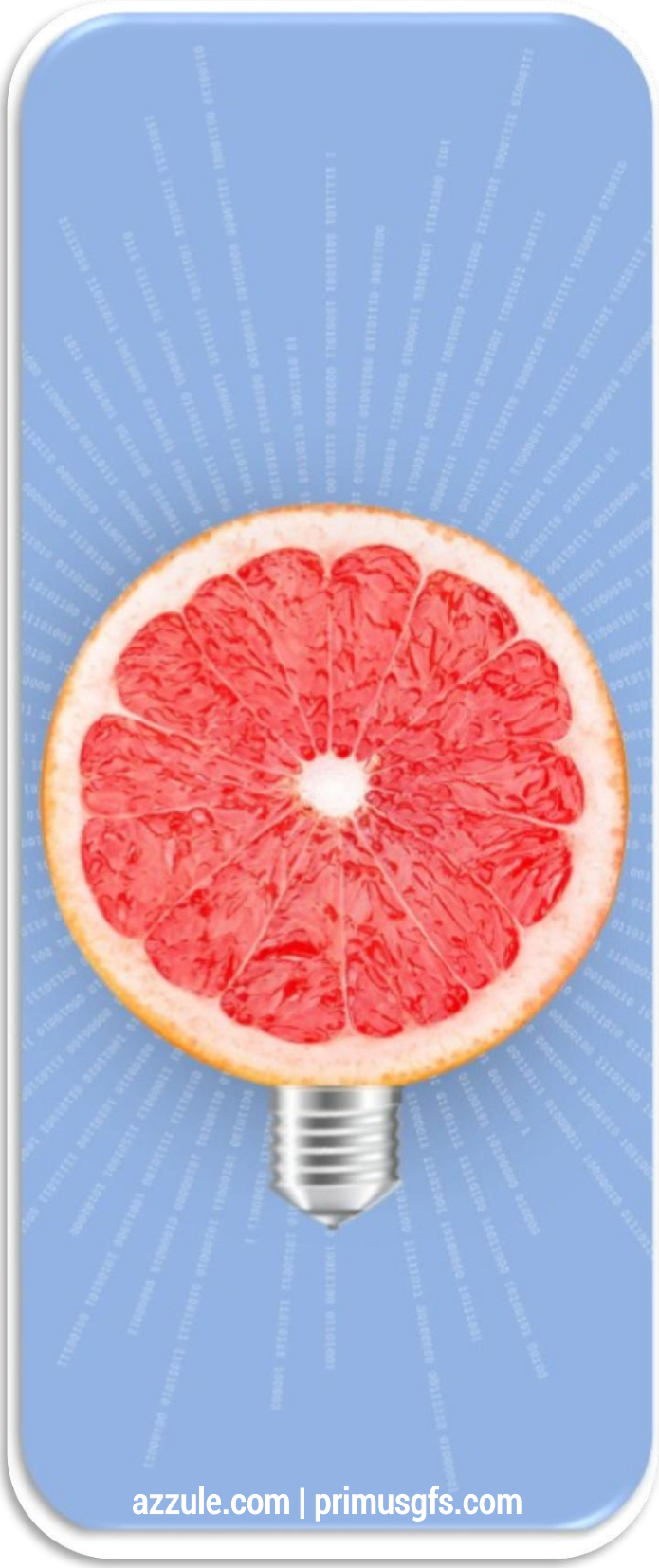
PrimusGFS v4.0

Module 2 - Farm

Questions & Expectations

2025



A Normative Document in the context of PrimusGFS refers to the official set of criteria that defines what requirements must be met, and how compliance is evaluated during an audit. These documents serve as the foundation for PrimusGFS audits and are essential for ensuring consistency, objectivity, and transparency across all certified operations.

The Questions & Expectations document is the annotated version of the audit checklist. Each question is accompanied by summarized expectations, outlining: the scope of what is being evaluated; the minimum requirements or evidence needed to meet compliance and clarifications or examples of acceptable practices.

The document is designed to ensure a consistent understanding of each audit criterion and to help both auditors and auditees interpret and apply the standards effectively during audits or preparations.

PrimusGFS v4.0 updates are shown in red, along with additional considerations to be aware of for existing and new questions.

Introduction

PrimusGFS v4.0

Acknowledgements

PrimusGFS v4.0 reflects Azzule Systems' ongoing commitment to strengthening food safety systems by aligning with the Global Food Safety Initiative (GFSI) 2024 Benchmarking Requirements, evolving regulatory frameworks (including the FDA FSMA), and global industry best practices.

PrimusGFS will undergo the GFSI benchmarking process during 2025.

This version incorporates updates resulting from:

- Feedback gathered through the public stakeholder consultation process (concluded June 14, 2024).
- Regulatory developments and scientific advancements.
- Revisions to improve clarity, organization, and audit efficiency.
- Renaming and reorganization of sections.
- The addition of new requirements and questions, particularly for GFSI BMR 2024, CEA (Controlled Environment Agriculture), FSMA Pre-Harvest Agricultural Water, Harvest Crew Equipment Sanitation and traceability.
- And alignment with terminology from Codex Alimentarius and FSPCA Preventive Controls.

Key structural improvements include the introduction of new sections and questions, the removal or consolidation of preexisting questions, and rewording for greater clarity and simplification of requirements.

As with previous versions, PrimusGFS v4.0 has been shaped by the generous contributions of stakeholders across the food safety community, including Certification Bodies, Training Centers, industry experts, and end users. Azzule Systems is deeply grateful for their time, experience, and dedication to advancing safe and sustainable food production worldwide.

We extend our sincere appreciation to all individuals and organizations who submitted suggestions, participated in consultations, and offered expert insight during the development process of version 4.0.

