



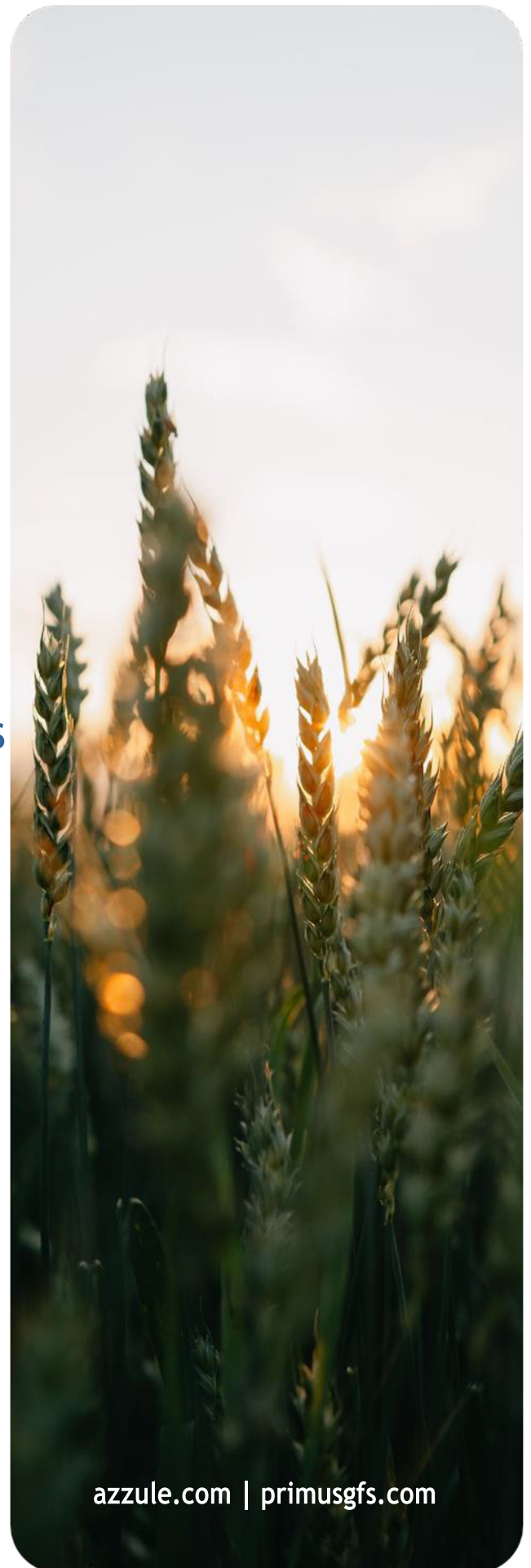
PrimusGFS v3.2

Module 8 - Grains and Pulses

Interpretation Guidelines

2023

This Module should be completed for farm operations when Module 8 option is selected within the application.



PrimusGFS Audit Grains and Pulses (Module 8) Guidelines

Used in conjunction with the PrimusGFS v3.2 Audit

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Index

Audit Execution	3
Audit Scoring	3
Automatic Failure	4
Documentation Requirements	5
Module 8: Grain and Pulses	8
General	8
Site	10
Site Inspection	15
Growing Area History	16
Training	17
Worker Hygiene	18
Agronomic Inputs	21
Water Use	24
Pre-harvest Pesticide Usage	26
Pesticide Handling and Application	29
Harvest Practices	31
Post-harvest Treatments	32
Storage Pest Control	36
Long-term Storage Structures	41
Temporary and Emergency Storage	42
Storage Practices	44
Maintenance and Sanitation	48
Shipment	51

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These guidelines help interpret/support the principles, requirements and expectations of the PrimusGFS v3.2 Modules 1, 2, 3, 4, 5, 6, 7 and 8 as noted in the Scheme normative documents. These guidelines are neither exhaustive nor exclusive and detail minimum requirements only by means of statements related to audit questions and expectations. There will be variations in applicability to an operation based on the process(es) and commodities involved. Auditors and auditees should interpret the questions and criteria in different situations, with the food safety and risk minimization being the key concerns.

The operation's practices, policies and procedures should be pertinent to the situation at hand and be able to stand up to any challenge by an auditor or other relevant interested party (including law enforcement). Where laws, customer requirements and specifications, commodity specific guidelines and/or best practice recommendations exist and are derived from a reputable source, these practices and parameters should be followed if they present a higher level of conformance than those included in the audit scheme.

Website links shown in this document are there to aid understanding and provide assistance by way of example (link listings are not exhaustive). These links are not a sign of endorsement by Azzule. Furthermore, Azzule Systems accepts no liability for the content of these links.

Please be aware that there is additional information on the PrimusGFS website including the audit checklist templates. The PrimusGFS website also has access to the official PrimusGFS General Regulations, which explain the overall scheme scoring systems and other details of the scheme.

The following text is a modified excerpt from the PrimusGFS General Regulations v3.2. It is provided here as an introduction to the audit notes. For full and current text please refer to the most recent version of the PrimusGFS General Regulations.

Audit Execution

The audit should be performed using the most recent version of the PrimusGFS normative documents. The PrimusGFS Standard is divided into seven Modules:

- Module 1 – Food Safety Management System
- Module 2 – Farm
- Module 3 – Indoor Agriculture
- Module 4 – Harvest Crew
- Module 5 – GMP
- Module 6 – HACCP
- Module 7 – Preventive Controls
- Module 8 – Grains and Pulses
- Module 9 – IPM Practices

Each Module is divided into sections, related to the specific Module and each section includes questions that detail the requirements for the specific section.

Scoring System

For all Modules, the amount of deficiencies and the associated risks have to be considered to assign the severity of the finding, which can be Minor Deficiency, Major Deficiency and Non-Conformance. When no deficiencies are found, a Total Conformance is given. The possible points for the questions in each Module are listed in the following table:

Scoring System for Questions				
Possible answer	Possible Points for the Question			
Total conformance	15 points	10 points	5 points	3 points
Minor deficiency	10 points	7 points	3 points	2 points
Major deficiency	5 points	3 points	1 point	1 point
Non-conformance	0 points	0 points	0 points	0 points
Not applicable	0 points	0 points	0 points	0 points

Detailed conformance requirements are noted for each question throughout this document, but some general statements are described below. These statements are superseded by the specific question conformance criteria and users should be aware that some questions do not follow the general statements below (e.g., automatic failure questions).

Conformance for Questions	
Answer	Criteria Used
Total conformance	To meet the question and/or conformance criteria in full.
Minor deficiency	To have minor deficiencies against the question and/or conformance criteria. To have single or isolated non-severe deficiencies (usually up to three) against the question and/or conformance criteria. To have covered most of the question conformance criteria, but not all.
Major deficiency	To have major deficiencies against the question and/or conformance criteria. To have numerous non-severe deficiencies (usually more than three) against the question and/or conformance criteria. To have single or isolated severe deficiencies against the question and/or conformance criteria. To have covered some of the question conformance criteria, but not most of it.
Non-conformance	To have not met the question and/or conformance criteria requirements at all. Having fundamental deficiencies against the question and/or conformance criteria (severe or non-severe issues).
Not applicable	The requirement described in the question is not applicable for the operation being audited. Justification should be provided in the auditor's comments. Be aware that there are some questions that do not allow a non-applicable response.

Automatic Failure

There are some questions that if down scored will lead to an automatic failure and an overall score of 0% for the corresponding Module. On being immediately informed of the automatic failure by the auditor during the audit, the auditee has the option to have the auditor continue the audit or to have the audit halt at that point (all charges will apply). The auditor should explain the advantages of finishing the audit, including the ability for the auditee to learn of other potential non-conformances and to show their buyers the status of their food safety system despite the automatic failure issue.

Special Circumstances for Not Certifying

Please also note, that under special circumstances and upon finding serious food safety risks, a “not certified” decision can be given. The auditee should be immediately informed of the automatic failure by the auditor during the audit. The auditee has the option to have the auditor continue the audit or to have the audit halt at that point (all charges will apply).

There are other Special Circumstance that are not technical in nature. Examples of these include detection of deliberate illegal activities, such as deliberate mislabeling, discovery of falsified records, attempting to bribe an auditor/CB personnel, threatening behavior towards an auditor/CB personnel, etc. Please refer to the General Regulations for further details.

Audit Termination

Once an audit has been started, should the auditee wish to stop the audit for any reason, the auditor will complete the report for as many questions as they were able to verify. PrimusGFS audits cannot be converted into a pre-assessment audit once the audit has been started. If an audit is terminated early, questions that the auditor was unable to verify will be marked as a non-conformance and will receive a score of zero. For questions unable to be verified, the auditor will indicate that the audit was terminated at the request of the auditee before the auditor could verify whether or not the audit conformed to the conformance criteria of the question. A report will be created on the database and issued, and all charges will apply.

Documentation Requirements

Organization’s Food Safety Systems:

When an Organization and its associated Operations are being audited, the auditor is checking the systems (SOP’s, policies, etc.) and the implementation of these systems throughout the visual inspection.

While auditees often create and implement their own systems, they can also use systems that have been created by other entities, for example, their customers’ technical manager, their consultants, etc., or a combination of resources. The Organization can create their own SOPs, or in other instances, can utilize SOP templates provided by other entities. As long as the systems meet the requirements of the PrimusGFS questions and expectations and these systems are being implemented properly, the auditee should receive full points for their efforts. The auditee is responsible for ensuring that the systems they use are reviewed, maintained and up-to-date. If the auditor detects any inconsistency, it will result in a down score.

New PrimusGFS Auditees/First-Time PrimusGFS Auditees

- **In operations that operate for more than three consecutive months throughout the year** – auditee should have at least three months of documentation (i.e., records of monitoring, training, meetings, etc.) available for review. If the auditee has less than three months of most of their documentation available for review, a pre-assessment audit is strongly advised. If the auditee has less than three months of most of their documentation available for review and decides to have a regular scheduled audit, they should be aware that they **cannot receive full conformance for**

paperwork questions relating to monitoring and that the down score will be based on the amount of paperwork available.

- **In short season operations that operate for less than three consecutive months throughout the year** - auditee should have at least three months of documentation (i.e. records of monitoring, training, meetings, etc.) available for review (this may include last season’s documentation). Where an operation does not have three months of records available (e.g., they are in operation for one month out of the year), the auditee should have at least the previous season’s records available for review. If the auditee has less than three months of most of their documentation available for review and decides to have a regular scheduled audit, they should be aware that they **may not receive full conformance for paperwork questions relating to monitoring and that the down score will be based on the amount of paperwork available.**

Existing PrimusGFS Auditees

- **In operations that operate for more than three consecutive months throughout the year** – auditee should have documentation available from the date of the prior audit.
- **In short season operations that operate for less than three consecutive months throughout the year** – auditee should have at least three months of documentation and documentation at least since the last audit (which includes the last season). Where an operation does not have three months of records available (e.g., they are in operation for one month out of the year), the auditee should have at least the previous season’s records available for review.

	Operates <three months/year	Operates >three months/year
New PrimusGFS Auditee	Three months of records (may include last season’s records). Where an operation does not have three months of records available (e.g., they are in operation for one month out of the year), the auditee should have at least the previous season’s records available for review.	Three months of records (may include last season’s records).
Existing PrimusGFS Auditee	Records at least since the last audit (or longer) to meet the minimum requirement of three consecutive months of records.	Records since the last audit.

Visual versus Verbal Confirmation

Visual confirmation is the default method of auditing, whether on the visual inspection portion or the paperwork section. Scores and comments are assumed to have been visually confirmed, unless stated otherwise. Verbal confirmation should be the exception to the rule and, if auditing properly, these should be rarely used. If a verbal confirmation is accepted, the auditor should write this in the comments section of the report for that specific question.

How to Use Point Assignment Guidelines

The following sections of this guidance manual are designed to help auditors choose the right score for each question, thereby helping to ensure consistency. This document does not cover all situations and is intended to be a guideline, as opposed to a rule. Auditors are expected to follow the guidelines as much as possible, but it is understood that there will be situations where an auditor should use their discretion. If an auditor does have to make a judgment call and/or tackle a situation not covered by this manual, then

the auditor should note the circumstances in the audit report with full justifications. (The auditor should also forward these details to their Certification Body and Azzule Systems, LLC in a separate note, so that this can be reviewed for future versions of the manual.)

In order to be consistent with the voluntary nature of requesting a third-party audit, and in order not to seem to be a legal document, the requirements within the questions are written as “should” and can be scored against. In other questions that use the term “ideally”, these statements cannot be scored against, but give the auditee an opportunity for improvement.

Notes in “red” are where the questions and/or conformance criteria have changed significantly since the previous version. Many of the changes are to improve clarification, but some are changes to the actual requirements. Please read carefully to see if these changes impact your particular situation.

Module 8: Grains and Pulses

General

8.01.01: Is there a designated person responsible for the operation's safety, health and hygiene programs?

Total conformance (10 points): There should be an on-site person(s) in charge of the operation's safety, health and hygiene programs (cross reference with 1.01.02). They should have documented training and this training should meet all applicable local and national requirements.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of errors and omissions in the records showing person/persons in charge of the operation's safety programs training and/or their relevant experience in safety, health and hygiene.
- There is a designated, appropriately trained person who is responsible for the operation's safety, health and hygiene programs and is part of the management structure (e.g., corporate) however they are not normally on-site.

Major deficiency (3 points) if:

- Numerous instance(s) of errors and omissions in the records showing person/persons in charge of the operation's safety programs training and/or their relevant experience in safety, health and hygiene.
- An outside consultant is the designated, appropriately trained person responsible for the operation's safety, health and hygiene programs however they are not normally on-site.

Non-conformance (0 points) if:

- Fundamental failure to document person(s) in charge of the operation's safety programs training and/or their relevant experience in safety, health and hygiene.
- No-one is in charge of the safety, health and hygiene programs, including document control and verification activities.

8.01.02: If the operation is growing under organic principles, is there written documentation of current certification by an accredited organic certification organization?

Total points 0: Information gathering question. Organic principles are defined as: a system that relies on ecosystem management rather than external agricultural inputs
<http://www.fao.org/docrep/003/ac116e/ac116e02.htm>).

