water outside a grower's control that is reasonably likely to contain microorganisms of significant public health concern and is reasonably likely to cause adulteration of edible portions of fresh produce in that field.
Ground History	2.3.4a	If the growing area(s) and product was affected from the flood waters, is there documented evidence of a risk assessment and that corrective measures were taken to affected land and product?	15	If the growing area and/or product were affected from the flood waters, there should be a documented risk assessment and evidence that corrective measures were taken with affected land and/or product (e.g., photographs, sketched maps, etc.). There should be proof that affected product and product within at least 30ft (9.1m) of the flooding was not harvested for human consumption and that replanting on formerly flooded production ground has not occurred for approximately 60 days if the ground has dried out, unless testing as noted in 2.3.4b has occurred.
Ground History	2.3.4b	Have soil tests been conducted on the flooded area(s) showing the soil was negative or within an appropriate regulatory agency's approved limits for contaminants?	15	If flooding has occurred on the farm, soil testing should be conducted prior to planting if planting is done earlier than 60 days from event and also before the soil has had adequate time to dry out. Soil testing should indicate soil levels of microorganisms lower than the standards for processed compost. Additional parameters to measure (e.g. heavy metals, pesticides, hydrocarbons) will depend on the characteristics of the flooding event. Suitable representative samples should be collected for the entire area suspected to have been exposed. If results indicate no issues, then the replanting time line can be reduced from approximately 60 days to approximately 30 days.
Ground History	2.3.4c	If septic or sewage systems adjacent to the growing area were affected by the flood waters, is there a documented inspection after flooding to ensure they are functioning properly and are not a source of contamination?	10	There should be records of inspecting the sewage/septic systems after flooding, showing that they are functioning properly and are not a source of contamination (e.g. overflow).
Ground History	2.3.5	Has a documented risk assessment been conducted at least annually for the operation?	10	A documented risk assessment of the growing area and surrounding areas should be performed and documented annually, and when any changes are made to the growing area or adjacent land. This should detail known or reasonable foreseeable risks/hazards, specific microbial, chemical and physical risks and their severity and likelihood of occurring in the following areas: previous use of the growing area, adjacent land use (e.g. CAFO), water sources (chemical hazards e.g. heavy metals, perchlorate, etc. and microbial hazards e.g. *E. coli*), water use, fertilizers, crop protection chemicals, worker health and hygiene, equipment and tools used for harvest, storage, transportation, topography of the land for runoff (% slope, soil type), prevailing weather conditions or weather events. and any other applicable areas. Farms and indoor agriculture operations following the CA or AZ LGMA should have a buffer zone of approximately 1,200 ft. (365m) for CAFO's with >1,000 head or 1 mile (1609m) for 80,000 head CAFO, which may increase or decrease after assessing the risks, determining, and deploying mitigation measures.
Ground History	2.3.5a	If any risk is identified, have corrective actions and/or preventative measures been documented and implemented?	10	For any risks identified in the assessment, the operation should detail what practice is being done to minimize identified risk/hazard, how to measure/monitor the effectiveness of the practice, how often to measure, and how it is verified and recorded.
Adjacent Land Use	2.4.1	Is the adjacent land to the growing area a possible source of contamination from intensive livestock production (e.g., feed lots, dairy operations, poultry houses, meat rendering operation)? If No, go to 2.4.2.	10	Adjacent refers to all parcels of land next to the growing operation, or within a distance where the crop in question may be affected. Intensive livestock production involves large numbers of animals on limited land. Examples of intensive livestock production are confined animal feeding operations (CAFO), cattle feed lots, dairy operations, poultry houses, etc. Consideration should be made for the topography of the land for runoff, potential flooding issues, and prevailing winds for manure related dust issues.

Adjacent Land Use	2.4.1a	Where there is intensive livestock production on the adjacent land, have appropriate measures been taken to mitigate this possible contamination source onto the growing area (e.g., buffer areas, physical barriers, foundation, fences, ditches, etc.)?	15	Animal or potential contaminant movement should be restricted with acceptable buffer zones, proper fencing and/or other physical barriers. A buffer zone of approximately 400 ft. (122 m) from the edge of the growing area which may increase or decrease depending on the risk variables i.e., topography (% slope uphill from the crop or downhill from the crop), soil type (sandy, loam, clay) is needed. Rain induced runoff of animal waste should be diverted by trenching or similar land preparation. Leaking animal waste should be diverted by trenching or similar land preparation. Farms and indoor agriculture operations following the CA or AZ LGMA should have a buffer zone of approximately 1,200 ft. (365m) for CAFO's with >1,000 head or 1 mile (1609m) for 80,000 head CAFO, which may increase or decrease after assessing the risks, determining, and deploying mitigation measures.
Adjacent Land Use	2.4.2	Is there evidence of domestic animals, wild animals, grazing lands (includes homes with hobby farms, and non-commercial livestock) in proximity to the growing operation? If No, go to 2.4.3.	10	This includes all non-intensive livestock production. Other examples include chicken coops, dogs, horses, homes with hobby farms, wild pigs etc. Auditor must consider the maturity stage and type of crop involved. For example, pig activity around a ground level berry crop is different from a high level tree crop.
Adjacent Land Use	2.4.2a	Have physical measures been put in place to restrain domestic and wild animals, grazing lands (includes homes with hobby farms, and non-commercial livestock) and their waste from entering the growing area (e.g., vegetative strips, wind breaks, physical barriers, berms, fences, diversion ditches)?	15	Mitigating measures should include a buffer area of approximately 30 ft. (9.1m) from the edge of the crop which may increase or decrease depending on the risk variables e.g. topography (uphill from the crop or downhill from the crop). Other measures may be used such as vegetative strips, wind breaks, physical barriers, berms, fences, diversion ditches to prevent or control runoff, mitigate particulates, etc.
Adjacent Land Use	2.4.3	Are untreated animal manure piles, compost, biosolids, or non-synthetic amendment stored and/or applied on adjacent land? If No, go to 2.4.4.	10	Adjacent refers to all parcels of land next to the growing operation or within a distance where the crop in question may be affected by untreated animal manure piles, compost, biosolids, or nonsynthetic amendment stored and/or applied on adjacent land.
Adjacent Land Use	2.4.3a	Where present, have physical measures been taken to secure untreated animal manure piles, compost, biosolids, or non-synthetic amendment stored and/or applied on adjacent land?	15	Mitigating measures should include a buffer area of approximately 400 ft. (122 m) from the edge of the crop which may increase or decrease depending on the risk variables e.g. topography (uphill from the crop or downhill from the crop). Other measures may include tarping systems, physical barriers, fences, ditches, etc. Implementing systems to redirect run off that may contain untreated manure, compost, or biosolids.
Adjacent Land Use	2.4.3b	If biosolids are stored and/or applied on adjacent land, has the adjacent landowner supplied paperwork confirming the biosolids meet prevailing guidelines, governmental, or local standards?	10	The adjacent landowner of where the biosolids are applied or stored should supply paperwork detailing sufficient information regarding the class of biosolids (e.g., Class AA, A, B): Information should be available that would make it possible to trace back to the source if needed. Information should be available to prove the materials meet prevailing guidelines, governmental, or local standards. Biosolid applications should be timed to avoid conflicts with growing schedules in adjacent fields.
Adjacent Land Use	2.4.4	Is the growing area situated in a higher risk location where contamination could occur from nearby operations or functions (e.g., leach fields, runoff or potential flooding from sewers, toilet systems, industrial facilities, labor camps, etc.)? If No, go to 2.4.5.	10	"Higher risk" refers to any nearby activities or operations that could pose a threat to the growing area or facility(s). These might include chemical, microbiological, or physical contamination or pollution. Examples include, but are not limited to, runoff or potential flooding from septic systems, sewers, toilet systems, industrial facilities, labor camps (issues of trash).
Adjacent Land Use	2.4.4a	Where the growing area is situated in a higher risk location, have appropriate measures been taken to mitigate risks related to nearby operations?	15	Mitigating measures should include appropriate buffer areas around the crop. For example with a properly designed leach field a buffer zone of approximately 30 ft. (9 m). Very high risk issues should consider approximately 400ft (122 m) or higher buffer zones. Buffer zone distances should be determined by considering the risk variables (e.g. topography, type of crop). Other mitigating measures may include physical barriers, fences, ditches, etc.
Adjacent Land Use	2.4.5	Are there any other potential risks in the adjacent land that could potentially lead to contamination of the growing area?	10	If there are any other potential sources of contamination to the growing area, this question is designed to allow the auditor to underline potential risks that are not covered by other more specific questions within the audit.
Adjacent Land Use	2.4.5a	Have appropriate measures been taken to mitigate risks related to nearby operations?	15	If there are any other potential sources of contamination to the growing area, there should be mitigating measures to prevent contamination.
Adjacent Land Use	2.4.6	Is there evidence of human fecal matter in the adjacent land to the audited area? If No, go to 2.5.1.	15	If the fecal matter found combines with conditions that can increase the potential of contamination to the growing area, the crop or the field equipment, this represents a high risk situation that has to be addressed. Evidence of human fecal matter represents potential of contamination to the growing area, the crop and field equipment. If No, go to 2.5.1.
Adjacent Land Use	2.4.6a	Where there is evidence of human fecal matter in the adjacent land, are there adequate controls in place to mitigate risk (e.g., access controls (barriers), distance from the growing area and equipment, crop type and maturity, land condition, etc.)?	15	If human fecal matter is found in the adjacent land, there should be adequate controls in place, and records of any corrective or preventive actions taken.

