



2018

An internationally recognized Global Food Safety Initiative (GFSI) food safety audit scheme

QUESTIONS & EXPECTATIONS

PrimusGFS v3.0

MODULE 4

HARVEST CREW

Good Agricultural Practices Requirements



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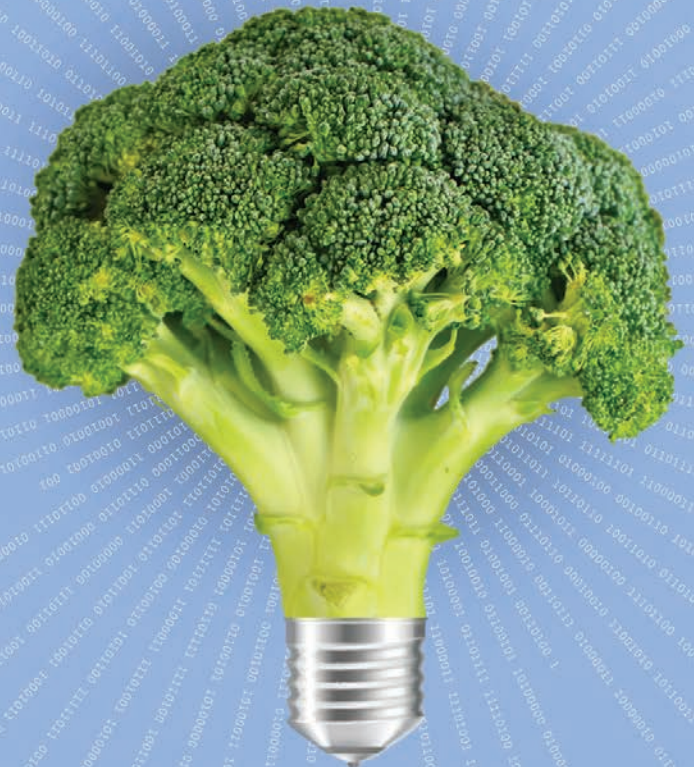
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PrimusGFS v3.0

Questions & Expectations

MODULE 4: HARVEST CREW

(Sections 4.01 to 4.08)

GOOD AGRICULTURAL PRACTICES REQUIREMENTS

This Module should be completed for each one of the **Harvest Crew** operations in the scope of the organization's application.

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GENERAL			
Question No.	Question	Total Points	Expectation
4.01.01	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 (including to all state and federal requirements).
4.01.02	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 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.

INSPECTION			
4.02.01	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 internal audit program. The records should include the date of the audit, name of the internal auditor, scope of the audit, justification for answers, detailing any deficiencies found and the corrective actions taken. An audit checklist (ideally PrimusGFS) should be used that covers all areas of the PrimusGFS audit, including worker hygiene, harvest practices, on-site storage, etc. No downscore if another audit checklist is used, as long as all areas are covered. See 1.04 regarding internal audit schedule.
4.02.02	Are there records of pre-harvest inspections and do they show that the current block (or coded area) is cleared for harvest?	5	A pre-harvest block inspection should have been performed and if harvesting is occurring, it should show if there are any harvesting restrictions, etc. The harvest crew might not have a copy of the actual inspection, but they should have a document indicating which blocks have been inspected and cleared for harvest. If answer No, go to 4.02.03.
4.02.02a	Where pre-harvest inspections have discovered issues, have buffer zones been clearly identified, and at the time of the audit, are those buffer zones being respected?	15	Where pre-harvest inspections have discovered issues (e.g., flooding, animal intrusion issues), have the buffer zones been implemented (e.g., 30ft (9.1m) from flooded areas, 5ft (1.5m) from evidence of pest activity). Use larger buffer zones if national and local laws are more stringent.
4.02.03	Is there a pre-operation inspection log?	10	Pre-operation inspections should identify potential problems with the harvesting operation, including equipment hygiene, tool hygiene, and worker hygiene. These inspections and corrective actions should be recorded.

TRAINING			
Question No.	Question	Total Points	Expectation
4.03.01	Is there a food safety hygiene training program covering new and existing workers and are 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 and then at some topics covered at least quarterly, but ideally monthly. These trainings should cover food safety and hygiene, 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.
4.03.02	Is there a documented training program with training logs for the sanitation workers, including best practices and chemical use details?	5	Sanitation training should ensure that the workers understand the importance of proper sanitation, cleaning efficacy, how to use the cleaning chemicals and how to understand Sanitation Standard Operating Procedures. Unless sanitation workers attend regular food safety trainings, sanitation training should also include elements of food safety training pertinent to sanitation operations (e.g., hand washing, restroom use, foreign material, etc.). Training logs should have a clearly defined topic(s) covered, trainer(s) and material(s) used/given.
4.03.03	Are there written and communicated procedures in place that require food handlers to report any cuts or grazes and/or if they are suffering 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 the 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.
4.03.04	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 systematically not following food safety requirements. These records should also show corrective actions and evidence that retraining has occurred (where relevant).

