

### General Description of Changes to Module 4

1. Changes to question numbers
2. Separated question about cleaning procedure and logs into 2 questions for harvest equipment/tools
3. Post Harvest Pesticide question rewritten for clarity
4. Added questions about pesticide application procedures and individuals applying & making decisions about pesticides

PrimusGFS v3.2 Summary of Changes				
Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.01.02		No change in v3.2	There should be written food safety policy rules regarding worker and visitor personal hygiene, GAPs and health requirements. <b>The policy should cover the rules related to hygiene and health (e.g., hand washing, eating/drinking, smoking, specific clothing rules, foreign material issues, cuts/wounds, illness rules, etc.), no infants and toddlers allowed in the growing area, what to do in the case of evidence of animals and/or fecal matter in the growing and/or storage areas, and what to do in the case of dropped product, and if the product comes into contact with blood or other bodily fluids.</b> All workers should be issued a list of rules in the relevant languages and confirm by signing they understand and agree to abide.	<p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of errors and omissions in <b>the food safety</b> hygiene and health policy.</li> <li>• <b>The policy is</b> not in the relevant language(s).</li> <li>• Single/isolated instance(s) of workers and visitors not being trained or not signing a document stating that they will comply with the operations' personal hygiene and health policies.</li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of errors and omissions in the records or food safety hygiene and health policy.</li> <li>• Numerous cases of workers and visitors not signing a document stating that they will comply with the operations' personal hygiene and health policy.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• No records <b>are available</b>.</li> <li>• No specific orientation given before starting work or within the first month.</li> <li>• Failure to maintain records.</li> <li>• The company does not have a document for workers and visitors to sign stating that they will comply with the operations' personal hygiene and health policies.</li> <li>• Fundamental failure of workers and visitors to sign <b>a document</b> stating that they will comply with the operations' personal hygiene and health policies.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.02.01		No change in v3.2	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 (not just checked ✓ or all Y/N), 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 down score if another audit checklist is used, as long as all areas are covered. See 1.04.01 for specific details..	<p>Total compliance (15 points): There should be records of the internal audits performed at each operation, with the frequency defined in the internal audit program. Frequency depends on the type and size of the operation. The records should include the date of the audit, name of the internal auditor, justification for the answers (not just checked ✓ or all Y/N), detail any deficiencies found and the corrective action(s) taken. An audit checklist (ideally PrimusGFS) should be used that covers all areas of the PrimusGFS audit, including growing area, storage area, worker amenities, external areas, worker practices, etc. No down score if another audit checklist is used, as long as all areas are covered. See also 1.04.01 for specific details.</p> <p>Frequency Details for Farm, Indoor Agriculture and Harvest Crew: at least a pre-season growing area assessment and a full GAP self-assessment during harvest season covering growing and harvesting operations should be on file. If growing and harvest activities are under the same organizational authority the self-assessment should be on file covering both growing and harvesting and conducted during the harvest season. A harvesting company not under the authority of a grower should have self-assessments on file during harvest season covering each type of harvest process utilized for the crew(s), i.e. crew can harvest product in-field semi-processing and bulk/final packing in the growing area. A more frequent self-assessment frequency should be used depending on the crop type, farm or indoor agriculture location, any associated risk pressures, and/or if required by any national, local or importing country legal requirements, or customer requirements. These factors will also affect the need for pre-harvest inspections. Farm(s), indoor agriculture growing area(s), storage, harvesting, worker and visitor hygiene, agricultural water sources, training program, etc., and all associated paperwork should be included.</p> <p>Minor Deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of follow up/corrective actions not noted.</li> <li>• Single/isolated instance(s) of incomplete answers or missing records.</li> <li>• Single/isolated instance(s) of areas/issues missing on the inspection.</li> </ul> <p>Major Deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of follow up/corrective actions not noted.</li> <li>• Numerous instances of incomplete answers or missing records.</li> <li>• Inspection frequency is not adequate relative to the type of business and the number of issues that require monitoring.</li> <li>• Numerous instances of areas/issues missing on the inspection.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• Fundamental failure to maintain records.</li> <li>• Fundamental failure to complete inspection records with detailed responses.</li> <li>• No documented internal audits have been performed.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.02.02		No change in v3.2.	A pre-harvest block inspection should have been performed <b>no more than 7 days prior to harvest</b> and if harvesting is occurring, it should show if there are any harvesting restrictions, etc. (e.g. evidence of animal intrusion, changes in weather conditions or weather events, pesticide application events) 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 there are no pre-harvest inspections, go to 4.02.03.	Total compliance (5 points): A pre-harvest block inspection should have been performed <b>no more than 7 days prior to harvest</b> and if harvesting is occurring, it should show if there are any harvesting restrictions, etc. (e.g. evidence of animal intrusion, changes in weather conditions or weather events, pesticide application events). 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 there are no pre-harvest inspections, go to 4.02.03.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.03.01		Is there a food safety hygiene training program covering new and existing workers and are there records of these training events?	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 <b>before starting work</b> and then some topics covered at least quarterly, but ideally monthly. These trainings should cover food safety and hygiene <b>policies and basic food safety and hygiene topics</b> , 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, <b>and correcting and reporting problems</b> . 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.	<p>Total compliance (15 points): There should be a formal training program to inform all workers of the current policies and procedures and requirements of the company regarding hygiene. Trainings 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 <b>before starting work</b> then some topics covered at least quarterly, but ideally monthly. Full annual food safety refresher training sessions are encouraged but do not replace the ongoing more frequent training. Training material covering the content of the company policies and requirements regarding food safety and hygiene <b>(4.01.02) and training</b> should cover food safety and hygiene topics (e.g. toilet use, hand washing, protective clothing (where applicable), recognizing and reporting injury and illness, blood and other bodily fluids, jewelry, dropped product, animal intrusion, food consumption/taking breaks, foreign material requirements, food defense, etc.), <b>the importance of recognizing and detecting food safety and/or hygiene issues with co-workers and visitors, and all food safety or hygiene issues for which they are responsible (e.g. recognizing contaminated produce that should not be harvested, inspecting harvest containers and equipment for contamination issues), correcting problems and reporting problems to a supervisor. Workers should also be trained on any new practices and/or procedures and when any new information on best practices becomes available. There should be records of training with date of training, clearly defined topic(s) covered, trainer(s), material(s) used/given and the names and signatures of workers trained.</b></p> <p>Minor Deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of logs having errors or incomplete information e.g. missing one of the following: training topic, trainer or material information.</li> <li>• <b>Training does not include the importance of recognizing food safety and/or hygiene issues with co-workers and visitors and/or correcting problems and reporting problems to a supervisor.</b></li> <li>• Training has occurred but, on a few occasions, full attendance logs have not been kept and/or not all workers were covered.</li> <li>• Training materials and/or company food safety policy are not in the relevant language(s).</li> <li>• Training occurring, not before starting to work but within the first week.</li> <li>• Single/isolated instance(s) of workers not being trained or not signing a document stating that they will comply with the operations' food safety hygiene program.</li> </ul> <p>Major Deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of logs having errors or incomplete information e.g. missing one of the following: training topic, trainer or material information.</li> <li>• Training has occurred but, on many occasions, full attendance logs have not been maintained.</li> <li>• <b>Up to three key topics e.g. hand washing, reporting injury/illness, blood and other bodily fluids, jewelry, dropped produce, animal intrusion, etc., have been omitted from the training.</b></li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
				<ul style="list-style-type: none"> <li>• Only annual refresher training has occurred, and the operation runs for more than 3 months of the year.</li> <li>• Training occurring, not before starting to work but within the first month.</li> <li>• Numerous instances of workers not being trained.</li> <li>Non-compliance (0 points) if:                             <ul style="list-style-type: none"> <li>• Failure to maintain records.</li> <li>• No records of training or workers not being trained.</li> <li>• More than three key topics e.g. hand washing, reporting injury/illness, blood and other bodily fluids, jewelry, dropped produce, animal intrusion, etc., have been omitted from the training program.</li> </ul> </li> <li>• No specific orientation given or given after the worker has been working for more than one month.</li> </ul>
4.03.02		No change in v3.2	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) material(s) used/given and who attended the training (name and signature).	Total compliance (5 points): 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 and who attended the training (name and signature). Training would also ideally include worker safety issues (e.g., use of personal protective equipment, accident prevention, what to do in case of an accident, procedures for avoiding electrical hazards when cleaning, etc.). Recorded training should occur at least on a 12-month basis.
