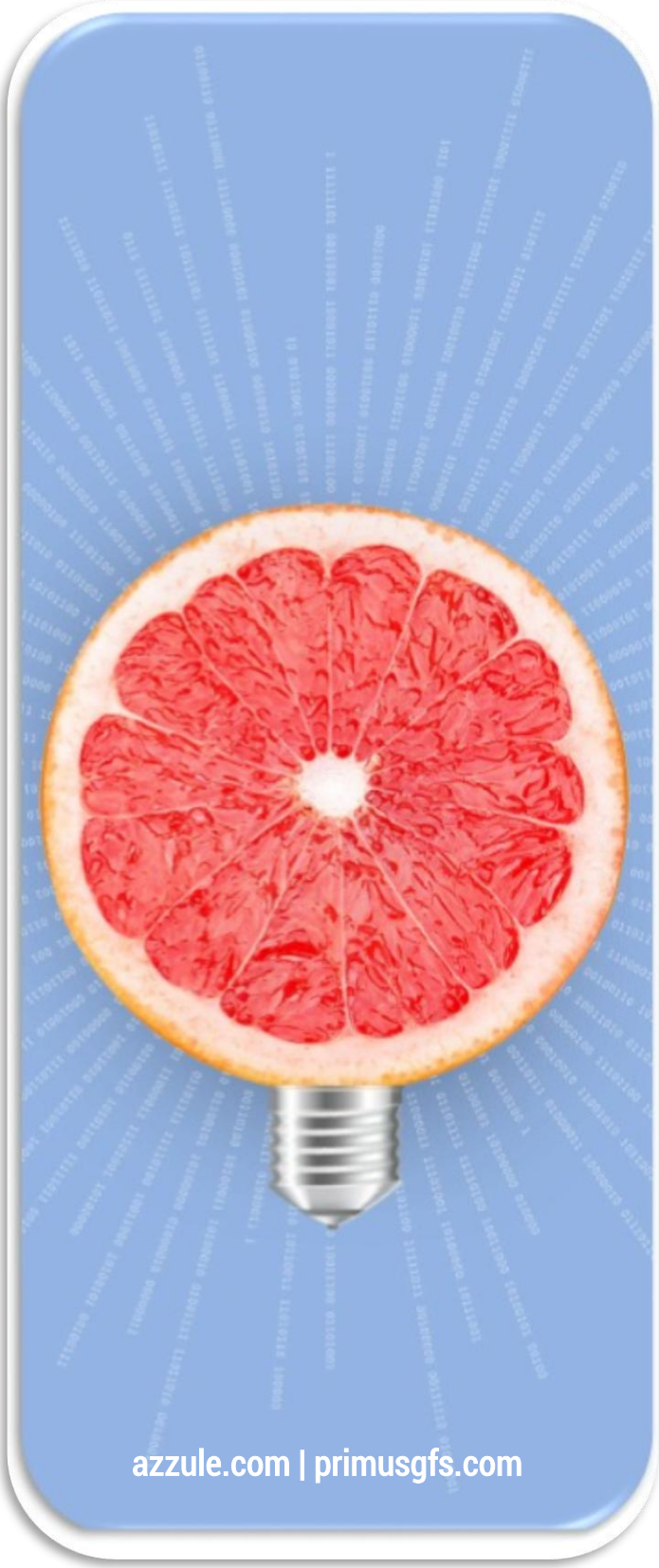
PrimusGFS v4.0

Module 4 – Harvest Crew

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 Harvest Crew operations in the scope of the organization's application