HARVESTING INSPECTIONS, POLICIES AND TRAINING			
Question No.	Question	Total Points	Expectation
4.04.01	Is there a documented policy, supported by worker training records, stating that when commodities are dropped on the ground they are discarded? (Non-applicable for commodities such as tubers, root crops, etc.)	5	There should be a documented policy stating that if products are dropped on ground, the products are discarded. Workers should be trained on this policy and records of training should be maintained. Not applicable for tubers and root crops (e.g., carrots, potatoes).
4.04.02	Is there a documented policy, supported by worker training records, stating what happens when harvesters find evidence of animal intrusion (e.g., fecal material)?	5	There should be a documented policy stating what happens if harvesting workers find evidence of animal intrusion (e.g., fecal material). Workers should be trained on this policy, including potential corrective actions (e.g., product disposal, buffer zones, equipment cleaning) and recording of the corrective actions. Records of training should be maintained.
4.04.03	Is there a documented policy, supported by worker training records, stating that commodities are discarded after coming into contact with blood or bodily fluids?	5	There should be a documented policy stating that if product has come into contact with blood and/or bodily fluids, all affected product must be destroyed. Policy should also describe cleaning or disposition of any food contact surface that comes into contact with blood. Workers should be trained on this policy and records of training should be maintained.

HARVEST WORKER HYGIENE			
4.05.01	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	At least one toilet per 20 workers should be provided, with separate toilet facilities provided for men and women in groups larger than 5 workers, or if more stringent, as per prevailing national/local guidelines, and should be within 1/4 mile or 5 minutes walking distance of where workers are located. Toilet facilities should be available to all workers and visitors. Automatic failure if there are insufficient or inadequate toilet facilities.
4.05.01a	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 that they are not parked (if on trailers) too close to the edge of the crop.

HARVEST WORKER HYGIENE (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.05.01b	Are the catch basins of the toilets designed and maintained to prevent contamination (e.g., free from leaks and cracks)?	5	Catch basins from toilets must be designed and maintained properly to prevent contamination onto field, product, packaging, and equipment. Catch basins should be free of leaks, cracks and constructed of durable materials that will not degrade or decompose, such as wood.
4.05.01c	Is there a documented procedure for emptying the catch basin in a hygienic manner and also in a way that prevents product, packaging, equipment, water systems and growing area contamination?	5	If self contained toilets are used, the toilet basins 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 policy should exist and should include a response plan for major leaks or spills.
4.05.01d	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.
4.05.01e	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.
4.05.01f	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).
4.05.01g	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. Toilet paper should be available at each toilet location and maintained in a hygienic manner (held on rolls, not placed in urinals or on the floor). Soiled tissue should be flushed down the toilet/placed in the holding tank (not be placed in trash cans and/or on the floor).
4.05.02	Is there evidence of human fecal contamination in the harvesting area? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	There should be no evidence of human fecal contamination in the harvesting area, area being harvested, packaging area, equipment area, or in any other area that would cause a contamination issue. If this question is answered Yes, an automatic failure of the audit will result.
4.05.03	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 (visual signs are allowed). The visuals or signs should be permanent and placed in key areas where workers can easily see them.

HARVEST WORKER HYGIENE (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.05.04	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	Enough hand washing stations, in working order, should be provided to ensure efficient worker flow (1 per 20 people on site), and available to all workers and visitors. 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.
4.05.04a	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).
4.05.04b	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.
4.05.04c	Are hand wash stations adequately stocked with unscented soap and paper towels?	5	All hand washing facilities should be properly stocked with liquid unscented/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.
4.05.04d	In the event of running out of toilet materials (e.g., water, soap, toilet tissue, hand paper towels), are there extra supplies readily available so that toilets can be restocked quickly?	5	Extra stock of fresh water, soap, toilet paper and paper towels, etc. should be readily available in the event that replenishment is needed while harvesting is occurring.
4.05.05	Are total coliforms (TC) and generic <i>E.coli</i> tests conducted on the water used for hand washing at the required and/or expected frequency?	15	Total coliforms (TC) and generic <i>E.coli</i> testing should occur on a routine basis. All water sources used for hand washing throughout the harvesting season should be tested. One sample per water source should be collected and tested prior to use and then at least quarterly, ideally monthly.
4.05.05a	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 a documented procedure in place detailing how water samples are to be taken, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, identifying the hand wash station, the water source and the date.
4.05.05b	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 testing results, but also as a preparation on how to handle such findings.

HARVEST WORKER HYGIENE (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.05.05c	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	15	For Total coliforms (TC) and generic <i>E. coli</i> , there should be negative or < detection limit (MPN or CFU/100mL). Where thresholds have been exceeded, there should be recorded corrective actions, including investigations and water retests.
4.05.06	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.).
4.05.07	Are secondary hand sanitation stations (e.g., hand dips, gels or spray stations) adequate in number and location, and are the stations maintained properly?	5	Secondary hand sanitation is required for items that may be “ready-to-eat” (e.g., herbs, tomatoes, edible flowers, etc.). Secondary hand sanitizers are optional for root vegetable crops or a commodity that requires cooking prior to eating. Secondary hand sanitation (hand dips, gels or sprays) does not replace hand washing requirements (lack surfactant qualities). Secondary hand sanitation stations should be unscented/non-perfumed, have 60% to 95% ethanol or isopropanol and should be located near hand washing and other easily accessible areas. Hand gel / spray stations should be well stocked and tested regularly to ensure they are at the required strength - checks should be recorded. Strength checks do not need to be performed for commercially purchased sanitizers that have been purchased already mixed.
4.05.08	Is it evident that corrective actions are taken when workers fail to comply with hand washing guidelines?	5	It should be evident that corrective actions are taken by a supervisor in charge when workers fail to comply with hand washing requirements.
4.05.09	Is there no sign of any worker with boils, sores, open wounds or exhibiting signs of foodborne illness working directly or indirectly with food?	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.
4.05.10	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.