Inspection	2.5.1	Is there documented evidence of the internal audits performed, detailing findings and corrective actions?	15	There should be records of the internal audits performed, meeting the frequency defined in the program. The records should include the name/location of operation, date of the audit, name of the internal auditor, justification for answers, detail any deficiencies found and the corrective actions taken. An audit checklist (ideally Primus Standard Audit) should be used that covers all areas of the Primus Standard audit, including growing area, storage area, worker amenities, external areas, worker practices, documentation, etc. No downscore if another audit checklist is used, as long as all areas are covered. See 1.5.1 regarding internal audit schedule.
Inspection	2.5.2	Are there chemical inventory logs for chemicals, including pesticides and fertilizers?	3	Chemicals within the scope of this question include pesticides, fertilizers, cleaners and sanitizers i.e. sanitation chemicals and food contact chemicals, such as chlorine, etc. Primary information in the product inventory includes: the product or chemical names, quantity available, and location of containers. Inventory by storage area/type of chemical is optimal. The inventory should take into account the arrival of new stocks and any discrepancies should be explained. Minimum frequency for inventory checks should be monthly during production season and a copy should be maintained separate from the chemical storage location(s). The frequency of the inventory checks may decrease in short season or off-season operations; auditor discretion applies.
Inspection	2.5.3	Are all chemicals (pesticides, sanitizers, detergents, lubricants, etc.) stored securely, safely and are they labeled correctly?	15	Chemicals (i.e., pesticides, sanitizers, detergents, lubricants, etc.) are required to be stored in a well vented, designated area (with a sign), dedicated, secure (locked) area away from food and packaging materials and separated from growing area and water sources. Spill controls should be in place for opened in use containers. All chemical containers should be off the floor, have legible labels of contents; this includes chemicals that have been decanted from master containers into smaller containers. Empty pesticide containers should be kept in a secured storage area until they can be recycled or disposed of properly.
Inspection	2.5.4	Are "food grade" and "non-food grade" chemicals used appropriately, according to the label and stored in a controlled manner (not commingled)?	10	All chemicals applied should be approved by the prevailing authority for their designated use and used according to label instructions. Only food grade lubricants should be used anywhere near product. "Food grade" and "non-food grade" materials should be stored in separate designated areas and adequately labeled. Grease guns and containers should be labeled adequately. Access to non-food grade materials should be limited to those entrusted with the correct use of chemicals.
Inspection	2.5.5	Are the crop, ingredients (including water), food contact packaging and food contact surfaces within accepted tolerances for spoilage and free from adulteration? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	The crop, ingredients (including water), food contact packaging and food contact surfaces should be free from spoilage, adulteration and/or gross contamination (21 CFR 110.3g). If legislation exists, then the contamination should be viewed against this legislation (e.g., USDA Grading Standards often include decay tolerances). Spoilage and adulteration would include any physical, chemical or biological contamination including blood and bodily fluids. Measures should be taken to prevent any known or reasonably foreseeable hazard (e.g., Clostridium botulinum in mushrooms). This question is designed to allow an auditor to halt an audit when finding gross contamination issues.
Training	2.6.1	Is there a food safety hygiene training program covering new and existing workers and are there records of these training events?	15	There should be a formal training program to inform workers of the current policies and requirements of the company regarding hygiene. Training should be in the language understood by the workers, and training type and intensity should reflect the risks associated with the products/processes. Frequency should be at the start of the season before starting work and then at some topics covered at least quarterly, but ideally monthly. These trainings should cover company food safety and hygiene policies and basic food safety and hygiene topics, the importance of detecting food safety and/or hygiene issues with co-workers and visitors, and all food safety or hygiene issues in which they are responsible. Training logs should have a clearly defined topic(s) covered, trainer(s) and material(s) used/given. Topics include, but not limited to, hand washing, protective clothing (where applicable), recognizing and reporting injury and illness, blood and bodily fluids, jewelry, dropped product, animal intrusion, food defense. There should be records of workers who have attended each session.

Training	2.6.2	Are there written and communicated procedures in place that require food handlers to report any cuts or grazes and/or if they are suffering from any illnesses that might be a contamination risk to the products being produced, and return to work requirements? (In countries with health privacy/confidentiality laws, e.g. USA, auditors can check procedure/policy but not actual records).	10	There should be documented procedures that are communicated (e.g., worker signature on a training log) to food handlers, requiring them to report any cuts, grazes and/or any illnesses that might be a food safety cross contamination risk. Procedures to note return to work requirements for affected workers. Procedures should cover recording requirements, but auditors should not request to review records where countries have laws covering privacy/confidentiality of health records.
Training	2.6.3	Are there worker food safety non-conformance records and associated corrective actions (including retraining records)?	3	There should be records covering when workers are found not following food safety requirements. These records should also show corrective actions and evidence that retraining has occurred (where relevant).
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.1	Are toilet facilities adequate in number and location? **A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	Toilet facilities should be available to all workers and visitors, while work is actively occurring. At least one toilet per 20 workers should be provided, or if more stringent, as per prevailing national/ local guidelines. Toilet facility placement should be within ¼ mile or 5 minutes walking distance of where workers are located, or if more stringent, as per prevailing national/ local guidelines. A 5 minute drive is not acceptable, while farm work is actively occurring with groups of three or more workers. Where there are two or less workers present (e.g., spray activities, irrigation check) and workers have transportation that is immediately available to toilets within a 5 minute drive, it is acceptable to score as total compliance. Automatic failure if there are insufficient or inadequate toilet facilities. A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.1a	Are toilet facilities in a suitable location to prevent contamination to product, packaging, equipment, and growing areas?	15	Placement of toilet facilities should be in a suitable location to prevent contamination to product, packaging, equipment, water sources, and growing areas. Consideration should be given when portable units are used so that they are not parked (if on trailers) too close to the edge of the crop. If pit toilets are used, consider proximity to crop and water sources.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.1b	Are toilets designed and maintained to prevent contamination (e.g., free from leaks and cracks)?	5	Toilets should be free from cracks and leaks and any waste holding tanks from toilets must be designed and maintained properly to prevent contamination. Waste holding tanks should be free of leaks, cracks and constructed of durable materials (e.g. plastic) that will not degrade or decompose (no wood). Pit toilets cannot be considered to be properly designed to prevent contamination.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.1c	Are toilets constructed of materials that are easy to clean?	3	Toilet facilities should be constructed of non-porous materials that are easy to clean and sanitize. Each toilet should be maintained and ventilated to outside air, and the floor and sidewalls should be watertight.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.1d	Are the toilet materials constructed of a light color allowing easy evaluation of cleaning performance?	3	Toilets should be constructed of materials light in color, allowing easy evaluation of cleaning performance.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.1e	Are toilets supplied with toilet paper and is the toilet paper maintained properly (e.g., toilet paper rolls are not stored on the floor or in the urinals)?	5	Toilet paper should be provided in a suitable holder in each toilet facility. Toilet paper should be maintained properly (e.g., toilet paper rolls are not stored on the floor or in the urinals).
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.1f	Where used, is there a documented procedure for emptying the waste holding tanks in a hygienic manner and also in a way that prevents product, packaging, equipment, water systems and growing area contamination?	5	If toilets have waste holding tanks, they should be emptied, pumped, and cleaned in a manner to avoid contamination to product, packaging, equipment, water systems and growing area(s). Equipment used in emptying/pumping must be in good working order. A documented procedure should exist and include a response plan for major leaks or spills, including indicating where pumped waste is disposed of and requiring communication to the designated person(s) responsible for the food safety program regarding the actions taken when a major leak or spill occurred.

Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.1g	Are the toilet facilities and hand washing stations clean and are there records showing toilet cleaning, servicing and stocking is occurring regularly?	10	Toilet facilities and hand washing stations should be cleaned and sanitized on a regular basis. Servicing records (either contracted or in-house) should be available for review showing toilet cleaning, servicing and stocking is occurring regularly. Soiled tissue should be flushed down the toilet/placed in the holding tank (not placed in trash cans and/or on the floor).
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.2	Is hand washing signage posted appropriately?	5	Toilet facilities should have hand washing signs as a reminder to wash hands before and after eating, returning to work and after using the toilet. Signs need to be posted and in the language of the workers (picture signs are allowed). The signs should be permanent and placed in key areas where workers can easily see them.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.3	Are hand washing stations adequate in number and appropriately located for worker access and monitoring usage? **A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	An adequate number of hand washing stations, in working order, should be provided to ensure efficient worker flow (1 per 20 people on site), and be available to all workers and visitors while work is actively occurring. Hands free is an optimum system. Hand washing stations should be located within close proximity of toilet facilities and 1/4 mile or 5 minutes walking distance of where workers are located. A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.3a	Are the hand wash stations designed and maintained properly (e.g., ability to capture or control rinse water to prevent contamination onto product, packaging, and growing area, free of clogged drains, etc.)?	5	Hand wash stations should be free of clogged drains, designed and maintained properly to capture or control rinse water that could cause contamination onto product, packaging, equipment and growing area(s).
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.3b	Are hand wash stations clearly visible (e.g., situated outside the toilet facility) and easily accessible to workers?	5	Hand wash stations should be clearly visible (i.e. situated outside the toilet facility) in order to verify hand washing activities, and easily accessible to workers.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.3c	Are hand wash stations adequately stocked with unscented soap and paper towels?	5	All hand washing facilities should be properly stocked with liquid non-perfumed, neutral or antiseptic soap. Single use paper towels should be used and units properly located. There should be an adequate stock of soap and paper towels.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.4	Are workers washing and sanitizing their hands before starting work each day, after using the restroom, after breaks, before putting on gloves and whenever hands may be contaminated?	15	Worker conformance to hand washing and sanitizing procedures should be assessed as washing hands is the first step in avoiding food contamination. Workers should be observed washing their hands prior to beginning work, after breaks, after using the toilets, before putting on gloves, and whenever hands may have become a source of contamination (e.g., after eating, after using a handkerchief or tissue, smoking, drinking, etc.).
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.5	Are workers who are working directly or indirectly with food, free from signs of boils, sores, open wounds and are not exhibiting signs of foodborne illness?	10	Workers who have exposed boils, sores, exposed infected wounds, foodborne illness or any other source of abnormal microbial contamination should not be allowed to work in contact with the product, packaging or food contact surfaces.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.6	Is jewelry confined to a plain wedding band and watches are not worn?	5	Workers are not observed wearing jewelry (including earrings, ear gages, necklaces, bracelets, rings with stones, rings or studs in nose, lip and eyebrow, watches) in the growing area. Plain wedding bands are the only exception. Other examples of foreign items maybe a source of foreign material contamination include studs, false finger nails and finger nail polish, false eye lashes, eye lash extensions and badges.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.7	Are worker personal items being stored appropriately (i.e. not in the growing area(s) or material storage area(s))?	5	Workers should have a designated area for storing personal items such as coats, shoes, purses, medication, phones, etc. Areas set aside for workers' personal items should be far enough away from growing area(s) and material storage area(s) to prevent contamination and avoid food security risks.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.8	Is smoking, eating, chewing and drinking confined to designated areas, and spitting is prohibited in all areas?	5	Smoking, chewing tobacco, chewing gum, drinking and eating is permitted in designated areas that are away from growing and storage areas. Spitting should be prohibited in all areas. Smoking should not be permitted in eating and drinking areas.

Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.9	Is fresh potable drinking water readily accessible to workers?	10	Fresh potable water meeting the quality standards for drinking water should be available for workers on-site to prevent dehydration. The term "potable" meaning that the water is of drinking water quality (e.g., the EPA Drinking Water Standard or equivalent). If water containers are used, they should be maintained in a clean condition, free from residues and contamination to ensure workers are not adversely affected by contaminated water from unclean containers. If there is evidence (i.e. visual observation or documentation) the water is coming from a questionable source, the auditor should review water quality test results.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.9a	Are single use cups provided (unless a drinking fountain is used) and made available near the drinking water?	5	Single use cups should be provided so that cross contamination issues are avoided from person to person. Examples include single-use paper cups, drinking fountains, etc. Common drinking cups and other common utensils are prohibited.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.10	Are first aid kits adequately stocked and readily available?	5	First aid kit(s) should be adequately supplied to reflect the kinds of injuries that occur (including any chemicals stored on-site) and should be stored in an area where they are readily available for emergency access. Date-coded materials should be within dates of expiration. Gloves should be worn over all band aids on hands.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.11	Are there adequate trash cans placed in suitable locations?	5	There should be adequate measures for trash disposal so that the growing and storage areas are not contaminated. Containers (e.g. dumpsters, cans) should be available and placed in suitable locations for the disposal of waste and trash, e.g. near toilets.
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*	2.7.12	Are any potential foreign material issues (e.g., metal, glass, plastic) controlled?	5	There should be no foreign material issues that are or could be potential risks to the product. Examples include, but are not limited to, glass bottles, unprotected lights on equipment, staples on wooden crates, hair pins, using "snappable" blades instead of one piece blades, broken and brittle plastic issues on re-useable totes.
Agronomic Inputs	2.8.1	Is human sewage sludge (biosolids) used in the growing cycle? Informational Gathering Question.	0	Human sewage sludge (biosolids), which are by-products of waste water treatment, should not to be used in the growing cycle for indoor growing operations, and also where specifically prohibited under best management practices (e.g., LGMA, T-GAPs). Informational Gathering Question.
Agronomic Inputs	2.8.1a	Is fertilizer being used where the country regulations/guidelines ban the use of such materials (e.g., Californian Leafy Green Commodity Specific Guidelines)? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Only fertilizer approved for that specific crop should be used. Some commodity specific guidelines have rules regarding the use of specific fertilizer types, e.g. Californian Leafy Green Commodity Specific Guidelines. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
Agronomic Inputs	2.8.1b	Are there fertilizer use records available for each growing area, including application records?	15	Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure.
Agronomic Inputs	2.8.1c	Are there Certificate(s) of Analysis (CoA), specifications, product label or other documents available for review provided by the supplier stating the components of the material?	10	Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn).

Agronomic Inputs	2.8.1d	Are there Certificate(s) of Analysis (CoA) from the supplier(s) that cover pathogen testing (plus any other legally/best practice required testing) and does the grower have relevant letters of guarantee regarding supplier SOPs and logs?	15	Certificates of analysis should be available for each lot (containing animal materials) used. As a minimum, microbial testing should include Salmonella spp., Listeria monocytogenes and E. coli O157:H7 for non-synthetic crop treatments (e.g., compost teas, fish emulsions, fish meal, blood meal, “bio fertilizers”) and for animal-based compost, using approved sampling and testing methods (e.g., AOAC and an accredited laboratory). Where legally allowed, a reduced sampling rate is possible if the material is produced by the auditee (e.g. mushroom growing operations with in-house compost production) and has been through a physical/chemical/biological process to inactivate human pathogens and the auditee has validation study documentation that shows that the material is safe and proper process control records (e.g., time/temperature records and calibration records, such as, temperature probe) are maintained and available during the audit. Validation studies must be applicable to the situation at hand and care should be taken not to over extrapolate. All local and national legislation should also be followed. The grower should have proof that compost suppliers have cross contamination SOPs and temperature/turning logs.
Agronomic Inputs	2.8.1e	Are there Certificate(s) of Analysis (CoA), letters of guarantee or other documents from the supplier(s) that cover heavy metal testing?	10	Certificate(s) of Analysis (CoA), letters of guarantee or other documents should be available from the crop treatment supplier(s) that cover heavy metal testing. Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn).
Agronomic Inputs	2.8.2	Is compost produced from animal derived materials used by the grower? Informational Gathering Question.	0	This question is specifically targeting compost produced from raw animal manures, as opposed to green waste. Informational Gathering Question.
Agronomic Inputs	2.8.2a	Is fertilizer being used where the country regulations/guidelines ban the use of such materials (e.g., Californian Leafy Green Commodity Specific Guidelines)? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Only fertilizer approved for that specific crop should be used. Some commodity specific guidelines have rules regarding the use of specific fertilizer types, e.g. Californian Leafy Green Commodity Specific Guidelines. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
Agronomic Inputs	2.8.2b	Are there fertilizer use records available for each growing area, including application records?	15	Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure.