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

Module 2- Farm

Question No.	Question	Total Points	Expectation
General			
2.01.01	Is there a trained on-site person responsible for the operation's food safety program?	10	There should be a trained on-site person(s) responsible for the operation's food safety program (cross reference with 1.01.04). They should have documented formal training or be trained by someone that has documented formal credentials in food safety topics relevant to their responsibilities. This training should meet all local and national requirements. Cross reference with 1.01.04.
2.01.02	If the operation is growing under organic principles, is there written documentation of current certification by an accredited organic certification organization?	0	Information gathering question. Current certification by an accredited organic certification organization (national/local) should cover the audited crops, be on file and available for review. N/A if not growing under organic principles.
2.01.03	Does the operation have written food safety hygiene and health rules covering at least worker and visitor hygiene and health, infants and toddlers, animal presence in growing and storage areas, fecal matter, dropped product, blood and bodily fluids?	15	There should be written food safety policy rules regarding worker and visitor personal hygiene, GAPs and health requirements. The rules should cover hygiene and health (e.g., hand washing, eating/drinking, smoking, specific clothing rules, foreign material issues, cuts/wounds, illness rules, etc.), no infants and toddlers allowed in the growing area, what to do in the case of evidence of animals and/or fecal matter in the growing and/or storage areas, and what to do in the case of dropped product, and if the product comes into contact with blood or other bodily fluids. All workers and visitors should be issued a list of rules in the relevant languages and confirm by signing they understand and agree to abide. Cross reference with 1.01.04 to verify topics are part of the training program for workers. Training provided and associated records should meet local and national regulations.
Site			
2.02.01	Is there a map that accurately shows all aspects of the operation, including water sources and fixtures used to deliver water used in the operation?	5	There is a map or similar document (photograph, drawing) that accurately shows the growing area(s), adjacent land use/features (e.g., buildings, industrial uses, nearby CAFOs, etc.), water sources, type of water distribution system (i.e., open or closed), location of permanent water fixtures and the direction of flow of the water system, including any holding tanks and water captured for re-use. Permanent fixtures include water district valves, wells, gates, reservoirs, canals, 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.

Question No.	Question	Total Points	Expectation
2.02.02	Are growing areas adequately identified or coded to enable trace back and trace forward in the event of a recall?	15	Coding details (e.g., farm name or reference code, blocks of the growing area(s)) should be in sufficient detail to enable trace back and trace forward through the distribution system and meet FDA Traceability Rule requirements (if applicable). Details of the coding need to be tied to the record keeping system (e.g., pesticide, fertilizer records, microbiological testing reports). There should be field maps available demonstrating the coding details used in the operation(s).
2.02.03	Has a documented risk assessment been developed, covering potential hazards associated with the site location and growing process including the flow of materials and equipment?	15	A documented risk assessment of the growing area and surrounding areas should be performed prior to the first seasonal planting and at least annually, and when any changes are made to the growing area, and adjacent land. Specific risk assessments for animal-based or derived components under 2.08.02, growing media are scored under 2.08.03, and water use is covered under 2.09.02. They may be included in this risk assessment or as separate documents. Document should detail known or reasonable foreseeable hazards, the specific microbial, chemical (includes allergens) and physical hazards and their severity and likelihood of occurring in the following areas: previous use of the growing area, land features (e.g., septic systems, open water, power lines, etc.) adjacent or nearby land use (e.g., CAFO), fertilizers, crop protection chemicals, worker health and hygiene, equipment and tools used for harvest, storage, transportation, topography of the land for runoff (% slope, soil type), prevailing weather conditions or weather events. and any other applicable areas. Farms and indoor agriculture operations following the CA or AZ LGMA should reference current metrics.
2.02.03a	Where the risk assessment identifies the need for control of any hazards, are these controls indicated in the assessment and implemented?	15	For any hazards identified in the assessment, the operation should detail what practice is being done to minimize identified hazard, 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 preventive measures have been taken when any hazard was identified and were adequate for the specific situation e.g., if overhead, irrigation is used, there should be examples of how the operation is minimizing the hazard.
2.02.04	Are the necessary food defense controls implemented in the operation?	10	The operation should have implemented 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 but are not limited to: personnel, visitors, contractors, computers, raw material receipt (raw materials, product and packaging), trucks (incoming and outbound), water sources, storage areas for product, materials, chemicals, equipment, packaging, utensils or other items used in the growing area, etc.
2.02.05	Is the exterior area immediately outside the growing area, including roads, yards and parking areas, free of litter, weeds and standing water?	5	Litter, waste, refuse, uncut weeds or grass and standing water within the immediate vicinity of the growing area may constitute an attractant or breeding place for rodents, insects or other pests, as well as microorganisms that may cause contamination.

Question No.	Question	Total Points	Expectation
2.02.06	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 area)?	5	Incorrectly stored pallets and equipment can provide areas for pest harborage and/or cross contamination. Equipment should be stored at least 4" (10 cm) off the ground. Growers should check the stored equipment (e.g., irrigation pipes) periodically to ensure that it has not become a pest harborage area or dirty due to rains. Inventory checks (e.g., as part of an internal audit) should occur in order to ensure that these storage areas do not become full of unnecessary items.
2.02.07	Are garbage receptacles and dumpsters kept covered or closed?	5	All dumpsters and garbage receptacles should have a cover and be kept covered to prevent the attraction of insects, rodents and other pests. Fine mesh lids are acceptable. Just having the lids is not acceptable i.e., when not in use, the dumpsters and garbage receptacles should be closed. Dumpsters that are only used for dry non-food waste (e.g., paper, cardboard, etc.) are exempt from this requirement.
2.02.08	Where soil, substrates or fertilizer are stored or handled, are measures in place to ensure seepage and runoff is collected or diverted and does not reach growing areas, product, or any of the water sources? **A ZERO POINT DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Soil, substrates and fertilizer (e.g., compost, compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, synthetic fertilizers, etc.) are stored in a manner to prevent contamination to the growing areas, product, or water sources. Containers should be structurally sound and not a source of runoff or contamination. There should be appropriate and effective barriers, coverings, soil berms, pits or lagoons to divert or collect potential run-off or threats from wind, as applicable. **A ZERO POINT DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
2.02.09	Where there are fill stations for fuel, pesticides, or liquid fertilizer, is it evident that the condition, location and/or use is not a risk of contamination to the product, water sources, growing areas, equipment, packaging materials, etc.?	15	Fill station area should not be a risk of contamination to the product, water sources, production areas, equipment, packaging materials, etc. Any containment structures (e.g., containment pad, bunding) must meet local and national requirements.
2.02.10	Has the operation eliminated or adequately controlled any potential sources of contamination (physical, chemical or biological) not covered by other more specific questions?	10	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, gunshot, 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.