4.03.03		No change in v3.2	No change in v3.2	Minor deficiency (7 points) if: <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of errors or omissions in procedure.</li> <li>• Single/isolated instance(s) of evidence that workers are unaware of the procedure requirements.</li> </ul> Major deficiency (3 points) if: <ul style="list-style-type: none"> <li>• Numerous instances of errors or omissions in the procedure.</li> <li>• Numerous instances of evidence that workers are unaware of procedure requirements.</li> </ul> Non-compliance (0 points) if: <ul style="list-style-type: none"> <li>• There is not a documented procedure in place.</li> <li>• A procedure is in place, but it has not been communicated to food handlers.</li> </ul>

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4.03.04		No change in v3.2	No change in v3.2	<p>Total compliance (3 points): <b>There should be a disciplinary system in place.</b> A worker non-conformance should be recorded when workers are found <b>not following food safety requirements.</b> The auditee should have a record for worker non-compliance, corrective actions and evidence that retraining has occurred (where relevant). Auditee records might be viewed as confidential, and therefore, a verbal confirmation should be gained. There might be a tier system, which includes re-training, verbal and written disciplinary actions and allowance for immediate termination for gross misconduct.</p> <p>Minor Deficiency (2 points) if:</p> <ul style="list-style-type: none"> <li>• <b>Single/isolated instance(s) of follow up/corrective action not noted.</b></li> </ul> <p>Major Deficiency (1 point) if:</p> <ul style="list-style-type: none"> <li>• <b>Numerous instance(s) of follow up/corrective actions not noted.</b></li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• <b>No records or no disciplinary system.</b></li> <li>• <b>Widespread failure to record follow up/corrective actions.</b></li> </ul>
4.05.01	4.04.01	No change in v3.2	<p><b>Toilet facilities should be available to all workers and visitors, while work is actively occurring.</b> At least one toilet per 20 workers should be provided, or if more stringent, as per prevailing national/local guidelines. <b>Toilet facility placement</b> should be within 1/4 mile or 5 minutes walking distance of where workers are located, <b>or if more stringent, as per prevailing national/local guidelines.</b> A 5 minute drive is not acceptable, while harvesting is actively occurring with groups of three or more workers. Where there are two or less workers present 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. <b>A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.</b></p>	<p>Total compliance (15 points): <b>Toilet facilities should be available to all workers and visitors, while work is actively occurring.</b> At least one toilet per 20 workers should be provided, or if more stringent, as per prevailing national/local guidelines. <b>Toilet facility placement</b> should be within ¼ mile or 5 minutes walking distance of where workers are located, <b>or if more stringent, as per prevailing national/ local guidelines.</b> A 5-minute drive is not acceptable, while harvesting is actively occurring with groups of three or more workers. Where there are two or less workers present and workers have transportation that is immediately available to toilets within a 5-minute drive, it is acceptable to score as total compliance. Reference: United States Department of Labor 1928 Title Field Sanitation <a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1928/1928.110">https://www.osha.gov/laws-regs/regulations/standardnumber/1928/1928.110</a></p> <p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• <b>The toilet facilities are not within ¼ mile or 5 minutes walking distance for crews of three or more.</b></li> <li>• <b>The toilet facilities are not within a 5-minute driving distance for crews of two or less.</b></li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• <b>The operation is not meeting the 1 toilet per 20 workers criteria.</b></li> </ul> <p>Automatic failure (0 points) if:</p> <ul style="list-style-type: none"> <li>• <b>There are insufficient or inadequate toilet facilities.</b></li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.05.01a	4.04.01a	No change in v3.2	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 and have a minimum 15 ft (4.5 m) buffer distance in the event of a spill or leak. If pit toilets are used, consider proximity to crop and water sources.	Total compliance (15 points): 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 and have a minimum 15 ft (4.5 m) buffer distance in the event of a spill or leak. If pit toilets are used, consider proximity to crop and water sources.
4.05.01b	4.04.01b	Are toilet facilities designed and maintained to prevent contamination (e.g., free from leaks and cracks)?	Toilet facilities 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). Each toilet should be ventilated to outside air. Pit toilets cannot be considered to be properly designed to prevent contamination.	<p>Total compliance (5 points): Toilet facilities 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). Each toilet should be ventilated to outside air. Note: pit toilets cannot be considered to be properly designed to prevent contamination.</p> <p>Minor deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Single observation of one of the waste holding tank(s) not designed or maintained improperly.</li> <li>• Single observation of toilet facility not being well maintained (e.g. cracks, holes, leaks) or not vented to outside air.</li> </ul> <p>Major deficiency (1 point) if:</p> <ul style="list-style-type: none"> <li>• More than one observation of the waste holding tank(s) designed or maintained improperly.</li> <li>• More than one observation of a toilet facility not being well maintained (e.g. cracks, holes, leaks) or not vented to outside air.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• Waste holding tank(s) poses a risk of contamination to the growing area, product, packaging, and equipment, such as observing leaks or being improperly constructed.</li> <li>• Failure to provide adequately maintained toilet facilities.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.05.01c	4.04.01f	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?	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.	Total compliance (5 points): 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 should include a response plan for major leaks or spills, as well as 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.
4.05.01d	4.04.01c	Are toilet facilities constructed of materials that are easy to clean?	Toilet facilities should be constructed of non-porous materials that are easy to clean and sanitize. The floors, walls, ceiling, partitions and doors should be made of a finish that can be easily cleaned.	Minor Deficiency (2 points) if: <ul style="list-style-type: none"> <li>• Single/isolated instance of toilet facilities not being constructed of non-porous materials.</li> </ul> Major Deficiency (1 point) if: <ul style="list-style-type: none"> <li>• Numerous instances of toilet facilities not being constructed of non-porous materials.</li> </ul> Non-compliance (0 points) if: <ul style="list-style-type: none"> <li>• Toilet facilities are not constructed of non-porous materials.</li> </ul>
4.05.01e	4.04.01d	Are the toilet facility materials constructed of a light color allowing easy evaluation of cleaning performance?	Toilet facilities should be constructed of materials light in color, allowing easy evaluation of cleaning performance.	Total compliance (3 points): Toilet facilities should be constructed of materials light in color, allowing easy evaluation of cleaning performance.



Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.05.01f	4.04.01e	Are toilet facilities 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)?	No change in v3.2	No change in v3.2
4.05.01g	4.04.01g	Are toilet facilities and hand washing stations clean and are there records showing cleaning, servicing and stocking is occurring regularly?	No change in v3.2	<p>Minor deficiency (7 points) if:</p> <ul style="list-style-type: none"> <li>•Single/isolated instance(s) of non-compliance to above requirements.</li> <li>•Single/isolated instance(s) of soiled toilet tissues being placed in trash can.</li> <li>•Single/isolated instance(s) of incomplete or missing records.</li> </ul> <p>Major deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>•Numerous instances of non-compliance to the above requirements.</li> <li>•Widespread observation of soiled toilet tissues being placed in trash cans.</li> <li>•Numerous instances of incomplete or missing records.</li> </ul>
4.05.02		Is the harvesting area free from any evidence of human fecal contamination? <b>ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.</b>	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. <b>ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.</b>	<p>Total compliance (15 points): 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. <b>Any evidence of human fecal matter in the harvesting or associated area is an automatic failure.</b></p> <p>Automatic Failure (0 points) if:</p> <ul style="list-style-type: none"> <li>• There is a single incidence of human fecal matter found in the harvesting or associated area.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.05.03	4.04.02	No change in v3.2	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.	Total compliance (5 points): 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 visibly 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.
4.05.04	4.04.03	No change in v3.2	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 within 1/4 mile or 5 minutes walking distance of where workers are located. <b>A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.</b>	Total compliance (15 points): 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. Hands free is an optimum system. Hand washing stations should be visible and located within close proximity of toilet facilities, and within 1/4 mile or 5 minutes walking distance of where workers are located.
4.05.04a	4.04.03a	No change in v3.2	No change in v3.2	No change in v3.2
4.05.04b	4.04.03b	No change in v3.2	No change in v3.2	No change in v3.2
4.05.04c	4.04.03c	No change in v3.2	No change in v3.2	No change in v3.2
4.05.04d	4.04.03d	No change in v3.2	No change in v3.2	No change in v3.2
4.05.05	4.04.04	No change in v3.2	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. Water samples should be taken from as close to the point of use as is practical e.g. hand wash spigot/faucet. If there are multiple hand wash units, then samples should be taken from a different location each test (randomize or rotate locations). If there are multiple sources for hand wash water, testing should also account for each source used.	Total compliance (15 points): 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. Water samples should be taken from as close to the point of use as is practical e.g. hand wash spigot/faucet. At least one sample per source is required. If there are multiple hand wash units, then samples should be taken from a different location each test (randomize or rotate locations). If there are multiple sources for hand wash water, testing should also account for each source used.

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4.05.05a	4.04.04a	No change in v3.2	No change in v3.2	No change in v3.2
4.05.05b	4.04.04b	No change in v3.2	No change in v3.2	No change in v3.2
4.05.05c	4.04.04c	No change in v3.2	No change in v3.2	Minor Deficiency (10 points) if: • Single/isolated instance(s) of records showing <b>unsuitable or</b> abnormal test results for total coliforms without adequate documented corrective actions. Major Deficiency (5 points) if: • Numerous instances of records showing <b>unsuitable or</b> abnormal test results for total coliforms without adequate documented corrective actions.
4.05.06	4.04.05	No change in v3.2	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.05.07	4.04.06	No change in v3.2	<p>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 dips (if used) should contain a food grade sanitizer at a determined concentration. Refer to hand sanitizer manufacturer label for dilutions. Hand dips should be regularly monitored (recorded anti-microbial strength checks) to ensure their effectiveness with corrective actions recorded (e.g. dip solution replenishment and anti-microbial additions). Hand gel / spray stations should be well stocked and tested regularly to ensure they are at the required strength - checks should be recorded. The auditor should check that gel pack type stations are stocked and have the auditee check the strength of anti-microbial chemicals in hand dips. Strength checks do not need to be performed for commercially purchased sanitizers that have been purchased already mixed.</p>	<p>Total compliance (5 points): Secondary hand sanitation is required for items that may be “ready-to-eat” (e.g., herbs, stone fruit, tomatoes, citrus, 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 non-perfumed/unscented, have 60% to 95% ethanol or isopropanol (benzalkonium chloride is also acceptable) and should be located near hand washing and other easily accessible areas. Hand dips (if used) should contain a food grade sanitizer at a determined concentration. Refer to hand sanitizer manufacturer label for dilutions. Hand dips should be regularly monitored (recorded anti-microbial strength checks) to ensure their effectiveness with corrective actions recorded (e.g. dip solution replenishment and anti-microbial additions). Hand gel / spray stations should be well stocked and tested regularly to ensure they are at the required strength - checks should be recorded. The auditor should check that gel pack type stations are stocked and have the auditee check the strength of anti-microbial chemicals in hand dips. Strength checks do not need to be performed for commercially purchased sanitizers that have been purchased already mixed.</p>
4.05.08	4.04.07	No change in v3.2	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.05.09	4.04.08	Are workers who are working directly or indirectly with food, free from evidence of boils, sores, open wounds and are not exhibiting signs of foodborne illness?	No change in v3.2	Minor deficiency (7 points) if: <ul style="list-style-type: none"> <li>• A single instance of a worker with exposed boils, sores, exposed infected wounds, foodborne illness or any other source of abnormal microbial contamination. There is not a threat of product or packaging contamination.</li> </ul> Major deficiency (3 points) if: <ul style="list-style-type: none"> <li>• More than one instance of workers with exposed boils, sores, exposed infected wounds, foodborne illness or any other source of abnormal microbial contamination. There is not a threat of product or packaging contamination.</li> </ul> Non-compliance (0 points) if: <ul style="list-style-type: none"> <li>• One or more workers are observed working in contact with food, food contact surfaces or packaging that has or have exposed boils, sores, infected wounds, showing signs of food borne illness or any other source of abnormal microbial contamination that is a hazard.</li> <li>• The auditor should consider whether this is adulteration and whether to apply Q 4.05.09 and score an automatic failure.</li> </ul>
4.05.10	4.04.09	Is jewelry confined to a plain wedding band and watches, studs, false eyelashes, etc., are not worn?	No change in v3.2	No change in v3.2
4.05.11	4.04.10	Are worker personal items being stored appropriately (i.e. not in the growing areas(s) or material storage areas)?	No change in v3.2	Total compliance (5 points): 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 defense risks.