HARVEST WORKER HYGIENE (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.05.11	Worker personal items are not being stored 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.
4.05.12	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. Potable water should be provided for drinking, following local and national laws.
4.05.13	Are workers wearing effective hair nets that contain all hair?	5	If the operation requires the use of hair nets, the harvest workers should be wearing appropriate hair nets that restrain all hair. Baseball caps and head coverings are allowed in the harvesting area only if they are clean and worn with a clearly visible hair net.
4.05.14	Are all harvest workers wearing clean clothing suitable for the operation (e.g., clean clothes, smocks, aprons, sleeves and non-latex gloves)?	5	Suitable protective clothing is required for workers handling products that are potentially ready-to-eat. Where dedicated protective clothing is not required/worn, it must be clear that outer street clothes are clean and not a potential source of contamination. Workers should not wear personal clothes with sequins, pom-poms, fur, etc. No sleeveless tops without an over garment.
4.05.15	Are all items removed from garment (shirt, blouse, etc.) top pockets, and unsecured items are not worn (e.g., pens, glasses on top of head, Bluetooth devices, etc.)?	3	There should be no items stored in workers' top pockets. Items in pockets and otherwise unsecured have the potential to fall into the product
4.05.16	Do workers remove protective outer garments (e.g., smocks, aprons, sleeves and gloves) when on break, before using the toilets and when going home at the end of their shift?	5	When worn, protective clothing (e.g., aprons, smocks, sleeves, and gloves) should be removed when workers leave the work area (e.g., when they go to the toilet facility, break areas, etc.). Workers cannot smoke, eat, or use the restroom while wearing these garments.
4.05.16a	Is there a designated area for workers to leave protective outer garments (e.g., smocks, aprons, sleeves, and gloves) when on break and before using the toilet?	5	There should be a designated area for workers to leave protective clothing when they are worn (e.g., aprons, smocks, sleeves, and gloves). Workers are observed using the designated area when they leave the work area (e.g., when they go to the toilet facility, break areas, etc.).

HARVEST WORKER HYGIENE (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.05.17	Is fresh potable drinking water readily accessible to workers?	10	Water should be suitably cool and in sufficient amounts, taking into account the air temperature, humidity and the nature of the work performed, to meet the needs of all workers. 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.
4.05.17a	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.
4.05.18	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.
4.05.19	Are all commodities that come in contact with blood and/or other bodily fluids destroyed? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	Any commodity that comes into contact with blood and/or other bodily fluids must be destroyed. If this occurs during the time of inspection, auditor must witness that product is destroyed.
4.05.20	Are there adequate trash cans placed in suitable locations?	5	There should be adequate measures for trash disposal so that the growing, harvesting 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.
4.05.21	Have any potential foreign material issues (e.g., metal, glass, plastic) contamination issues been 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.

HARVEST PRACTICES			
Question No.	Question	Total Points	Expectation
4.06.01	Is there evidence of animal presence and/or animal activity (wild or domestic) in the harvesting area?	15	Animals can represent potential contamination to the harvesting 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.
4.06.01a	Is there any evidence of fecal matter in the harvesting area?	15	Fecal matter is a potential contaminant to the product being grown. Produce that has come into direct contact with fecal material is not to be harvested. A “no harvest zone” 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 assessment should be conducted by qualified workers. 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.
4.06.01b	Is the fecal matter found in the audited area, a systematic event (not sporadic)? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	Animal fecal matter has the potential of representing contamination to the product being grown. Produce that has come into direct contact with fecal matter is not to be harvested. A “no harvest zone” 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 assessment should be conducted by a qualified worker. This question is “no” if the grower has already noted this issue and performed adequate corrective actions. Consideration of the maturity stage and type of crop involved is required. If this question is answered Yes, automatic failure of this audit will result. Any evidence of human fecal matter in the growing area is an automatic failure.
4.06.02	Is there evidence of infants or toddlers in the harvesting area?	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.
4.06.03	Are there written cleaning and sanitation procedures (Sanitation Standard Operating Procedures) for the harvesting equipment?	10	Harvesting equipment should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). Procedures should detail what, who, how and when, including chemical details, solution temperature, water pressure, dwell times, any disassembly/reassembly instructions and cleaning verification procedures.
4.06.03a	Are cleaning and sanitation logs on file for harvesting equipment that show what was done, when and by who?	10	Sanitation logs should include: date, list of areas/equipment that were cleaned and sanitized, and the individual accountable who signed-off for each task completed.