Current certification by an accredited organic certification agency following a governmental organic program should cover the audited crops, be on file, and available for the auditor to review. Where an inspection has recently taken place, but new certificate is not yet available, there should be documented proof of a recent inspection for the auditor to review.

N/A if not growing under organic principles.

8.01.03: Does the operation have a written food safety hygiene and health policy covering at least worker and visitor hygiene and health and foreign materials?

Total conformance (15 points): There should be a written food safety policy regarding worker and visitor personal hygiene, GAPs, and health requirements. The policy should cover the rules related to hygiene and health (e.g., hand washing, eating/drinking, smoking, cuts/wounds, illness rules, foreign material issues, etc.). All workers/visitors should be requested to read (in the relevant language), confirm they understand and sign they agree to abide by the company's food safety, hygiene and health policy rules regarding personal hygiene, health and foreign material requirements. A copy of the signed food safety policy should be kept on file and a copy given to the worker.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of errors and omissions in the records or food safety hygiene and health policy.
- The policy is not in the relevant language(s).
- Single/isolated instance(s) of workers and visitors not signing a document stating that they will comply with the operations' personal hygiene and health policies.

Major deficiency (5 points) if:

- Numerous instances of errors and omissions in the records or food safety hygiene and health policy.
- Numerous cases of workers and visitors not signing a document stating that they will comply with the operations' personal hygiene and health policy.

Non-conformance (0 points) if:

- No records available.
- No policy available.
- Fundamental failure to maintain records.
- 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.
- Fundamental failure of workers and visitors to sign a document stating that they will comply with the operations' personal hygiene and health policies.

8.01.04: Is there a documented risk assessment based on hazards to workers' and visitors' health and safety?

Total conformance (10 points): There should be documented risk assessment for the hazards to workers and visitors, identified in workplace. The risk assessment should be reviewed at least annually and when a significant change occurs that could impact health and safety (e.g., new equipment, new chemicals, new practices, etc.). Examples of potential safety and health hazards include but are not limited to slip, trip and fall hazards, electrical hazards, equipment malfunctions and breakdowns, inappropriate machine guarding, fire, process flow, work practices, exposure to chemical hazards, exposure to excessive noise, dust or extreme temperatures, exposure to toxic biological materials (e.g., mold), ergonomic factors (e.g., repetitive motion, vibration).

Minor deficiency (10 points) if:

- Single/isolated instance(s) of errors or omissions on the risk assessment e.g., missing a physical, chemical, biological or other hazard.

Major deficiency (5 points):

- Numerous instance(s) of errors or omissions on the risk analysis e.g., missing more than three physical, chemical, biological or other hazards.
- Last documented risk assessment was done over 12 months ago.

Non-conformance (0 points):

- Fundamental errors on the risk analysis.
- No documented risk assessment.

8.01.04a: Where the risk assessment identifies the need for control of any hazards, are these controls indicated in the assessment and implemented?

Total conformance (10 points): For any risks identified in the assessment, the operation should detail what practice is being done to minimize identified risks, how to measure/monitor the effectiveness of the practice, how often to measure, and how it is verified and recorded. There should be documented evidence/validation that corrective actions and/or preventative measures have been taken when any risk was identified and were adequate for the specific situation.

Minor deficiency (10 points):

- Single/isolated instance(s) of corrective action and/or preventative measure records missing details or not being adequate.

Major deficiency (5 points):

- Numerous instances of corrective action and/or preventative measure records missing details or not being adequate.

Non-conformance (0 points):

- No corrective actions and/or preventative measures were performed or are inadequate to control risk(s).
- Corrective actions and/or preventative measures were not recorded for identified risks.

8.01.05: Is there documented evidence of the internal audits performed, detailing findings and corrective actions?

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 \checkmark 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.

Frequency Details for Grains and Pulses operations:

- 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.
- A more frequent self-assessment frequency should be used depending on the crop type, farm 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. Growing area(s), storage, harvesting, worker and visitor hygiene, agricultural water sources, training program, etc., and all associated paperwork should be included.

Minor Deficiency (10 points) if:

- Single/isolated instance(s) of follow up/corrective actions not noted.
- Single/isolated instance(s) of incomplete answers or missing records.
- Single/isolated instance(s) of areas/issues missing on the internal audit.

Major Deficiency (5 points) if:

- Numerous instances of follow up/corrective actions not noted.
- Numerous instances of incomplete answers or missing records.
- Inspection frequency is not adequate relative to the type of business and the number of issues that require monitoring.
- Numerous instances of areas/issues missing on the internal audit

Non-compliance (0 points) if:

- Fundamental failure to follow up/corrective actions or maintain records.
- Widespread failure to complete internal audit records with detailed answers.

- No documented internal audits have been performed.

Site

8.02.01: Is there a map that accurately shows all aspects of the operation, including adjacent land use/features, storage areas, water sources and fixtures used to deliver water used in the operation?

Total conformance (5 points): There is a map or similar document (photograph, drawing) that accurately shows the growing area(s), adjacent land use/features (e.g., animal pastures, irrigation ditches, roads, natural topography), location of permanent water fixtures and the flow of the water system, including any holding tanks and water captured for re-use. Permanent fixtures include wells, gates, reservoirs, returns and other above ground features. Septic systems, effluent lagoons or ponds, surface water bodies are also identified. Document should enable location of the water sources and the production blocks they serve.

Minor deficiency (3 points) if:

- Single/isolated aspect of the operation, source/fixture missing from the map.

Major deficiency (1 points)

- Numerous aspects of the operation water sources/fixtures are missing from the map.

Non-conformance (0 points) if:

- There is no map or similar document (photograph, drawing).
- The map provided does not represent the growing operations observed during the audit.

8.02.02: Are growing areas adequately identified or coded to enable trace back and trace forward in the event of a recall?

Total conformance (15 points): Coding details (e.g., farm name or reference code, blocks of the growing area(s)) should be in sufficient detail to enable trace back and trace forward through the distribution system. Details of the coding need to be tied to the record keeping system (e.g., pesticide, fertilizer records, residue testing reports). There should be field maps available demonstrating the coding details used in the operation(s).

Minor deficiency (10 points) if:

- Single/isolated instance of errors and omissions in the coding details and linkage to the record keeping system.

Major deficiency (5 points)

- Numerous instances of errors and omissions in the coding details and linkage to the record keeping system.

Non-conformance (0 points) if:

- There are no maps demonstrating the coding details.
- The coding details presented do not reflect the coding system used by the operation.

8.02.03: Has a documented risk assessment been developed, covering potential hazards associated with site location and growing process?

Total conformance (15 points): A documented risk assessment of all possible sources of contamination of the site and surrounding areas should be performed prior to the first seasonal planting and at least annually, and when any changes are made to practices, the growing area and adjacent land. Specific risk assessments for new land purchase/lease are scored under 8.04.01, organic fertilizers under 8.07.01, and water use under 8.08.01, and storage practices under 8.17.01. They may be included under this risk assessment or as separate documents. Documents should detail known or reasonably foreseeable hazards, the specific microbial, chemical and physical hazards and their severity and likelihood of occurring. Consider chemical hazards e.g., pesticides, heavy metals, perchlorate, fuel oil, mycotoxins (DON, ZON, OTA, ergot, T2/HT2), allergens (other crops e.g., soy, mustard, celery); physical hazards

e.g., glass, metal, gun shot, stone, plastic, other crops, treated seed; microbial hazards at all process stages and including adjacent land, equipment and tools used for harvest, storage, transportation, topography of the land for runoff (% slope, soil type), weather events (e.g., heavy rain, flooding, etc.) and any other applicable areas.

A detailed risk assessment should have been conducted and documented.

One approach:

- i) Identify hazards.
- ii) Determine who may be harmed and how
- iii) Evaluate the risks and decide on actions to control the risks
- iv) Document findings and implement actions
- v) Review and update assessment as necessary

http://www.fsc.go.jp/sonota/foodsafety_riskanalysis.pdf

<https://www.epa.gov/waterresilience>

<https://www.epa.gov/sustainable-water-infrastructure>

Minor deficiency (10 points):

- Single/isolated instance(s) of errors or omissions on the risk assessment e.g., missing a physical, chemical or biological hazard.

Major deficiency (5 points):

- Numerous instance(s) of errors or omissions on the risk assessment e.g., missing more than three physical, chemical or biological hazards.
- Last documented risk assessment was done over 12 months ago.

Non-conformance (0 points):

- Fundamental errors on the risk assessment.
- No documented risk assessment.

8.02.03a: Where the risk assessment identifies the need for control of any hazards, are these controls indicated in the assessment and implemented?

Total conformance (15 points): For any risks identified in the assessment, the operation should detail what practice is being done to minimize identified risks, how to measure/monitor the effectiveness of the practice, how often to measure, and how it is verified and recorded. There should be documented evidence that corrective actions and/or preventative measures have been taken when any risk was identified and were adequate for the specific situation. Auditor must detail any mitigation steps for identified risks.

Minor deficiency (10 points):

- Single/isolated instance(s) of corrective action and/or preventative measure records missing details or not being adequate.

Major deficiency (5 points):

- Numerous instances of corrective action and/or preventative measure records missing details or not being adequate.

Non-conformance (0 points):

- No corrective actions and/or preventative measures were performed or are inadequate to control risk(s).
- Corrective actions and/or preventative measures were not recorded for identified risks.

8.02.04: Are the necessary food defense controls implemented in the operation?

Total conformance (5 points): The operation should implement the necessary controls for preventing intentional contamination of the product, high-risk areas, external areas and vulnerable points (i.e., those that are not permanently locked). These measures should be based on the risk associated with the operation, as detailed in the food defense plan (1.08.02). Some high-risk areas of the operation include: personnel, visitors, contractors, computers, trucks (incoming and outbound), water sources, storage areas for harvested product, materials and chemicals, shipping areas, equipment used in the growing area, etc.

Food Defense Guidance Documents & Regulatory Information

<http://www.fda.gov/food/guidanceregulation/guidancedocumentsregulatoryinformation/fooddefense/>

Minor deficiency (3 points) if:

- Single/isolated instance(s) is observed of an area lacking necessary food defense controls, based on the risks associated with the operation.
- Protection is not constant or continuous.

Major deficiency (1 point) if:

- Numerous instances are observed of areas lacking necessary food defense controls, based on the risks associated with the operation.
- Numerous instances of exposed external areas of the facility lacking fencing.

Non-conformance (0 points) if:

- Fundamental failure to implement necessary food defense controls, based on the risks associated with the operation.
- There is not any form of protection based on the risk(s) associated with the operation.

8.02.05: Is the exterior area immediately outside the growing and storage areas, including roads, yards and parking areas, free of litter, debris, spilled grain, weeds and standing water?

Total conformance (5 points): Litter, debris, spilled grain, uncut weeds or grass and standing water within the immediate vicinity of the growing and storage areas may constitute an attractant or breeding place for rodents, insects or other pests, as well as microorganisms that may cause contamination. Grain loading areas should be hardscaped and free of grain spillage. All debris and vegetation growing within 10 feet (3 m) of storage areas should be removed (ideally from the whole storage area).

<https://extension.entm.purdue.edu/publications/E-66.pdf>

<https://crops.extension.iastate.edu/cropnews/2009/09/think-about-stored-grain-pests-harvest>

Minor deficiency (3 points) if:

- Single/isolated instance of the vicinity around growing and storage and loading areas not maintained properly.

Major deficiency (1 point) if:

- Numerous instances of the vicinity around growing and storage and loading areas not maintained properly.

Non-conformance (0 points) if:

- Fundamental failure to maintain the vicinity around growing and storage areas.

8.02.06: Are control measures being implemented for the outside storage of equipment, pallets, tires etc. (i.e., out of the mud, stacked to prevent pest harborage, away from the growing and storage areas)?

Total conformance (5 points): Incorrectly stored pallets and equipment can provide areas for pest harborage and/or cross contamination. Equipment should be stored at least 4" (10 cm) off the ground. Workers should check the stored equipment (e.g., irrigation pipes) periodically to ensure that it has not

become a pest harborage area or dirty due to rains. Inventory checks should occur in order to ensure that these storage areas do not become full of unnecessary items.

Minor deficiency (3 points) if:

- Single/isolated instance of equipment not stored properly.
- Excessive storage of old, obsolete equipment.

Major deficiency (1 point) if:

- Numerous instances of improper storage of equipment.

Non-conformance (0 points) if:

- No provisions are made to keep equipment from harboring pests.
- Evidence of pest infestation e.g., multiple occurrences of fecal contamination, nests and live pests.

8.02.07: Is the area around the trash area/dumpster/cull truck clean and tidy?

Total conformance (3 points): The trash area/dumpster/cull truck should be located away from growing and storage areas, where traffic flow may be a source of cross contamination. The area around the trash area/dumpster/cull truck should be maintained in a clean condition. There should not be any spillage on the ground. There should not be any standing water or liquid seepage around the trash area/dumpster/cull truck and there should not be any foul odor present. The trash area/dumpster/cull truck should be cleaned on a regular basis.

Minor deficiency (2 points) if:

- Minor amounts of debris around the trash area/dumpster/cull truck.

Major deficiency (1 point) if:

- Major amounts of debris around the trash area/dumpster/cull truck.
- Strong odor around dumpster/cull truck/trash area.
- Visible liquid leakage from the trash area/dumpster/cull truck.

Non-conformance (0 points) if:

- Evidence of old trash and spillage around the trash area/dumpster/cull truck, indicating that spills are not cleaned up as they happen.
- Evidence of insects or other pests in or around trash area/dumpster/cull truck.

8.02.08: Are all chemicals (pesticides, fertilizers, sanitizers, detergents, lubricants, etc.) stored securely, safely and are they labeled correctly?

Total conformance (15 points): Chemicals (i.e., pesticides, fertilizers, sanitizers, detergents, lubricants, etc.) are required to be stored in a well vented, designated (with a sign), dedicated, secure (locked) area away from food materials and separated from growing areas, grain storage areas, 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. Liquid should not be stored above powders. Where chemicals are stored, adequate liquid containment (spill controls) techniques need to be employed (secondary containment, absorbent materials, angled sealed floors, spill kits etc.). Chemical storage should be designed to help contain spills and leaking containers. Empty containers should be stored and disposed of safely. Empty pesticide containers should be kept in a secured storage area until they can be recycled or disposed of properly. If containers cannot be refilled, reconditioned, recycled or returned to the manufacturer, they should be crushed, broken or punctured to make them unusable. Containers should be disposed of in accordance with label directions and with local laws and national requirements. Pesticide containers designed to be returned and refilled should not be reused or tampered with. Food grade chemicals should not be commingled with non-food grade chemicals. Chemical storage requirements must meet local and national requirements.