4.05.12	4.04.11	No change in v3.2	No change in v3.2	No change in v3.2
4.05.13	4.04.12	No change in v3.2	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.05.14	4.04.14	No change in v3.2	No change in v3.2	<p>Total compliance (5 points): If the operation has taken a decision to establish an outer garment policy based on risks this should consider the following: customer requirements, national and local legal requirements, potential cross contamination and foreign material risks, etc. Outer garments include where applicable: smocks, aprons, sleeves, <b>non-latex</b> gloves, etc. Suitable clothing is required for workers handling products that are potentially ready-to-eat (e.g., tomatoes, leafy greens, etc.). Items should be laundered in-house or by contract laundering agency. Individual workers should not take protective outer garments home for cleaning. Where items are laundered in-house the auditee should have documented SOP and GAP rules about how these garments are cleaned. Glove policy should be clear to workers – auditors will establish policy before making scoring decisions and note this policy for the audit report. Gloves are not allowed to replace hand-washing requirements. Gloves should be changed after break periods, using toilet facilities, any activity other than handling of food items or when gloves are soiled, torn or otherwise contaminated. If re-useable gloves are used, then they should be made of material that can be readily cleaned and sanitized, clean gloves should be issued at least daily and as needed throughout the day and stored properly in-between uses. Gloves should not be taken home for cleaning. Where gloves are used they should be non-latex (e.g. vinyl, nitrile, etc.). This includes gloves in first-aid kits.</p> <p>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. <b>Foot protection should also be considered where it could lead to contamination of the product (e.g., during watermelon harvest where workers stand inside harvest bins/trailers/buses); auditor discretion applies.</b></p>
4.05.15	4.04.13	No change in v3.2	No change in v3.2	No change in v3.2
4.05.16	4.04.15	No change in v3.2	No change in v3.2	No change in v3.2
4.05.16a	4.04.15a	No change in v3.2	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.05.17	4.04.16	No change in v3.2	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. <b>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.</b>	Total compliance (10 points): Fresh potable water meeting the quality standards for drinking water should be provided and placed in locations readily accessible to all workers on-site to prevent dehydration. 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. The term “potable” meaning that the water is of drinking water quality (e.g., the EPA Drinking Water Standard or equivalent). Auditors should verbally verify the source of the water at the time of the audit. 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. <b>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.</b>
4.05.17a	4.04.16a	No change in v3.2	Total compliance (5 points): Single use cups should be provided so that cross contamination issues are avoided from person to person. Examples include <b>single-use cups</b> , drinking fountains, etc. <b>Common drinking cups and other common utensils are prohibited.</b>	Total compliance (5 points): Single use cups should be provided so that cross contamination issues are avoided from person to person. Examples include <b>single-use cups</b> , drinking fountains, etc. <b>Common drinking cups and other common utensils are prohibited.</b>
4.05.18	4.04.17	No change in v3.2	No change in v3.2	No change in v3.2
4.05.19	4.04.18	No change in v3.2	No change in v3.2	No change in v3.2
4.05.20	4.04.19	No change in v3.2	No change in v3.2	No change in v3.2
4.05.21	4.04.20	Are any potential foreign material issues (e.g., metal, glass, plastic) controlled?	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.01	4.05.01	Is the harvest area free from animal presence and/or animal activity (wild or domestic)? If Total Compliance, go to 4.05.02.	Animals can represent potential contamination to the harvesting area, to the crop, to the equipment, etc., and therefore, should not be present in the operations. Evidence of animal presence can include tracks, fecal matter, feathers, etc.	Total compliance (15 points): Animals can represent potential contamination to the harvesting area, to the crop, to the 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	4.05.01a	Is the harvest area free from any evidence of animal fecal matter? <b>A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.</b>	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 (score under 4.05.02).	Minor deficiency (10 points) if: <ul style="list-style-type: none"> <li>• Single/isolated instance of fecal matter found in the harvesting area and a food safety risk assessment was implemented correctly.</li> <li>• A "no harvest zone" is implemented but the radius is less than 5 ft.</li> </ul> Major deficiency (5 points) if: <ul style="list-style-type: none"> <li>• More than one instance of fecal matter found in the audited area and a food safety risk assessment was implemented correctly.</li> <li>• Any instance of fecal matter is found in the audited area and a "no harvest zone" was not implemented.</li> <li>• Any instance of fecal matter is found, and a food safety assessment is not conducted.</li> </ul> Automatic Failure (0 points) if: <ul style="list-style-type: none"> <li>• Any observation of Widespread animal fecal contamination in the audited area is an automatic failure.</li> <li>• Any observation of any human fecal matter in the audited area is an automatic failure. Score under 4.05.02.</li> </ul>
4.06.01b		Question removed		
4.06.02	4.05.03	Is the harvest area free from evidence of infants or toddlers?	No change in v3.2	No change in v3.2
4.06.03		Question removed		
4.06.03a		Question removed		



Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.04	4.05.04	No change in v3.2	<p>Chemicals (i.e., pesticides, sanitizers, detergents, lubricants, etc.) are required to be stored in a well vented, designated (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.</p>	<p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of chemicals not properly stored.</li> <li>• Single/isolated instance(s) of improperly labeled or unlabeled chemical containers.</li> <li>• Single/isolated instance(s) of empty containers either not being stored properly or disposed of properly.</li> <li>• The chemical storage area is not marked to indicate its use.</li> <li>• Single isolated instance(s) of chemicals being used without proper attention to chemical spillage.</li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of improperly stored chemicals.</li> <li>• Numerous instances of improperly labeled or unlabeled chemical containers.</li> <li>• Chemical storage is segregated in an enclosed, designated area, but not locked.</li> <li>• Chemical storage area(s) has inadequate liquid containment systems.</li> <li>• Numerous instances of empty containers either not being properly stored or disposed of properly.</li> <li>• Numerous instances of chemicals being used without proper attention to chemical spillage.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• Failure to properly store chemicals.</li> <li>• There is no designated area for chemicals.</li> <li>• There is a designated area for chemicals, but it is not an enclosed or locked area.</li> <li>• Spilled chemicals found in the chemical storage areas (not cleaned up properly)</li> </ul>
4.06.05	4.05.05	Are "food grade" and "non-food grade" chemicals used appropriately, according to the label and not commingled?	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.06	4.05.06	No change in v3.2 <b>Point change 10 to 15</b>	No change in v3.2	<p>Total compliance (15 points): All water sources that are used for postharvest contact <b>with the edible portion of a crop</b> (e.g., washing, re-hydrating) and product contact surfaces (e.g., cleaning grading or packing tables and harvest tools) <b>should be tested on a routine basis. One sample per water source should be collected and tested prior to use and then at least quarterly thereafter, or at a frequency relative to the associated risks.</b> For commodities under the Leafy Greens Marketing Agreement, one sample per water source should be collected and tested prior to use if &gt;60 days since the last test of the water source. Additional samples shall be collected at intervals of no less than 18 hrs. apart and at least monthly during use. Results of water testing for total coliforms and E. coli should meet the US EPA drinking water microbiological specification. For total coliforms and generic E. coli, there should be negative or &lt; detection limit (MPN or CFU/100mL). If out of specification results are detected, then full details of corrective actions should be noted, including investigations and water retests.</p> <p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• Single instance of water testing not occurring at <b>the required frequency.</b></li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• <b>More than one</b> instance of water testing not occurring at <b>the required frequency</b></li> </ul>
4.06.06a	4.05.06a	No change in v3.2	No change in v3.2	No change in v3.2
4.06.06b	4.05.06b	No change in v3.2	No change in v3.2	<p>Minor Deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• <b>Single instance</b> of records showing solution abnormal test results without adequate documented corrective actions.</li> </ul> <p>Major Deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• <b>More than one</b> instance of records showing solution abnormal test results without adequate documented corrective actions.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• No corrective actions have been performed.</li> </ul>
4.06.07	4.05.07	No change in v3.2	Information gathering question. This question refers to product that is harvested in the <b>growing area</b> and then taken to a facility for handling and/or packing.	Information gathering question. This question refers to product that is harvested and then taken to a facility for handling and/or packing.