HARVEST PRACTICES (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.06.04	Are all chemicals (pesticides, sanitizers, detergents, lubricants, etc.) stored securely, safely and are they labeled correctly?	15	Chemicals are required to be stored in a designated area. The chemical storage area to be located away from any raw materials, packaging & finished food products. Spill controls should be in place for opened in use containers.
4.06.05	Are "food grade" and "non-food grade" chemicals used appropriately, according to label and stored in a controlled manner?	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 and packaging materials. "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.
4.06.06	Are there records of microbial testing for water used for postharvest product contact (e.g., washing, re-hydrating) and product contact surfaces (e.g., cleaning grading packing tables and harvest tools) showing that there is no detectable total coliforms or generic <i>E. coli</i> in the water?	10	For Generic <i>E. coli</i> , there should be negative or < detection limit (MPN or CFU/100mL). Where thresholds have been exceeded, there should be recorded corrective actions, including investigations and water retests (<i>E. coli</i> O157:H7 < detection limits or Negative-zero tolerance).
4.06.06a	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 results, but also as a preparation on how to handle such findings.
4.06.06b	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	15	For total coliforms and Generic <i>E. coli</i> , there should be negative or < detection limit (MPN or CFU/100mL). Where thresholds have been exceeded, there should be recorded corrective actions, including investigations, water retests and crop testing (<i>E. coli</i> O157:H7 and <i>Salmonella</i> < detection limits or Negative-zero tolerance).
4.06.07	Is the product harvested and transported to a facility for additional handling and/or final packing?	0	Information gathering question. This question refers to product that is harvested in the field and then taken to a facility for handling and/or packing.
4.06.08	Is the product packed in the final packing unit in the field ?	0	Information gathering question. This question refers to product packed in the field that is in the final unit for shipping (i.e. clamshell, wrapped products, carton boxes, etc.), that usually bypasses any selection packing lines in a facility i.e. goes to a cooling process as opposed to a packing line.

HARVEST PRACTICES (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.06.08a	Is packing material (e.g., cartons, bags, clamshells, sacks, RPCs) intended for carrying product used for that purpose only?	5	All containers intended for product should not be used for any other purpose besides product storage.
4.06.08b	Is packaging material inspected prior to use and free from handling contamination and exposure to ground?	10	Avoid stacking soiled bins on top of each other if the bottom of the bin has had direct contact with soil. Product and packing materials used in the harvesting process should be placed with protection underneath and handled in a manner to eliminate contamination from the ground or from inappropriate human handling, which includes commodities where it is industry practice to place the products on the ground after harvest (e.g., celery). Crops down scored for exposure to the ground do not include root crops that are grown underground (e.g., carrots, potatoes, etc.) or crops that are grown on the ground. Measures should be taken to prevent any known or reasonably foreseeable hazard (such as for <i>Clostridium botulinum</i> in mushrooms).
4.06.08c	Is packing material left in the field unattended, stored secured and protected?	5	All containers, cartons, packing material should be stored in a protected area to reduce the risk of contamination and tampering that can occur if packing material is left in the field unattended .
4.06.08d	Are finished products coded (containers, cartons and unit packaging) for the day of harvest?	3	Finish product containers, cartons or other packing material should be lot coded in order to ensure an effective trace back and recall program and also for inventory control. If required by buyer or legal requirements, packaging labeling should include information about recommended storage conditions and usage.
4.06.09	Is the crop, harvested product, 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, harvested product, 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., <i>Clostridium botulinum</i> in mushrooms). This question is designed to allow an auditor to halt an audit when finding gross contamination issues.
4.06.10	Are grading and packing tables used? If No, go to 4.06.11.	0	This refers to food contact surfaces used to grade, inspect, re-pack, or pack product (e.g., picking carts, grading tables, etc.).

HARVEST PRACTICES (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.06.10a	Does the design and condition of the grading and packing tables (e.g., smooth surfaces, smooth weld seams, nontoxic materials, no wood) facilitate effective cleaning and maintenance?	10	Grading and packing surfaces should be made of materials suitable for food contact that can be easily cleaned, sanitized and maintained. Equipment should be designed to allow access and easy cleaning (including hollow structures on supports, rollers, racks, etc.), with no hard to get to (debris catching) areas. Surfaces that are porous, trap debris, or are badly damaged should be replaced. Wood, for example, is porous and can trap moisture. Welds should be smooth and not "bobbly".
4.06.10b	Is there a documented cleaning program, with records, for the grading and packing tables that includes the frequency of cleaning and sanitizing, the procedures used and the strength test records of anti-microbial solution used to sanitize surfaces?	5	There should be evidence of a sanitation program in place for the grading and packing tables, bins, picking carts, etc. The program should state the frequency of cleaning and sanitizing and the procedures.
4.06.11	Are re-useable containers (e.g. buckets, field totes, lugs, bins) used in the harvesting operation? If No, go to 4.06.12.	0	This refers to any re-useable containers used in the harvesting operation (e.g., buckets, field totes, lugs, bins, gondolas, etc.) used in the harvesting operation.
4.06.11a	Does the design and condition of re-useable containers (e.g., smooth surfaces, smooth weld seams, nontoxic materials, no wood, no fabric) facilitate effective cleaning and maintenance?	10	All re-useable containers (e.g., totes, bins, buckets, etc.) should be made of easy to clean, smooth seamed materials that do not flake or oxidize. Efforts should be made to eliminate wooden surfaces because of its porous nature.
4.06.11b	Is there a documented cleaning program, with records, for the reusable containers that includes the frequency of cleaning and sanitizing, the procedures used and the strength test records of anti-microbial solution used to sanitize surfaces?	5	There should be evidence that a sanitation program is in place for re-useable containers, and records to verify. The program should state the frequency of cleaning and sanitizing and the procedures.
4.06.11c	Are re-useable containers free from any handling contamination?	10	Re-useable containers used in the harvesting process should be managed to eliminate contamination from inappropriate handling practices.
4.06.12	Are tools (e.g. knives, clippers, scissors, etc.) used in harvesting? If No, go to 4.06.13.	0	This refers to harvest tools (e.g. knives, clippers, scissors, etc.) used in harvesting.
4.06.12a	Does the design and condition of harvest tools (e.g., smooth surfaces, smooth weld seams, nontoxic materials, no wood, no fabric) facilitate effective cleaning and maintenance?	5	To prevent foreign contamination issues, harvest tools (e.g., knives, coring rings, etc.) should be constructed of easy to clean materials. Tools should be shard free, and smooth seamed so that they do not have the ability to flake or oxidize.