Agronomic Inputs	2.8.2c	Are there Certificate(s) of Analysis (CoA), specifications, product label or other documents available for review provided by the supplier stating the components of the material?	10	Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn).
Agronomic Inputs	2.8.2d	Are there Certificate(s) of Analysis (CoA) from the supplier(s) that cover pathogen testing (plus any other legally/best practice required testing) and does the grower have relevant letters of guarantee regarding supplier SOPs and logs?	15	There should be evidence that each laboratory test result (certificate of analysis) provided is traceable to each material used. (e.g., CoA is traced to each lot of crop treatment used). Tests should include microbiological analyses. As a minimum, microbial testing should include Salmonella spp., Listeria monocytogenes and E. coli O157:H7 for non-synthetic crop treatments (e.g., compost teas, fish emulsions, fish meal, blood meal, "bio fertilizers") and for animal-based compost, using approved sampling and testing methods (e.g., AOAC and an accredited laboratory).
Agronomic Inputs	2.8.2e	Are there Certificate(s) of Analysis (CoA), letters of guarantee or other documents from the supplier(s) that cover heavy metal testing?	10	Certificate(s) of Analysis (CoA), letters of guarantee or other documents should be available from the crop treatment supplier(s) that cover heavy metal testing. Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn).
Agronomic Inputs	2.8.3	Is untreated animal manure used? Informational Gathering Question.	0	Untreated animal manure refers to manure that is raw and has not gone through a treatment process. Examples include raw manure and/or uncomposted, incompletely composted animal manure and/or green waste or non-thermally treated animal manure. Untreated animal manure should not be used in indoor growing operations or where prohibited under best management practices. Informational Gathering Question.
Agronomic Inputs	2.8.3a	Is fertilizer being used where the country regulations/guidelines ban the use of such materials (e.g., Californian Leafy Green Commodity Specific Guidelines)? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Only fertilizer approved for that specific crop should be used. Some commodity specific guidelines have rules regarding the use of specific fertilizer types, e.g. Californian Leafy Green Commodity Specific Guidelines. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
Agronomic Inputs	2.8.3b	Are there fertilizer use records available for each growing area, including application records?	15	Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure.
Agronomic Inputs	2.8.3c	Are there Certificate(s) of Analysis (CoA), specifications, product label or other documents available for review provided by the supplier stating the components of the material?	10	Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn).
Agronomic Inputs	2.8.3d	Are there Certificate(s) of Analysis (CoA), letters of guarantee or other documents from the supplier(s) that cover heavy metal testing?	10	Certificate(s) of Analysis (CoA), letters of guarantee or other documents should be available from the crop treatment supplier(s) that cover heavy metal testing. Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn).
Agronomic Inputs	2.8.4	Are other non-synthetic crop treatments used (e.g. compost teas, fish emulsions, fish meal, blood meal, "bio fertilizers")? Informational Gathering Question.	0	Examples include but are not limited to compost teas (also known as agricultural teas), fish emulsions, fish meal, blood meal, inoculants (beneficial microbes), and "bio fertilizers" that are produced from animal materials. Informational Gathering Question.
Agronomic Inputs	2.8.4a	Is fertilizer being used where the country regulations/guidelines ban the use of such materials (e.g., Californian Leafy Green Commodity Specific Guidelines)? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Only fertilizer approved for that specific crop should be used. Some commodity specific guidelines have rules regarding the use of specific fertilizer types, e.g. Californian Leafy Green Commodity Specific Guidelines. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**

Agronomic Inputs	2.8.4b	Are there fertilizer use records available for each growing area, including application records?	15	Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure.
Agronomic Inputs	2.8.4c	Are there Certificate(s) of Analysis (CoA), specifications, product label or other documents available for review provided by the supplier stating the components of the material?	10	Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn).
Agronomic Inputs	2.8.4d	Are there Certificate(s) of Analysis (CoA) from the supplier(s) that cover pathogen testing (plus any other legally/best practice required testing) and does the grower have relevant letters of guarantee regarding supplier SOPs and logs?	15	There should be evidence that each laboratory test result (certificate of analysis) provided is traceable to each material used. (e.g., CoA is traced to each lot of crop treatment used). Tests should include microbiological analyses. As a minimum, microbial testing should include Salmonella spp., Listeria monocytogenes and E. coli O157:H7 for non-synthetic crop treatments (e.g., compost teas, fish emulsions, fish meal, blood meal, "bio fertilizers") and for animal-based compost, using approved sampling and testing methods, e.g. AOAC, and an accredited laboratory.
Agronomic Inputs	2.8.4e	Are there Certificate(s) of Analysis (CoA), letters of guarantee or other documents from the supplier(s) that cover heavy metal testing?	10	Certificate(s) of Analysis (CoA), letters of guarantee or other documents should be available from the crop treatment supplier(s) that cover heavy metal testing. Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn).
Agronomic Inputs	2.8.5	Is the operation using soil or substrate amendments as an input? (e.g., plant by-products, humates, seaweed, inoculants, and conditioner, etc.) Informational Gathering Question.	0	This refers to soil or substrate amendments (except inorganic nutrients/fertilizers) used that do not contain animal products and/or animal manures. Examples include but are not limited to plant by-products (e.g., coir), humates (e.g., peat), seaweed, conditioners (e.g., vermiculite), etc. Informational Gathering Question.
Agronomic Inputs	2.8.5a	Is fertilizer being used where the country regulations/guidelines ban the use of such materials (e.g., Californian Leafy Green Commodity Specific Guidelines)? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Only fertilizer approved for that specific crop should be used. Some commodity specific guidelines have rules regarding the use of specific fertilizer types, e.g. Californian Leafy Green Commodity Specific Guidelines. . **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
Agronomic Inputs	2.8.5b	Are there fertilizer use records available for each growing area, including application records?	15	Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed.
Agronomic Inputs	2.8.5c	Are there Certificate(s) of Analysis (CoA), specifications, product label or other documents available for review provided by the supplier stating the components of the material?	10	Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn).
Agronomic Inputs	2.8.5d	Are there Certificate(s) of Analysis (CoA) and/or letters of guarantee stating that the materials used are free from animal products and/or animal manures?	15	There should be Certificate(s) of Analysis (CoA) and/or letters of guarantee from the fertilizer supplier, stating that the materials they are supplying are free from animal products and/or animal manures. A statement of ingredients or letter from suppliers attesting this fact is acceptable. Auditor should match the names of the materials being used with the CoA's and/letters of guarantee.
Agronomic Inputs	2.8.6	Is the operation using inorganic fertilizers as an input? (e.g., ammonium nitrate, ammonium sulfate, chemically synthesized urea, etc.) Informational Gathering Question.	0	Examples of manufactured inorganic fertilizers include ammonium nitrate, ammonium sulfate, chemically synthesized urea, etc. Informational Gathering Question.
Agronomic Inputs	2.8.6a	Is fertilizer being used where the country regulations/guidelines ban the use of such materials (e.g., Californian Leafy Green Commodity Specific Guidelines)? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Only fertilizer approved for that specific crop should be used. Some commodity specific guidelines have rules regarding the use of specific fertilizer types, e.g. Californian Leafy Green Commodity Specific Guidelines. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**