Question No.	Question	Total Points	Expectation
2.02.11	Is there no evidence of animal presence and/or animal activity (wild or domestic) in the audited area? If Total Conformance, go to 2.02.12.	15	Animals can represent potential contamination to the growing area, to the crop, to the field equipment, etc., and therefore, should not be present in the operations. Evidence of animal presence can include tracks, burrows, fecal matter, feathers, roosting (e.g., on power lines), nesting, etc. This includes any packaging or storage areas (e.g., equipment, agronomic inputs, chemicals). Note: The appearance of birds flying across a field or equipment is not necessarily cause for a down score, however, the area under their flightpath must be inspected for potential contamination due to fecal matter, etc. Evidence of fecal matter is scored in 2.02.11a.
2.02.11a	Is there no evidence of any evidence of animal fecal matter in the audited area? **A ZERO POINT (NON-CONFORMANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	Fecal matter is a potential contaminant to the product being grown. Produce that has come into direct contact with fecal matter is not to be harvested. A "no harvest zone" of approximately 5ft (1.5 m) radius should be implemented unless or until adequate mitigation measures have been considered. If evidence of fecal matter is found, a documented food safety risk assessment should be conducted by qualified worker and include appropriate corrective and preventive actions. Consideration of the maturity stage and type of crop involved is required. Any evidence of human fecal matter in the growing area is an automatic failure (scored under 2.02.12).
2.02.12	Is there no evidence of human fecal matter in the audited area? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Human fecal matter is a potential contaminant to the product being grown. Any evidence of human fecal matter in the growing area is an automatic failure. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
2.02.13	Is there no evidence of infants and toddlers in the audited area?	10	Infants and toddlers can represent potential contamination to the growing area, to the crop, to packaging and should not be present in the operations, including chemical or equipment storage areas.
Ground History			
2.03.01	Were growing area(s) used for growing food crops last season?	0	Information gathering question. Land should be purchased or leased that has previously been successfully utilized for growing crops without incidence.
2.03.02	Has the growing area(s) been used for any non-agricultural functions? If No, go to 2.03.03.	0	Information gathering question. Purchase or lease of ground previously used for non-agricultural functions (e.g., toxic waste site, landfill, mining, extraction of oil or natural gas) should be avoided. Land should be purchased or leased that has previously been successfully utilized for growing crops for human consumption without incidence. https://www.epa.gov/superfund
2.03.02a	If the growing area has been used previously for non-agricultural functions, have soil tests been conducted showing soil was negative or within an appropriate regulatory agency's approved	15	If the growing area has been previously used for non-agricultural functions soil testing should be conducted to determine if the soil is free of contaminants (e.g., heavy metals, residues of persistent organic contaminants) that may still be present in the soil.

Question No.	Question	Total Points	Expectation
	limits for contaminants?		
2.03.03	Has the growing area(s) been used for any purpose that included the presence of animals in the growing area (e.g., animal husbandry, grazing land for animals) in the last 12 months? If No, go to 2.03.04.	0	Information gathering question. If the land was used previously for any purpose that included animals in the growing area (e.g., animal husbandry, grazing land for animals), there should be a sufficient buffer time before growing a crop for human consumption.
2.03.03a	If the land was used previously for any purpose that included the presence of animals in the growing area (e.g., animal husbandry or grazing land for animals), has a risk assessment been performed?	10	A risk assessment should be documented that includes recording the details of the animal activity (commercial or domestic) and any risk reduction steps. Cross reference with 2.02.03, 2.02.03a. Auditor should confirm risk reduction steps are in place and verified as being effective.
2.03.04	Has flooding from uncontrolled causes occurred on the growing area(s) since the previous growth cycle? If No, go to 2.03.05.	0	Information gathering question. This would be the case of: the flowing or overflowing of a field with water outside a grower's control that is reasonably likely to contain microorganisms or chemicals of significant public health concern and is reasonably likely to cause adulteration of edible portions of fresh produce in that field.
2.03.04a	If the growing area(s) and product was affected from the flood waters, is there documented evidence of a risk assessment, and that corrective measures were taken to affected land and product?	15	If the growing area and/or product were affected from the flood waters, there should be a documented risk assessment and evidence that corrective measures were taken with affected land and/or product (e.g., water sources tested, photographs, sketched maps, etc.). Cross reference with 2.02.03. There should be proof that affected product and product within approximately 30ft (9.1m) of the flooding should not have been harvested for human consumption and that replanting on formerly flooded production ground has not occurred for a minimum of 60 days and if the ground has sufficiently dried out, unless testing as noted in 2.03.04b has occurred.
2.03.04b	If planting is to be done earlier than 60 days from a flooding event, have soil tests been conducted on the flooded area(s) showing the soil was negative or within an appropriate regulatory agency's approved limits for contaminants?	15	If planting is to be done earlier than 60 days from a flooding event (and also before the soil has had adequate time to dry out) soil clearance testing should be conducted prior to planting. Soil testing should indicate soil levels of microorganisms lower than the standards for processed compost. Additional parameters to measure (e.g., heavy metals, pesticides, hydrocarbons) will depend on the characteristics of the flooding event. Suitable representative samples should be collected for the entire area suspected to have been exposed. If results indicate no issues, then the replanting time line can be reduced from approximately 60 days to approximately 30 days. Farms and indoor agriculture operations following the CA or AZ LGMA should reference current metrics.

Question No.	Question	Total Points	Expectation
2.03.04c	If septic or sewage systems adjacent to the growing area were affected by the flood waters, is there a documented inspection after flooding to ensure they are functioning properly and are not a source of contamination?	10	There should be records of inspecting the sewage/septic systems after flooding, showing that they are functioning properly and are not a source of contamination (e.g., overflow). Cross reference with 2.02.03.
Adjacent Land Use			
2.04.01	Is there evidence of intensive livestock production (e.g., feedlots, dairy operations, poultry houses, meat rendering operation) on adjacent or nearby land? If No, go to 2.04.02.	0	Information gathering question. Adjacent refers to all parcels of land next to the growing operation, or within a distance where the crop in question may be affected. Intensive livestock production involves large numbers of animals on limited land. Examples of intensive livestock production are confined animal feeding operations (CAFO), cattle feed lots, dairy operations, poultry houses, etc.
2.04.01a	Where there is intensive livestock production on the adjacent land, have appropriate measures been taken to mitigate this possible contamination source onto the growing area (e.g., buffer areas, physical barriers, foundation, fences, ditches, etc.)?	15	Animal or potential contaminant movement should be restricted with acceptable buffer zones, proper fencing and/or other physical barriers. A buffer zone of approximately 400 ft. (122 m) from the edge of the growing area which may increase or decrease depending on the risk variables i.e., topography (% slope uphill from the crop or downhill from the crop), soil type (sandy, loam. clay)) is needed. Rain induced runoff of animal waste should be diverted by trenching or similar land preparation. Leaking animal waste should be diverted by trenching or similar land preparation. Consideration should be made for the topography of the land for runoff, potential flooding issues, and prevailing winds for manure related dust issues. Farms and indoor agriculture operations following the CA or AZ LGMA should reference current metrics.
2.04.02	Is there evidence of domestic animals and/or wild animals (includes homes with hobby farms, and non-commercial livestock) on adjacent or nearby land? If No, go to 2.04.03.	0	Information gathering question. This includes all non-intensive livestock production. Other examples include chicken coops, dogs, horses, homes with hobby farms, wild pigs etc. Auditor must consider the maturity stage and type of crop involved. For example, pig activity around a ground level berry crop is different from a high-level tree crop.
2.04.02a	Where there are domestic and/or wild animals (includes homes with hobby farms, and non-commercial livestock) have physical measures been put in place to restrain the animals and their waste from entering the growing area (e.g., vegetative strips,	15	Mitigating measures should include a buffer area of approximately 30 ft. (9.1m) from the edge of the crop which may increase or decrease depending on the risk variables e.g. topography (% slope uphill from the crop or downhill from the crop), soil type (sandy, loam, clay)). Other measures may be used such as vegetative strips, wind breaks, physical barriers, berms, fences, diversion ditches to prevent or control runoff, mitigate particulates, etc.