HARVEST PRACTICES (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.06.12b	Are harvest tools free from exposure to the ground and/or any handling contamination?	5	Harvest tools (e.g., knives, clippers, scissors, coring rings, holsters, etc.) should be free from exposure to the ground and/or any handling contamination.
4.06.12c	Is there a tool accountability, storage and control program for knives and similar cutting hand tools used in the harvest area when not in use?	5	There should be an accountability, storage and control program in place for knives and similar cutting hand tools to identify potential product contamination. Tool accountability should include the inspection of the cutting surfaces for wear and tear, as well as a tool inventory check at the start and end of each shift. Workers should not be taking tools, such as knives, from the work area and should be required to use knife scabbards that can easily be cleaned i.e. non-porous. Leather scabbards should not be used.
4.06.12d	Is there a documented cleaning program, with records, for the harvest tools that includes the frequency of cleaning and sanitizing, the procedures used and the strength test records of anti-microbial solution used to sanitize surfaces?	5	There should be evidence that a sanitation program is in place for harvesting tools, including records to verify. The program should state the frequency of cleaning and sanitizing and the procedures. Dipping of harvest tools in an anti-microbial solution during the harvesting process might also be required.
4.06.12e	Are harvesting tool dips being maintained properly in terms of anti-microbial solution strength and are records of the solution checks being maintained? AUDITORS SHOULD REQUIRE A TEST AT THE TIME OF THE AUDIT.	5	There should be records to show that the knife dip solutions are being maintained on a regular basis. The strength of the sanitizers should be checked on a regular basis (e.g., hourly) and recorded, with a minimum strength for a chlorinated system of >1ppm free chlorine or >650mV. Total chlorine does not measure the “available chlorine” after the tool dip has started to be used. AUDITORS ARE INSTRUCTED TO REQUIRE A TEST AT THE TIME OF THE AUDIT.
4.06.13	Is machinery used in the harvesting process? If No, go to 4.06.14.	0	This includes equipment with the potential to affect product (e.g., conveyor belts, mechanical harvesting units, field packing rigs, coring rigs and any “in-field” processing rigs). Please note that there are some more specific questions for coring rigs and any “in-field” processing rigs in a later section.
4.06.13a	Are food contact equipment surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g., tape, string, cardboard, etc.)?	15	Food contact surfaces on equipment should be free of flaking paint, corrosion, rust, and/or unhygienic materials, as they can pose foreign material and/or microbiological hazards. Food contact surfaces should be made of non-toxic, non-porous materials. Surfaces should be maintained in good condition.
4.06.13b	Are food contact equipment surfaces clean?	15	Unsanitary food contact surfaces can directly lead to contamination of the product. Food debris, bio films, excessive dust, etc., should be cleaned off equipment.