4.06.08	4.05.08	Is the product packed in the final packing unit in the <b>growing area</b> ? If No, go to 4.05.09.	Information gathering question. This question refers to product that is harvested in the <b>growing area</b> and then taken to a facility for handling and/or packing.	Total points 0: <b>Information gathering question.</b> This question refers to product packed in the <b>growing area</b> 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.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.08a	4.05.08a	No change in v3.2	No change in v3.2	No change in v3.2
4.06.08b	4.05.08b	Is <b>packing material</b> inspected prior to use and <b>is product and packing material</b> free from handling contamination and exposure to the ground?	Avoid stacking soiled bins on top of each other if the bottom of the bin has had direct contact with soil/ <b>substrate</b> . 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. Crops down scored for exposure to the ground do not include root crops that are grown underground (e.g., carrots, potatoes, <b>onions, garlic</b> , etc.) or crops that are grown <b>with harvested portion in contact with the ground or plastic</b> (e.g., melons). Handling contamination could also be caused by using cloths or towels to remove dirt and/or debris from <b>packaging and/or product, standing on the sides of beds/trays during mushroom harvest, standing in bins of product on field trucks, etc.</b>	<p>Total compliance (10 points): Avoid stacking soiled bins on top of each other if the bottom of the bin has had direct contact with soil/<b>substrate</b>. 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. Crops down scored for exposure to the ground do not include root crops that are grown underground (e.g., carrots, potatoes, onions, garlic, etc.) or crops that are grown <b>with harvested portion in contact with the ground or plastic</b> (e.g., melons). <b>Examples of handling contamination include</b> using cloths or towels to remove dirt and/or debris from <b>packing and/or product, standing on the sides of beds/trays during mushroom harvest, standing in bins of product on field trucks, etc.</b> Automatic failure question 4.05.09 should be used when observing evidence of product or packaging foreign material, hazardous materials or adulteration issues.</p> <p>Minor Deficiency (7 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of packing material <b>or product</b> coming in direct contact with the ground.</li> <li>• Single/isolated instance(s) of packing material not being inspected prior to use.</li> <li>• Single/isolated instance(s) of inappropriate handling practices.</li> </ul> <p>Major Deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of packing material <b>or product</b> coming in direct contact with the ground.</li> <li>• Numerous instances of packing material not being inspected prior to use.</li> <li>• Numerous instances of inappropriate handling practices.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• No inspections of packing material are being performed prior to use.</li> <li>• Widespread failure to keep packing material <b>or product</b> from directly contacting the ground.</li> <li>• Widespread failure to prevent handling contamination.</li> </ul>
4.06.08c	4.05.08c	If packing material <b>is</b> left in the <b>growing area</b> unattended, <b>is it</b> stored secured and protected?	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 <b>growing area</b> unattended.	<p>Total compliance (5 points): 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 <b>growing area</b> unattended. <span style="float: right;">Minor</span></p> <p>Deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of <b>packing material</b> not being stored secure and protected.</li> </ul> <p>Major Deficiency (1 point) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of <b>packing material</b> not being stored secure and protected.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• Widespread failure to store <b>packing material</b> in a secured and protected manner.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.08d		Question removed		
4.06.09	4.05.09	No change in v3.2	<p>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., Clostridium botulinum in mushrooms). <b>Other examples might include glass, trash/litter, motor oil in products, etc.</b> This question is designed to allow an auditor to halt an audit when finding gross contamination issues. <b>ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.</b></p>	No change in v3.2
4.06.10	4.05.10	Are grading and packing surfaces, carts, ladders and other harvest aids used? If No, go to 4.05.11.	<p><b>Information gathering question.</b> This refers to food contact surfaces used to grade, inspect, re-pack, or pack product (e.g., grading tables, mushroom grading platforms, picking carts, ladders, etc.).</p>	Total points 0: <b>Information gathering question.</b> This refers to food contact surfaces used to grade, inspect, re-pack, or pack product (e.g., picking carts, grading tables, mushroom grading platforms, ladders, etc.).
4.06.10a	4.05.10a	Does the design and condition of the grading and packing surfaces (e.g., smooth surfaces, smooth weld seams, nontoxic materials, no wood) facilitate effective cleaning and maintenance?	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.10b	4.05.10b	Are there written cleaning and sanitation procedures (Sanitation Standard Operating Procedures) for the grading and packing surfaces that includes the frequency of cleaning and sanitizing, and the procedures used, including chemical use details?	Food contact surfaces used to grade, inspect, re-pack, or pack product (e.g., picking carts, grading tables, ladders, etc.) should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). The program should state the frequency of cleaning and sanitizing, detail what, who, how and when, including chemical details (name, dilution/strength), and cleaning verification procedures.	<p>Total compliance (5 points): Food contact surfaces used to grade, inspect, re-pack, or pack product (e.g., picking carts, grading tables, ladders, etc.) should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). The program should state the frequency of cleaning and sanitizing, detail what, who, how and when, including chemical details (name, dilution/strength), and cleaning verification procedures.</p> <p>Minor deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of information missing from the SSOPs.</li> </ul> <p>Major deficiency (1 point) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of information missing from the SSOPs.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• There are no documented SSOPs.</li> </ul>
	4.05.10c New Question	Are cleaning and sanitation logs on file for grading and packing surfaces that show what was done, when, by who and detail strength testing of anti-microbial solution used to sanitize surfaces?	Sanitation logs should include: date, list of areas/equipment that were cleaned and sanitized, sanitizer strength tests, and the individual accountable who signed-off for each task completed.	<p>Total compliance (10 points): Sanitation logs should include: date, list of areas/equipment that were cleaned and sanitized, sanitizer strength tests, and the individual accountable who signed-off for each task completed.</p> <p>Minor deficiency (7 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of incomplete records, discrepancies against the SSOPs or other omissions.</li> </ul> <p>Major deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of incomplete records, discrepancies against the SSOPs or other omissions.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• No sanitation logs.</li> <li>• Sanitation logs exist but they are not reflecting what actually occurs.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.11	4.05.11	Are re-useable containers (e.g. buckets, totes, lugs, RPCs, bins) used in the harvesting operation? If No, go to 4.05.12.	<b>Information gathering question.</b> This refers to any re-useable containers used in the harvesting operation (e.g., buckets, totes, lugs, RPCs, bins, etc.) used in the harvesting operation.	Total points 0: <b>Information gathering question.</b> This refers to any re-useable containers used in the harvesting operation (e.g., buckets, totes, lugs, RPCs, bins, gondolas, etc.) used in the harvesting operation.
4.06.11a	4.05.11a	No change in v3.2	No change in v3.2	No change in v3.2
4.06.11b	4.05.11c	Are there written cleaning and sanitation procedures (Sanitation Standard Operating Procedures) for the reusable containers that includes the frequency of cleaning and sanitizing, and the procedures used including chemical use details?	Re-useable containers should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). The program should state the frequency of cleaning and sanitizing, detail what, who, how and when, including chemical details (name, dilution/strength), and cleaning verification procedures.	<p>Total compliance (5 points): <b>Re-usable containers should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs).</b> The program should state the frequency of cleaning and sanitizing, detail what, who, how and when, including chemical details (name, dilution/strength), and cleaning verification procedures.</p> <p>Minor deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of information missing from the <b>SSOPs</b>.</li> </ul> <p>Major deficiency (1 point) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of information missing from the <b>SSOPs</b>.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• <b>There are</b> no documented <b>SSOPs</b>.</li> </ul>
4.06.11c	4.05.11b	No change in v3.2	Re-useable containers used in the harvesting process should be managed to eliminate contamination from inappropriate handling practices. <b>Handling contamination could also be caused using cloths or towels to remove dirt and/or debris from packaging. Avoid stacking soiled bins on top of each other if the bottom of the bin has had direct contact with soil.</b>	Total compliance (10 points): Re-useable containers used in the harvesting process should be managed to eliminate contamination from inappropriate handling practices. <b>Handling contamination could also be caused using cloths or towels to remove dirt and/or debris from containers. Avoid stacking soiled bins on top of each other if the bottom of the bin has had direct contact with soil.</b>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	4.05.11d New Question	Are cleaning and sanitation logs on file for reusable containers that show what was done, when, by who and detail strength testing of anti-microbial solution used to sanitize surfaces?	Sanitation logs should include: date, list of areas/equipment that were cleaned and sanitized, sanitizer strength tests, and the individual accountable who signed-off for each task completed. Where cleaning & sanitizing is handled by a 3rd party (packinghouse, contract RPC company) auditee is expected to provide evidence of cleaning & sanitizing activities.	<p>Total compliance (10 points): Sanitation logs should include: date, list of areas/equipment that were cleaned and sanitized, sanitizer strength tests, and the individual accountable who signed-off for each task completed. Where cleaning &amp; sanitizing is handled by a 3rd party (packinghouse, contract RPC company) auditee is expected to provide evidence of cleaning &amp; sanitizing activities.</p> <p>Minor deficiency (7 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of incomplete records, discrepancies against the SSOPs or other omissions.</li> </ul> <p>Major deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of incomplete records, discrepancies against the SSOPs or other omissions.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• No sanitation logs.</li> <li>• Sanitation logs exist but they are not reflecting what actually occurs.</li> </ul>
4.06.12	4.05.12	Are tools (e.g. knives, clippers, scissors, etc.) used in harvesting? If No, go to 4.05.13.	<b>Information gathering question.</b> This refers to harvest tools (e.g. knives, clippers, scissors, etc.) used in harvesting.	Total points 0: <b>Information gathering question.</b> This refers to harvest tools (e.g. knives, clippers, scissors, etc.) used in harvesting.