Question No.	Question	Total Points	Expectation
	windbreaks, physical barriers, berms, fences, diversion ditches)?		
2.04.03	Is there evidence of untreated animal manure piles, compost, biosolids, or non-synthetic amendment stored and/or applied on adjacent land? If No, go to 2.04.04.	0	Information gathering question. Adjacent refers to all parcels of land next to the growing operation or within a distance where the crop in question may be affected by untreated animal manure piles, compost, biosolids, or non-synthetic amendment stored and/or applied on adjacent land.
2.04.03a	Where present, have physical measures been taken to secure untreated animal manure piles, compost, biosolids, or non-synthetic amendment stored and/or applied on adjacent land?	15	Mitigating measures should include a buffer area of approximately 400 ft. (122 m) from the edge of the crop which may increase or decrease depending on the risk variables e.g., topography (uphill from the crop or downhill from the crop). Other measures may include tarping systems, physical barriers, fences, ditches, etc. Implementing systems to redirect run off that may contain untreated manure, compost, or biosolids.
2.04.03b	If biosolids are stored and/or applied on adjacent land, has the adjacent landowner supplied paperwork confirming the biosolids meet prevailing guidelines, governmental, or local standards?	10	The adjacent landowner of where the biosolids are applied or stored should supply paperwork detailing sufficient information regarding the class of biosolids (e.g., Class AA, A, B): Information should be available that would make it possible to trace back to the source if needed. Information should be available to prove the materials meet prevailing guidelines, governmental, or local standards. Biosolid applications should be timed to avoid conflicts with growing schedules in adjacent fields.
2.04.04	Is the growing area situated in a higher risk location where contamination could occur from nearby operations or functions (e.g., leach fields, runoff or potential flooding from sewers, toilet systems, industrial facilities, worker housing, etc.)? If No, go to 2.04.05.	0	Information gathering question. "Higher risk" refers to any nearby activities or operations that could pose a food safety threat to the growing area or facility(s). These might include chemical, microbiological, or physical contamination or pollution. Examples include, but are not limited to, runoff or potential flooding from septic systems, sewers, toilet systems, industrial facilities, worker housing (issues of trash, etc.).
2.04.04a	Where the growing area is situated in a higher risk location, have appropriate measures been taken to mitigate risks related to nearby operations?	15	Mitigating measures should include appropriate buffer areas around the crop. For example, with a properly designed leach field a buffer zone of approximately 30 ft. (9 m). Very high-risk issues should consider approximately 400ft (122 m) or higher buffer zones. Buffer zone distances should be determined by considering the risk variables (e.g., topography, type of crop). Other mitigating measures may include physical barriers, fences, ditches, etc.

Question No.	Question	Total Points	Expectation
2.04.05	Is there evidence of any other potential risks in the adjacent land that could potentially lead to contamination of the growing area?	0	Information gathering question. If there are any other potential sources of contamination to the growing area, this question is designed to allow the auditor to underline potential risks that are not covered by other more specific questions within the audit.
2.04.05a	Have appropriate measures been taken to mitigate risks related to nearby operations?	15	If there are any other potential sources of contamination to the growing area, there should be mitigating measures to prevent contamination.
2.04.06	Is there evidence of human fecal matter in the adjacent land to the audited area? If No, go to 2.05.01.	0	Information gathering question. If the fecal matter found combines with conditions that can increase the potential of contamination to the growing area, the crop or the field equipment, this represents a high-risk situation that has to be addressed. Evidence of human fecal matter represents potential of contamination to the growing area, the crop and field equipment. If No, go to 2.05.01.
2.04.06a	Where there is evidence of human fecal matter in the adjacent land, are there adequate controls in place to mitigate risk (e.g., access controls (barriers), distance from the growing area and equipment, crop type and maturity, land condition, etc.)?	15	If human fecal matter is found in the adjacent land, there should be adequate controls in place, and records of any corrective or preventive actions taken.
Inspection			
2.05.01	Are there chemical inventory logs for chemicals, including pesticides and fertilizers?	3	Chemicals within the scope of this question include pesticides, fertilizers, cleaners and sanitizers i.e., sanitation chemicals and food contact chemicals, such as chlorine, etc. Primary information in the product inventory includes: the product or chemical names, container volumes/weights, 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.
2.05.02	Are copies of all Safety Data Sheets on file and fully accessible at all times with clear indexes?	3	Current SDS sheets should be available for hazardous chemicals (detergents, sanitizers, pesticides, etc.). SDS may be kept on file, stored on memory stick, CD or computer, and auditee can demonstrate they are readily accessible to workers. Chemicals used should meet local and national authorities.