HARVEST PRACTICES (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.06.13c	Are non-food contact equipment surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g., tape, string, cardboard, etc.)?	10	Flaking paint, corrosion, rust and/or unhygienic materials should not be present on any surfaces. Where possible, equipment framework is not penetrated by bolts or studs.
4.06.13d	Are non-food contact equipment surfaces clean?	10	Unsanitary non-food contact surfaces can indirectly lead to contamination of the product. Food debris, bio films, excessive dust, etc., should be cleaned off equipment.
4.06.13e	Does the design and condition of the equipment (e.g., smooth surfaces, smooth weld seams, nontoxic materials, no wood) facilitate effective cleaning, sanitation and maintenance?	5	Equipment should be made of appropriate materials that can be easily cleaned and maintained, that are not porous or toxic and can withstand the cleaning process. Equipment should be designed to allow access and easy cleaning (including hollow structures on supports, rollers, racks, etc.), with no hard to get to (debris catching) areas. Surfaces that are porous, trap debris, badly damaged should be replaced. Wood, for example, is porous and can trap moisture. Welds should be smooth and not “bobbly”.
4.06.13f	Is there a documented cleaning program, with records, for the harvest equipment that includes the frequency of cleaning and sanitizing, the procedures used and the strength test records of anti-microbial solution used to sanitize surfaces?	5	There should be evidence of a sanitation program in place for harvesting equipment, with records to verify. The program should state the frequency of cleaning and sanitizing and the procedures. Frequency should reflect the type of machinery, type of harvesting practice and the risk associated with the crop involved. For “in-field” processing, clean and core, etc., at least daily cleaning should be performed.
4.06.13g	Is equipment designed and used properly to minimize product contamination (e.g., drip pans utilized, dedicated tractor pathways)?	5	Overhead contamination from materials such as hydraulic fluid can result in product and packaging contamination, and therefore, equipment should be fitted with catch pans. Dedicated tractor pathways should also be used to minimize product contamination.
4.06.13h	Is there written documentation showing that only food grade lubricants are used on the critical parts of the harvesting machinery that have the potential to contaminate product?	3	In order to prevent or reduce contamination to product/packaging, food grade lubricants (i.e. incidental food contact compounds or H1 materials) should be used on critical areas of the equipment where product exposure exists. Proof must be available that food grade lubricants are being used.
4.06.13i	Are all glass issues on harvesting machines, in-field trucks, and tractors protected in some manner?	3	Glass located on the harvesting machinery (e.g., lights, night lights) that may pose a threat of contamination onto product, packaging, and re-useable containers should be protected. Machinery includes tractors and other equipment that may come into contact with product. There should be no evidence of cracked lenses.

HARVEST PRACTICES (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.06.13j	Are all platforms above product, packaging, or food contact surfaces (e.g., belts) on the harvest machinery and in-field trucks fitted with protection to prevent product contamination?	3	Overhead contamination of exposed product areas can result in microbiological, chemical and/or physical contamination. Measures should be taken to eliminate or reduce potential contamination by placing protection on areas of equipment above product, food contact surfaces, and belts.
4.06.14	Is water used directly on product contact (e.g. re-hydration, core in field)? If No, go to 4.06.15.	0	This refers to water that is used directly on product contact. Examples may includes but are not limited to re-hydration, core in field.
4.06.14a	Are there specific Standard Operating Procedures (SOPs) for the monitoring, testing and changing of recirculated and batch water systems (e.g., dump tanks) and for monitoring water temperature?	10	There should be specific SOPs describing the process of changing the water systems and monitoring the water temperature. The water temperature should be appropriate for the products and processes being performed.
4.06.14b	Are there records of visual monitoring, testing and changing of recirculated and batch water systems (e.g., dump tanks) and water temperature checks (where relevant)?	5	There should be records of visual monitoring, testing and changing of recirculated and batch water systems and water temperature checks (where relevant).
4.06.14c	Is there a specific Standard Operating Procedure (SOP) that clearly details the anti-microbial parameters in water systems (single pass and recirculated/batch water systems) and are they correct for the type of anti-microbial being used?	10	There should be a specific SOP describing the process of performing and recording anti-microbial strength testing in water systems. Anti-microbial standards should be indicated in an SOP and/or on the recording documentation. For chlorine, the criteria should be >1ppm free chlorine or ORP >650 mV for recirculated/batch water systems. Total chlorine records are not viewed as acceptable for recycled water systems. Single pass systems must have a stated anti-microbial level. Other anti-microbials include ozone, peracetic acid, etc.
4.06.14d	Are there records (with corrective actions) that show anti-microbial (e.g., free chlorine, ORP, peroxyacetic acid) strength testing of wash water prior to start up and throughout the run?	10	Water systems using anti-microbial agents should have records showing that the strength of the solution is within stated parameters. For "single pass" systems, this should be every batch of anti-microbial solution that is mixed. Recirculated/batch water systems should be checked hourly by measuring the "free anti-microbial" as opposed to bound microbial (e.g., testing for free chlorine (or ORP) as opposed total chlorine). Where out of specification results are recorded, there should be corrective action records, including root cause analysis and preventive actions (where relevant).

HARVEST PRACTICES (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.06.14e	Does the operation use the appropriate test strips, test kits or test probes for verifying the concentrations of anti-microbial chemicals (e.g., postharvest product contact water, dip stations, etc.) being used, are they in operational condition and are they being used correctly?	15	The strength (concentration, pH, etc.) of anti-microbial chemicals should be checked on a regular basis and recorded. All test solutions/ strips should be within date code, appropriate for the concentrations used and stored correctly. If the ORP meter controls the pumps that are injecting the anti-microbial and/or buffer, there should be an independent calibrated ORP probe or other method (e.g., test strip papers, titration) in order to verify injector readings.
4.06.15	Is the harvested product “in-field processed” or “in-field semi-processed” (e.g., core in field, top & tail, florets)? If No, go to 4.06.16.	0	“In field processed” products are subject to all the questions in this audit and these extra requirements below. “In field processed” usually refers to product who having multiple cuts surfaces created in the field (e.g., coring in field, topping & tailing, florets).
4.06.15a	Where harvested product is “in-field processed” or “in-field semi-processed,” does the process flow, machine layout, worker control, utensil control, etc. ensure that processed products are not contaminated by unprocessed products?	5	The design, worker management, utensil management and general practice should avoid contact between processed and unprocessed product, contact surfaces and tools.
4.06.15b	Are all plastic bin liners closed immediately after harvest to avoid contamination of the harvested product?	3	All plastic bin liners should be closed immediately and appropriately secured after harvest to avoid product contamination.
4.06.16	Are transport vehicles (e.g., forklifts) clean, are not a source of contamination and are being used in a sanitary manner?	5	Transport vehicles (e.g., forklifts) should be part of the sanitation program, maintained clean and not allowed to be a vector of cross contamination.
4.06.17	Is there any post-harvest treatment performed to the product in the field? If No, go to 4.07.01.	0	This refers to use of post harvest chemicals on product.
4.06.17a	Are there up to date records of all pesticides applied in the field to the harvested product? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	The operation should follow a pesticide application record keeping program for all postharvest treatments that at least includes the following: Date and time of application, treated product, brand/product name, EPA (or equivalent) registration information, active ingredient, amount applied (rate/dosage), applicator name, restricted entry interval, and type of equipment.