Where pesticide storage is not located on-site auditor discretion applies on question applicability.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of chemicals not properly stored.
- Single/isolated instance(s) of improperly labeled or unlabeled chemical containers.
- Single/isolated instance(s) of empty containers either not being stored properly or disposed of properly
- The chemical storage area is not marked to indicate its use.
- Single isolated instance(s) of chemicals being used without proper attention to chemical spillage.

Major deficiency (5 points) if:

- Numerous instances of improperly stored chemicals.
- Numerous instances of improperly labeled or unlabeled chemical containers.
- Chemical storage is segregated in an enclosed, designated area, but not locked.
- Chemical storage area(s) has inadequate liquid containment systems.
- Numerous instances of empty containers either not being properly stored or disposed of properly.
- Numerous chemicals being used without proper attention to chemical spillage.

Non-conformance (0 points) if:

- Fundamental failure to properly store chemicals.
- There is no designated area for chemicals.
- There is a designated area for chemicals but it is not an enclosed or locked area.
- Spilled chemicals found in the chemical storage areas (not cleaned up properly)

8.02.09: Where organic fertilizers (e.g., compost, manure, slurry) are stored or handled, are measures in place to ensure seepage and runoff is collected or diverted and does not reach growing areas, storage areas, or any of the water sources?

Total conformance (15 points): Organic fertilizers (e.g., compost, manures, slurry, compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc.) are stored in a manner to prevent contamination to the growing or storage areas, or water sources. Containers should be structurally sound and not a source of runoff or contamination. There should be appropriate and effective barriers, secondary containment (pad, bunding), coverings, soil berms, pits or lagoons to divert or collect potential run-off or threats from wind, as applicable.

Minor deficiency (10 points) if:

- Single/isolated instance of seepage and runoff risk to the growing areas, storage areas, or water sources.

Major deficiency (5 points) if:

- Numerous instances of seepage and runoff risk to the growing areas, storage areas, or water sources.

Automatic Failure (0 points) if:

- **There are no barriers to collect run-off.**
- **Runoff was observed entering the growing area during the audit.**
- **Fundamental failure to prevent contamination**

8.02.10: Where there are fill stations for fuel, pesticides, or liquid fertilizers is it evident that the location and/or use is not a risk of contamination to the product, water sources, growing areas, equipment, storage areas, etc.?

Total conformance (15 points): Fill station area should not be a risk of contamination to the crop, water sources, equipment, storage areas, etc. Any containment structures (e.g., containment pad, bunding) must meet local and national requirements.

Minor deficiency (10 points) if:

- Single/isolated instance of the fill station(s) being a risk of contamination.

Major deficiency (5 points) if:

- Numerous instances of the fill station(s) being a risk of contamination.

Non-conformance (0 points) if:

- Widespread failure to prevent contamination.
- **Direct contamination of the crop, water source, equipment, stored commodity. Auditor should consider reverting to Q. 8.05.10, the automatic adulteration failure question.**

8.02.11: Has the operation eliminated or adequately controlled any potential sources of contamination (physical, chemical or biological) not covered by other more specific questions?

This question is designed to allow the auditor to underline potential contaminants to the auditee that are not covered by other more specific questions within the audit. There should be no physical (e.g., glass, plastic, metal, gun shot, stones, other crops, etc.), chemical (e.g., pesticides, fuel/lubricants, mycotoxins, allergens, etc.) or biological (e.g., human fecal matter) issues that are or could be potential risks to the product.

Total conformance (10 points): Any potential contaminants that are not covered by other more specific questions within the audit have been identified by the operation and pertinent controls have been established. Not applicable if the operation has not identified any potential contaminants that are not covered by other more specific questions within the audit.

Minor deficiency (10 points) if:

- Single/isolated instance of potential contaminants present and not covered by other more specific questions within the audit have not been identified by the operation.

Major deficiency (5 points) if:

- Numerous instances of the of potential contaminants present and not covered by other more specific questions within the audit have not been identified by the operation.

Non-conformance (0 points) if:

- Fundamental contaminants present and not covered by other more specific questions within the audit have not been identified and controlled by the operation.

Site Inspection

8.03.01: Are there chemical inventory logs for chemicals, including pesticides and fertilizers?

Total conformance (3 points): Chemical inventories should be on file. Chemicals within the scope of this question include pesticides, fertilizers, cleaners and sanitizers i.e., sanitation chemicals and food contact chemicals, such as chlorine, etc. Primary information in the product inventory includes: the product or chemical names, container volumes, number on hand, and location of containers. Inventory by storage area/type of chemical is optimal. The inventory should take into account the arrival of new stocks and any discrepancies should be explained. Minimum frequency for inventory checks should be monthly during production season and a copy should be maintained separate from the chemical storage location(s) and available for auditor review. The frequency of the inventory checks may decrease in short season or off-season operations; auditor discretion applies.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of missing chemical usage logs and/or inventories.
- Single/isolated instance(s) of omission(s) or error(s) in the chemical usage logs and/or inventories.
- Single/isolated instance(s) of new deliveries not being accounted for.

- Single/isolated instance(s) of minimum inventory frequency not being maintained (if usage logs are not being utilized).

Major deficiency (1 point) if:

- Numerous instances of missing chemical usage logs/inventories.
- Numerous instances of omissions or errors in the chemical usage logs and/or inventories.
- Numerous instances of new deliveries not being accounted for.
- Numerous instances of minimum inventory frequency not being maintained (if usage logs are not being utilized).

Non-conformance (0 points) if:

- No chemical usage logs/inventories are on file.
- Chemical inventory is not available for review.

8.03.02: Is there a documented and implemented Integrated Pest Management (IPM) program in place?

Total points 0: Information gathering question. Principles of IPM require regular crop inspections monitoring relevant pests, diseases and weeds. Program should identify and monitor pests, have documented action thresholds, documented non-chemical pest prevention and control steps (e.g., crop rotation, pest-resistant varieties, physical removal, etc.), monitoring for effectiveness and where necessary targeted use of pesticides. Use of non-specific pesticides should be a last resort.

<https://www.epa.gov/ipm/introduction-integrated-pest-management#identify>

8.03.03: Is there a farm conservation and sustainability plan documenting how the operation implements specific conservation and sustainability practices on their land?

Total points 0: Information gathering question. On-farm conservation and sustainability may improve soil health, water quality, air quality, energy efficiency, wildlife habitat, etc. There should be evidence (e.g., land use maps, soils information, photos, energy efficiency information, land easements, reserves) of the operation's current practices and future goals.

<https://farm-energy.extension.org/sustainability-on-the-farm/>

Growing Area History

8.04.01: Has a documented risk assessment been conducted for any new land purchase or lease?

Total conformance (15 points): A documented risk assessment of all possible sources of contamination in the growing and storage areas, each water source and surrounding areas should be performed prior to any new land purchase or lease. This should detail known or reasonably foreseeable risks/hazards, the specific microbial, chemical and physical risks and their severity and likelihood of occurring e.g., previous non-agricultural use (toxic waste site, landfill, mining, oil or natural gas extraction, fracking, etc.), flooding from uncontrolled causes and risk assessment should consider adjacent land use impacts from such concerns.

Minor deficiency (10 points):

- Single/isolated instance(s) of errors or omissions on the risk assessment e.g., missing a physical, chemical or biological hazard.

Major deficiency (5 points):

- Numerous instance(s) of errors or omissions on the risk assessment e.g., missing more than three physical, chemical or biological hazards.

Non-conformance (0 points):

- Fundamental errors on the risk assessment.
- No documented risk assessment.

8.04.01a: Where the risk assessment identifies the need for control of any hazards, are these controls indicated in the assessment and implemented?

Total conformance (15 points): For any risks identified in the assessment, the operation should detail what practice is being done to minimize identified risks/hazards, how to measure/monitor the effectiveness of the practice, how often to measure, and how it is verified and recorded. There should be documented evidence/validation that corrective actions and/or preventative measures have been taken when any risk was identified and were adequate for the specific situation. Documentation may include negative soil test results for heavy metals, residues of persistent organic contaminants and/or microbial contaminants, septic system inspections, etc.

Minor deficiency (10 points):

- Single/isolated instance(s) of corrective action and/or preventative measure records missing details or not being adequate.

Major deficiency (5 points):

- Numerous instances of corrective action and/or preventative measure records missing details or not being adequate.

Non-conformance (0 points):

- No corrective actions and/or preventative measures were performed or are inadequate to control risk(s).
- Corrective actions and/or preventative measures were not recorded for identified risks.

8.04.02: Has flooding from uncontrolled causes occurred on the growing area(s) since the previous growth cycle?

Total points 0: Information gathering question. This would be the case of the flowing or overflowing of a field with water outside a grower's control that is reasonably likely to contain chemical contaminants (e.g., pesticides, heavy metals, fuel oils) or microbial contaminants (e.g., sewage).

8.04.02a: If the growing area(s) and/or product was affected from the flood waters, is there documented evidence of a risk assessment and that corrective measures were taken to affected land and product?

Total conformance (10 points): If the growing area and/or product were affected from the flood waters, there should be a documented risk assessment and evidence (archived for 2 years) that corrective measures were taken with affected land and/or product (e.g., photographs, sketched maps, etc.).

Minor deficiency (7 points) if:

- Single/isolated instance(s) of errors or omissions on the risk assessment
- Single/isolated instance of missing evidence of corrective actions performed.

Major deficiency (3 points) if:

- Numerous instance(s) of errors or omissions on the risk assessment
- Numerous instances of missing evidence of corrective actions performed.

Non-conformance (0 points) if:

- Multiple widespread errors on the risk assessment
- No documented risk assessment
- No documented corrective actions were performed.
- Product affected by flooding was harvested for human consumption.

Training

8.05.01: Is there a safety, health and hygiene training program covering new and existing workers and are there records of these training events?

Total conformance (15 points): There should be a formal training program to inform all workers of the current policies and requirements of the company regarding safety, health and 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 before starting work and at least annually. These trainings should cover safety, health and hygiene policies including basic food safety, health and hygiene topics, the importance of detecting safety, health and/or hygiene issues with co-workers and visitors, all safety or hygiene issues in which they are responsible and correcting and reporting problems. Topics include, but not limited to, hand washing, protective clothing (where applicable), workplace safety, recognizing and reporting injury and illness, blood and bodily fluids, animal intrusion, food defense. 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. Training provided and associated records should meet all legal requirements.

Minor Deficiency (10 points) if:

- Single/isolated instance(s) of logs having errors or incomplete information e.g., missing one of the following: training topic, trainer or material information.
- Training does not include the importance of recognizing food safety, health and/or hygiene issues with co-workers and visitors and/or correcting problems and reporting problems to a supervisor.
- Training has occurred but, on a few occasions, full attendance logs have not been kept and/or not all workers were covered.
- Training materials and/or company food safety policy are not in the relevant language(s).
- Training occurring, not before starting to work but within the first week.
- Single/isolated instance(s) of workers not being trained or not signing a document stating that they will comply with the operation's food safety hygiene program.

Major Deficiency (5 points) if:

- Numerous instances of logs having errors or incomplete information e.g., missing one of the following: training topic, trainer or material information.
- Training has occurred but, on many occasions, full attendance logs have not been maintained.
- Up to three key topics e.g., workplace safety, reporting injury/illness, blood and other bodily fluids, animal intrusion, etc., have been omitted from the training.
- Only annual refresher training has occurred, and the operation runs for more than 3 months of the year.
- Numerous cases of workers not signing a document stating that they will comply with the operations' food safety hygiene program.
- Training occurring, not before starting to work but within the first month.
- Numerous instances of workers not being trained.

Non-conformance (0 points) if:

- Fundamental failure to maintain records.
- No records of training or workers not being trained.
- More than three key topics e.g., workplace safety, reporting injury/illness, blood and other bodily fluids, animal intrusion, etc., have been omitted from the training program.
- No specific training given or given after the worker has been working for more than one month.
- No formal training program implemented.

8.05.02: Are there worker safety, health and hygiene non-conformance records and associated corrective actions (including retraining records)?

Total conformance (3 points): There should be a disciplinary system in place. A worker non-conformance should be recorded when workers are found not following safety, health and/or hygiene requirements. The auditee should have a record for worker non-conformance, 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.

Minor Deficiency (2 points) if:

- Single/isolated instance(s) of follow up/corrective action not noted.

Major Deficiency (1 point) if:

- Numerous instance(s) of follow up/corrective actions not noted.

Non-conformance (0 points) if:

- No records or no disciplinary system.
- Fundamental failure to record follow up/corrective actions.

Worker Hygiene**8.06.01: Are toilet and hand washing facilities available, clean, maintained and stocked with adequate supplies?**

Total conformance (15 points):

- Toilet facilities should be available to all workers and visitors.
- Toilet and hand wash facilities should clean, maintained in working condition, and have an adequate supply of toilet paper, soap and paper towels (or equivalent).
- Adequate trash disposal should be available.

United States Department of Labor 1928 Title Field Sanitation

<https://www.osha.gov/laws-regs/regulations/standardnumber/1928/1928.110>

21 CFR Part 110.37 <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=110.37>

Minor deficiency (10 points) if:

- One of the above criteria is not met.

Major deficiency (5 points) if:

- Two of the above criteria are not met.

Non-conformance (0 points) if:

- Failure to provide adequate toilet and/or hand washing facilities.
- Three of the above criteria are not met.

8.06.02: Are workers washing and sanitizing their hands before starting work each day, after using the restroom, after breaks, and whenever hands may be contaminated?

Total conformance (10 points): Worker conformance to hand washing and sanitizing procedures should be assessed, as washing hands is the first step in avoiding food contamination. Workers should be observed washing their hands prior to beginning work, after breaks, after using the toilet, and whenever hands may have become a source of contamination (e.g., after eating, smoking, etc.).