Question No.	Question	Total Points	Expectation
2.05.03	Are all chemicals (pesticides, fertilizers, sanitizers, detergents, lubricants, etc.) stored securely, safely and are they labeled correctly?	15	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 and packaging materials and separated from growing area and water sources. Access is restricted to trained personnel. Spill controls should be in place for opened in use containers. All chemical containers should be off the floor, have legible labels of contents; this includes chemicals that have been decanted from master containers into smaller containers. Empty chemical containers should be stored and disposed of properly. Chemical storage requirements must meet local and national requirements. Where pesticide storage is not located on-site, auditor discretion applies on question applicability.
2.05.04	Are the crop, ingredients (including water), food contact packaging and food contact surfaces within accepted tolerances for spoilage and without evidence of adulteration? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	The crop, ingredients (including water), food contact packaging and food contact surfaces should be free from spoilage, adulteration and/or gross contamination (21 CFR 110.3g). If legislation exists, then the contamination should be viewed against this legislation (e.g., USDA Grading Standards often include decay tolerances). Spoilage and adulteration would include any physical, chemical or biological contamination including blood and bodily fluids. Measures should be taken to prevent any known or reasonably foreseeable hazard (e.g., Clostridium botulinum in mushrooms). This question is designed to allow an auditor to halt an audit when finding gross contamination issues. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
Training			
2.06.01	Is there a food safety hygiene training program covering new and existing workers and are there records of these training events?	15	There should be a formal training program and training records, to inform workers of the current rules and requirements of the company regarding hygiene. Cross reference with 1.01.04. Training should be in the language understood by the workers, and training type and intensity should reflect the risks associated with the products/processes. Frequency should be at the start of the season before starting work and then some topics covered at least quarterly, but ideally monthly. These trainings should cover food safety and hygiene policies and basic food safety and hygiene topics, allergens, the importance of detecting food safety and/or hygiene issues with co-workers and visitors, all food safety or hygiene issues in which they are responsible and correcting and reporting problems. Training logs should have a clearly defined topic(s) covered, trainer(s) and material(s) used/given. Topics include, but not limited to, hand washing, protective clothing (where applicable), recognizing and reporting injury and illness, blood and bodily fluids, jewelry, dropped product, animal intrusion, food defense. There should be records of workers who have attended each session.
2.06.02	Are there written and communicated procedures in place that require food handlers to report any cuts or grazes and/or if they are suffering from any illnesses that might be a contamination risk to the products being produced, and return to	10	There should be documented procedures that are communicated to food handlers (e.g., worker signature on a training log) to food handlers, requiring them to report any cuts, grazes and/or any illnesses that might be a food safety cross contamination risk. Procedures should indicate return to work requirements for affected workers, to whom the food handlers should report, how the issue is recorded and appropriate actions to be taken for a particular issue. Procedures should cover recording requirements, but auditors should not request to review records where countries have laws covering privacy/confidentiality of health records.

Question No.	Question	Total Points	Expectation
	work requirements? (In countries with health privacy/confidentiality laws, e.g., USA, auditors can check procedure/policy but not actual records).		
2.06.03	Are there worker food safety non-conformance records and associated corrective actions (including retraining records)?	3	There should be records covering when workers are found not following food safety requirements. These records should also show corrective actions and evidence that retraining has occurred (where relevant).
Field Worker Hygiene *(Applies to on-the-farm workers, not the harvesting workers)*			
2.07.01	Are toilet facilities adequate in number and location? **A ZERO POINT (NON-CONFORMANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	Toilet facilities should be available and accessible to all workers and visitors, while work is actively occurring. At least one toilet per 20 workers should be provided, or if more stringent, as per prevailing national/local guidelines. Toilet facility placement should be within 1/4 mile or 5 minutes walking distance of where workers are located, or if more stringent, as per prevailing national/local guidelines. A 5 minute drive is not acceptable, while farm work is actively occurring with groups of three or more workers. Where there are two or less workers present (e.g., spray activities, irrigation check) and workers have transportation that is immediately available to toilets within a 5 minute drive, it is acceptable to score as total conformance. Automatic failure if there are insufficient or inadequate toilet facilities. **A ZERO POINT (NON-CONFORMANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
2.07.01a	Are toilet facilities located where they are not a risk of contamination to product, packaging, equipment, water sources and growing areas?	15	Placement of toilet facilities should be in a suitable location to prevent contamination to product, packaging, equipment, water sources, and growing areas. Consideration should be given when portable units are used that they are not parked (if on trailers) too close to the edge of the crop and have a minimum 15 ft (4.5 m) buffer distance in the event of a spill or leak. If the 15 ft (4.5 m) buffer distance cannot be achieved, daily inspection of the toilet and hand washing equipment for leaks must be conducted, documented and available for review. If pit toilets are used, consider proximity to crop and water sources.
2.07.01b	Are toilet facilities designed and maintained to prevent contamination (e.g., free from leaks and cracks)?	5	Toilet facilities should be free from cracks and leaks and any waste holding tanks from toilets must be designed and maintained properly to prevent contamination. Waste holding tanks should be free of leaks, cracks and constructed of durable materials (e.g., plastic) that will not degrade or decompose (no wood). Each toilet should be ventilated to outside air. Pit toilets cannot be considered to be properly designed to prevent contamination.
2.07.01c	Are toilet facilities constructed of materials that are easy to clean?	3	Toilet facilities should be constructed of non-porous materials that are easy to clean and sanitize. The floors, walls, ceiling, partitions and doors should be made of a finish that can be easily cleaned.

Question No.	Question	Total Points	Expectation
2.07.01d	Are toilet facilities supplied with toilet paper and is the toilet paper maintained properly (e.g., toilet paper rolls are not stored on the floor or in the urinals)?	5	Toilet paper should be provided in a suitable holder in each toilet facility. Toilet paper should be maintained properly (e.g., toilet paper rolls are not stored on the floor or in the urinals).
2.07.01e	Where used, is there a documented procedure for emptying the waste holding tanks in a hygienic manner and also in a way that prevents product, packaging, equipment, water systems and growing area contamination?	5	If toilets have waste holding tanks, they should be emptied, pumped, and cleaned in a manner to avoid contamination to product, packaging, equipment, water systems and growing area(s). Equipment used in emptying/pumping must be in good working order. A documented procedure should exist and should include a response plan for major leaks or spills, including indicating where pumped waste is disposed of and requiring communication to the designated person(s) responsible for the food safety program regarding the actions taken when a major leak or spill occurred.
2.07.01f	Are the toilet facilities and hand washing stations clean and are there records showing cleaning, servicing and stocking occurring regularly?	10	Toilet facilities and hand washing stations should be stocked, serviced and cleaned and sanitized on a regular basis. Records (contracted, in-house or both) should be available for review showing cleaning and servicing and stocking is occurring regularly. Soiled tissue should be flushed down the toilet/placed in the holding tank (not placed in trash cans and/or on the floor).
2.07.02	Is hand washing signage posted appropriately?	5	Hand washing signs (multi-lingual or pictograms) should be posted as a reminder to wash hands before and after eating, returning to work and after using the toilet. The signs should be permanent and placed in key areas where workers can easily see them (e.g., at toilets, break areas, etc.).
2.07.03	Are hand washing stations adequate in number and appropriately located for worker access and monitoring usage? **A ZERO POINT (NON-CONFORMANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	An adequate number of hand washing stations, in working order, should be provided to ensure efficient worker flow (1 per 20 people on site), and be available to all workers and visitors while work is actively occurring. Hands free is an optimum system. Hand washing stations should be located within close proximity of toilet facilities and 1/4 mile or 5 minutes walking distance of where workers are located. **A ZERO POINT (NON-CONFORMANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
2.07.03a	Are the hand wash stations designed and maintained properly (e.g., ability to capture or control rinse water to prevent contamination onto product, packaging, and growing area, free	5	Hand wash stations should be free of clogged drains, designed and maintained properly (including waste water containers) to capture or control rinse water that could cause contamination onto product, packaging, equipment and growing area(s).