HARVEST PRACTICES (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.06.17b	Do records show that pesticides applied postharvest and their use are in compliance with all requirements of label direction, national (e.g., EPA) registration and any federal, state or local regulations and guidelines? A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE	15	Grower should have information for the registered and/or authorized by governmental agencies in the country of production for the target crops in the postharvest period, in accordance with label directions . Information should at least detail: ingredients, target pest(s)/organism(s) or diseases, application methods that are required or preferred, how much chemical should be applied, rate of application, whether there are any restrictions on use (such as temperature, time of day, season of the year, contamination of sensitive areas, exposure of non-target species, application methods that are prohibited, how often the pesticide should or may be applied, all restricted entry intervals (REIs) pertaining to existing uses (as applicable), maximum application rates per treatment and per year, pre-planting intervals (PPIs), pre-harvest intervals(PHIs) and storage and disposal guidelines. N/A is only allowed when registration/authorization information does not exist for pesticides to be used in the postharvest period for the target crops in the country of production. Where registration information exists, and it is not available at the growing operation, then an automatic failure of the audit will result.
4.06.17c	For those pesticides that are registered and/or authorized by a government agency for use in the postharvest period to the target crops in the country of production or are not registered for use in the postharvest period on target crops in the country of production (if the country does not have or has a partial legislative framework to cover pesticides), can the grower show that they have registration information, label information, MRL tolerances, etc. for the country of destination? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	Grower should be aware of the pesticides registered and/or authorized by a government agency for use in the target crops in the country of production. Where the country of production does not have or has a partial legislation covering pesticides, and if the use of pesticides that are registered for the target crop in another country (extrapolation) is not prohibited, the grower must have information for the pesticides in the country(ies) of destination. The information must show: registration for the specific crop, product labels, Maximum Residue Limit (MRL) tolerances and may also include banned chemical lists, and any other relevant guidelines or legislation. If there are no postharvest treatments being used in this situation, the question is not-applicable. If there is no information available for the postharvest treatments used that are not registered in the country of production, or its use based on registration, label and other legislation of the destination country, extrapolation is prohibited by the country of production, and an automatic failure of the audit will result.
4.06.17d	Where products are destined for export, are there records showing that application rates are sufficient to meet MRL entry requirements of the country of export? Records show any non-compliant product is diverted to a market where it meets requirements. ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	10	There are records showing that application rates are sufficient to meet MRL entry requirements for the country of export. Records show that any non-compliant product is diverted to a market where it meets their requirements. Any records of pesticide chemical residue testing results show residues on products do not exceed the published Maximum Residue Limits (MRL) in the destination market(s) and if so, corrective actions have been taken and documented.

TRANSPORTATION AND TRACKING			
Question No.	Question	Total Points	Expectation
4.07.01	Are the vehicles transporting fresh produce from field to facility limited to this function only, maintained in proper condition, and adequate for the purpose?	5	Vehicles transporting product should be limited to this function only and should be adequate for transporting produce . Vehicles should be in a good state of repair, clean, odor free, free from personal items, and free from chemical and microbiological contamination. If loads are tied down, tarps, belts, ropes, etc., should also be in good working order, without contamination risk to product.
4.07.02	Is there a system in place to track product from the farm? If No, go to 4.08.01.	15	There should be a tracking system in place to ensure that product can be traced back to each exact growing location and harvest date (e.g., grower identification, farm identification, block, harvesting date, etc.).
4.07.02a	If product is being packed in the field, are the cartons, boxes, RPCs or any other packaging material used, identified with the harvesting date and growing location information? This question does not apply for raw material/ bulk product destined for further handling in a packinghouse or processing facility.	10	For finished goods packed in the field, there should be date coding on each external package, such as cartons, boxes, reusable plastic containers or any other. The information should be enough to identify the date of harvest and the exact location of where the product was grown. This question is not-applicable for raw material/bulk product destined for further handling in a packinghouse or processing facility.
4.07.02b	If product is being packed in the field and individual packing units are used (e.g., clamshells, bags, baskets or others), are these individual units identified with the harvesting date and growing location information? This question does not apply for raw material/ bulk product destined for further handling in a packinghouse or processing facility.	10	For finished goods packed in the field, there should be date coding on each individual unit package, as clamshells, bags, baskets or others. The information should be enough to identify the date of harvest and the exact location of where the product was grown. This question is not-applicable for raw material/bulk product destined for further handling in a packinghouse or processing facility.