Minor deficiency (7 points) if:

- Single/isolated instance(s) of a worker who is not complying with the hand washing policy.

Major deficiency (3 points) if:

- Numerous instances of workers that are not complying with the hand washing policy.

Non-conformance (0 points) if:

- Majority of or fundamental failure of workers to comply with hand washing policies.

8.06.03: Are workers who are working directly with food, free from signs of boils, sores, open wounds and are not exhibiting signs of foodborne illness?

Total conformance (10 points): Workers who have exposed boils, sores, exposed infected wounds, foodborne illness or any other source of abnormal microbial contamination should not be allowed to work in contact with the product or food contact surfaces.

Minor deficiency (7 points) if:

- 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.

Major deficiency (3 points) if:

- 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.

Non-conformance (0 points) if:

- One or more workers are observed working in contact with food or food contact surfaces 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.

8.06.04: Are worker personal items being stored appropriately (i.e., not in the growing or storage areas)?

Total conformance (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 storage area(s) to prevent contamination and avoid food defense risks.

Minor deficiency (3 points) if:

- Single or isolated instance(s) of personal belongings, personal food, etc. being found in growing or storage areas.

Major deficiency (1 point) if:

- Numerous instances of personal belongings, personal food, etc. being found in growing or storage areas.

Non-conformance (0 points) if:

- Fundamental failure to prevent personal belongings, personal food, etc. being taken into the growing or storage areas.

8.06.05: Is smoking, eating, chewing and drinking confined to designated areas?

Total conformance (5 points): Smoking, chewing tobacco, chewing gum, drinking and eating is permitted in designated areas that are away from growing and storage areas.

21 CFP Part 112.32

<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfCFR/CFRSearch.cfm?fr=112.32>

Minor deficiency (3 points) if:

- Single/isolated instance(s) are observed of non-conformance to the above (includes evidence of smoking, eating, spitting, chewing gum, improper storage of break time food or drinking containers in interior refuse containers).
- Single/isolated instance(s) of designated area not meeting appropriate GAP standards.

Major deficiency (1 point) if:

- Numerous instances are observed of non-conformance to the above (includes evidence of smoking, eating, spitting, chewing gum, improper storage of break time food or drinking containers in interior refuse containers).
- No designated smoking area (unless the site has a non-smoking policy).
- Numerous instances of designated area not meeting appropriate GAP standards.

Non-conformance (0 points) if:

- Widespread consumption of food and beverages outside of designated areas.
- Widespread evidence of smoking outside the designated area.
- Widespread evidence of using chewing tobacco in growing and storage areas.
- Widespread non-conformance to the above criteria.

8.06.06: Are first aid kits adequately stocked and readily available?

Total conformance (5 points): First aid kit(s) should be adequately supplied to reflect the kinds of injuries that occur (including any chemicals stored on-site) and should be stored in an area where they are readily available for emergency access. Date-coded materials should be within dates of expiration.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of first aid kit(s) not having adequate supplies, supplies out-of-date or kit not readily accessible.

Major deficiency (1 point) if:

- Numerous instances of first aid kit(s) not having adequate supplies, supplies out-of-date or kit not readily accessible.

Non-conformance (0 points) if:

- Fundamental failure to provide first aid kit(s) with adequate supplies, supplies out-of-date or kit not readily accessible.

Agronomic Inputs

8.07.01: Is there a documented risk assessment in place for all organic fertilizers used on the farm?

Total points (15 points): A documented risk assessment should be performed prior to use and should consider type of organic fertilizer, method of treatment, method and timing of application, microbial and heavy metal test results/COAs.

Organic fertilizers include human sewage sludge (biosolids), animal derived compost (raw animal manure), untreated animal manure (e.g., raw manure &/or non-composted, incompletely composted animal manure, green waste, non-thermally treated animal manure), non-synthetic treatments (e.g., bone meal, blood meal, compost teas, fish emulsions, fish meal, bio-fertilizers, etc.), soil amendments (e.g., plant by-products, humates, seaweed, inoculants, and conditioner, etc.). Human sewage sludge (biosolids) are by-products of wastewater treatment. The use of untreated biosolids is prohibited.

<https://www.epa.gov/biosolids/basic-information-about-biosolids>;

<http://omafra.gov.on.ca/english/nm/nasm/info/brochure.htm>

Minor deficiency (10 points):

- Single/isolated instance(s) of errors or omissions on the risk assessment e.g., missing a physical, chemical or biological hazard.

<https://extension.psu.edu/use-of-biosolids-in-crop-production>; <https://www.epa.gov/agriculture/agriculture-nutrient-management-and-fertilizer>; <https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/plantsanimals/mnm/>;

Major deficiency (5 points):

- Numerous instance(s) of errors or omissions on the risk assessment e.g., missing more than three physical, chemical or biological hazards.
- Last documented risk assessment was done over 12 months ago.

Non-conformance (0 points):

- Fundamental errors on the risk assessment.
- No documented risk assessment.

8.07.01a: Where the risk assessment identifies the need for control of any hazards, are these controls indicated in the assessment and implemented?

Total conformance (15 points): For any risks identified in the assessment, the operation should detail what practice is being done to minimize identified risks, how to measure/monitor the effectiveness of the practice, how often to measure, and how it is verified and recorded. There should be documented evidence that corrective actions and/or preventative measures have been taken when any risk was identified and were adequate for the specific situation. Documentation may include test results for microbial contaminants and/or heavy metals, etc. Auditor must detail any mitigation steps for identified risks.

Minor deficiency (10 points):

- Single/isolated instance(s) of corrective action and/or preventative measure records missing details or not being adequate.

Major deficiency (5 points):

- Numerous instances of corrective action and/or preventative measure records missing details or not being adequate.

Non-conformance (0 points):

- No corrective actions and/or preventative measures were performed or are inadequate to control risk(s).
- Corrective actions and/or preventative measures were not recorded for identified risks.

8.07.02: Are the organic fertilizers being used according to local and national regulations or guidelines?

Total conformance (15 points): Growers need to consider carefully how using organic fertilizers (e.g., biosolids) will affect crop rotations and forage and hay production. Growers also should check to be certain that the marketability of forage, feed, or food crops they produce (see 8.07.01) will not be affected by the use of biosolids. All local and national legislation or guidelines should be followed.

Potentially useful references:

<https://www.epa.gov/biosolids/biosolids-laws-and-regulations>

<https://www.epa.gov/agriculture/agriculture-nutrient-management-and-fertilizer>;

<https://www.ers.usda.gov/topics/farm-practices-management/crop-livestock-practices/manure-management>

<https://www.saskatchewan.ca/business/agriculture-natural-resources-and-industry/agribusiness-farmers-and-ranchers/crops-and-irrigation/soils-fertility-and-nutrients/managing-manure-as-a-fertilizer>

Minor deficiency (10 points):

- Single/isolated instance(s) of errors or omissions in the records.

Major deficiency (5 points) if:

- Numerous instances of errors or omissions in the records.

Non-conformance (0 points) if:

- There is a single incidence of fertilizer being used where the local or national regulations/guidelines ban their use.

8.07.02a: Are there organic fertilizer use records available for each growing area, including application records?

Total conformance (15 points): Records should be legible and at least detail date of application, type of fertilizer, amount, method of application, where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of errors or omissions in the records.

Major deficiency (5 points) if:

- Numerous instances of errors or omissions in the records.

Non-conformance (0 points) if:

- Fundamental failure to maintain records.
- No records are available.
- The interval between application and harvest is not being respected, and there is no validation study to verify application timelines.

8.07.02b: Are there Certificate(s) of Analysis (COA), specifications, product label or other documents available for review provided by the supplier stating the components of the material and that cover heavy metals testing?

Total conformance (10 points): Certificate(s) of Analysis (COA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone) and that cover heavy metals testing. Concerns are for heavy metals that may affect human health (e.g., Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn): Table 2-1 Ceiling Concentrations for Pollutants, EPA Guide to Part 503 Rule). There should be sufficient identification information that would make it possible to trace back to the source if needed, therefore, only approved suppliers should be used limited to those firms demonstrating consistent conformance with prevailing national/local standards and guidelines.

<https://www.epa.gov/biosolids/plain-english-guide-epa-part-503-biosolids-rule>

<https://aapfco.org/metals.html>

Minor deficiency (7 points) if:

- Single/isolated instance(s) of no reference to inert materials used.
- Single/isolated instance(s) of a missing heavy metals test on an individual lot used.

Major deficiency (3 points) if:

- Numerous instances of no reference to inert materials used.
- Numerous instances of missing heavy metals tests on an individual lot used.
- Single/isolated instance(s) of the same missing test from multiple lots used.

Non-conformance (0 points) if:

- There is no documentation available detailing the components of the material.
- Documentation is provided, but is not in sufficient detail to be able to trace back to the source.
- There are no COAs or other documentation available for the material being used.
- Fundamental failure to provide evidence for required tests performed on the lots used.

8.07.02c: Are there Certificate(s) of Analysis (COA) from the supplier(s) that cover pathogen testing (plus any other legally/best practice required testing) and does the grower have relevant letters of guarantee regarding supplier SOPs and logs?

Total conformance (15 points): Certificates of analysis should be available for each lot used containing animal materials. As minimum, microbial testing should include *Salmonella* spp., *Listeria monocytogenes* and *E. coli* O157:H7 for non-synthetic crop treatments (e.g., compost teas, fish emulsions, fish meal, blood meal, "bio fertilizers") and for animal-based compost, using approved sampling and testing methods (e.g., AOAC and an accredited laboratory). Where legally allowed, a reduced sampling rate is possible if the material is produced by the auditee and has been through a validated physical/chemical/biological process to inactivate human pathogens and the auditee has validation study documentation that shows that the material is safe and proper process control records (e.g., time/temperature/turning records and calibration records, such as, temperature probe) are maintained and available during the audit. Validation studies used must be applicable to the situation at hand and care should be taken not to over extrapolate. All local and national legislation should also be followed. The grower should have proof that compost suppliers have cross contamination SOPs and temperature/turning logs.

Reference:

21 CFR Part 112 Subpart F- Biological Soil Amendments of Animal Origin and Human Waste, for details on treatment processes and microbial testing standards.

<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfCFR/CFRSearch.cfm?CFRPart=112&showFR=1&ubpartNode=21:2.0.1.1.12.6>

NOP 5021 Guidance Compost and Vermicompost in Organic Crop Production;

<https://www.ams.usda.gov/sites/default/files/media/5021.pdf>

Minor deficiency (10 points) if:

- Single/isolated instance(s) of a missing test on an individual lot used.

Major deficiency (5 points) if:

- Numerous instances of missing tests on an individual lot used.
- Single/isolated instance(s) of the same missing test from multiple lots used.

Non-conformance (0 points) if:

- There are no COAs for the material being used.
- Fundamental failure to provide evidence for required tests performed on the lots used.

8.07.03: Are inorganic fertilizer use records available for each growing area, including application records?

Total conformance (15 points): Inorganic fertilizers include ammonium nitrate, ammonium sulfate, chemically synthesized urea, etc. These are sometimes called synthetic fertilizers. Records should be legible and at least detail date of application, type of fertilizer, amount, method of application where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of missing records.

Major deficiency (5 points) if:

- Numerous instances of missing records.

Non-conformance (0 points) if:

- Fundamental failure to maintain records.
- No records are available.

8.07.04: Are there Certificate(s) of Analysis (COA), specifications, product label or other documents available for review provided by the supplier stating the components of the inorganic fertilizer and that cover heavy metals testing?

Total conformance (10 points): Certificate(s) of Analysis (COA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone) and that cover heavy metals testing. Concerns are for heavy metals that may affect human health (e.g., Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn): Table 2-1 Ceiling Concentrations for Pollutants, EPA Guide to Part 503 Rule). There should be sufficient identification information that would make it possible to trace back to the source if needed, therefore, only approved suppliers should be used limited to those firms demonstrating consistent conformance with prevailing national/local standards and guidelines.

<https://aapfco.org/metals.html>

<https://www.epa.gov/biosolids/plain-english-guide-epa-part-503-biosolids-rule>

Minor deficiency (7 points) if:

- Single/isolated instance(s) of no reference to inert materials used.
- Single/isolated instance(s) of a missing heavy metals test on an individual lot used.

Major deficiency (3 points) if:

- Numerous instances of no reference to inert materials used.
- Numerous instances of missing heavy metals tests on an individual lot used.
- Single/isolated instance(s) of the same missing test from multiple lots used.

Non-conformance (0 points) if:

- There is no documentation available detailing the components of the material.
- Documentation is provided but is not in sufficient detail to be able to trace back to the source.
- There are no COAs or other documentation available for the material being used.
- Fundamental failure to provide evidence for required tests performed on the lots used.

Water Use**8.08.01: Is there a documented risk assessment in place for all water sources used on the farm?**

Total points (15 points): There should be a documented risk assessment should be performed for each water source and type of distribution system, considering water source uses, water quality, risks from animal access, upstream contamination/runoff, crop characteristics, timing and application methods, adjacent and nearby land use, topography of the land for runoff (% slope, soil type), and weather events (e.g., heavy rainfall, flooding) that may impact the water system at least annually, and when any changes occur.

Minor deficiency (10 points):

- Single/isolated instance(s) of errors or omissions on the risk assessment e.g., missing a physical, chemical or biological hazard.

Major deficiency (5 points):

- Numerous instance(s) of errors or omissions on the risk assessment e.g., missing more than three physical, chemical or biological hazards.
- Last documented risk assessment was done over 12 months ago.

Non-conformance (0 points):

- Fundamental errors on the risk assessment.
- No documented risk assessment.

8.08.01a: Where the risk assessment identifies the need for control of any hazards, are these controls indicated in the assessment and implemented?

Total conformance (15 points): For any risks identified in the assessment, the operation should detail what practice is being done to minimize identified risks, how to measure/monitor the effectiveness of the practice, how often to measure, and how it is verified and recorded. There should be documented evidence that corrective actions and/or preventative measures have been taken when any risk was identified and were adequate for the specific situation. Auditor must detail any mitigation steps for identified risks.