Agronomic Inputs	2.8.6b	Are there fertilizer use records available for each growing area, including application records?	15	Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed.
Agronomic Inputs	2.8.6c	Are there Certificate(s) of Analysis (CoA), specifications, product label or other documents available for review provided by the supplier stating the components of the material?	10	Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer's or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn).
Irrigation / Water Use	2.9.1	Is the water used for the growing operation sourced from municipal or district water pipeline systems?	0	informational gathering question.
Irrigation / Water Use	2.9.1	What is this water source used for (e.g., irrigation, crop protection sprays, fertigation, frost/freeze protection, cooling, dust abatement, etc.)?	0	Informational gathering question.
Irrigation / Water Use	2.9.1	What type of irrigation methods are used (e.g., micro-irrigation, drip, overhead, flood irrigation, furrow irrigation, seepage irrigation, hydroponic (specify type))?	0	Informational gathering question.
Irrigation / Water Use	2.9.1	Does the water come in contact with the edible portion of the crop?	0	Informational gathering question.
Irrigation / Water Use	2.9.1a	Are generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	Water samples should be taken from as close to the point of use as is practical. At least one sample per distribution system is required. If there are multiple sampling points in a distribution system, then samples are taken from a different location each test (randomize or rotate locations). For farm and indoor agriculture operations, one sample per water source is collected and tested prior to use if >60 days since the last test of the water source. Additional samples are taken at least monthly during use of the water source. A less frequent testing is acceptable if supported by a valid documented risk assessment although there should be at least one water test per season. Where there are more stringent federal, national or local requirements, these requirements should be followed. **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
Irrigation / Water Use	2.9.1b	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	10	There should be documented procedures in place detailing how water samples are taken in the field, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.
Irrigation / Water Use	2.9.1c	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	10	Written procedures (SOPs) should exist covering corrective measures not only for the discovery of unsuitable or abnormal water test results but also as a preparation on how to handle such findings.
Irrigation / Water Use	2.9.1d	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	15	For generic *E. coli* (unless more stringent guidelines/laws in existence) <126MPN (or CFU)/100mL (rolling geometric mean n=5) and <235MPN (or CFU)/100mL for any single sample. Where thresholds have been exceeded, there should be recorded corrective actions that prevent or mitigate product contamination, including investigations, water retests, and if required, crop testing (*E. coli* O157:H7 and *Salmonella* - zero tolerance). Failure to take corrective actions, prevent or mitigate product contamination when there is evidence of high levels or an upward trend of *E. coli* may result in an automatic failure of the audit. For farms or indoor agriculture operations following the FDA's Produce Safety Rule, the operation needs to ensure they are meeting the requirements for samples to calculate the Geometric Mean (GM) and Statistical Threshold (STV).
Irrigation / Water Use	2.9.1e	Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?	15	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction based test, test probe, ORP meter or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well "shocking" should be recorded.

Irrigation / Water Use	2.9.1f	Are there records for periodic visual inspection of the water source with corrective actions (where necessary)?	5	"Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken.
Irrigation / Water Use	2.9.2	Is well water used in the growing operation?	0	Informational gathering question.
Irrigation / Water Use	2.9.2	What is this water source used for (e.g., irrigation, crop protection sprays, fertigation, frost/freeze protection, cooling, dust abatement, etc.)?	0	Informational gathering question.
Irrigation / Water Use	2.9.2	What type of irrigation methods are used (e.g., micro-irrigation, drip, overhead, flood irrigation, furrow irrigation, seepage irrigation, hydroponic (specify type))?	0	Informational gathering question.
Irrigation / Water Use	2.9.2	Does the water come in contact with the edible portion of the crop?	0	Informational gathering question.
Irrigation / Water Use	2.9.2a	Are generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	Water samples should be taken from as close to the point of use as is practical. At least one sample per distribution system is required. If there are multiple sampling points in a distribution system, then samples are taken from a different location each test (randomize or rotate locations). For farm and indoor agriculture operations, one sample per water source is collected and tested prior to use if >60 days since the last test of the water source. Additional samples are taken at least monthly during use of the water source. A less frequent testing is acceptable if supported by a valid documented risk assessment although there should be at least one water test per season. Where there are more stringent federal, national or local requirements, these requirements should be followed. **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
Irrigation / Water Use	2.9.2b	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	10	There should be documented procedures in place detailing how water samples are taken in the field, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.
Irrigation / Water Use	2.9.2c	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	10	Written procedures (SOPs) should exist covering corrective measures not only for the discovery of unsuitable or abnormal water test results but also as a preparation on how to handle such findings.
Irrigation / Water Use	2.9.2d	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	15	For generic *E. coli* (unless more stringent guidelines/laws in existence) <126MPN (or CFU)/100mL (rolling geometric mean n=5) and <235MPN (or CFU)/100mL for any single sample. Where thresholds have been exceeded, there should be recorded corrective actions that prevent or mitigate product contamination, including investigations, water retests, and if required, crop testing (*E. coli* O157:H7 and *Salmonella* - zero tolerance). Failure to take corrective actions, prevent or mitigate product contamination when there is evidence of high levels or an upward trend of *E. coli* may result in an automatic failure of the audit. For farms or indoor agriculture operations following the FDA's Produce Safety Rule, the operation needs to ensure they are meeting the requirements for samples to calculate the Geometric Mean (GM) and Statistical Threshold (STV).
Irrigation / Water Use	2.9.2e	Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?	15	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction based test, test probe, ORP meter or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well "shocking" should be recorded.
Irrigation / Water Use	2.9.2f	Are there records for periodic visual inspection of the water source with corrective actions (where necessary)?	5	"Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken.
Irrigation / Water Use	2.9.3	Is non-flowing surface water used in the growing operation? (e.g., pond, reservoir, watershed)	0	Informational gathering question.

Irrigation / Water Use	2.9.3	What is this water source used for (e.g., irrigation, crop protection sprays, fertigation, frost/freeze protection, cooling, dust abatement, etc.)?	0	Informational gathering question.
Irrigation / Water Use	2.9.3	What type of irrigation methods are used (e.g., micro-irrigation, drip, overhead, flood irrigation, furrow irrigation, seepage irrigation, hydroponic (specify type))?	0	Informational gathering question.
Irrigation / Water Use	2.9.3	Does the water come in contact with the edible portion of the crop?	0	Informational gathering question.
Irrigation / Water Use	2.9.3a	Are generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	Water samples should be taken from as close to the point of use as is practical. At least one sample per distribution system is required. If there are multiple sampling points in a distribution system, then samples are taken from a different location each test (randomize or rotate locations). For farm and indoor agriculture operations, one sample per water source is collected and tested prior to use if >60 days since the last test of the water source. Additional samples are taken at least monthly during use of the water source. A less frequent testing is acceptable if supported by a valid documented risk assessment although there should be at least one water test per season. Where there are more stringent federal, national or local requirements, these requirements should be followed. **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
Irrigation / Water Use	2.9.3b	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	10	There should be documented procedures in place detailing how water samples are taken in the field, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.
Irrigation / Water Use	2.9.3c	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	10	Written procedures (SOPs) should exist covering corrective measures not only for the discovery of unsuitable or abnormal water test results but also as a preparation on how to handle such findings.
Irrigation / Water Use	2.9.3d	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	15	For generic *E. coli* (unless more stringent guidelines/laws in existence) <126MPN (or CFU)/100mL (rolling geometric mean n=5) and <235MPN (or CFU)/100mL for any single sample. Where thresholds have been exceeded, there should be recorded corrective actions that prevent or mitigate product contamination, including investigations, water retests, and if required, crop testing (*E. coli* O157:H7 and *Salmonella* - zero tolerance). Failure to take corrective actions, prevent or mitigate product contamination when there is evidence of high levels or an upward trend of *E. coli* may result in an automatic failure of the audit. For farms or indoor agriculture operations following the FDA's Produce Safety Rule, the operation needs to ensure they are meeting the requirements for samples to calculate the Geometric Mean (GM) and Statistical Threshold (STV).
Irrigation / Water Use	2.9.3e	Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?	15	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction based test, test probe, ORP meter or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well "shocking" should be recorded.
Irrigation / Water Use	2.9.3f	Are there records for periodic visual inspection of the water source with corrective actions (where necessary)?	5	"Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken.
Irrigation / Water Use	2.9.4	Is open flowing surface water used in the operation? (e.g., river, canal, ditch)	0	Informational gathering question.
Irrigation / Water Use	2.9.4	What is this water source used for (e.g., irrigation, crop protection sprays, fertigation, frost/freeze protection, cooling, dust abatement, etc.)?	0	Informational gathering question.
Irrigation / Water Use	2.9.4	What type of irrigation methods are used (e.g., micro-irrigation, drip, overhead, flood irrigation, furrow irrigation, seepage irrigation, hydroponic (specify type))?	0	Informational gathering question.
Irrigation / Water Use	2.9.4	Does the water come in contact with the edible portion of the crop?	0	Informational gathering question.