ON SITE STORAGE			
4.08.01	Is there an on-site storage for items and/ or equipment used in the harvesting process (e.g., packing material, cartons, clamshells, re-usable containers, disinfectants, grading/ packing tables, RPCs, harvesting equipment, etc.)?	0	Information gathering question. This question refers to an on-site storage for items and/or equipment used in the harvesting process (e.g., packing material, cartons, clamshells, re-usable containers, disinfectants, grading/packing tables, RPCs, harvesting equipment, etc.).

ON SITE STORAGE (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.08.01a	Is on-site storage for items and/or equipment used in the harvesting process (e.g., packing material, cartons, clamshells, re-usable containers, disinfectants, grading/packing tables, RPCs, harvesting equipment, etc.) clean and secure?	10	On-site storage (including inside vehicle storage) for items and/or equipment used in the harvesting process should be secure, clean, and maintained properly to reduce pest and foreign material contamination.
4.08.02	Are packaging, containers, and harvesting equipment stored to prevent cross contamination (this includes RPCs, cartons, clamshells, bins, and other harvesting type of containers that are single use or reusable, etc.)?	5	Packaging, containers, etc., should be stored away from farm chemicals, sanitizers, fertilizers, etc. All packaging materials should be stored off the ground (i.e. on racks, pallets, shelves, etc). Cartons and other packing materials should be properly protected during storage to prevent contamination.
4.08.03	Are there cleaning logs for the storage area(s)?	5	All storage areas should have a sanitation program in place and there should be records of the cleaning and sanitation activities performed, including areas cleaned, dates and person performing the activity.
4.08.04	Is there an effective pest control program in place for fixed location storage areas?	15	There should be an effective, proactive pest control program (in-house or contracted) to control rodents (also insects, reptiles and birds where necessary) and prevent infestation in all fixed (permanent/dropped in place) storage areas.
4.08.04a	Are pest control devices located away from items and/or equipment used in the harvesting process (e.g., packing material, cartons, clamshells, re-usable containers, disinfectants, grading/packing tables, RPCs, harvesting equipment, etc.), and poisonous rodent bait traps are not used inside the storage areas?	5	Pest control devices should be located away from items or equipment with food contact surfaces to prevent any physical or microbial contamination. Poisonous rodent bait traps should not be used inside any storage areas.
4.08.04b	Are pest control devices maintained in a clean and intact condition and marked as monitored (or bar code scanned) on a regular basis?	5	All pest control devices should be maintained clean, in working condition and replaced when damaged in order to accomplish their intended use. Date of inspections (at least monthly) should be posted on the devices as well as kept on file (unless barcode scanned).
4.08.04c	Are pest control devices adequate in number and location?	5	The location of the traps should be based on a risk assessment of the storage area and surrounding area. Traps should always be placed at both sides of doorways.
4.08.04d	If storage areas are fully enclosed, are measures taken to prevent pest entry?	5	Fully enclosed storage buildings should have measures in place to prevent pest entry (i.e. pest proof doors, screened openings, etc.). Main doors should be kept closed unless in use.

ON SITE STORAGE (CONTINUED)			
Question No.	Question	Total Points	Expectation
4.08.04e	Are all pest control devices identified by a number or other code (e.g., barcode) ?	5	All traps should be clearly identified (e.g., numbered) to facilitate monitoring and maintenance. All traps should be located with wall signs (that state the trap number and also that they are trap identifier signs).
4.08.04f	Are all pest control devices effective and bait traps secured?	5	All traps should be correctly orientated with openings parallel with and closest to walls. Bait traps should be locked and tamper resistant in some way (e.g., locks, screws, etc.). Bait traps should be secured to prevent removal and only block bait (no pellets) should be used. If mounted on slabs, then wall signs should be used to aid location.
4.08.04g	Is there a schematic drawing/ plan of the storage area showing numbered locations of all pest monitoring devices , both inside and outside the storage area?	5	A schematic drawing or trap map is on file, current, and details internal and external traps. All devices should be numbered and clearly identified on the map. Map numbers should match physical placement. The document should be accurate, dated and should show the type of device.
4.08.04h	Are service reports created for pest control checks detailing inspection records, application records, and corrective actions of issues noted (in-house and/or contract)?	5	Service reports from the contract pest control company should be available for review if pest control is contracted out. In-house inspection records should be available for review if pest control is conducted in-house. Records should include service(s) performed, date of service, chemicals used, signs of activity, corrective actions and trend reports.

WHERE LAWS, COMMODITY SPECIFIC GUIDELINES AND/OR BEST PRACTICE RECOMMENDATIONS EXIST AND ARE DERIVED FROM A REPUTABLE SOURCE, THEN THESE PRACTICES AND PARAMETERS SHOULD BE USED. AUDIT USERS SHOULD ALLOW A DEGREE OF RISK ASSOCIATION IF LAWS, GUIDELINES, BEST PRACTICES, ETC., HAVE NOT BEEN DOCUMENTED.