Minor deficiency (10 points):

- Single/isolated instance(s) of corrective action and/or preventative measure records missing details or not being adequate.

Major deficiency (5 points):

- Numerous instances of corrective action and/or preventative measure records missing details or not being adequate.

Non-conformance (0 points):

- No corrective actions and/or preventative measures were performed or are inadequate to control risk(s).
- Corrective actions and/or preventative measures were not recorded for identified risks.

8.08.02: Are there records of periodic visual inspection of the water source(s)?

Total conformance (5 points): "Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g., access to shut-offs, cracks/holes in lines, issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any corrective action taken. The appropriate documentation should be available for review.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of an error or omission in the inspection records or corrective action details.

Major deficiency (1 point) if:

- Multiple instances of errors or omissions in the inspection records or corrective action details.

Non-conformance (0 points) if:

- Fundamental failure to maintain inspection records.
- Fundamental failure to record corrective action details.

8.08.03: Are there backflow prevention devices on all main lines, including where chemical, fertilizer and pesticide applications are made?

Total conformance (10 points): Water systems should be fitted with backflow prevention devices to prevent contamination of the water supply. Main water lines should be fitted with back-flow protection for the incoming water (no matter what the source). Individual water lines should be fitted with backflow protection where practical. Irrigation systems should utilize effective devices which can minimize the potential risk of accidentally allowing any injected chemical/fertilizer to flow back into the irrigation well, surface water source, or to discharge onto the land where not intended.

Potentially useful references:

<https://extension.colostate.edu/docs/pubs/crops/backflow-prev-farm.pdf>

<https://blog.uvm.edu/cwcallah/files/2019/05/Backflow-Prevention-V1.0-Final.pdf>

<https://agriculture.canada.ca/en/environment/wells-and-groundwater/well-design-and-wellhead-protection>

Minor deficiency (7 points) if:

- Single/isolated instance(s) of a minor water line that is not protected in some way e.g., hose pipe, lacking an air gap for a tank inlet.

Major deficiency (3 points) if:

- Numerous instances of minor water lines that are not protected in some way e.g., hose pipe, lacking an air gap for a tank inlet.

Non-conformance (0 points) if:

- There is no backflow protection on primary main water line(s).

8.08.04: If the operation stores water (tank, cistern, container), is the storage container well maintained?

Total conformance (15 points): Container should be structurally sound with no evidence of damage or rust, no vegetation growing on or in the container. The base of the container should be free from debris and weeds. Access lids are properly secured, and any vents, overflow and drains are screened. Air gaps are present and should be at least twice the diameter of the water supply inlet and not be less than 25 mm (1 inch).

Minor deficiency (10 points) if:

- Single/isolated instance(s) of debris, weeds or other potential contaminants.

Major deficiency (5 points) if:

- Numerous instances of debris, weeds or other potential contaminants.

Non-conformance (0 points) if:

- The storage container(s) are not well maintained.
- There is a structural issue with the water containment system.

Pre-harvest Pesticide Usage

8.09.01: Are there up-to-date records of all pre-harvest pesticides applied (seed treatment, pre-store and during growth cycle)? A ZERO POINT (NON-CONFORMANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.

Total conformance (15 points): The growing operation should follow a pesticide application record keeping program that at least includes the following: date and time of application, crop name, treated area size and location (must be traceable), brand/product name, country of production registration information (e.g., US EPA), active ingredient, amount applied (rate/dosage), applicator identification, weather conditions (e.g., windspeed and direction), pre-harvest interval, restricted entry interval, application equipment identification and target pests. Records should include biopesticides (<http://www2.epa.gov/pesticides/biopesticides>). 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, etc.).

Major deficiency (5 points) if:

- Numerous instances of missing required information (e.g., missing target pest, applicator identification, equipment identification, etc.).

Automatic Failure (0 points) if:

- **Any failure to record critical required information (e.g., brand/product name, date, amount applied, location, etc.).**
- **Fundamental failure to record required information.**

- **There are no records of pre-harvest pesticides applied.**

8.09.02: Are all pre-harvest pesticides applied, authorized/registered by the authority/government of the country of production? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.

Total conformance (15 points): Application records show all pre-harvest pesticides applied (seed treatment, pre-store treatment, and 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 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 conformance with the MRLs of the destination countries for the applied "authorized" active ingredient (see 8.09.05)

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. ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.

Minor deficiency (10 points) if:

- There is no minor deficiency category for this question.

Major deficiency (5 points) if:

- There is no major deficiency category for this question.

Automatic Failure (0 points) if:

- **There is a single incidence of pesticides being used without being registered or authorized by the country of production government.**

8.09.03: Are all pre-harvest pesticides used applied as recommended/directed in the label? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.

Total conformance (15 points): Application records should show that pre-harvest pesticides (seed treatment, pre-store treatment, and during the growth cycle) applied in accordance with label directions and national or local regulation(s).

In operations applying pesticides "authorized" by the government, where use directions are not in the label, application records should show "authorization program" use/application directions are followed.

Minor deficiency (10 points) if:

- There is no minor deficiency category for this question

Major deficiency (5 points) if:

- There is no major deficiency category for this question.

Automatic Failure (0 points) if:

- **There is a single incidence of pesticides being used without following label directions.**

8.09.04: Where harvesting is restricted by pre-harvest intervals, are required pre-harvest intervals on product labels, national (e.g., EPA) registration and any national or local regulations and guidelines being adhered to? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.

Total conformance (15 points): Application and harvest records should show pre-harvest intervals on product labels, national (e.g., EPA) registration and any local or national regulations are being adhered to.

In operations applying pesticides “authorized” by the government, where use directions are not in the label, application and harvest records show the “authorization program” directions for pre-harvest intervals are followed.

Minor deficiency (10 points) if:

- There is no minor deficiency category for this question

Major deficiency (5 points) if:

- There is no major deficiency category for this question.

Automatic Failure (0 points) if:

- **There is a single incidence of pre-harvest intervals not being adhered to.**
- **There is no evidence that pre-harvest intervals are being adhered to (e.g., missing or non-traceable to the location harvest records).**

8.09.05: Is there documentation of pesticide Maximum Residue Limits (MRLs) conformance considering country of destination, target crop(s), and active ingredients applied?

Total conformance (15 points): The operation should have documented evidence about the MRL requirements for each country of destination for each pesticide (active ingredient) applied during the growth cycle. If there is no MRL defined by the country of destination for any active ingredient applied, the operation should have documented evidence of the applicable regulations in that country (e.g., default MRL, Codex Alimentarius, non-detectable, etc.). In the case where the MRLs have been standardized or harmonized for a group of countries (i.e., European Union) it is acceptable that the operation demonstrate conformance by referencing the "list" of MRLs issued from the formal body that represents those countries for this purpose.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of missing required information (e.g., missing MRL information for an active ingredient)

Major deficiency (5 points) if:

- Numerous instances of missing required information (e.g., missing MRL information for 3 or more active ingredients)

Non-conformance (0 points) if:

- There is no MRL information for the destination countries (or widespread missing information)

8.09.06: Where the MRLs of the destination countries are lower (stricter) than the country of production or where required by buyer, do test results show that Maximum Residue Limits (MRLs) of the intended markets are met?

Total conformance (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.

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.

Other alternative or complementary methods to demonstrate MRL conformance for an active ingredient include:

- 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.
- ii) Industry guidelines (e.g., “Agenda de Pesticidas” From ASOEX Chile).

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.

Minor deficiency (10 points) if:

- There is no minor deficiency category for this question

Major deficiency (5 points) if:

- There is no major deficiency category for this question.

Non-conformance (0 points) if:

- **There is a single incidence of an active ingredient with an exceeded MRL.**
- **There is no evidence of MRL conformance for any active ingredient applied.**
- **Evidence provided is not sufficient to support MRL conformance.**
- **Automatic failure if corrective actions are not provided and accepted by the certification body.**

Pesticide Handling & Application

8.10.01: Is there a documented procedure for the pesticide applications, considering mixing and loading, transporting, applying, surplus mix/tank rinsate disposal and equipment cleaning?

Total conformance (15 points): There should be a documented procedure for pesticide applications, specifically mixing and loading pesticides, transporting, application procedures and equipment cleaning. The procedure should include adhering to the product label.

Mixing and loading procedures should require activity to be in a well-ventilated, well-lit area away from unprotected people, watercourses, food and other items that might be contaminated. Measuring equipment including scales is dedicated to purpose.

Transporting procedures should require undiluted chemicals are securely and safely transported, diluted chemicals have spray equipment valves closed during transport.

Application procedures should include information about the necessary Personal Protective Equipment (PPE), re-entry intervals, excessive winds, posting of treated areas, etc.

Surplus mix/tank rinsate disposal procedures should require minimizing risk of contamination and pollution by ensuring maximum rate is not exceeded, and specify surplus spray mixture handling.

Equipment cleaning procedures should include measuring devices, mixing containers, application equipment (e.g., sprayer), 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.

If any of these practices are observed during the inspection, it should be evident that the procedures are being followed.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of an error or omission in the procedure or practice.

Major deficiency (5 points) if:

- Numerous instances of an error or omission in the procedure or practice.

Non-conformance (0 points) if:

- Widespread errors or omissions in the procedure or practice.
- There is no procedure.

8.10.02: Is there documentation that shows the individual(s) making decisions for pesticide applications is competent?

Total conformance (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 pesticide applications (e.g., choice of pesticides, application timings, rates, etc.)

Minor deficiency (10 points) if:

- Single/isolated instance(s) of missing documentation for one individual making decisions on pesticide applications (if more than one).

Major deficiency (5 points) if:

- Single/isolated instance of a proof of training/certificate/license being out of date.
- Numerous instances of missing documentation for individuals making decisions on pesticide applications (if more than one).

Non-conformance (0 points) if:

- There is no documentation for the individual(s) making the decision(s).

8.10.03: Is there documentation that shows that individuals who handle pesticide materials are trained and are under the supervision of a trained person?

Total conformance (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.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of missing training documentation.

Major deficiency (5 points) if:

- Numerous instances of missing training documentation.
- Worker who is not qualified to handle pesticide materials independently has training but no supervision.

Non-conformance (0 points) if:

- There is no documentation showing training for individuals handling pesticide materials.
- There is no documentation for the supervising person.

Harvest Practices

8.11.01: Are there records showing that blocks (or coded areas) are cleared for harvest?

Total conformance (10 points): There should be documentation showing that pre-harvest intervals are being met and blocks are cleared for harvest.

Minor Deficiency (7 points) if:

- Single/isolated instance(s) of incomplete or missing records.

Major Deficiency (3 points) if:

- Numerous instances of incomplete or missing records.

Non-conformance (0 points) if:

- No documented pre-harvest inspections have been performed.
- No evidence that the current block being harvested had been cleared for harvest.

8.11.02: Is harvest and transport equipment (combine, wagons, grain carts, trailers, conveyors, loading shovels, etc.) maintained in good condition and surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g., tape, string, cardboard, etc.)?

Total conformance (10 points): Harvest and transport equipment (combine, wagons, grain carts, trailers, conveyors, loading shovels, etc.) is free of flaking paint, corrosion, rust and other unhygienic materials (e.g., tape, string, cardboard, etc.). Food contact surfaces should be made of appropriate materials that can be easily cleaned and maintained.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of flaking paint, corrosion, rust or other unhygienic materials which does not pose a threat to commodity contamination.

Major deficiency (3 points) if:

- Single/isolated instance(s) of flaking paint, corrosion, rust or other unhygienic materials which may pose a threat to commodity.
- Numerous instances of flaking paint, corrosion, rust or other unhygienic materials which do not pose a threat to commodity.

Non-conformance (0 points) if:

- Inspection shows numerous areas of flaking paint, corrosion, rust or other unhygienic materials, which may pose a threat to commodity.

8.11.03: Are harvest equipment (combine harvesters, trailers, loading shovels, etc.) surfaces clean?

Total conformance (10 points): Unsanitary food contact surfaces can directly lead to contamination of the product. Equipment used for harvesting purposes including transporting, handling, conveying, loading, etc., should be clean and dry before use.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of food contact surface that is unclean.

Major deficiency (3 points) if:

- Numerous instances of food contact surfaces that are unclean.

Non-conformance (0 points) if:

- Widespread observations of food contact surfaces that are unclean.

8.11.04: Are all glass issues on harvest equipment (combine harvesters, trailers, etc.) protected in some manner?

Total conformance (3 points): Glass located on the harvesting machinery (e.g., lights, night lights) that may pose a threat of contamination onto product should be protected. Machinery includes tractors and other equipment that may come into contact with product. There should be no evidence of cracked lenses.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of unprotected glass.

Major deficiency (1 point) if:

- Numerous instances of unprotected glass.

Non-conformance (0 points) if:

- Widespread failure to control glass on harvesting machines, in-field trucks and/or tractors.
- More than one instance of a broken glass item found on harvest equipment during the audit.

Storage Receiving

8.12.01: Are there written procedures in place to check quality and moisture content of harvested crop at receiving?

Total conformance (10 points): There should be a documented procedure that requires and outlines how to sample grain, carry out quality checks and assess moisture content. Taking multiple grain samples when filling the storage area and during storage can help account for variable moistures and reduce the risk of storage molds. Use the highest moisture content value to determine management options that can reduce the risk for storage molds, hot spots, and spoilage.

<https://ahdb.org.uk/grain-storage>

Minor deficiency (7 points) if:

- Single/isolated instance(s) of errors or omissions in the procedure.

Major deficiency (3 points) if:

- Numerous instances of errors or omissions in the procedure.

Non-conformance (0 points) if:

- There is no documented procedure.

8.12.02: Are there inspection records of incoming commodities (including quality and moisture checks) on received loads?

Total conformance (10 points): There should be documented records of quality and moisture checks on incoming loads of commodities. Records should reflect the documented procedure.

Minor Deficiency (7 points) if:

- Single/isolated instance(s) of omissions or incorrect data in the records.

Major Deficiency (3 points) if:

- Numerous instances of omissions or incorrect data in the records.

Non-conformance (0 points) if:

- No records.
- Fundamental failure to maintain records.

8.12.03: Are there inspection records of storage areas immediately prior to use for integrity, cleanliness, pests, and other sources of potential contamination?