4.06.12a	4.05.12a	No change in v3.2 <b>Point change 5 to 10</b>	No change in v3.2	No change in v3.2
4.06.12b	4.05.12b	No change in v3.2	No change in v3.2	No change in v3.2
4.06.12c	4.05.12c	No change in v3.2	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.12d	4.05.12d	Are there written cleaning and sanitation procedures (Sanitation Standard Operating Procedures) for harvest tools that includes the frequency of cleaning and sanitizing, and the procedures used including chemical use details?	Harvest tools should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). The program should state the frequency of cleaning and sanitizing, detail what, who, how and when, including chemical details (name, dilution/strength), and cleaning verification procedures.	<p>Total compliance (5 points): Harvest tools should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). The program should state the frequency of cleaning and sanitizing, detail what, who, how and when, including chemical details (name, dilution/strength), and cleaning verification procedures.</p> <p>Minor deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of information missing from the SSOPs.</li> </ul> <p>Major deficiency (1 point) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of information missing from the SSOPs.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• There are no documented SSOPs.</li> </ul>
	4.05.12e New Question	Are cleaning and sanitation logs on file for harvest tools that show what was done, when, by who and detail strength testing of anti-microbial solution used to sanitize surfaces?	Sanitation logs should include: date, list of areas/equipment that were cleaned and sanitized, sanitizer strength tests, and the individual accountable who signed-off for each task completed.	<p>Total compliance (10 points): Sanitation logs should include: date, list of areas/equipment that were cleaned and sanitized, sanitizer strength tests, and the individual accountable who signed-off for each task completed.</p> <p>Minor deficiency (7 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of incomplete records, discrepancies against the SSOPs or other omissions.</li> </ul> <p>Major deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of incomplete records, discrepancies against the SSOPs or other omissions.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• No sanitation logs.</li> <li>• Sanitation logs exist but they are not reflecting what actually occurs.</li> </ul>



Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.12e	4.05.12f	No change in v3.2	<p>There should be records to show that the <b>tool dip solutions (e.g. knife dips)</b> are being maintained on a regular basis. The strength of the sanitizers should be checked on a regular basis (e.g., hourly) and recorded. <b>All test solutions/strips should be within date code, appropriate for the concentrations used and stored correctly (especially light and temperature sensitive materials). Anti-microbial chemicals must be food grade.</b></p> <p>AUDITORS ARE INSTRUCTED TO REQUIRE A TEST AT THE TIME OF THE AUDIT.</p>	<p>Total compliance (5 points): There should be records to show that the tool dip solutions (e.g., knife dips) 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 <b>≥10 ppm free chlorine. All test solutions/strips should be within date code, appropriate for the concentrations used and stored correctly (especially light and temperature sensitive materials).</b></p> <p>Total chlorine does not measure the "available chlorine" after the tool dip has started to be used. Auditors are instructed to require the auditee to check the strength of anti-microbial chemicals during the audit.</p> <p>Minor deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of strength tests not being performed at the required frequency.</li> <li>• Single/isolated instance(s) of missing or incomplete records.</li> <li>• Single/isolated instance(s) of corrective actions not being performed.</li> <li>• <b>Single/isolated instance(s) of testing not being done correctly.</b></li> </ul> <p>Major deficiency (1 point) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of strength tests not being performed at the required frequency.</li> <li>• Numerous instances of missing or incomplete records.</li> <li>• Numerous instances of corrective actions not being performed.</li> <li>• <b>Numerous instances of testing not being done correctly.</b></li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• There is no strength testing being performed <b>or fundamental failure to perform tests correctly.</b></li> <li>• Fundamental failure to maintain records.</li> <li>• Corrective actions are not being performed.</li> </ul>
4.06.13	4.05.13	Is machinery used in the harvesting process? If No, go to 4.05.14.	<p><b>Information gathering question.</b> This includes equipment with the potential to affect product (e.g., conveyor belts, mechanical harvesting units, field packing rigs, <b>field packing buses, live bottom trailers,</b> 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.</p>	<p>Total points 0: <b>Information gathering question.</b> This includes equipment with the potential to affect product (e.g., conveyor belts, mechanical harvesting units, field packing rigs, field packing buses, <b>live bottom trailers, coring rigs and any "in-field" processing rigs including tractors/trucks pulling in-field equipment).</b> Please note that there are some more specific questions for coring rigs and any "in-field" processing rigs in a later section.</p>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.13a	4.05.13a	Are food contact <b>machinery</b> surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g., tape, string, cardboard, etc.)?	Food contact surfaces on <b>machinery</b> 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.	Total compliance (15 points): Food contact surfaces on <b>machinery</b> 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	4.05.13b	Are food contact <b>machinery</b> surfaces clean?	No change in v3.2	No change in v3.2
4.06.13c	4.05.13c	Are non-food contact <b>machinery</b> surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g., tape, string, cardboard, etc.)?	No change in v3.2	No change in v3.2
4.06.13d	4.05.13d	Are non-food contact <b>machinery</b> surfaces clean?	No change in v3.2	Non-compliance (0 points) if: <ul style="list-style-type: none"> <li>• Widespread observations of <b>non</b>-food contact surfaces that are unclean.</li> <li>• Equipment is not cleaned after the harvesting operation has ceased for that run time e.g. after final shift.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.13e	4.05.13e	<p>Does the design and condition of the <b>machinery</b> (e.g., smooth surfaces, smooth weld seams, nontoxic materials, no wood) facilitate effective cleaning, sanitation and maintenance?</p> <p><b>Point change 5 to 10</b></p>	<p><b>Machinery</b> 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".</p>	<p>Total compliance (5 points): <b>Machinery</b> 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".</p>
4.06.13f	4.05.13i	<p>Are there written cleaning and sanitation procedures (Sanitation Standard Operating Procedures) for the harvest machinery that includes the frequency of cleaning and sanitizing, the procedures used including chemical use details?</p>	<p>Harvest machinery should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). The program should state the frequency of cleaning and sanitizing, detail what, who, how and when, including chemical details (name, dilution/strength), and cleaning verification procedures. Frequency should reflect the type of machinery, type of harvesting practice and the risk associated with the crop involved. This includes water tanks used for post-harvest water use. For "in-field" processing, clean and core, etc., at least daily cleaning should be performed.</p>	<p>Total compliance (5 points): <b>Harvest machinery should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). The program should state the frequency of cleaning and sanitizing, detail what, who, how and when, including chemical details (name, dilution/strength), and cleaning verification procedures.</b> Frequency should reflect the type of machinery, type of harvesting practice and the risk associated with the crop involved. <b>This includes water tanks used for post-harvest water use.</b> For "in-field" processing, clean and core, etc., at least daily cleaning should be performed.</p> <p>Minor deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of information missing from the <b>SSOPs</b>.</li> </ul> <p>Major deficiency (1 point) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of information missing from the <b>SSOPs</b>.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• <b>There are</b> no documented <b>SSOPs</b>.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	4.05.13j	Are cleaning and sanitation logs on file for harvest machinery that show what was done, when, by who and detail strength testing of anti-microbial solution used to sanitize surfaces?	Sanitation logs should include: date, list of areas/equipment that were cleaned and sanitized, sanitizer strength tests, and the individual accountable who signed-off for each task completed.	<p>Total compliance (10 points): Sanitation logs should include: date, list of areas/equipment that were cleaned and sanitized, sanitizer strength tests, and the individual accountable who signed-off for each task completed.</p> <p>Minor deficiency (7 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of incomplete records, discrepancies against the SSOPs or other omissions.</li> </ul> <p>Major deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of incomplete records, discrepancies against the SSOPs or other omissions.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• No sanitation logs.</li> <li>• Sanitation logs exist but they are not reflecting what actually occurs.</li> </ul>
4.06.13g	4.05.13f	Is machinery designed and used properly to minimize product contamination (e.g., drip pans utilized, dedicated tractor pathways)?	No change in v3.2	No change in v3.2
4.06.13h	4.05.13k	No change in v3.2	No change in v3.2	No change in v3.2
4.06.13i	4.05.13g	No change in v3.2	No change in v3.2	No change in v3.2
4.06.13j	4.05.13h	No change in v3.2	No change in v3.2	Total compliance (3 points): 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 fitting protection on equipment above exposed product, food contact surfaces, and belts.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.14	4.05.14	Is water used directly on product contact (e.g. re-hydration, core in field)? If No, go to 4.05.15.	No change in v3.2	Total points 0: <b>Information gathering question.</b> This refers to water that is used directly on product contact. Examples may include but are not limited to re-hydration, core in field.
4.06.14a	4.05.14a	Are there specific Standard Operating Procedures (SOPs) for the monitoring of anti-microbial parameters in single-pass and/or recirculated/batch water systems and changing of recirculated/batch water systems (e.g., dump tanks) and for pH and monitoring water temperature (if applicable)?	<p><b>Product contact</b> water systems should have SOPs that describe <b>how they are managed, including the water change frequency (recirculated/batch water systems), anti-microbial(s) used, pH monitoring (if required), their concentration(s), monitoring method(s) and frequency and corrective action procedures.</b> The anti-microbial monitoring frequency should be sufficient to demonstrate the required concentration is maintained throughout the time the system is operated. Methods and monitoring procedures for measuring build-up of organic material (<b>soil and plant debris</b>) in recirculated and batch water systems <b>should be described.</b> Water should be changed when it is dirty or when switching products. If product(s) immersed in water are known to be susceptible to infiltration, the SOP should include water and product temperature parameters and monitoring frequency. There should be sufficient validation to support the anti-microbial concentration used, the water changing frequency (if less than daily) and water testing frequency. <b>Measuring total chlorine is not acceptable for recycled/batch water systems.</b> For chlorine systems, the concentration should be <math>\geq 10</math>ppm free chlorine. Lower concentrations should be properly justified with supporting documents, rationale and evidence. Other anti-microbials include peracetic acid, chlorine dioxide, etc.</p>	<p>Total compliance (10 points): There should be specific SOPs describing the process of <b>performing and recording anti-microbial strength testing in water systems (including parameters, testing frequency, methodology and corrective action requirements), methods and monitoring procedures for measuring build-up of organic material (turbidity) in recirculated and batch water systems and monitoring pH and water temperature (if applicable).</b> Water should be changed when it is dirty or when switching products. There should be documentation that validates the water changing frequency. Minimum frequency for water changing is at least daily; records of changes are kept. Water may be used for longer if a validated regeneration system (e.g., a water pasteurization/filtration system) is being used. The water temperature should be appropriate for the products and processes being performed. <b>Measuring total chlorine is not viewed as acceptable for recycled water systems.</b> Single pass systems must have a stated anti-microbial level. For chlorine, the criteria should be <math>\geq 10</math>ppm free chlorine. Lower concentrations should be properly justified with supporting documents, rationale and evidence. Note, US (NOP) regulations allow for chlorine use in wash water at levels sufficient to control microbial contaminants and higher than 4 ppm free chlorine, where there is a final through rinse with potable water to meet their <math>\leq 4</math> ppm free chlorine product contact requirement. Other anti-microbials include peracetic acid, chlorine dioxide, etc.</p> <p>Reference:  <a href="https://www.canr.msu.edu/news/turbidity_in_post_harvest_wash_water_monitor_and_change_when_needed">https://www.canr.msu.edu/news/turbidity_in_post_harvest_wash_water_monitor_and_change_when_needed</a></p> <p>Minor deficiency (7 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of errors or omissions within the SOPs for water <b>monitoring and</b> changing.</li> <li>• Single/isolated instance(s) of errors or omissions in the validation documentation for water <b>monitoring and</b> changing.</li> </ul> <p>Major deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of errors or omissions within the SOP's for water <b>monitoring and</b> changing.</li> <li>• Numerous instances of errors or omissions in the validation documentation for water <b>monitoring and</b> changing.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• SOPs for water monitoring and changing do not exist.</li> <li>• SOPs do not address the frequency of water <b>monitoring and</b> changing.</li> <li>• <b>SOPs require changing less than daily and there is not a validated regeneration system used.</b></li> <li>• There is no validation documentation for water <b>monitoring and</b> changing frequency.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.14b	4.05.14c	Are there records of monitoring for build-up of organic material (turbidity) and changing of recirculated and batch water systems (e.g., dump tanks, flumes, hydro vacuums, hydro coolers, etc.)?	There should be records of visual monitoring, testing and changing of recirculated and batch water systems and water temperature checks (where relevant) during use. Water should be changed at least daily and when it is dirty and when switching products. Frequency of water changing is at least daily.	Total compliance (5 points). There should be records of visual monitoring or testing and changing of recirculated and batch water systems during use. Water should be changed at least daily and when it is dirty and when switching products. Water may be used for longer if a validated regeneration system (e.g., a water pasteurization/filtration system) is being used.