Question No.	Question	Total Points	Expectation
	of clogged drains, etc.)?		
2.07.03b	Are hand wash stations adequately stocked with unscented soap and paper towels?	5	All hand washing facilities should be properly stocked with liquid non-perfumed, neutral or antiseptic soap. Single use paper towels should be used and units properly located. There should be an adequate stock of soap and paper towels.
2.07.04	Are workers washing and sanitizing their hands before starting work each day, after using the restroom, after breaks, before putting on gloves and whenever hands may be contaminated?	15	Worker conformance to hand washing and sanitizing procedures should be assessed as washing hands is the first step in avoiding food contamination. Workers should be observed washing their hands prior to beginning work, after breaks, after using the toilets, before putting on gloves, and whenever hands may have become a source of contamination (e.g., after eating, after using a handkerchief or tissue, smoking, drinking, etc.).
2.07.05	Are workers who are working directly or indirectly with food, without evidence of boils, sores, open wounds and are not exhibiting signs of foodborne illness?	10	Workers who have exposed boils, sores, exposed infected wounds, foodborne illness or any other source of abnormal microbial contamination should not be allowed to work in contact with the product, packaging or food contact surfaces.
2.07.06	Are workers not observed wearing watches, jewelry (plain band permitted), studs, false eyelashes, false fingernails, etc.?	5	Workers are not observed wearing jewelry (including earrings, ear gages, necklaces, bracelets, rings with stones, rings or studs in nose, lip and eyebrow, watches) in the growing area. Plain wedding bands are the only exception. Other examples of foreign items that may be a source of foreign material contamination include studs, false finger nails and finger nail polish, false eye lashes, eye lash extensions and badges.
2.07.07	Are worker personal items being stored in such a way that they are not a potential food safety risk to product, growing area, equipment or materials?	5	Workers should have a designated area for storing personal items such as coats, shoes, purses, medication, phones, etc. Areas set aside for workers' personal items should be far enough away from growing area(s) and material storage area(s) to prevent contamination and avoid food defense risks.
2.07.08	Is smoking, eating, chewing and drinking confined to designated areas, and spitting is prohibited in all areas?	5	Smoking, chewing tobacco, chewing gum, drinking and eating is permitted in designated areas that are away from growing and storage areas. Spitting should be prohibited in all areas. Smoking should not be permitted in eating and drinking areas.

Question No.	Question	Total Points	Expectation
2.07.09	Is fresh potable drinking water in clean containers readily accessible to workers?	10	Fresh potable water meeting the quality standards for drinking water should be provided and placed in locations readily accessible to all workers on-site to prevent dehydration. The term "potable" meaning that the water is of drinking water quality (e.g., the EPA Drinking Water Standard or equivalent). Auditors should verbally verify the source of the water at the time of the audit. If water containers are used, they should be maintained in a clean condition, free from residues and contamination to ensure workers are not adversely affected by contaminated water from unclean containers. If there is evidence (i.e. visual observation or documentation) the water is coming from a questionable source, the auditor should review water quality test results.
2.07.09a	Are single use cups provided (unless a drinking fountain is used) and made available near the drinking water?	5	Single use cups should be provided so that cross-contamination issues are avoided from person to person. Examples include single-use cups, drinking fountains, etc. Where individual drinking cups are used, control measures are in place to mitigate potential product contamination. Communal drinking cups and other shared utensils are prohibited.
2.07.10	Are first aid kits adequately stocked and readily available to workers?	5	First aid kit(s) supplies should be appropriate for the workplace and the injuries most likely to occur there (including any chemicals stored on-site) and should be stored in an area where they are readily available for emergency access. Date-coded materials should be within dates of expiration. Gloves should be worn over all band aids on hands.
2.07.11	Are trash receptacles adequate and placed in suitable locations?	5	There should be adequate measures for trash disposal so that spills are contained (no evidence of leaks) and the growing and storage areas are not contaminated. Containers (e.g., dumpsters, trash cans) should be available and placed in suitable locations for the disposal of waste and trash e.g., near hand wash stations.
2.07.12	Are any potential foreign material issues (e.g., metal, glass, plastic) controlled?	5	There should be no foreign material issues that are or could be potential risks to the product. Examples include, but are not limited to, glass bottles, unprotected lights on equipment, staples on wooden crates, hair pins, using "snappable" blades instead of one-piece blades, broken and brittle plastic issues on re-useable totes.
Agronomic Inputs			
2.08.01	What type(s) of fertilizers and amendments are used in the growing operation?	0	Information gathering question.
2.08.01a	Are animal based or derived fertilizers or amendments used as an input?	0	Information gathering question. Animal based or derived components 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, animal derived compost teas, fish emulsions, fish meal, animal-based bio-fertilizers, etc.). Untreated animal manure and human sewage sludge (biosolids), which are by-products of wastewater treatment, should not be used in indoor growing operations, and when prohibited under best management practices (e.g., LGMA, T-GAPs).

Question No.	Question	Total Points	Expectation
2.08.01b	Are non-animal based or derived fertilizers or amendments used as an input?	0	Information gathering question. Non-animal based or derived fertilizers or amendments can be organic (e.g., peat moss, bark, coconut coir, rice hulls, wood fiber, non-animal-based compost teas, non-animal derived bio-fertilizers) or inorganic. (e.g., perlite, rock wool, oasis cubes, pumice, vermiculite, sand, hydrogel).
2.08.01c	Are synthetic fertilizers used as an input (e.g., ammonium nitrate, ammonium sulfate, chemically synthesized urea, etc.)?	0	Information gathering question. Examples of manufactured synthetic fertilizers include ammonium nitrate, ammonium sulfate, chemically synthesized urea, etc. These are sometimes called inorganic fertilizers.
2.08.02	Is there a documented risk assessment in place for all animal-based fertilizers and amendments used on the growing operation?	15	A documented risk assessment should be performed prior to use and should consider animal-based fertilizer and amendments, 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, animal derived compost teas, fish emulsions, fish meal, animal derived 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
2.08.02a	Where the risk assessment identifies the need for control of any hazards, are these controls indicated in the assessment and implemented?	15	For any hazards identified in the assessment, the operation should detail what practice is being done to minimize identified hazards, how to measure or monitor the effectiveness of the practice, how often to measure, and how it is verified and recorded. There should be documented evidence of validation that corrective actions and preventive measures have been taken when any hazard was identified and were adequate for the specific situation. Documentation may include test results for microbial contaminants, heavy metals, etc.
2.08.03	Is there a documented risk assessment in place for all fertilizers and amendments not containing animal-based or derived components used in the growing operation?	15	There should be a documented risk assessment of all fertilizers and amendments not containing animal-based components used in the growing operation. This should detail known or reasonably foreseeable hazards, the specific microbial, chemical and physical hazards and their severity and likelihood of occurring. Synthetic fertilizers include ammonium nitrate, ammonium sulfate, chemically synthesized urea, etc. These are sometimes called inorganic fertilizers. Growing media are the soilless components that plants grow in. Components can be organic **(e.g.,** peat moss, bark, coconut coir, rice hulls, wood fiber, compost teas) or inorganic. (e.g., perlite, rock wool, oasis cubes, pumice, vermiculite, sand, hydrogel). The physical characteristics are determined by the components used and the proportions in which they are blended. Attention to substrates that are reused.