Total conformance (10 points): Storage areas should be checked to ensure they are clean and not a source of potential contamination immediately prior to use. Corrective actions of any issues should be documented.

Minor Deficiency (7 points) if:

- Single/isolated instance(s) of omissions or incorrect data in the records.

Major Deficiency (3 points) if:

- Numerous instances of omissions or incorrect data in the records.

Non-conformance (0 points) if:

- No records.
- Failure to maintain records.

Post-harvest Treatments

8.13.01: Are there up-to-date records of all pesticides applied post-harvest? A ZERO POINT (NON-CONFORMANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.

Total conformance (15 points): The growing operation should follow a pesticide application record keeping program that at least includes the following: date and time of application, crop name, treated area size and location (must be traceable), brand/product name, country of production registration information (or equivalent), active ingredient, amount applied (rate/dosage), applicator identification, pre-harvest interval, restricted entry interval, application equipment identification and target pests. Records should include biopesticides (<http://www2.epa.gov/pesticides/biopesticides>). 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, etc.)

Major deficiency (5 points) if:

- Numerous instances of missing required information (e.g., missing target pest, applicator identification, equipment identification, etc.)

Automatic Failure (0 points) if:

- **Any failure to record critical required information (e.g., brand/product name, date, amount applied, location, etc.).**
- **Fundamental failure to record required information.**

8.13.02: Are "food grade" and "non-food grade" post-harvest chemicals used appropriately, according to the label and not commingled?

Total conformance (10 points): All chemicals applied should be approved by the prevailing authority (e.g., US: EPA/FDA, Canada: CFIA/Environment Canada, Chile: SAG/Ministerio de Salud, Mexico: COFEPRIS) for their designated use and used according to label instructions. For example, where used, diatomaceous earth should be food grade. "Food grade" and "non-food grade" materials should be stored in separate designated areas and adequately labeled.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of commingling of non-food grade with food grade chemicals.
- Single/isolated instance(s) of non-food grade materials found/used in the storage area.
- Single/isolated instance(s) of a chemical being used contrary to label.

Major deficiency (3 point) if:

- Numerous instances of commingling of non-food grade with food grade chemicals.
- Numerous instances of non-food grade materials found/used in the storage area.
- Numerous instances of a chemical(s) being used contrary to label.

Non-conformance (0 points) if:

- No attempt to split non-food grade from food grade materials.
- Widespread use of non-food grade materials found/used in the storage areas.
- Widespread use of a chemical(s) used contrary to label.
-

8.13.03: Are all pesticides applied post-harvest authorized/registered by the authority/government of the country of production? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.

Total conformance (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 conformance with the MRLs of the destination countries for the applied "authorized" active ingredient (see 8.13.05).

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. ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.

Minor deficiency (10 points) if:

- There is no minor deficiency category for this question

Major deficiency (5 points) if:

- There is no major deficiency category for this question.

Automatic Failure (0 points) if:

- **There is a single incidence of pesticides being used without being registered or authorized by the country of production government.**

8.13.04: Are all pesticides used post-harvest applied as recommended/directed in the label? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.

Total conformance (15 points): Application records should show that pesticides used post-harvest are applied in accordance with label directions and any national or local regulation(s).

In operations applying pesticides "authorized" by the government, where use directions are not in the label, application records should show "authorization program" use/application directions are followed.

Minor deficiency (10 points) if:

- There is no minor deficiency category for this question

Major deficiency (5 points) if:

- There is no major deficiency category for this question.

Automatic Failure (0 points) if:

- **There is a single incidence of pesticides being used without following label directions.**

8.13.05: Is there documentation of pesticide Maximum Residue Limits (MRLs) conformance considering country of destination, target crop(s), and active ingredients applied?

Total conformance (15 points): The operation should have documented evidence about the MRL requirements for each country of destination for each pesticide (active ingredient) applied post-harvest. If there is no MRL defined by the country of destination for any active ingredient applied, the operation should have documented evidence of the applicable regulations in that country (e.g., default MRL, Codex Alimentarius, non-detectable, etc.). In the case where the MRLs have been standardized or harmonized for a group of countries (i.e., European Union) it is acceptable that the operation demonstrate conformance by referencing the "list" of MRLs issued from the formal body that represents those countries for this purpose.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of missing required information (e.g., missing MRL information for an active ingredient)

Major deficiency (5 points) if:

- Numerous instances of missing required information (e.g., missing MRL information for 3 or more active ingredients)

Non-conformance (0 points) if:

- There is no MRL information for the destination countries (or widespread missing information)

8.13.06: Where the MRLs of the destination countries are lower (stricter) than the country of production or where required by buyer, do test results show that Maximum Residue Limits (MRLs) of the intended markets are met?

Total conformance (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.

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.

Other alternative or complementary methods to demonstrate MRL conformance for an active ingredient include:

- iii) 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.
- iv) Industry guidelines (e.g., "Agenda de Pesticidas" From ASOEX Chile).

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.

Minor deficiency (10 points) if:

- There is no minor deficiency category for this question

Major deficiency (5 points) if:

- There is no major deficiency category for this question.

Non-conformance (0 points) if:

- There is a single incidence of an active ingredient with an exceeded MRL.

- **There is no evidence of MRL conformance for any active ingredient applied.**
- **Evidence provided is not sufficient to support MRL conformance.**
- **Automatic failure if corrective actions are not provided and accepted by the certification body.**

Storage Pest Control

8.14.01: Is there a documented and effective pest control program detailing the scope of the program, target pests and frequency of checks, including a copy of the contract with the extermination company (if used), Pest Control Operator license(s)/training, and insurance documents?

Total conformance (15 points): There should be documented and effective, proactive pest control program (in-house or contracted) to control rodents, insects, reptiles, domestic animals, wildlife and birds in all storage areas. Program should detail the scope of the program, target pests and frequency of checks. If performed in-house, the pest-control operators or equivalent should be registered, licensed or have documented formal training (if regulation does not require certification or registration). As applicable, the person's training and/or license should specify structural pest control and fumigation (if applicable) or equivalent or have documentation to show that the license includes structural pest control and fumigation training if not specified on license. Any substitute operator's license credentials should also be on file. If the service is contracted, the pest control contract service/company should be licensed in structural pest control and fumigation (if applicable), insured and the contract should be documented (quoting the scope of the program, types of pests it covers and frequency of visits). When licensing legislation does not apply (e.g., in certain countries), there should be evidence of on-going training. Auditors should check documentation for expiry dates.

<https://grainscanada.gc.ca/en/grain-quality/manage/guides/pdf/pfsg-pgef-eng.pdf>

Minor deficiency (10 points) if:

- One piece of documentation is not in place or is not current.
- Single/isolated omission(s) in the written program.

Major deficiency (5 points) if:

- Two pieces of documentation are not in place or are not current, such as evidence of the training and/or license for one pest control operator.
- Numerous omissions in the written program,

Non-conformance (0 points) if:

- More than two pieces of documentation are not in place or are not current.
- There is no documented pest control program.
- Written program does not resemble what is happening in practice at all.
- There is no evidence of the training and/or license of the pest control operator(s).

8.14.02: Is there a schematic drawing/plan of the storage operation, showing numbered locations of all pest monitoring devices (e.g., rodent traps, bait stations, insect traps, etc.) both inside and outside the facility?

Total conformance (10 points): A schematic drawing or trap map is on file, current and details internal and external traps. All devices (e.g., tin cats, Ketch-Alls, bait stations, glue boards, insect traps, etc.) should be numbered and clearly identified on the map. The numbers should match what is in operation. The document should be accurate, dated and should show the type of device.

Minor deficiency (7 points) if:

- The location map does not distinguish between the different types of devices.
- Single/isolated instance(s) of trap(s) being missed off the plan.
- Single/isolated instance(s) of trap(s) numbering being incorrect.

Major deficiency (3 points) if:

- Numerous instances of traps being missed off the plan.
- Numerous instances of traps numbering being incorrect.

Non-conformance (0 points) if:

- No map available for review.
- Majority of traps are not included on the map.
- Map does not represent actual physical placement of traps at all.

8.14.03: Are service reports created for pest control checks detailing inspection records, application records, and corrective actions of issues noted (in-house and/or contract)?

Total conformance (10 points): Service reports from the contract pest control company and in-house inspection records should be available for review. Records should include services performed, date of service, chemicals used (see below), signs of activity with corrective actions, and trend reports. Match Pest Control Operator (PCO) signature on service logs with licenses/certificates on file. Where the contracted pest control has left their client details of an issue or a recommendation (e.g., excessive gap at the bottom of a door), then the client should acknowledge the issue(s) and note corrective action completion(s) where relevant.

Where chemicals are used, records should detail:

- Product name of materials applied
- The EPA or product registration number (as required by law)
- Target pest
- Rate of application (percent of concentration)
- Location or site of application
- Method of application (if applicable)
- Amount of pesticide used
- Date and time of application
- Signature of applicator
- Corrective actions
- Trend reports

<https://ahdb.org.uk/knowledge-library/grain-storage-guide>

National Pest Management Standards, Pest Management Standards for Food Plants

<http://npmapestworld.org/default/assets/File/2016%20Pest%20Management%20Standards%20for%20Food%20Processing-Electronic.pdf>

Minor deficiency (7 points) if:

- Single/isolated instance(s) of missing or incomplete information/records e.g., pest activity, trap replacement etc.
- Single/isolated instance(s) where contracted pest operators action points have not been acknowledged and completed.
- Single/isolated instance(s) of not noting chemical use details.

Major deficiency (3 points) if:

- Numerous instances of missing or incomplete information/records e.g., pest activity, trap replacement, etc.
- Numerous instances where contracted pest operators action points have not been acknowledged and completed.
- Numerous instances of not noting chemical use details.

Non-conformance (0 points) if:

- No service reports.
- Fundamental failure to maintain service reports.

- Fundamental failure to record chemical use details.

8.14.04: Is the area outside the storage zone free of evidence of pest activity?

Total conformance (10 points): All areas should be free of evidence of recurring/existing external pest activity. Specifically, there should be:

- No recurring/existing evidence of rodent, birds or other domestic animals or wildlife activity (remains, significant burrows, tracks, nests, feces, footprints) in active areas within the storage areas of the operation's property.
- No recurring/existing rodent, birds or other domestic animals, wildlife; activity/spoors (significant burrows, trails, nests, feces, tracks) in active areas within operation's property storage areas.
- No decomposed rodent(s) or other animals (frogs, lizards, etc.) in bait stations or along perimeter.

There should be no down scores attributed to finding a few (three or less) "fresh" rodents and/or evidence of rodent feeding in the external traps.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of recurring/existing rodent or animal (e.g., dogs, birds, etc.) activity/spoors (burrows, trails, feces, tracks, etc.)
- Single/isolated instance(s) of bird nesting observed around the exterior perimeter of storage areas.

Major deficiency (3 point) if:

- Numerous instances of recurring/existing rodent or animal (e.g., dogs, birds, etc.) activity/spoors (burrows, trails, feces, tracks, etc.).
- Numerous instances of bird nesting observed around the exterior perimeter of storage areas.
- Numerous (more than three) external traps inspected showing evidence of rodent activity.
- Single instance of a decomposed rodent or other animal (frog, lizard etc.) in external traps or along perimeter.

Non-conformance (0 points) if:

- Evidence of significant (infestation level) rodent activity (burrows, trails, feces, tracks, animal spoor)
- Significant bird activity in traffic zones.
- More than one decomposed rodent or other animals (frogs, lizards, etc.) in external traps or along perimeter.

8.14.05: Are pest control devices located away from exposed commodities?

Total conformance (10 points): Pest control devices (excludes insect monitoring devices) should be located away from exposed commodities or equipment to prevent any physical or microbial contamination. Poisonous bait stations should not be located within areas where commodities are being stored. Care should be taken to place pest control devices in such a manner that they do not pose a threat of contaminating product, packaging or raw materials. This includes the following restrictions:

- 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).
- No bait should be found outside of bait stations.
- 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 (scored in 8.14.03).
- All applications should be recorded properly (scored in 8.14.03), 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.
- If use of poisonous bait is required inside storage areas, then the area that is being trapped should have all the commodity removed prior to the use of the poisonous baits.

Minor deficiency: (7 points) if:

- Single/isolated instance(s) of grain or pellet baits being used in an outside bait station (external trap).

- Single/isolated instance (up to three snap traps) of snap traps being used outside a trap box (not presenting risk to product or packaging).
- Single/isolated instance(s) of any other issues noted on the conformance criteria.

Major deficiency (3 points) if:

- Numerous instances of grain or pellet bait being used in an outside bait station (external trap).
- Single instance of bait/poison inside the facility (inside of a trap).
- Single instance of bait/poison found outside of a device, outside the facility.
- Numerous instances of snap traps being used outside a trap box.
- Snap traps using an allergenic bait.
- Numerous instance(s) of any other issues noted on the conformance criteria.

Non-conformance (0 points) if:

- More than one instance of bait/poison inside the facility (inside of a trap).
- Single instance of bait/poison inside the facility (outside of a trap).
- More than one instance of bait/poison found outside of a device, outside the facility.
- More than one major deficiency.
- Widespread use of snap traps outside of trap boxes.

8.14.06: Are pest control devices maintained in a clean and intact condition and marked as monitored (or bar code scanned) on a regular basis?

Total conformance (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.

The following criteria are met:

- 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.
- If cardboard traps are used (interior and dry areas only) they should be in good repair and marked as monitored (see below).
- 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.
- Approximately 10% of the traps, glue boards and bait stations should be checked by the auditor.
- 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 devices with a clear window on top.
- Bait and other poisons should be controlled and applied by a licensed applicator. See 8.14.01.
- 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.
- No bait stations should be missing entire bait.
- No old or moldy bait observed.
- Bait stations and traps should not be fouled with weeds, dirt, and other debris.
- External rodent control devices should be checked at least monthly these checks to be recorded.
- Any snap traps used should be inside stations and should be checked at least weekly – these checks to be recorded.

Local regulations may require exceptions/differences to above guidelines. At all times, local regulations should be met but if the audit system requirements are more stringent, these should also be adhered to.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of traps, bait stations and glue boards not working properly or adequately maintained (check cards, cleanliness, etc.)