Irrigation / Water Use	2.9.4a	Are generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	Water samples should be taken from as close to the point of use as is practical. At least one sample per distribution system is required. If there are multiple sampling points in a distribution system, then samples are taken from a different location each test (randomize or rotate locations). For farm and indoor agriculture operations, one sample per water source is collected and tested prior to use if >60 days since the last test of the water source. Additional samples are taken at least monthly during use of the water source. A less frequent testing is acceptable if supported by a valid documented risk assessment although there should be at least one water test per season. Where there are more stringent federal, national or local requirements, these requirements should be followed. **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
Irrigation / Water Use	2.9.4b	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	10	There should be documented procedures in place detailing how water samples are taken in the field, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.
Irrigation / Water Use	2.9.4c	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	10	Written procedures (SOPs) should exist covering corrective measures not only for the discovery of unsuitable or abnormal water test results but also as a preparation on how to handle such findings.
Irrigation / Water Use	2.9.4d	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	15	For generic *E. coli* (unless more stringent guidelines/laws in existence) <126MPN (or CFU)/100mL (rolling geometric mean n=5) and <235MPN (or CFU)/100mL for any single sample. Where thresholds have been exceeded, there should be recorded corrective actions that prevent or mitigate product contamination, including investigations, water retests, and if required, crop testing (*E. coli* O157:H7 and *Salmonella* - zero tolerance). Failure to take corrective actions, prevent or mitigate product contamination when there is evidence of high levels or an upward trend of *E. coli* may result in an automatic failure of the audit. For farms or indoor agriculture operations following the FDA's Produce Safety Rule, the operation needs to ensure they are meeting the requirements for samples to calculate the Geometric Mean (GM) and Statistical Threshold (STV).
Irrigation / Water Use	2.9.4e	Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?	15	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction based test, test probe, ORP meter or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well "shocking" should be recorded.
Irrigation / Water Use	2.9.4f	Are there records for periodic visual inspection of the water source with corrective actions (where necessary)?	5	"Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken.
Irrigation / Water Use	2.9.5	Is reclaimed water used in the operation? NOTE: This refers to wastewater that has gone through a treatment process.	0	informational gathering question.
Irrigation / Water Use	2.9.5	What is this water source used for (e.g., irrigation, crop protection sprays, fertigation, frost/freeze protection, cooling, dust abatement, etc.)?	0	Informational gathering question.
Irrigation / Water Use	2.9.5	What type of irrigation methods are used (e.g., micro-irrigation, drip, overhead, flood irrigation, furrow irrigation, seepage irrigation, hydroponic (specify type))?	0	Informational gathering question.
Irrigation / Water Use	2.9.5	Does the water come in contact with the edible portion of the crop?	0	Informational gathering question.

Irrigation / Water Use	2.9.5a	Are generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	Water samples should be taken from as close to the point of use as is practical. At least one sample per distribution system is required. If there are multiple sampling points in a distribution system, then samples are taken from a different location each test (randomize or rotate locations). For farm and indoor agriculture operations, one sample per water source is collected and tested prior to use if >60 days since the last test of the water source. Additional samples are taken at least monthly during use of the water source. A less frequent testing is acceptable if supported by a valid documented risk assessment although there should be at least one water test per season. Where there are more stringent federal, national or local requirements, these requirements should be followed. **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
Irrigation / Water Use	2.9.5b	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	10	There should be documented procedures in place detailing how water samples are taken in the field, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.
Irrigation / Water Use	2.9.5c	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	10	Written procedures (SOPs) should exist covering corrective measures not only for the discovery of unsuitable or abnormal water test results but also as a preparation on how to handle such findings.
Irrigation / Water Use	2.9.5d	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	15	For generic *E. coli* (unless more stringent guidelines/laws in existence) <126MPN (or CFU)/100mL (rolling geometric mean n=5) and <235MPN (or CFU)/100mL for any single sample. Where thresholds have been exceeded, there should be recorded corrective actions that prevent or mitigate product contamination, including investigations, water retests, and if required, crop testing (*E. coli* O157:H7 and *Salmonella* - zero tolerance). Failure to take corrective actions, prevent or mitigate product contamination when there is evidence of high levels or an upward trend of *E. coli* may result in an automatic failure of the audit. For farms or indoor agriculture operations following the FDA's Produce Safety Rule, the operation needs to ensure they are meeting the requirements for samples to calculate the Geometric Mean (GM) and Statistical Threshold (STV).
Irrigation / Water Use	2.9.5e	Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?	15	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction based test, test probe, ORP meter or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well "shocking" should be recorded.
Irrigation / Water Use	2.9.5f	Are there records for periodic visual inspection of the water source with corrective actions (where necessary)?	5	"Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken.
Irrigation / Water Use	2.9.6	Is tail water (including hydroponics) used in the operation?	0	informational gathering question.
Irrigation / Water Use	2.9.6	What is this water source used for (e.g., irrigation, crop protection sprays, fertigation, frost/freeze protection, cooling, dust abatement, etc.)?	0	Informational gathering question.
Irrigation / Water Use	2.9.6	What type of irrigation methods are used (e.g., micro-irrigation, drip, overhead, flood irrigation, furrow irrigation, seepage irrigation, hydroponic (specify type))?	0	Informational gathering question.
Irrigation / Water Use	2.9.6	Does the water come in contact with the edible portion of the crop?	0	Informational gathering question.

Irrigation / Water Use	2.9.6a	Are generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	Water samples should be taken from as close to the point of use as is practical. At least one sample per distribution system is required. If there are multiple sampling points in a distribution system, then samples are taken from a different location each test (randomize or rotate locations). For farm and indoor agriculture operations, one sample per water source is collected and tested prior to use if >60 days since the last test of the water source. Additional samples are taken at least monthly during use of the water source. A less frequent testing is acceptable if supported by a valid documented risk assessment although there should be at least one water test per season. Where there are more stringent federal, national or local requirements, these requirements should be followed. **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
Irrigation / Water Use	2.9.6b	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	10	There should be documented procedures in place detailing how water samples are taken in the field, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.
Irrigation / Water Use	2.9.6c	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	10	Written procedures (SOPs) should exist covering corrective measures not only for the discovery of unsuitable or abnormal water test results but also as a preparation on how to handle such findings.
Irrigation / Water Use	2.9.6d	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	15	For generic *E. coli* (unless more stringent guidelines/laws in existence) <126MPN (or CFU)/100mL (rolling geometric mean n=5) and <235MPN (or CFU)/100mL for any single sample. Where thresholds have been exceeded, there should be recorded corrective actions that prevent or mitigate product contamination, including investigations, water retests, and if required, crop testing (*E. coli* O157:H7 and *Salmonella* - zero tolerance). Failure to take corrective actions, prevent or mitigate product contamination when there is evidence of high levels or an upward trend of *E. coli* may result in an automatic failure of the audit. For farms or indoor agriculture operations following the FDA's Produce Safety Rule, the operation needs to ensure they are meeting the requirements for samples to calculate the Geometric Mean (GM) and Statistical Threshold (STV).
Irrigation / Water Use	2.9.6e	Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?	15	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction based test, test probe, ORP meter or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well "shocking" should be recorded.
Irrigation / Water Use	2.9.6f	Are there records for periodic visual inspection of the water source with corrective actions (where necessary)?	5	"Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken.
Irrigation / Water Use	2.9.7	Is dryland farming used in the growing operation?	0	This refers to crop production that relies on direct rainfall only. Informational gathering question.
Irrigation / Water Use	2.9.8	Is there a documented assessment for each water source covering animal access, upstream contamination/runoff, proper well condition, water treatment, backflow, maintenance, cross contamination from leaching, recirculating water systems, etc., as applicable?	15	Prior to the first seasonal planting and at least annually and when any changes are made to the system, there should be a documented risk assessment for each water source including any risk mitigations in place, covering potential physical, chemical and biological hazards from animal access, upstream contamination/runoff, proper well condition, water treatment, water capture, backflow, maintenance, cross contamination from leaching, cross connections, recirculating water systems, etc. If flood or furrow irrigation is used, there needs to be examples of how the operation is minimizing the risk. Farms and indoor agriculture operations following the CA or AZ LGMA, where the risk assessments suggest a need, surface waters passing within 400 feet (121 meters) of a CAFO with more than 80,000 head, must be treated to meet microbial acceptance criteria for Generic E.coli of negative or < detection limit (MPN or CFU/100mL) if used in any overhead irrigation application at the field level within two weeks of scheduled harvest.
Irrigation / Water Use	2.9.9	Are there backflow prevention devices on all main lines, including where chemical, fertilizer and pesticide applications are made?	10	Water systems should be fitted with backflow prevention devices to prevent contamination of the water supply. Main water lines should be fitted with back-flow protection for the incoming water (no matter what the source). Individual water lines should be fitted with backflow protection where practical.