Question No.	Question	Total Points	Expectation
2.08.03a	Where the risk assessment identifies the need for control of any hazards, are these controls indicated in the assessment and implemented?	15	For any hazards identified in the assessment, the operation should detail what practice is being done to minimize the identified hazard, how to measure or monitor the effectiveness of the practice, how often to measure, and how it is verified and recorded. There should be documented evidence of validation that corrective actions and preventative measures have been taken when any hazard was identified and were adequate for the specific situation. Documentation may include test results for microbial contaminants and/or chemical contaminants (e.g., allergens, heavy metals), etc.
2.08.04	Are all fertilizers and amendments being used according to local and national guidelines? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	All local and national legislation or guidelines should be followed e.g., EPA. Produce Safety Rule, Californian Leafy Green Commodity Specific Guidelines. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
2.08.04a	Are there fertilizer and amendment use records available for each growing area, including application records?	15	Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure.
2.08.04b	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?	10	Certificate(s) of Analysis (COA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone) 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)).
2.08.04c	Are there Certificate(s) of Analysis (CoA) from the supplier(s) that cover pathogen testing (plus any other legally/best practice required testing) and does the grower have relevant letters of guarantee regarding supplier SOPs and logs?	15	Applicable to animal-based or derived fertilizers and amendments only. Certificates of analysis should be available for each lot (containing animal materials) used. As a minimum, microbial testing should include Salmonella spp., Listeria monocytogenes and E. coli O157:H7 for non-synthetic crop treatments (e.g., compost teas, fish emulsions, fish meal, blood meal, “bio fertilizers”) and for animal-based compost, using approved sampling and testing methods (e.g., AOAC and an accredited laboratory). Where legally allowed, a reduced sampling rate is possible if the material is produced by the auditee (e.g. mushroom growing operations with in-house compost production) and has been through a physical/chemical/biological process to inactivate human pathogens and the auditee has validation study documentation that shows that the material is safe and proper process control records (e.g., time/temperature records and calibration records, such as, temperature probe) are maintained and available during the audit. Validation studies must be applicable to the situation at hand and care should be taken not to over extrapolate. All local and national legislation should also be followed. The grower should have proof that compost suppliers have cross contamination SOPs and temperature/turning logs.

Question No.	Question	Total Points	Expectation
Irrigation / Water Use			
2.09.01	What water source(s) are used in the operation?	0	Information gathering question.
2.09.01a	What is this water source used for (e.g., irrigation, crop protection sprays, fertigation, frost/freeze protection, cooling, hand washing, dust abatement, etc.)?	0	Information gathering question.
2.09.01b	What type of irrigation methods are used (e.g., micro-irrigation, drip, overhead, flood irrigation, furrow irrigation, seepage irrigation, hydroponic (specify type))?	0	Information gathering question.
2.09.01c	Does the water come in contact with the edible portion of the crop?	0	Information gathering question.
2.09.01d	Is water captured and re-used?	0	Information gathering question.
2.09.01b	Is dryland farming used in the growing operation	0	Information gathering question. Crop production that relies only on rainfall.
2.09.02	Is there a documented risk assessment in place for all water sources and distribution systems used on the farm?	15	There should be a risk assessment for each water source and type of distribution system, considering water source (e.g., ground or surface), water 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 documented at least annually, and when any changes occur.
2.09.02a	Where the risk assessment identifies the need for control of any hazards, are these controls indicated in the assessment and implemented?	15	For any risks identified in the assessment, the operation should detail what practice is being done to minimize identified risks, how to measure or monitor the effectiveness of the practice, how often to measure, and how it is verified and recorded. There should be documented evidence of validation that corrective actions and preventive measures have been taken when any risk was identified and were adequate for the specific situation.
2.09.02b	Are there results for generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCONFORMANCE) DOWN SCORE IN THIS QUESTION RESULTS**	15	Testing results should be recorded, including the organism(s) tested for, the testing methodology, lab that performed the test, details of the sampling sites, when the test occurred and the results (including units of measure). If any issues are detected, corrective actions should be recorded (see 2.09.02e). Each water-use activity (irrigation, cleaning/sanitation, hand washing, crop protection product application, fertilizer application (if applicable) and post-harvest applications) should be represented/included in the program, with testing results available representing each activity and based upon a sampling plan and testing frequency. As a minimum, at least one sample per source and distribution system is required. If there are multiple sampling