4.06.14c		Question removed, combined with 4.05.14a		

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.14d	4.05.14b	No change in v3.2	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 as opposed total chlorine). <b>Recirculated/ batch water systems using chlorine should have records showing the pH is controlled.</b> Where out of specification results are recorded, there should be corrective action records, including root cause analysis and preventive actions (where relevant).	<p>Total compliance (10 points): 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 as opposed to total chlorine). <b>Recirculated/ batch water systems using sodium/calcim hypochlorite should have records showing the pH is controlled.</b> Where out of specification results are recorded, there should be corrective action records, including root cause analysis and preventive actions (where relevant).</p> <p>Minor deficiency (7 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of records showing solution strength out of parameters without adequate documented corrective actions.</li> <li>• Single/isolated instance(s) of errors or omission in the records.</li> <li>• Single/isolated instance(s) of total chlorine being recorded when free chlorine <b>should</b> have been <b>used</b> e.g. in chlorinated recycled water systems</li> <li>• Single/isolated instance(s) of checks not carried out at the required frequencies.</li> </ul> <p>Major deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of records showing solution strength out of parameters without adequate documented corrective actions.</li> <li>• Numerous instances of errors or omission in the records.</li> <li>• Numerous instances of total chlorine being recorded when free chlorine <b>should</b> have been <b>used</b> e.g. in chlorinated recycled water systems.</li> <li>• Numerous instances of checks not carried out at the required frequencies.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• Water testing is not being recorded.</li> <li>• Recorded solution strengths consistently out of parameters i.e. an unstable system (even if documented corrective actions exist).</li> <li>• Widespread errors and omissions in the records.</li> <li>• Total chlorine has been recorded throughout the system, when free chlorine should have been recorded e.g. in chlorinated recycled water systems.</li> <li>• Frequencies of checks consistently do not meet requirements of prior to start up and throughout the production runs.</li> <li>• Single pass water system is in use without anti-microbial being used. <b>The auditor should consider whether to apply 4.05.09 and score an automatic failure in view of the risk of cross contamination.</b></li> <li>• Recycled/reused water system is in use without an anti-microbial being used. <b>The auditor should consider whether to apply 4.05.09 and score an automatic failure in view of the risk of cross contamination.</b></li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.14e	4.05.14d	No change in v3.2	No change in v3.2	<p>Total compliance (15 points): The strength (concentration, pH, etc.) 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, or as recommended by the disinfectant supplier). <b>Water samples for testing should be taken from, and/or probes located in, areas farthest from the antimicrobial injection/addition site.</b> Any water treatment at the source (e.g., well, canal) should be monitored. Solutions that are too weak will be ineffective, while those too strong may be harmful to workers or product. Where necessary, pH of solutions should also be checked. Methods include dip sticks, test strip papers, conductivity meters, titration, color comparison methods (e.g., tintometers, etc.). All test solutions/strips should be within date code, appropriate for the concentrations used and stored correctly (especially light and temperature sensitive materials). If an ORP meter controls the pumps that are injecting the anti-microbial and/or buffer, <b>free chlorine levels should be verified by an independent method</b> (e.g., titration, <b>appropriate test strips</b>). Probe sensors <b>should be properly located, have</b> periodic cleaning and calibration and may become temporarily saturated by over-injection of anti-microbial or buffer. The auditor should have the auditee check the strength of anti-microbial chemicals while touring the operation.</p> <p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of a method not being used correctly.</li> <li>• Single/isolated instance(s) of a testing procedure being used that is not appropriate for the concentration and/or sanitizer in use.</li> <li>• Single/isolated instance(s) of out of date verifying chemicals being used.</li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of a method not being used correctly.</li> <li>• Numerous instances of a testing procedure being used that is not appropriate for the concentration and/or chemical in use.</li> <li>• Numerous instances of out of date verifying chemicals being used.</li> <li>• ORP meter used to control pumps injecting anti-microbial and or/buffer without <b>an independent method</b> to verify readings.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• Chemical concentrations are not monitored.</li> <li>• Equipment to monitor anti-microbial chemical concentrations is not available or is not being used correctly.</li> </ul>



Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.15	4.05.15	Is the harvested product "in-field processed" or "in-field semi-processed" (e.g., core in field, top & tail, florets)? If No, go to 4.05.16.	Information gathering question. "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).	Total points 0: Information gathering question. "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 having multiple cut surfaces created in the field (e.g., coring in field, topping & tailing, florets).
4.06.15a	4.05.15a	No change in v3.2	No change in v3.2	No change in v3.2
4.06.15b	4.05.15b	No change in v3.2	No change in v3.2	No change in v3.2
4.06.16		Question removed		
4.06.17	4.06.01	Is there any post-harvest treatment performed to the product in the growing area? If No, go to 4.07.01	Information gathering question. This refers to any post-harvest treatments taking place in the growing area (e.g. blueberries packed in the field with sodium metabisulphite pads, tables grapes packed in the field treated/gassed with sulfur dioxide, etc.).	Total points 0: Information gathering question. This refers to any post-harvest treatments taking place in the growing area (e.g. blueberries packed in the field with sodium metabisulphite pads, tables grapes packed in the field treated/gassed with sulfur dioxide, etc.).
4.06.17a	4.06.01a	Are there up to date records of all pesticides applied in the growing area to the harvested product? <b>ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.</b>	The operation should follow a pesticide application record keeping program for all postharvest treatments that at least includes the following: date of application, product identity (e.g. lot or batch number/code), brand/product name, EPA registration number (or country of production equivalent registration information), active ingredient, amount applied (rate/dosage), applicator identification, application equipment identification "and/or" type of treatment, and target pest/disease. Information may be recorded on separate documents providing all information is available and consistent. <b>A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.</b>	Total compliance (15 points): The growing operation should follow a post-harvest pesticide application record keeping program that at least includes the following: date of application, product identity (e.g. Lot or batch number/code), brand/product name, EPA registration number (or country of production equivalent registration information), active ingredient, amount applied (rate/dosage), applicator identification, application equipment identification "and/or" type of treatment, and target pest/disease. Information may be recorded on separate documents providing all information is available and consistent.  Minor deficiency (10 points) if: • Single/isolated instance(s) of missing required information (e.g. missing target pest, applicator identification, equipment identification or type of treatment, etc.) Major deficiency (5 points) if: • Numerous instances of missing required information (e.g. missing target pest, applicator identification, equipment identification or type of treatment, etc.) Automatic Failure (0 points) if: • Any failure to record critical required information. (e.g. brand/product name, date, amount applied, product identity, etc.) • Fundamental failure to record required information.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.17b	4.06.01b	<p>Are all pesticides applied post-harvest authorized/registered by the authority/government of the country of production?</p> <p><b>ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.</b></p>	<p>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 approval for its use, this is acceptable, when the program is operated by the government and considers at a minimum the target crop, pesticide trade name and active ingredient, formulation, dosage, pre-harvest intervals and target pest(s) or in cases where the government authorizes an active ingredient but not a trade name, there must be evidence of compliance with the MRLs of the destination countries for the applied "authorized" active ingredient (see 4.06.01d)</p> <p>When pesticide product registration/authorization information does not exist for the target crop in the country of production or there are not enough products registered/authorized to control a pest or disease (partial registration/authorization), extrapolation is possible if that practice is allowed by the country of production (e.g. in Mexico "Anexo Técnico 1. Requisitos Generales para la Certificación y Reconocimiento de Sistemas de Riesgos de Contaminación (SRRC) Buen Uso y Manejo de Plaguicidas (BUMP) o Buenas Prácticas Agrícolas en la Actividad de Cosecha (BPCo) durante la producción primaria de vegetales – Section 12.3 should be considered. <b>ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.</b></p>	<p>Total compliance (15 points): Application records show all pesticides applied post-harvest 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 approval for its use, this is acceptable when operated by the government and considers as a minimum the target crop, pesticide trade name and active ingredient, formulation, dosage, pre-harvest intervals and target pest(s) or in cases where the government authorizes an active ingredient but not a trade name, there must be evidence of compliance with the MRLs of the destination countries for the applied "authorized" active ingredient (see 4.06.01d)</p> <p>When pesticide product registration/authorization information does not exist for the target crop in the country of production or there are not enough products registered/authorized to control a pest or disease (partial registration/authorization), extrapolation is possible if that practice is allowed by the country of production (e.g. in Mexico "Anexo Técnico 1. Requisitos Generales para la Certificación y Reconocimiento de Sistemas de Riesgos de Contaminación (SRRC) Buen Uso y Manejo de Plaguicidas (BUMP) o Buenas Prácticas Agrícolas en la Actividad de Cosecha (BPCo) durante la producción primaria de vegetales – Section 12.3 should be considered. <b>ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.</b></p> <p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• There is no minor deficiency category for this question</li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• There is no major deficiency category for this question.</li> </ul> <p>Automatic Failure (0 points) if:</p> <ul style="list-style-type: none"> <li>• There is a single incidence of pesticides being used without being registered or authorized by the country of production government.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.06.17c	4.06.01c	<p>Are all pesticides applied post-harvest used as recommend ed/directed in the label?</p> <p><b>ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.</b></p>	<p>Application records should show all post-harvest pesticides are applied in accordance with label directions and any federal, state or local regulation(s). In operations applying post-harvest pesticides "authorized" by the government, where use directions are not in the label, application records should show "authorization program" use/applications directions are followed.</p>	<p>Total compliance (15 points): Application records should show all post-harvest pesticides are applied in accordance with label directions and any federal, state or local regulation.</p> <p>In operations applying post-harvest pesticides "authorized" by the government, where use directions are not in the label, application records should show "authorization program" use/applications directions are followed.</p> <p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• There is no minor deficiency category for this question</li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• There is no major deficiency category for this question.</li> </ul> <p>Automatic Failure (0 points) if:</p> <ul style="list-style-type: none"> <li>• There is a single incidence of pesticides being used without following label directions.</li> </ul>