Irrigation / Water Use	2.9.10	If the operation stores water (tank, cistern, container), is the storage container well maintained?	15	Container should be structurally sound with no evidence of damage or rust, no vegetation growing on or in the container. The base of the container should be free from debris and weeds. Access lids are properly secured and any vents, overflow and drains are screened. Air gaps are present and should be at least twice the diameter of the water supply inlet and not be less than 25 mm (1 inch).
Pesticide Usage	2.10.1	Are there up-to-date records of all pesticides applied during the growth cycle? **A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	The growing operation should follow a pesticide application record keeping program that at least includes the following: date and time of application, crop name, treated area size and location (must be traceable), brand/product name, EPA (or equivalent) registration information, active ingredient, amount applied (rate/dosage), applicator identification, pre-harvest interval, restricted entry interval, application equipment identification and target pests. **A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
Pesticide Usage	2.10.2	Are all pesticides applied during the growth cycle authorized/registered by the authority/government of the country of production? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Application records should show all pesticides applied during the growth cycle are officially registered by the country of production for the target crop (e.g. EPA in the US, COFEPRIS in Mexico, SAG in Chile, Pest Management Regulatory Agency (PMRA) in Canada). In countries where there is an authorization program in place (e.g. SENASICA in Mexico), this is acceptable, provided the program is operated by the government and considers at a minimum the target crop, pesticide commercial name and active ingredient, formulation, dosage, pre-harvest intervals and target pest(s). **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
Pesticide Usage	2.10.3	Are all pesticides used during the growth cycle applied as recommended/directed in the label? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	Application records should show that pesticides used during the growth cycle are applied in accordance with label directions and any federal, state or local regulation(s). In operations applying pesticides “authorized” by the government, where use directions are not in the label, application records should show “authorization program” use/application directions are followed.
Pesticide Usage	2.10.4	Where harvesting is restricted by pre-harvest intervals, are required pre-harvest intervals on product labels, national (e.g., EPA) registration and any federal, state or local regulations and guidelines being adhered to? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Application and harvest records show pre-harvest intervals on product labels, national (e.g., EPA) registration and any federal, state or local regulations and guidelines are being adhered to. In operations applying pesticides “authorized” by the government, where use directions are not in the label, application and harvest records show the “authorization program” directions for pre-harvest intervals are followed. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
Pesticide Usage	2.10.5	Where products are destined for export, is there information for pesticide Maximum Residue Limits (MRLs) compliance considering, country of destination, target crop(s), and active ingredients applied?	15	Where products are destined for export, the operation should have documented evidence about the MRL requirements for each country of destination for each pesticide (active ingredient) applied during the growth cycle. If there is no MRL defined by the country of destination for any active ingredient applied, the operation should have documented evidence of the applicable regulations in that country (e.g. default MRL, Codex Alimentarius, non-detectable, etc.). In the case where the MRLs have been standardized or harmonized for a group of countries (i.e. European Union) it is acceptable that the operation demonstrate compliance by referencing the "list" of MRLs issued from the formal body that represents those countries for this purpose. This question is Not Applicable if the product is only sold in the country of production (domestic market).
Pesticide Usage	2.10.6	Where products are destined for export, is there evidence that Maximum Residue Limits (MRLs) of the intended markets are met? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	Maximum Residue Limits (MRLs) analysis should be performed when the MRLs of the destination countries are lower (stricter) than the country of production. This assumes that grower is meeting country of origin MRL and label requirements. MRL test results and records should demonstrate that products/crops meet MRL regulations in those intended markets and any non-conforming product is diverted from those markets. This question is Not Applicable if the product is only sold in the country of production (domestic market). **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
Pesticide Usage	2.10.7	Is there a documented procedure for the pesticide applications, considering mixing and loading, applying, and equipment cleaning?	15	There should be a documented procedure for pesticide applications, specifically mixing and loading, application procedures and equipment cleaning. The procedure should adhere to the product label and include: requiring activity to be in a well-ventilated, well-lit area away from unprotected people, food and other items that might be contaminated; necessary PPE, re-entry intervals, excessive winds, posting of treated areas, etc; how to rinse and clean pesticide equipment including measuring devices, mixing containers and application equipment.

Pesticide Usage	2.10.8	Is there documentation that shows the individual(s) making decisions for pesticide applications is competent?	15	Current valid certificates, licenses, or another form of proof of training recognized by prevailing national/local standards and guidelines should be available for the individual(s) making decisions on pesticide applications (e.g., choice of pesticides, application timings, rates, etc.).
Pesticide Usage	2.10.9	Is there documentation that shows that individuals who handle pesticide materials are trained and are under the supervision of a trained person?	15	All workers who handle pesticides must have current certificates, licenses, or other forms of proof of training (recognized by prevailing national/local standards and guidelines) qualifying them to do so independently or they must have proof of training and be under the supervision of a worker who can do so independently.
ADDITIONAL QUESTIONS (NOT PART OF OVERALL FOOD SAFETY PERCENTAGE) - SECTION 3				
Management System	3.1.1	Is there a documented food safety policy detailing the company's commitment to food safety?	5	The documented policy should include a clear statement and detailed objectives of the company's commitment to meet the food safety needs of its products. Everyone in the company should understand the food safety policy and be aware of their role in ensuring that it is met. The policy should be posted in a public area and in the language understood by the workers.
Management System	3.1.2	Is there an organizational chart showing all management and workers who are involved in food safety related activities and documentation (job descriptions) detailing their food safety responsibilities?	10	The documented organizational chart should show positions and reporting structure of workers whose activities affect food safety within the company. This document should also detail job functions and responsibilities related to food safety. Suitable alternates should be indicated in case someone can not perform the assigned responsibilities at certain moment. Document should be signed and dated by management to indicated it is current and accurate.
Management System	3.1.3	Is there a food safety committee and are there logs of food safety meetings with topics covered and attendees?	5	Meetings that are either devoted to, or mention food safety issues, should be recorded as proof of company's ongoing commitment to food safety (minimum quarterly frequency). These meetings should detail Senior Management involvement in the Food Safety program.
Management System	3.1.4	Is there a training management system in place that shows what types of trainings are required for various job roles of specific workers, including who has been trained, when they were trained, which trainings they still need to take, and a training schedule?	5	The company has a system in place (e.g., training matrix) that shows what types of trainings are required for various job roles that affect food safety, who has been trained, when they were trained, which trainings they still need to take, and a training schedule. The training records required under specific questions will be reviewed in the applicable section(s).
Management System	3.1.5	Is there documented management verification review of the entire food safety management system at least every 12 months, including an evaluation of resources, and are there records of changes made?	10	There should be written verification of the entire food safety management system at planned intervals (minimum every 12 months). There should be evidence that senior management is involved in the review to ensure its continuing suitability, adequacy and effectiveness and that they are continuing to support and invest in adequate food safety resources (e.g., equipment, services, supplies, personnel training, worker staffing levels, customer requirements/specifications, etc.). The review should determine the need for changes and the changes made should be documented. The documented review should meet any national or local legislative requirements.
Management System	3.1.6	Where specific industry guidelines or best practices exist for the crop and/or product, does the operation have a current copy of the document?	3	There is a current copy of any specific industry guidelines for the crop and/or product available for review.
Control of Documents and Records	3.2.1	Is there a written document control procedure (including document control register/record) describing how documents will be maintained, updated and replaced?	3	The document control procedure should show how controlled documents are to be written, coded, approved, issued and updated, and should also show how obsolete versions of documents are controlled. If using an electronic record keeping system, the procedure should also detail how electronic records are managed to control of access, how changes to records are controlled-including who has edit rights and how electronic records are secured; i.e. back up system.
Control of Documents and Records	3.2.2	Are all records and test results that can have an impact on the food safety program verified by a qualified person independent of the individual(s) completing the records?	5	Records and test results should be reviewed and signed off by a qualified person within 7 days. The verifier is independent of the individual completing the record(s), understands the purpose of the verification and understands what they need to review on the record(s) before they sign (i.e. PSA qualification, evidence of training). If any issues are detected, corrective actions should be recorded.
Procedures and Corrective Actions	3.3.1	Is there a written and standardized procedure for creating Standard Operating Procedures (SOPs) and their content?	5	There should be a written document that describes how to create SOPs when required to cover any food safety related activities. SOPs should include a date and document number or reference code and detail what is to be done, how it is done, how often, by whom, what recordings are required and any immediate corrective action to perform when deficiencies occur. There should be clear evidence that this system is being followed, based on SOPs reviewed.
Procedures and Corrective Actions	3.3.2	Are the written procedures available to relevant users and is a master copy maintained in a central file?	5	The written procedures should be available to the users and other interested parties involved in performing the activities described in the procedures. A master copy of all SOPs and associated recording forms should be assembled and stored as a reference.