- Single/isolated instance(s) of unsecured bait inside bait stations.
- Single/isolated instance(s) of bait stations having moldy bait.
- Single/isolated instance(s) of any other issues noted on the conformance criteria.

Major deficiency (1 point) if:

- Numerous instances of traps, bait stations or glue boards not working properly or adequately maintained (check cards, cleanliness, etc.)
- Numerous instances of unsecured bait inside bait station.
- Numerous instances of bait stations having moldy bait.
- Numerous instance(s) of any other issues noted on the conformance criteria.

Non-conformance (0 points) if:

- Widespread failure to maintain the pest control devices.
- Widespread failure to monitor the pest control devices.

8.14.07: Are interior and exterior building perimeter pest control devices adequate in number and location?

Total conformance (5 points): The distance between devices should be determined based on the pest, activity and the needs of the operation. As a reference, the following guidelines can be used to locate devices.

- Insect monitoring devices: pitfall traps in pairs, one at the surface and one 3-6 inches (8-15 cm) down into the grain bulk in a 16-20 ft. (5-6 m) grid alternating with probe traps inserted at grain surface in a 13-16 ft. (4-5 m) grid.
- Floor monitoring devices in corners, at wall/floor junctions every 13-16 ft. (4-5 m) around store.
- Outside building perimeter: mechanical rodent 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. (15 m) of buildings and every 50-100 ft. (15-30 m).

[Monitoring insect and mite populations in grain stores | AHDB](#)

[NPMA 2016 PEST MANAGEMENT STANDARDS FOR FOOD PROCESSING & HANDLING FACILITIES](#)

<https://www.epa.gov/rodenticides/restrictions-rodenticide-products#types>

Minor deficiency (3 points) if:

- Single/isolated instance(s) of devices positioned at longer intervals than mentioned above.
- Single/isolated instance(s) of devices missing or not within 6 feet (about 2 meters) of exit/entry doors.
- No bait stations along facility property fence line (auditor discretion on necessity for fence line trapping).
- Devices not located in a single area that should be covered

Major deficiency (1 point) if:

- Numerous instances of devices positioned at longer intervals than mentioned above.
- Numerous instances of devices missing or not within 6 feet (about 2 meters) of exit/entry doors.
- Devices not located in more than one area that should be trapped e.g., building perimeters (see text above).
- No exterior devices.

Non-conformance (0 points) if:

- Device positioning is such that the number of devices is nowhere near adequate in terms of spacing and coverage of entry points, e.g., one or two devices to cover a large production area.
- Devices not located in numerous areas that should be covered.

8.14.08: Are all pest control devices identified by a number or other code (e.g., barcode)?

Total conformance (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 map numbering and positions match reality.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of pest control devices having no visible numbers on them or on the station location.

Major deficiency (1 point) if:

- The devices are marked on the map but the devices themselves are not numbered or the numbering sequence is incorrect.

Non-conformance (0 points) if:

- None of the devices are numbered.
- There is no map.

8.14.09: Are all pest control devices effective and bait stations secured?

Total conformance (5 points): All devices should be correctly orientated. Rodent devices with openings parallel with and closest to wall. Bait stations should be secured to minimize movement of the device and be tamper resistant. Bait stations should be secured with a ground rod, chain, cable or wire, or glued to the wall/ground, or secured with a patio stone 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 – only devices containing bait are required to be secured.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of bait stations not being secured.
- Single/isolated instance(s) of devices “out of position” or incorrectly orientated.

Major deficiency (1 point) if:

- Numerous instances of bait stations not being secured.
- Numerous instances of devices “out of position” or incorrectly orientated.

Non-conformance (0 points) if:

- Widespread failure to secure bait stations.
- Widespread failure to properly position interior traps.

Long-term Storage Structures**8.15.01: Are interior floors, walls and ceiling roofs in good condition, free of rust, weather-proofed and/or have a vapor barrier installed (e.g., 6-mil plastic)?**

Total Conformance (5 points): It is important to keep the building in good repair to prevent the intrusion of moisture and pests. Floor surfaces should be impervious to water, non-absorbent, non-toxic, clean easily and resistant to wear and corrosion. Roof ceilings and plastic covers are properly maintained to protect exposed materials. Damaged walls are safety issues, difficult to clean and rust can be a foreign material risk. Ceiling roofs should be free from evidence of roof leaks (stains), holes or other damage.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of issues with condition of floors, walls or ceiling roofs.

Major deficiency (1 point) if:

- Numerous instances of issues with condition of floors, walls or ceiling roofs.

Non-conformance (0 points) if:

- Fundamental failure to maintain floors, walls or ceiling roofs.

8.15.02: Where there is bin storage, are openings (bin doors, unloading auger, under floor spaces, aeration fan openings) sealed except when aeration fans are operating?

Total conformance (5 points): Openings should be sealed to keep insects from entering, keep cool air flowing out of bin and keep winds blowing into fan openings. Walls should be free of holes, crevices and cracks to prevent pest infestations. If pipe holes are needed, they should be protected to avoid pest entry. Vents and air ducts should also be protected.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of finding the issues mentioned above.

Major deficiency (1 point) if:

- Numerous instances of finding the issues mentioned above.

Non-conformance (0 points) if:

- Fundamental failure to seal openings to protect against pest entry.

8.15.03: Where there is bulk storage, are doors in good condition with no gaps, lockable and kept closed except during operations such as loading?

Total conformance (5 points): All doors to the outside should be designed and properly fitted out to prevent the ingress of rodents and insects into the facility. Doors should have no gaps greater than approximately 1/8 inch (3 mm). Rule of thumb is that if you can see daylight gaps, then further investigation is required. Doors should be kept closed and locked when not in use.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of finding the issues mentioned above.

Major deficiency (1 point) if:

- Numerous instances of finding the issues mentioned above.

Non-conformance (0 points) if:

- Fundamental failure to seal openings to protect against pest entry.

Temporary and Emergency Storage**8.16.01: Where there is temporary storage, does the structure have rigid self-supporting sidewalls, adequate aeration, a roof and/or an appropriate waterproof cover (e.g., tarpaulin) and adequate access to grain for loading, sampling and monitoring?**

Total conformance (5 points): Management of temporary grain storage is extremely important; exposed grain may get trampled, windblown and damaged by moisture. Temporary plastic covers may get loosened, walls can burst from pressure from wetted grain, hoops, bands and other types of reinforcements can fail. Site should have sufficient space for loading operations. Trucks/trailers should have a diameter of approximately 130 ft. (40 m) to turn. Local and national regulations must be followed. Potentially Useful References:

T.J. Herrman et al., Emergency Grain Storage, Outdoor Piling, KSU, September 1998.
Maier & Wilke., GQTF-38 Temporary Grain Storage Considerations. Purdue University.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of finding the issues mentioned above.

Major deficiency (1 point) if:

- Numerous instances of finding the issues mentioned above.

Non-conformance (0 points) if:

- Fundamental failure to protect temporary storage.

8.16.01a: Are interior walls and ceiling roofs in good condition, free of rust, weather-proofed and/or have a vapor barrier installed (e.g., 6-mil plastic)?

Total conformance (5 points): It is important to keep the building in good repair to prevent the intrusion of moisture and pests. Roof ceilings and plastic covers are properly maintained to protect exposed materials. Damaged walls are safety issues, difficult to clean and rust can be a foreign material risk. Ceiling roofs should be free from evidence of roof leaks (stains), holes or other damage.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of issues with condition of walls or ceiling roofs.

Major deficiency (1 point) if:

- Numerous instances of issues with condition of walls or ceiling roofs.

Non-conformance (0 points) if:

- Fundamental failure to maintain walls or ceiling roofs.

8.16.01b: Are floor surfaces made of concrete, weather-proofed and/or have a vapor barrier installed (e.g., 6-mil plastic)?

Total conformance (5 points): Floor surfaces should be impervious to water, non-absorbent, non-toxic, clean easily and resistant to wear and corrosion.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of issues with condition of floors.

Major deficiency (1 point) if:

- Numerous instances of issues with condition of floors.

Non-conformance (0 points) if:

- Fundamental failure to maintain floors.
- Numerous instances of issues with condition of floors.

Non-conformance (0 points) if:

- Fundamental failure to maintain floors.

8.16.02: Where there is emergency outside storage, is the location on higher ground, have adequate drainage, have a weather-proofed pad and/or a vapor barrier installed (e.g., 6-mil plastic) and have adequate space for vehicles to turn?

Total conformance (5 points): Site should be properly located to ensure good drainage and have sufficient space for loading operations. Trucks/trailers should have a diameter of approximately 130 ft. (40 m) to turn. Local and national regulations must be followed.

Potentially Useful References:

T.J. Herrman et al., Emergency Grain Storage, Outdoor Piling, KSU, September 1998.
Maier & Wilke., GQTF-38 Temporary Grain Storage Considerations. Purdue University.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of finding the issues mentioned above.

Major deficiency (1 point) if:

- Numerous instances of finding the issues mentioned above.

Non-conformance (0 points) if:

- Fundamental failure to protect temporary storage.

Storage Practices

8.17.01: Has a documented risk assessment been conducted at least annually, covering grain storage practices?

Total conformance (15 points): A documented risk assessment of grain storage practices should be performed at least annually, and when any changes are made to storage practices and/or commodities stored. This should detail known or reasonably foreseeable hazards in the absence of any controls, the specific microbial, chemical and physical hazards and their severity and likelihood of occurring. Consider previous crop stored (chemical transfer), commingling of different types of commodities (certified and non-certified grain, organic and conventional, gluten and gluten-free, GM and non-GM, human and non-human food commodities, treated seed and stored food commodities), storage conditions (temporary or long-term, temperature, humidity, sanitation, maintenance, etc.), pest control, etc.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of errors or omissions on the risk assessment e.g., missing a physical, chemical or biological hazard.

Major deficiency (5 points):

- Numerous instance(s) of errors or omissions on the risk assessment e.g., missing more than three physical, chemical or biological hazards.
- Last documented risk assessment was done over 12 months ago.

Non-conformance (0 points):

- Fundamental errors on the risk assessment.
- No documented risk assessment.

8.17.02: Where the risk assessment identifies the need for control of any hazards, are these controls indicated in the assessment and implemented?

Total conformance (15 points): For any risks identified in the assessment, the operation should detail what practice is being done to minimize identified risks, how to measure/monitor the effectiveness of the practice, how often to measure, and how it is verified and recorded. There should be documented evidence/validation that corrective actions and/or preventative measures have been taken when any risk was identified and were adequate for the specific situation. Auditor must detail any mitigation steps for identified risks.

Minor deficiency (10 points):

- Single/isolated instance(s) of corrective action and/or preventative measure records missing details or not being adequate.

Major deficiency (5 points):

- Numerous instances of corrective action and/or preventative measure records missing details or not being adequate.

Non-conformance (0 points):

- No corrective actions and/or preventative measures were performed or are inadequate to control risk(s).
- Corrective actions and/or preventative measures were not recorded for identified risks.

8.17.03: Does the operation have inventory records of each commodity with quantities and type stored, length of time each commodity was held along with carry-over records between harvest years?

Total conformance (10 points): Operations should have documentation showing exact location, commodity type and quantity as well as length of time commodity was held. Records (e.g., harvest log, storage inventory, sales records) should be kept that record type and amount of grain stored vs. amount shipped by harvest year. Carry-over between harvest years is recorded. Records should be reconciled at

least annually. Commodities may be held in appropriate long-term storage structures for periods exceeding 1 year. Short-term storage in silo bags should not exceed six months, and in modified structures should not exceed 3 months. Temporary storage under roof in open or partially open structures should not exceed 4 weeks; emergency uncovered storage (in the open, no roof) should not exceed 5 days.

<https://www.ams.usda.gov/content/usda-announces-temporary-and-emergency-grain-storage-options-us-warehouse-act-licensees>

<https://ahdb.org.uk/knowledge-library/grain-storage-guide>

<https://www.world-grain.com/articles/10299-grain-ops-silo-bags-as-a-storage-option>

Minor deficiency (7 points) if:

- Single/isolated instance(s) of omission(s) or error(s) in the inventory records.
- Single/isolated instance(s) of carry-over details not being recorded.
- Single/isolated instance(s) of storage periods exceeding appropriate storage periods.

Major deficiency (3 points) if:

- Numerous instances of omissions or errors in the inventory records.
- Numerous instances of carry-over details not being recorded.
- Numerous instances of storage periods exceeding appropriate storage periods.

Non-conformance (0 points) if:

- No inventory records are on file.
- Fundamental failure to record carry-over details.
- Fundamental failure to meet appropriate storage periods.

8.17.04: Are there grain storage monitoring records for temperature, moisture accumulation, insects as well as general grain condition and condition of storage area with details of any corrective actions taken?

Total conformance (10 points): Frequent checks of stored commodities help to detect any storage problems early. Monitor surface conditions, temperatures, grain condition, and different smells, both in the grain and exhaust air. Check every one-three weeks, depending on season. Grain that is crusting, wet, or slimy as well as has ice or frost accumulation and/or heating can be a sign of poor conditions and spoilage. Condensation or frost on the underside of the roof, hatches, and vents on a cold day almost always indicate a moisture migration problem. If signs of heating or hot spots are detected, document corrective actions (e.g., run the fan continuously until no further issues can be detected, remove, clean, dry and or/ sell grain).

Minor Deficiency (7 points) if:

- Single/isolated instance(s) of omissions in the records and corrective action details.
- Single/isolated instance(s) of frequency of monitoring not meeting minimum expectations.

Major Deficiency (3 points) if:

- Numerous instances of omissions in the records and corrective action details.
- Numerous instances of frequency of monitoring not meeting minimum expectations.

Non-conformance (0 points) if:

- No records.
- Corrective actions are not recorded when an issue is detected.
- Monitoring frequency is insufficient to verify the grain storage practices are adequate.

8.17.05: Are there records showing commodities are rotated using FIFO policy so that new grain is not put on top of old grain or that old grain is fumigated prior to addition of new grain?