Question No.	Question	Total Points	Expectation
	IN AUTOMATIC FAILURE OF THIS AUDIT.		points in a distribution system, then samples should be taken from a different location for each test (i.e., randomize or rotate locations). Water samples should be taken from as close to the point of use as is practical. A reduced sampling and testing frequency is acceptable if supported by a valid documented risk assessment although there should be at least one water test per season. Where there are national (e.g., FDA Produce Safety Rule) or local requirements, or there are applicable guidelines e.g., Californian Leafy Green Commodity Specific Guidelines, CEA Food Safety Coalition, the operation needs ensure they are meeting these requirements. **A ZERO POINT (NONCONFORMANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
2.09.02c	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	10	There should be documented procedures in place detailing how water samples are taken in the field, including stating how samples should be identified i.e., clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means), testing methodology and lab that performs the tests. Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.
2.09.02d	Do written procedures (SOPs) exist covering corrective action measures for unsuitable or abnormal water testing results?	10	Written procedures (SOPs) should exist covering corrective action measures not only for the discovery of unsuitable or abnormal water test results but also as a preparation on how to handle such findings. Corrective action procedures should include investigative details, root cause analysis, correction as well as corrective and preventive action.
2.09.02e	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	15	For generic *E. coli* (unless more stringent guidelines/laws in existence) <126MPN (or CFU)/100mL (rolling geometric mean n=5) and <235MPN (or CFU)/100mL for any single sample. Where thresholds have been exceeded, there should be recorded corrective actions that prevent or mitigate product contamination, including investigations, water retests, and if required, crop testing (*E. coli* O157:H7 and *Salmonella* - zero tolerance). Failure to take corrective actions, prevent or mitigate product contamination when there is evidence of high levels or an upward trend of *E. coli* may result in an automatic failure of the audit. For farms following the FDA's Produce Safety Rule, the operation needs to ensure they are meeting the requirements for agricultural water testing currently in effect. Farms following the CA or AZ LGMA should reference current metrics.
2.09.02f	Where anti-microbial water treatments (e.g., chlorination, U.V., ozone, etc.) are required, are there records of the monitoring frequencies, results and where necessary the corrective actions?	15	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction-based test or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g., chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well "shocking" should be recorded. Prior to use, growers should check regulations (e.g., US FSMA) and industry guidelines (e.g. CA and AZ LGMA) to determine the appropriate parameters and tolerances for the treatment used.
2.09.02g	Are there records (with corrective actions) of periodic visual inspection of the condition of water source(s)?	5	Records should detail what was checked, the condition, unusual occurrences, (e.g., issues regarding well cap, access to shut-off valve not impaired, any leaks from holes/cracks in line, well casing, seals, piping tanks, treatment equipment, cross connections, check valves, trash, animal presence, pooled water, etc.), and any corrective and preventive action taken.

Question No.	Question	Total Points	Expectation
2.09.03	Where applicable, are there backflow prevention devices on all main lines, including where chemical, fertilizer and pesticide applications are made?	10	Water systems should be fitted with backflow prevention devices to prevent contamination of the water supply. Main water lines should be fitted with back-flow protection for the incoming water (no matter what the source). Individual water lines should be fitted with backflow protection where practical.
2.09.04	If the operation stores water (tank, cistern, container), are the storage containers well maintained?	15	Containers should be structurally sound with no evidence of damage or rust, no vegetation growing on or in the container. The base of the container should be free from debris and weeds. Access lids are properly secured and any vents, overflow and drains are screened. Air gaps are present and should be at least twice the diameter of the water supply inlet and not be less than 25 mm (1 inch).
Pesticide Usage			
2.10.01	Are there up-to-date records of all pesticides applied (seed treatment and during the growth cycle)? **A ZERO POINT (NON-CONFORMANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	The growing operation should follow a pesticide application record keeping program that at least includes the following: date and time of application, crop name, treated area size and location (must be traceable), brand/product name, EPA (or country of production equivalent) registration information, active ingredient, amount applied (rate/dosage), applicator identification, pre-harvest interval, restricted entry interval, application equipment identification and target pests. **A ZERO POINT (NON-CONFORMANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
2.10.02	Are all 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.**	15	Application records should show all pesticides applied are officially registered by the country of production for the target crop (e.g., EPA in the US, COFEPRIS in Mexico, SAG in Chile, Pest Management Regulatory Agency (PMRA) in Canada). In countries where there is approval for its use, this is acceptable, when the program is operated by the government and considers at a minimum the target crop, pesticide trade name and active ingredient, formulation, dosage, pre-harvest intervals and target pest(s) or in cases where the government authorizes an active ingredient but not a trade name, there must be evidence of conformance with the MRLs of the destination countries for the applied "authorized" active ingredient (see 2.10.05) 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.**
2.10.03	Are all pesticides used applied as recommended/directed in the label? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC**	15	Application records should show that pesticides are applied in accordance with label directions and any local or national 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.

Question No.	Question	Total Points	Expectation
	FAILURE OF THE AUDIT.		
2.10.04	Where harvesting is restricted by pre-harvest intervals, are required pre-harvest intervals on product labels, national (e.g., EPA) registration and any local or national regulations and guidelines being adhered to? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Application and harvest records show pre-harvest intervals on product labels, national (e.g., EPA) registration and any local or national regulations and guidelines are being adhered to. In operations applying pesticides "authorized" by the government, where use directions are not in the label, application and harvest records show the "authorization program" directions for pre-harvest intervals are followed. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
2.10.05	Is there documentation of pesticide Maximum Residue Limits (MRLs) conformance considering country of destination, target crop(s), and active ingredients applied?	15	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. This question is Not Applicable if the product is only sold in the country of production (domestic market).
2.10.06	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?	15	Maximum Residue Limits (MRLs) analysis should be performed when the MRLs of the destination countries are lower (stricter) than the country of production. This assumes that grower is meeting country of origin MRL and label requirements. MRL test results and records should demonstrate that products/crops meet MRL regulations in those intended markets and any non-conforming product is diverted from those markets. This question is Not Applicable if the product is only sold in the country of production (domestic market).
Pesticide Handling & Application			

Question No.	Question	Total Points	Expectation
2.11.01	Is there a documented procedure that is followed, for the pesticide applications, considering mixing and loading, transporting, applying, surplus mix/tank rinsate disposal and equipment cleaning?	15	There should be a documented procedure for pesticide applications, specifically mixing and loading, how to transport, application procedures and equipment cleaning. The procedure should adhere to the product label and include: requiring activity to be in a well-ventilated, well-lit area away from unprotected people, food and other items that might be contaminated; necessary PPE, safe transportation, re-entry intervals, excessive winds, posting of treated areas, etc.; surplus mix/tank rinsate disposal, how to rinse and clean pesticide equipment including measuring devices, mixing containers and application equipment. If any of these practices are observed during the inspection, it should be evident that the procedures are being followed.
2.11.02	Is there documentation that shows the individual(s) making decisions for pesticide applications is competent?	15	Current valid certificates, licenses, another form of proof of training recognized by prevailing local or national regulations and guidelines should be available for the individual(s) making decisions on pesticide applications (e.g., choice of pesticides, application timings, rates, etc.).
2.11.03	Is there documentation that shows that individuals who handle pesticide materials are trained and are under the supervision of a trained person?	15	All workers who handle pesticides must have current certificates, licenses, or other forms of proof of training (recognized by prevailing national/local standards and guidelines) qualifying them to do so independently or they must have proof of training (in-house or external) and be under the supervision of a worker who can do so independently.

Where laws, commodity specific guidelines and/or best practice recommendations exist and are derived from a reputable source, then these practices and parameters should be used. Audit users should allow a degree of risk association if laws, guidelines, best practices, etc., have not been documented.

Document Revision History		
Date	Rev.#	Description
31/07/2025	0	Initial