Procedures and Corrective Actions	3.3.3	Is there a documented corrective action procedure that describes the required basic requirements for handling all non-conformances affecting food safety?	5	The corrective action procedure should outline how the company manages corrective actions. Specifically, requiring the determination of root cause, establishment of an action plan(s) to address immediate issue(s) regarding non-conformance(s) (including any actions taken regarding affected product), corrective actions taken, the development of preventive actions to help avoid future occurrences and validation of corrective action. Procedure should require that records of the corrective action activities and their follow-up are completed using the same format with the required information detailed.
Internal and external inspections	3.4.1	Is there a documented procedure for how internal audits are to be performed at the operations, including frequency and covering all processes impacting food safety and the related documents and records?	10	A written procedure for internal audits should be created covering each operation. The procedure should cover the inspection of the sites, the practices in place, the related documents required, the records generated, the recording system to be used for the audits, the frequency of the internal audits and identification of the person(s) responsible for conducting the internal audits. The internal audit records are assessed in specific questions
Internal and external inspections	3.4.2	Are there written procedures for handling regulatory inspections?	3	Written procedures for handling regulatory inspections allow workers to be aware of how to handle the inspection appropriately including ensuring that the inspector is always accompanied, identified meeting space, rules on taking samples and photographs, how to follow-up after the inspection, corrective action requirements, etc.
Release of Items/Product	3.5.1	Is there a documented product release procedure available?	5	Product release procedures are needed when the product is approved for shipment or harvest (they do not indicate the release of a product that has been placed on hold). Product release procedures assure that a lot is only released for shipment (sale) when lot meets agreed standards (e.g. specification) or meets agreed testing requirements (e.g. results confirmed negative or within limits results from testing, etc.). This includes crops approved for harvest and crop harvest where harvested product is direct picked into packaging during harvest (e.g., mushrooms, berries, individually wrapped lettuce) or there is in-field processing/semi-processing. Products should not be released for harvest or shipment without assuring that necessary evaluations have been performed. N/A for organizations that only have authority over the growing activities and operation(s), and not the harvesting activities.
Release of items/product	3.5.2	Are there records of product releases kept on file?	5	Product release records are needed to document when the product is approved for shipment or harvest (they do not indicate the release of a product that has been placed on hold). Product release records should show documented evidence that all product that is shipped and harvested is released only when the release procedure has been completed and the product has been "signed off" for by authorized personnel. Records should be available demonstrating the sign off for the “release” of all product shipped. N/A for organizations that only have authority over the growing activities and operation(s), and not the harvesting activities.
Release of items/product	3.5.3	Is there a documented procedure for handling on hold and rejected items?	5	There should be a documented procedure that explains how items (raw materials, packaging, work in progress, finished product, etc.) that have either been rejected or placed on hold should be handled, including the release of the on hold/rejected items. The procedure should identify who (position/title) is authorized to determine the disposition of materials that are placed on hold and include details on how the affected items are separated in terms of identification system (e.g., when, why, who), and any other physical separation needed to ensure that affected items are not commingled with other goods in such a way that their disposition is not clear.
Release of items/product	3.5.4	Are there records of the handling of on hold and rejected items kept on file?	5	Records should be kept to provide information about any item (raw materials, packaging, work in progress, finished product, etc.) that is rejected or put on hold, including at least: date and time, amount of product affected, reason for being on hold/rejected, name of the person who rejected the product or put it on hold, details of product disposition, date, time, the actions taken, and the signature of an authorized person to release the product.

Release of items/product	3.5.5	Is there a documented procedure for dealing with customer and buyer food safety complaints/feedback along with records and company responses, including corrective actions?	10	There should be a documented procedure detailing how to handle food safety related complaints, rejections and feedback. The procedure should require the recording to include (where applicable): • Date/Time of complaint/rejection/feedback • Who made the complaint/gave feedback, • Contact information, • Product description, • Where the product was purchased, • Amount of product, • Product code/date, • Nature of complaint/rejection/feedback, • Corrective actions (including details of cause if known) • Corrective actions taken to prevent reoccurrence. Where appropriate, a trend analysis of food safety feedback should be performed to assist with the development of corrective actions.
Supplier Monitoring/ Control	3.6.1	Is there a written procedure detailing how suppliers and service providers are evaluated and approved, and include the ongoing verification activities including monitoring?	10	The procedure for evaluation, approval and on-going verification, including monitoring of suppliers, on-site service providers and outsourced service providers should include the indicators to be considered for decision making (including food safety hazards), exceptions and the elements the providers should comply with to make sure they meet the defined specifications. This procedure should include monitoring requirements in order to remain approved, and methods for suspending and un-approving suppliers and service providers. The procedure should also detail what is needed (minimum requirements) in the case of working with a supplier in an emergency situation that has not yet been approved.
Supplier Monitoring/ Control	3.6.2	Is there a list of approved suppliers and service providers?	5	There should be a list of approved suppliers and service providers. All incoming products, ingredients, materials (including primary packaging) and services that relate to food safety should be sourced from approved entities. Where exceptions are made (e.g., market conditions), approval from management should be justified and documented.
Supplier Monitoring/ Control	3.6.3	Are there current written food safety related specifications for all incoming products, ingredients, materials (including primary packaging), services provided on-site, and outsourced services?	5	There should be written, detailed, up-to-date specifications for all incoming products, ingredients, materials (including primary packaging), services provided on-site, and outsourced services (including when exceptions will be allowed) that have an effect on food safety, addressing the required Good Agricultural Practices and/or Good Manufacturing Practices. Documented specifications should be easily accessible to workers. The specifications should be reviewed at least annually.
Supplier Monitoring/ Control	3.6.4	Does the organization have documented evidence to ensure that all incoming products, ingredients, materials, services provided on-site and outsourced service suppliers comply with the approval requirements and that all supplier verification activities (including monitoring) are being followed, as defined in the supplier approval procedure?	15	The organization should have the required documentation for approved suppliers to ensure that they are complying with the established supplier/service provider approval procedures, contracts, specifications, regulatory requirements and best practice guidelines. Supplier verification documents should demonstrate that the ongoing approval requirements detailed in 1.06.03 are being met (e.g., third party audits, certificates of analysis, reviews of supplier records, etc.).
Supplier Monitoring/ Control	3.6.5	Where food safety related testing is being performed by external laboratory service providers, are these licensed and/or accredited laboratories (e.g., ISO 17025 or equivalent, national and local regulations, etc.)?	5	There should be documented evidence that the in-house laboratory is using the correct methods for testing (e.g., validation) and have established protocols to detect errors and to initiate corrective actions. There are records showing that workers handling samples have been trained on proper sample collection and testing protocols. An accredited laboratory is used when testing is conducted to comply with specific regulatory (e.g. FDA) testing requirements applied to address an identified or suspected food safety problem (e.g. sprouts).
Food Defense	3.7.1	Is there a written food fraud vulnerability assessment (FFVA) and protection plan for all types of fraud, including all incoming and outgoing products?	3	There should be a vulnerability assessment and comprehensive protection plan for all types of food fraud. This includes economically motivated hazards, economically motivated food safety hazards, adulterant substances, mislabeling, theft, tampering, simulation, diversion or gray market, intellectual property rights and counterfeiting. An example of a food fraud scenario that may occur at an operation is when suppliers provide products/materials that do not match their required specifications (e.g. unapproved chemicals, non-food grade packaging material, product substitution).

Food Defense	3.7.2	Does the company have a documented food defense plan based on the risks associated with the operation?	5	The company should have a documented food defense plan that includes a written **vulnerability** assessment, and controls for the identified risks. Some high-risk areas include: building access, personnel, visitors, contractors, computes, raw material receipt (raw materials, product and packaging), trucks (incoming and outbound), water sources, storage areas for product, materials, chemicals, etc. The food defense plan creation should also meet any national or local regulations (including management oversight and approval). Based on this assessment, the operation should create monitoring, corrective action and verification procedures (where appropriate). These procedures should note the recording requirements of the food defense plan. The plan should be reviewed at least once every 12 months.
Food Defense	3.7.3	Are records associated with the food defense plan and its procedures being maintained, including monitoring, corrective action and verification records (where appropriate)?	5	The records required in the food defense plan should be maintained, in accordance with the details of the plan and its associated procedures. These records are also subject to the document control and records requirements of this audit.