4.06.17d	4.06.01d	<p>Where products are destined for export, is there information for post-harvest pesticide Maximum Residue Limits (MRLs) compliance considering, country of destination, target crop(s) and active ingredients applied?</p>	<p>Where products are destined for export, the operation should have documented evidence about the MRL requirements for each country of destination for each post-harvest pesticide (active ingredient) applied. If there is no MRL defined by the country of destination for any active ingredient applied, the operation shall 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.</p>	<p>Total compliance (15 points): Where products are destined for export, the operation should have documented evidence about the MRL requirements for each country of destination for each post-harvest pesticide (active ingredient) applied. If there is no MRL defined by the country of destination for any active ingredient applied, the operation shall 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.</p> <p><b>This question is Not Applicable if the product is only sold in the country of production (domestic market).</b></p> <p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of missing required information (e.g. missing MRL information for an active ingredient)</li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of missing required information (e.g. missing MRL information for 3 or more active ingredient)</li> </ul> <p>Non-Compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• There is no MRL information for the destination countries (or widespread missing information)</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	4.06.01e	Where products are destined for export, is there evidence that Maximum Residue Limits (MRLs) of the intended markets are met?	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).	<p>Total compliance (15 points): 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.</p> <p>The auditor should review MRL laboratory reports to ensure MRL entry requirements are met for the country of destination or the applicable regulation in the country of destination when there is no MRL set for any active ingredient, (e.g. the Codex Alimentarius Commission, default MRL, under the limit of detection [LOD], etc.). MRL laboratory reports should be traceable to the operation and consider at least the active ingredients applied during the growth cycle.</p> <p>Other alternative or complementary methods to demonstrate MRL compliance for an active ingredient include:</p> <ul style="list-style-type: none"> <li>i) Documented analysis of degradation curves and corresponding dosage and/or pre-harvest interval modifications. Degradation curves used as reference should be issued/provided by the manufacturer of the pesticide or country of production government and correspond to the degradation of the pesticide active ingredient in the agroclimatic zone where the Plant Protection Product was applied.</li> <li>ii) Industry guidelines (e.g. "Agenda de Pesticidas" From ASOEX Chile).</li> </ul> <p>Following a procedure for when and where to pull samples for MRL testing based on risk considering factors such as active ingredients applied, timing of the application and harvest, pre-harvest intervals, dosage, etc., is an ideal practice.</p> <p><b>This question is Not Applicable if the product is only sold in the country of production (domestic market).</b></p> <p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• There is no minor deficiency category for this question</li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• There is no deficiency category for this question.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• There is a single incidence of an active ingredient with an exceeded MRL.</li> <li>• There is no evidence of MRL compliance for any active ingredient applied.</li> <li>• Evidence provided is not sufficient to support MRL compliance.</li> <li>• Automatic failure if corrective actions are not provided and accepted by the certification body.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	4.06.01f New Question	Is there a documented procedure for the post-harvest pesticide applications, considering mixing and loading, applying, and equipment cleaning?	There should be a documented procedure describing how to mix and load post-harvest pesticides, how to apply post-harvest pesticides and how to rinse and clean post-harvest pesticide application equipment. 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.	<p>Total compliance (15 points): There should be a documented procedure describing how to mix and load post-harvest pesticides, how to apply post-harvest pesticides and how to rinse and clean post-harvest pesticide application equipment. The procedure should include adhering to the product label.</p> <p><u>Mixing and loading</u> procedures should require activity to be in a well-ventilated, well-lit area away from unprotected people, food and other items that might be contaminated.</p> <p><u>Application</u> procedures should include information about the necessary Personal Protective Equipment (PPE), re-entry intervals, excessive winds, posting of treated areas, etc.</p> <p><u>Equipment cleaning</u> procedures should include measuring devices, mixing containers, application equipment (e.g. spray bar), rinseable containers, etc., and should address: rinsing empty equipment immediately to prevent residues from drying and becoming difficult to remove, and adding the rinsate (water from rinsing containers or equipment) to spray tanks as part of the pesticide mixing process.</p> <p>If any of these practices are observed during the inspection, it should be evident that the procedures are being followed.</p> <p>This procedure could be partially applicable or non-applicable depending the type of post-harvest treatment used (e.g. SO2 Generator pads do not require mixing/loading instructions)</p> <p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of an error or omission in the procedure or practice.</li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of an error or omission in the procedure or practice.</li> </ul> <p>Non-Compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• Widespread errors or omissions in the procedure or practice.</li> <li>• There is no procedure.</li> </ul>
	4.06.01g New Question	Is there documentation on that shows the individual(s) making decisions for post-harvest pesticide applications is competent?	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.).	<p>Total compliance (15 points): 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 post-harvest pesticide applications (e.g., choice of pesticides, application rates, etc.)</p> <p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of missing documentation.</li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance of a proof of training/certificate/license being out of date.</li> <li>• Numerous instances of missing documentation.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• There is no documentation for the individual(s) making the decision.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	4.06.01h New Question	Is there documentation that shows that individuals who handle post-harvest pesticide materials are trained and are under the supervision of a trained person?	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 (in-house or external) and be under the supervision of a worker who can do so independently.	<p>Total compliance (15 points): 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 (in-house or external) and be under the supervision of a worker who can do so independently.</p> <p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of missing training documentation.</li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of missing training documentation.</li> <li>• Worker who is not qualified to handle pesticide materials independently has training but no supervision</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• There is no documentation showing training for individuals handling pesticides materials.</li> <li>• There is no documentation for the supervising person</li> </ul>
4.07.01		Are the vehicles loading and transporting fresh produce from growing area to facility limited to this function only, maintained in proper condition, and adequate for the purpose?	Vehicles loading and transporting product should be limited to this function only and should be adequate for transporting produce. Vehicles should be part of the sanitation program, 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.	Total compliance (5 points): Vehicles transporting product should be limited to this function only and should be adequate for transporting produce. Vehicles should be part of the sanitation program, 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.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.07.02		Is there a system in place to track product from the <b>growing area</b> ? <b>Point change 15 to 10</b>	No change in v3.2	<p>Total points (<b>10 points</b>): 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.).</p> <p>Minor deficiency (7 points) if:</p> <ul style="list-style-type: none"> <li>•Single/isolated instance(s) of missing required information for harvested commodities i.e. growing location or harvest information.</li> </ul> <p>Major deficiency (3 point) if:</p> <ul style="list-style-type: none"> <li>•Numerous instances of missing required information for harvested commodities i.e. growing location or harvest information.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>•There is no tracking information for harvested commodities.</li> </ul>
4.07.02a		If product is being packed in the <b>growing area</b> , 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.	For finished goods packed in the <b>growing area</b> , 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.	Total compliance ( <b>10 points</b> ): For finished goods packed in the <b>growing area</b> , there should be date coding on each external package, 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.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.07.02b		<p>If product is being packed in the <b>growing area</b> 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.</p>	<p>For finished goods packed in the <b>growing area</b>, 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.</p>	<p>Total compliance (10 points): For finished goods packed in the <b>growing area</b>, there should be date coding on each external package, 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.</p>
4.08.04		<p>Is there a <b>documented and effective</b> pest control program in place for fixed location storage areas?</p>	<p>There should be a <b>documented and effective</b>, 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. <b>There should be a written scope of the program, indicating target pests and frequency of checks.</b></p>	<p>Total compliance (15 points): There should be a <b>documented and effective</b>, 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. <b>There should be a written scope of the program, indicating target pests and frequency of checks.</b></p> <p>Minor deficiency (10 points) if:</p> <ul style="list-style-type: none"> <li>• <b>Single/isolated omission(s) in the written program.</b></li> </ul> <p>Major deficiency (5 points) if:</p> <ul style="list-style-type: none"> <li>• <b>Numerous omissions in the written program,</b></li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• There is no <b>documented</b> pest control program in place for fixed location storage area(s).</li> <li>• <b>Written program does not resemble what is happening in practice at all.</b></li> </ul>



Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.08.04a		<p>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 bait stations are not used inside the storage areas?</p>	<p>Pest control devices should be located away from items or equipment with food contact surfaces to prevent any physical or microbial contamination. Poisonous bait stations should not be used inside any storage areas. <b>No bait should be found outside of bait stations.</b></p>	<p>Total compliance (5 points): Pest control devices should be located away from items or equipment with food contact surfaces to prevent any physical or microbial contamination. Poisonous bait traps should not be used inside any storage areas. Care should be taken to place pest control devices in such a manner that they do not pose a threat of contaminating product, packing or raw materials. This includes the following restrictions:</p> <ul style="list-style-type: none"> <li>• There should be no domestic fly sprays used within the storage areas.</li> <li>• Block bait or soft, pouch-style bait as opposed to grain and pellet bait should be used (except for the external use of National Organic Program approved materials).</li> <li>• If used, insect light traps (ILTs), electrical fly killers (EFKs) or pheromone traps should be regularly cleaned out (kept free from a build-up of insects and debris). Sticky type ILTs should be monitored at least monthly and the sticky board replaced if ineffective. ILTs that use sticking as opposed to zapping methods (EFKs) are preferred.</li> <li>• If used, insect light traps or electric fly killers should not be placed above or in close proximity (10 feet, 3 meters) to product, food contact surfaces, equipment, or packaging material.</li> <li>• If used, insect light trap bulbs should be replaced at least every 12 months (this should be recorded), or as more frequently if directed by manufacturers.</li> <li>• No fly swatters should be evident in the storage areas.</li> <li>• No bait should be found outside of bait stations.</li> <li>• If used, snap traps should be placed inside a trap box and should not use allergen containing baits (e.g., peanut butter). Any snap traps inside stations should be checked at least weekly and checks recorded.</li> <li>• Any indoor use of chemicals e.g., knock down sprays should be done without contaminating food, packaging, and equipment (see the next bullet point regarding poisonous baits). All applications should be recorded properly (scored in 4.08.04h), detailing where and when the application occurred, and any special methods used to avoid contamination. All applications should be made by experienced, licensed operators following any and all legal requirements and best practices.</li> <li>• The use of poisonous bait within the storage area should not occur. If this use is required, then the area that is being trapped should have all the product and packaging removed prior to the use of the poisonous baits.</li> </ul> <p>Minor deficiency: (3 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of improperly positioning or maintaining electrical fly traps or insect light traps.</li> <li>• Single/isolated instance(s) of a fly swatter found in growing or storage area.</li> <li>• Single/isolated instance(s) of grain or pellet baits being used in an outside bait station (external trap).</li> <li>• Single can of fly spray (or other insecticide) found in the growing/storage areas (including chemical/sanitation storage).</li> <li>• Snap traps being used outside the operation (not presenting risk to product or packaging) and are lacking weekly inspection logs or being used for routine monitoring (as opposed to short term eradication).</li> <li>• Single/isolated instance(s) of any other issues noted on the compliance criteria.</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