Total conformance (5 points): All materials should be rotated using First in First Out (FIFO) procedures to ensure commodities are used in the correct order they are received and within their allocated shelf-life. Proper rotation of materials can prevent stock losses due to pest infestation, decomposition, mold and other problems associated with prolonged storage.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of missing receipt dates and/or tracking information on commodities.
- Single/isolate instance of records showing commodities are not used in the correct order they are received and within their allocated shelf-life

Major deficiency (1 point) if:

- Numerous instances of missing receipt dates and/or tracking information on commodities.
- Numerous instances showing commodities are used in the correct order they are received and within their allocated shelf-life

Non-conformance (0 points) if:

- There are no receipt dates and/or tracking information on commodities.
- There are no records showing commodities are used in the correct order they are received and within their allocated shelf-life.

8.17.06: Are there records showing that where an infestation (e.g., insect, rodent) was detected, appropriate measures were taken and documented?

Total conformance (5 points): Corrective actions may include moving the affected grain and retreating (protectant insecticide treatment), diverting to livestock feed, selling at reduced market value, grain fumigation, storage clean-out and treatment/fumigation. Documentation of appropriate measures being taken when record or records show a detected issue of infestation.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of a record or records showing an issue detected but no documentation of appropriate measures being taken.

Major deficiency (1 point) if:

- Numerous instances of records showing an issue detected but no documentation of appropriate measures being taken.

Non-conformance (0 points) if:

- Fundamental failure to document appropriate measures were taken for detected issues.

8.17.07: Are there records showing that stored commodities considered adulterated with filth, chemicals and/or other contaminants have been diverted or disposed of as legally required by the authority/government of the country of production? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.

Total conformance (15 points): Contamination should be assessed against appropriate legislation and diverted or disposed of as legally required by the authority/government of the country of production. 21 CFR Part 112.192; 7 CFR Part 810 US Standards for Grain; CPG Sec 578.300 Wheat-Adulteration by Insect and Rodent Filth; CPG 585.675 Popcorn-Adulteration with Rodent Filth and Field Corn; CPG Sec 675.200 Diversion of Adulterated Food to Acceptable Animal Feed Use; CPG 675.300 Moisture Damaged Corn; CPG Sec 160.700 Reconditioning of Foods Adulterated Under 402(a)(4); CPG Sec 555.600 Filth from Insects, Rodents, and Other Pests in Foods; Section 51 Safe Foods for Canadians Act.

Minor deficiency (10 points) if:

- There is no minor deficiency category for this question

Major deficiency (5 points) if:

- There is no major deficiency category for this question.

Automatic Failure (0 points) if:

- **There is a single incidence of evidence of unacceptable limits adulteration of commodities with filth, chemicals and/or other contaminants and there are no records of commodities being diverted or disposed of as legally required by the authority/government of the country of production.**

8.17.08: Are stored commodities, properly marked (physically and/or on a plan) with harvest date and field of origin information?

Total conformance (10 points): All materials should be properly marked (on physical storage and/or a plan) with harvest date and field of origin information for traceability/recall purposes. This coding should be understood by all workers, in order to ensure FIFO and effective traceback/recall procedures.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of missing harvest date and/or field of origin information for stored commodities.

Major deficiency (1 point) if:

- Numerous instances of missing harvest date and/or field of origin information for stored commodities.

Non-conformance (0 points) if:

- There are no harvest date and/or field of origin information for stored commodities.

8.17.09: Are rejected or on hold commodities clearly identified and separated from other materials?

Total conformance (10 points): Rejected or on hold commodities should be kept separate and identified from other materials to avoid accidental use or shipping. The disposition of rejected grain should be documented.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of commodities on hold or rejected, in a designated area but not being clearly labeled as such.

Major deficiency (3 points) if:

- Numerous instances of commodities on hold or rejected, in a designated area but the items are not being clearly labeled as such.
- On hold/rejected commodities are commingled with other goods in such a way that their status is unclear and a potential misuse might occur.

Non-conformance (0 points) if:

- Rejected or on hold commodities are not clearly separated and identified.

8.17.10: Where air thermometers, grain thermometers, moisture meters, air relative humidity meters, anemometers, black lights, etc., are being used, are they in operational condition and are they being used correctly?

Total conformance (3 points): Air thermometers, grain thermometers, moisture meters, air relative humidity meters, anemometers, black lights, etc., being used should be working correctly. Where necessary, equipment should be calibrated at least annually (1.04.04, 1.04.05).

Minor deficiency (2 points) if:

- Single/isolated instance(s) of piece(s) of equipment found not to be working properly or out of calibration.

Major deficiency (1 point) if:

- Numerous pieces of equipment found not to be working properly or out of calibration.

Non-conformance (0 points) if:

- All equipment checked was found not to be working properly or out of calibration.

Maintenance and Sanitation

8.18.01: Does the operation have a preventative maintenance program that includes a schedule and completion records?

Total conformance (10 points): A preventative maintenance program can help prevent production and ancillary equipment, facility structure and fittings failure that can result in biological, physical or chemical contamination of products. Equipment includes drying equipment, transfer equipment, storage structures. Use of predictive maintenance systems are also acceptable for this question.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of incomplete records.
- Single/isolated instance(s) of pieces of equipment missed off the schedule.

Major deficiency (3 points) if:

- Numerous instances of incomplete records.
- Numerous instances of pieces of equipment missed off the schedule.

Non-conformance (0 points) if:

- Appropriate frequencies are not documented and followed to ensure equipment is being routinely inspected.
- No program.

8.18.02: Are there logs of maintenance work and repairs and are they signed off when work is completed?

Total conformance (10 points): A log of maintenance for unscheduled repair work and request orders is necessary to track improperly working equipment, building repairs and similar issues not covered under the preventive maintenance program. Repair activities also have the potential to create unintended hazards if not properly conducted. Tracking these activities help with product contamination investigation as well as to improve preventative maintenance. Records should include: date/ time, targeted equipment/ area, reason for service required, observations; date & signature when repair is completed.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of incomplete records.

Major deficiency (3 points) if:

- Numerous instances of incomplete records.

Non-conformance (0 points) if:

- No logs are on file.
- Fundamental failure to maintain records.

8.18.03: Is there a written cleaning schedule (Master Sanitation Schedule) that shows what and where is to be cleaned and how often?

Total conformance (10 points): A master sanitation program should be in place that covers all areas of the storage operation, including grain storage areas, break areas, restrooms, maintenance and waste areas. Within these locations, areas such as walls, floors, light covers, overhead pipes, etc. should be included. List should include equipment (e.g., conveying equipment, combines, wagons, grain carts, loading shovels, aeration equipment, trailers, etc.). The master sanitation schedule should include a detailed list of areas and equipment to be cleaned as well as the frequency; frequency may vary from every month to yearly, depending on local weather conditions, what's being stored, how often the storage empties and past experience.

Note that all cleaning mentioned on the schedule should be covered somewhere in the cleaning procedures and also on the sanitation logs. Schedule should be kept on file in an easily retrievable manner.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of errors or omissions in the schedules i.e., missed areas/equipment and/or no frequencies being set.

Major deficiency (3 points) if:

- Numerous instances of errors or omissions i.e., missed areas/equipment and/or no frequencies being set.

Non-conformance (0 points) if:

- No schedules.
- Schedules exist but they are not reflecting what actually occurs.

8.18.04: Are there written cleaning and sanitation procedures (Sanitation Standard Operating Procedures) for the storage areas and all equipment that includes the frequency of cleaning and sanitizing, and instructions including chemical use details?

Total conformance (10 points): The storage areas (floors, walls, overheads, etc.), all equipment (e.g., conveying equipment, combines, wagons, grain carts, loading shovels, aeration equipment, trailers, etc.) should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). There should be SSOPs covering the cleaning (dry and wet) and any fumigation operations noted in the master sanitation schedule. Procedures should detail scope, frequency of cleaning and sanitizing, responsible person(s), step-by-step instructions, record keeping and cleaning verification procedures. Frequency should reflect the type of equipment, type of harvesting practice and the risk associated with the crop/equipment involved (including dual-purpose areas/equipment). Procedures should respect the label and match operations noted on the master sanitation schedule (8.05.01).

<https://www.dtnpf.com/agriculture/web/Ag/equipment/article/2018/09/17/cleaning-maintenance-grain-storage-2>

<https://agcrops.osu.edu/newsletter/corn-newsletter/2021-27/it%E2%80%99s-time-clean-your-grain-bins-and-everywhere-else-around-your>

<https://extension.psu.edu/managing-stored-grain-on-the-farm>

Minor deficiency (7 points) if:

- Single/isolated instance(s) of errors and omissions within the SSOPs.
- Single/isolated instance(s) of omitted procedure(s) for a piece of equipment or storage area.

Major deficiency (3 points) if:

- Numerous instances of errors and omissions within the SSOPs.
- Numerous instances of omitted procedures for a piece of equipment or storage area.

Non-conformance (0 points) if:

- No written procedures have been developed.
- Procedures exist but they do not reflect what actually occurs.

8.18.05: Are cleaning and sanitation records on file for storage areas and harvest equipment (combine, wagons, grain carts, trailers, conveyors, loading shovels, etc.) that show previous use, that they were cleaned prior to handling new grain and method of cleaning?

Total conformance (10 points): The operation has sanitation logs that cover all areas detailing walls, floors, overhead and all equipment (e.g., conveying equipment, combines, wagons, grain carts, loading shovels, aeration equipment, trailers, etc.). Records are kept on file in an easily retrievable manner. The logs should be cross-checked against the master sanitation program (8.05.01). Logs of infrequent cleaning should be checked.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of incomplete records, discrepancies against the master sanitation schedule or other omissions.

Major deficiency (3 points) if:

- Numerous instances of incomplete records, discrepancies against the master sanitation schedule or other omissions.
- Missing infrequent cleaning logs.

Non-conformance (0 points) if:

- No sanitation logs.
- Sanitation logs exist but they do not reflect what actually occurs.

8.18.06: Are there records showing filters in storage areas are regularly cleaned, replaced and if any signs of infestation are detected, corrective actions are taken?

Total conformance (10 points). Records should be made available to verify that filters in ventilation and air filtration units are regularly cleaned and replaced (if required). Corrective actions are taken if there are any signs of infestation. Records may include in-house sanitation records, pest control records, maintenance records and/or contractor records/invoices.

Minor conformance (3 points) if:

- Single/isolated instance(s) of incomplete records or omissions.

Major conformance (1 point) if:

- Numerous instances of incomplete records or omissions.

Non-conformance (0 points) if:

- No records.
- Fundamental failure to maintain records.

8.18.07: Are there records showing grain dryers are regularly maintained and are not a potential source of contamination to crop?

Total conformance (10 points): There should be adequate ventilation to prevent fuel exhaust gases from tainting the commodity. Direct drying systems using diesel, LP, natural gas, coal, etc., as an energy source must have documentation to show fuel meets applicable legal fuel standards (including no reused diesel fuel) and manufacturer's air: fuel ratio recommendations are followed for efficient combustion.

Minor Deficiency (7 points) if:

- Single/isolated instance(s) of omissions or incorrect data in the records.
- Single instance of evidence of potential contamination to stored commodity.

Major Deficiency (3 points)

- Numerous instances of omissions or incorrect data in the records.

- More than one instance of evidence of potential contamination to stored commodity

Non-conformance (0 points)

- No records.
- Fundamental failure to maintain records.
- Fundamental failure to prevent fuel exhaust gases from tainting the commodity.

8.18.08: Are excess lubricants and grease removed from the grain handling equipment and are lubricant catch pans fitted where needed?

Total conformance (5 points): Dripping caused by over lubricating is a potential chemical contaminant to the product. Frequent lubrication using minimal material and use of drip pans are control examples. Note, food grade materials are designed for incidental food contact. All efforts should be made to avoid these materials getting onto the commodity. No excess lubricants or grease on equipment

Minor deficiency (3 points) if:

- Single/isolated instance (s) of excess lubricants or grease on equipment (no product hazard).
- Single/isolated instance(s) of unprotected motor, axle, pump etc.

Major deficiency (1 point) if:

- Numerous instances of excess lubricants or grease on equipment (no product hazard).
- Numerous instances of unprotected motors, pumps axles etc.

Non-conformance (0 points) if:

- Widespread failure to protect pumps, motors, axles etc.
- **Observation of serious direct contamination of product, ingredient or packaging materials with a food grade material – auditor should follow 8.17.07.**

Shipment

8.19.01: Is there a documented and implemented procedure to sample and retain a representative sample from each load leaving the operation?

Total points 0: Information gathering question. Taking and retaining a sample from each load before it leaves the operation provides a record of what has been dispatched. Samples should be labelled with farm name, store/bin #, variety, date/time, trailer # and maintained for a minimum period of three months (or until payment has been received for sampled load) in a cool, dry place.

<https://ahdb.org.uk/knowledge-library/sampling-grain-at-outloading>;

<https://grainscanada.gc.ca/en/industry/grain-safety/>

8.19.02: Is there a documented procedure for checking the previous load, the sanitary condition of truck trailers prior to loading, and includes requirement that the load be fully covered?

Total conformance (10 points): There should be a documented procedure to check truck trailer (or other transportation system, e.g., railway carriages) sanitary condition prior to loading. Checks should include cleanliness, trailer fitness for intended use (design and construction materials), records previous load (ideally previous three loads), pest free, odor free, load segregation, etc. Procedure should include requirements that bulk trailers be fully covered (e.g., waterproof tarpaulin). Where relevant, requirements from the organization that has contracted the carrier should be followed.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of not having a completed procedure.

Major deficiency (3 points) if:

- Numerous instances of not having a completed procedure.

Non-conformance (0 points) if:

- There is no documented procedure.

8.19.03: Are there records of shipping truck trailer's (or other transportation systems) previous load, sanitary condition prior to loading and confirmation of load being fully covered?

Total conformance (10 points): Truck trailers (or other transportations systems, e.g., railway carriages) should have documentation of the previous load (ideally previous three loads), be checked for their sanitary condition and confirmation that load is fully covered (e.g., waterproof tarpaulin). Records should reflect the documented procedure.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of a missing record.
- Single/isolated instance(s) of record not reflecting documented procedure requirements.

Major deficiency (5 points) if:

- Numerous instances of missing records.
- Numerous instances of record not reflecting documented procedure requirements.

Non-conformance (0 points) if:

- No records.
- Fundamental failure to maintain records as required by the written procedure.