				<p>Major deficiency (1 point) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of improperly positioning or maintaining electrical fly traps or insect light traps.</li> <li>• Numerous instances fly swatters found in growing or storage area.</li> <li>• Numerous instances of grain or pellet bait being used in an outside bait station (external <b>device</b>).</li> <li>• More than one can of fly spray (or other insecticide) found in the growing/storage areas (including chemical/sanitation storage).</li> <li>• Single instance of bait/poison found outside of a <b>device</b>.</li> <li>• Snap traps being used for a short-term eradication process with weekly inspection logs but using an allergenic bait.</li> <li>• Numerous instance(s) of any other issues noted on the compliance criteria.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• More than one instance of bait/poison found outside of a <b>device</b>.</li> <li>• More than one major deficiency.</li> <li>• Numerous (more than three snap traps) being used inside the operation and are lacking weekly inspection logs or being used for routine monitoring (as opposed to short term eradication).</li> <li>• <b>The use of poisonous rodent bait within storage areas (buildings) should not occur. If this use is required, then the area that is being trapped should have all the product and packaging removed prior to the use of the poisonous baits.</b></li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.08.04b		No change in v3.2	All pest control devices should be maintained clean, in working order and replaced when damaged so that they will accomplish their intended use. Date of inspections should be posted on the devices (unless barcode scanned), as well as kept on file.	<p>Total compliance (5 points): 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 should be posted on the devices (unless barcode scanned), as well as kept on file. For digital monitoring systems, auditors should review time-stamped digital monitoring records and periodic physical inspection records to ensure program is working as intended.</p> <p>The following criteria should be met:</p> <ul style="list-style-type: none"> <li>• If non-toxic glue boards are used, they should be located inside a trap box or PVC piping, etc., and changed frequently ensuring that the surface has a shiny glaze with no build-up of dust or debris.</li> <li>• If cardboard traps are used (interior and dry areas only) they should be in good repair and marked as monitored (see below).</li> <li>• If mechanical wind-up traps are used, they should be wound. Winding is checked by triggering the spring device to operate the trap. The trap should be rewound after testing.</li> <li>• Approximately 10% of the traps, glue boards and bait stations should be checked by the auditor.</li> <li>• Record of service verification such as stickers, cards or bar codes should be on the inside of the station and on bottom of glue boards requiring the station to be opened to record data (date and initial of inspector) or to scan. External labeling is allowed on traps with a clear window on top.</li> <li>• Bait and other poisons should be controlled and applied by a licensed applicator.</li> <li>• Bait in bait stations should be secured inside the bait station on a rod above the floor of the station, or the bait station is designed so bait cannot be removed by a rodent or “float away” in a heavy rain. Bait stations should be tamper resistant. A key should be made available at the time of the audit.</li> <li>• No bait stations should be missing entire bait.</li> <li>• No old or moldy bait observed.</li> <li>• Bait stations and traps should not be fouled with weeds, dirt, and other debris.</li> <li>• External pest control devices should be checked at least monthly– these checks to be recorded.</li> <li>• Internal multiple-catch devices should be checked at least weekly – these checks to be recorded.</li> <li>• Any snap traps used should be inside stations and should be checked at least weekly – these checks to be recorded.</li> </ul> <p>Minor deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of traps, bait stations and glue boards not working properly or adequately maintained (check cards, cleanliness, etc.)</li> <li>• Single/isolated instance(s) of unsecured bait inside bait stations.</li> <li>• Single/isolated instance(s) of bait stations having moldy bait.</li> <li>• Single/isolated instance(s) of any other issues noted on the compliance criteria.</li> </ul> <p>Major deficiency (1 point) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of traps, bait stations or glue boards not working properly or adequately maintained (check cards, cleanliness, etc.)</li> </ul>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
				<ul style="list-style-type: none"> <li>• Numerous instances of unsecured bait inside bait station.</li> <li>• Numerous instances of bait stations having moldy bait.</li> <li>• Numerous instance(s) of any other issues noted on the compliance criteria.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• Widespread failure to maintain the pest control devices.</li> <li>• Widespread failure to monitor the pest control devices.</li> </ul>
4.08.04c		No change in v3.2	<p>The distance between devices should be determined based on the activity and the needs of the operation. As a reference, the following guidelines can be used to locate devices. Inside pest control: mechanical traps every 20-40 ft (6-12 m). Outside building perimeter: mechanical traps and/or bait stations every 50-100 ft (15-30 m). Interior and exterior devices should be placed on both sides of doorways. Land Perimeter (if used): within 50 ft (30 m) or buildings and at 50-100 ft (15-30 m).</p>	<p>Total compliance (5 points): The location of the devices should be based on a risk assessment of the storage area and surrounding area.</p> <ul style="list-style-type: none"> <li>• Multiple catch traps or glue boards in stations or PVC pipes should be positioned between 20 to 40 feet (6 to 12 meters) intervals around the inside perimeter of all rooms. Spacing might be affected by the structure, storage and types activities occurring.</li> <li>• Snap traps in stations may be used if necessary in certain areas e.g., in areas with high dust levels (e.g., potatoes, onions), covered breezeways or box mezzanines where large traps or glue boards are not practical. Snap traps in stations should be positioned between 20 to 40 feet (6 to 12 meters) intervals though spacing may be affected by the structure, storage and types activities occurring.</li> <li>• Inside the storage area, traps should be placed within 6 feet (about 2 meters) of both sides of all outside exit/entry doors. This includes either side of the pedestrian doors. Effort should be made to avoid placing traps on curbing.</li> <li>• Bait stations or multiple-catch traps should be positioned between 50-100 feet (15-30 meters) intervals around the exterior of the building perimeter and within 6 feet (about 2 meters) of both sides of all outside exit/entry doors, except where there is public access (public access is defined as access easily gained by the general public such as parking lots or sidewalks, school areas or areas of environmental concern). Device placement might be affected by the structure, external storage and type of area (urban, rural etc.).</li> <li>• Bait stations (where used) should be positioned within 100 feet (30 meters) of structures. This may impact fence line/property boundary baiting i.e. bait stations must be within 100 feet (30 meters) of buildings and at 50-100 feet (15-30 m) intervals. If an exterior fence line/property perimeter program is utilized at distances greater than 100 feet (30 m) from buildings, then non-bait traps (e.g. multiple-catch traps) should be positioned at 50-100 feet (15-30 m) intervals along perimeter. Auditor should check label for bait and ensure compliance to distance requirements on label.</li> </ul> <p><a href="https://www.epa.gov/rodenticides/restrictions-rodenticide-products#types">https://www.epa.gov/rodenticides/restrictions-rodenticide-products#types</a>  <a href="http://nmpapestworld.org/default/assets/File/2016%20Pest%20Management%20Standards%20for%20Food%20Processing-Electronic.pdf">http://nmpapestworld.org/default/assets/File/2016%20Pest%20Management%20Standards%20for%20Food%20Processing-Electronic.pdf</a></p>

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
				<p>Minor deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of <b>devices</b> positioned at longer intervals than mentioned above.</li> <li>• Single/isolated instance(s) of <b>devices</b> missing or not within 6 feet (about 2 meters) of exit/entry doors.</li> </ul> <p>Major deficiency (1 point) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of <b>devices</b> positioned at longer intervals than mentioned above.</li> <li>• Numerous instances of <b>devices</b> missing or not within 6 feet (about 2 meters) of exit/entry doors.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• <b>Device</b> positioning is such that the number of <b>devices</b> is nowhere near adequate in terms of spacing and coverage of entry points.</li> <li>• <b>Device</b> not located in numerous areas that should be trapped.</li> </ul>
4.08.04e		No change in v3.2	All <b>devices</b> should be clearly identified (e.g. numbered) to facilitate monitoring and maintenance. All <b>internal rodent devices</b> should be located with signs (that state the trap number and also that they are <b>pest control device</b> identifier signs).	Total compliance (5 points): The devices are numbered, and a coding system is in place to identify the type of device on a map. Auditor should check that the trap map numbering and <b>device</b> positions, match reality. All <b>internal rodent devices</b> , should be located with a wall sign (that states the <b>device</b> number and that it is a <b>pest control device</b> identifier), in case they are moved.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
4.08.04f		No change in v3.2	All <b>devices</b> should be correctly orientated with openings parallel with and closest to walls. Bait <b>stations</b> should be locked and tamper resistant in some way (e.g., locks, screws, etc.). Bait <b>stations</b> should be secured to prevent removal.	<p>Total compliance (5 points): All <b>devices</b> should be correctly orientated with openings parallel with and closest to walls. Bait stations should be secured to minimize movement of the device and be tamper resistant, and only block bait (no pellets) should be used (<b>scored under 4.08.04a</b>). Bait stations should be secured with a ground rod, chain, cable or wire, or glued to the wall/ground, or secured with a <b>patio stone</b> to prevent the bait from being removed by shaking, washed away, etc. Bait stations should be tamper resistant through the use of screws, latches, locks, or by other effective means. Note – <b>only devices</b> containing bait are required to be secured. Live traps used indoors are not required to be secured to the ground; auditee may use metal “sleeves” or similar solutions to prevent displacement, crushing by forklifts, etc. Glue boards should be inside a device (e.g. trap box, PVC pipe, etc.) rather than loose on the floor. Auditor discretion applies to traps placed on curbing.</p> <p>Minor deficiency (3 points) if:</p> <ul style="list-style-type: none"> <li>• Single/isolated instance(s) of bait stations not being secured.</li> <li>• Single/isolated instance(s) of devices “out of position” or <b>incorrectly orientated</b>.</li> </ul> <p>Major deficiency (1 point) if:</p> <ul style="list-style-type: none"> <li>• Numerous instances of bait stations not being secured.</li> <li>• Numerous instances of devices “out of position” or <b>incorrectly orientated</b>.</li> </ul> <p>Non-compliance (0 points) if:</p> <ul style="list-style-type: none"> <li>• Widespread failure to secure bait stations.</li> <li>• <b>Widespread failure to properly position interior traps</b>.</li> </ul>