Module 4- Harvest Crew

Question No.	Question	Total Points	Expectation
General			
4.01.01	Is there a trained on-site person(s) 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 1.01.02). 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.
4.01.02	Does the operation have a 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 the rules related to hygiene and health (e.g., hand washing, eating/drinking, smoking, specific clothing rules, foreign material issues, cuts/wounds, illness rules, etc.), no infants and toddlers allowed in the growing area, what to do in the case of evidence of animals and/or fecal matter in the growing and/or storage areas, and what to do in the case of dropped product, and if the product comes into contact with blood or other bodily fluids. All workers 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.
Inspection			
4.02.01	Are there records of pre-harvest inspections and do they show that the current block (or coded area) is cleared for harvest? If there are no pre-harvest inspections got to 4.02.02.	5	A pre-harvest block inspection should have been performed no more than 7 days prior to harvest and if harvesting is occurring, it should show if there are any harvesting restrictions, etc. (e.g., pre-harvest testing results, evidence of animal intrusion, changes in weather conditions or weather events, pesticide application events) The harvest crew might not have a copy of the actual inspection, but they should have a document indicating which blocks have been inspected and cleared for harvest. If there are no pre-harvest inspections, go to 4.02.02.
4.02.01a	Where pre-harvest inspections have discovered issues, have buffer zones been clearly identified, and at the time of the audit, are those buffer zones being respected?	15	Where pre-harvest inspections have discovered issues (e.g., flooding, animal intrusion issues) buffer zones should be implemented (e.g., 30ft (9.1m) from flooded areas, 5ft (1.5m) from evidence of pest activity). Use larger buffer zones if national and local laws are more stringent.
4.02.02	Is there a pre-operation inspection log?	10	Pre-operation inspections just prior to start-up should identify potential problems with the harvesting operation, including equipment hygiene, tool hygiene, and worker hygiene. These inspections and corrective actions should be recorded. Use of surface monitoring checks e.g., ATP, A3 (ATP, ADP, AMP), plate counts, etc., are ideal practice and if used, should be recorded properly along with any required corrective actions.

Question No.	Question	Total Points	Expectation
Training			
4.03.01	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 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.
4.03.02	Is there a documented training program with training logs for the sanitation workers, including best practices and chemical use details?	5	Sanitation training should ensure that the workers understand the importance of proper sanitation, cleaning efficacy, how to use the cleaning chemicals and how to understand Sanitation Standard Operating Procedures. Unless sanitation workers attend regular food safety trainings, sanitation training should also include elements of food safety training pertinent to sanitation operations (e.g., hand washing, restroom use, foreign material, etc.). Training logs should have a clearly defined topic(s) covered, trainer(s) material(s) used/given and who attended the training (name and signature).
4.03.03	Are there written and communicated procedures in place that require food handlers to report any cuts or grazes and/or if they are suffering any illnesses that might be a contamination risk to the products being produced, and return to work requirements? (In countries with health privacy/confidentiality laws, e.g., USA, auditors can check procedure/policy but not the actual records).	10	There should be documented procedures that are communicated (e.g., worker signature on a training log) to food handlers, requiring them to report any cuts, grazes and/or any illnesses that might be a food safety cross contamination risk. Procedures to 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.
4.03.04	Are there worker food safety non-conformance records and associated corrective actions (including retraining records)?	3	There should be records covering when workers are found not following food safety requirements. These records should also show corrective actions and evidence that retraining has occurred (where relevant).

Question No.	Question	Total Points	Expectation
Harvest Worker Hygiene			
4.04.01	Are toilet facilities adequate in number and location? **A ZERO POINT (NON-COMPLIANCE) 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 harvesting is actively occurring with groups of three or more workers. Where there are two or less workers present and workers have transportation that is immediately available to toilets within a 5-minute drive, it is acceptable to score as total conformance. Automatic failure if there are insufficient or inadequate toilet facilities. **A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
4.04.01a	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.
4.04.01b	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.
4.04.01c	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.
4.04.01d	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).

Question No.	Question	Total Points	Expectation
4.04.01e	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 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.
4.04.01f	Are the toilet facilities and hand washing stations clean and are there records showing cleaning, servicing and stocking is occurring regularly?	10	Toilet facilities and hand washing stations should be stocked, serviced and cleaned and sanitized on a regular basis. Servicing 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).
4.04.02	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.).
4.04.03	Are hand washing stations adequate in number and appropriately located for worker access and monitoring usage? **A ZERO POINT (NON-COMPLIANCE) 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 available to all workers and visitors. Hands free is an optimum system. Hand washing stations should be visible and located within close proximity of toilet facilities and lunchrooms and within 1/4 mile or 5 minutes walking distance of where workers are located. **A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
4.04.03a	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 of clogged drains, etc.)?	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).
4.04.03b	Are hand wash stations clearly visible (e.g., situated outside the toilet facility) and easily accessible to workers?	5	Hand wash stations should be clearly visible (i.e., situated outside the toilet facility) in order to verify hand washing activities, and easily accessible to workers.

Question No.	Question	Total Points	Expectation
4.04.03c	Are hand wash stations adequately stocked with unscented soap and paper towels?	5	All hand washing facilities should be properly stocked with liquid unscented/non-perfumed, neutral or antiseptic soap. Single use paper towels should be used and units properly located. There should be an adequate stock of soap and paper towels.
4.04.03d	In the event of running out of toilet materials (e.g., water, soap, toilet tissue, hand paper towels), are there extra supplies readily available so that toilets can be restocked quickly?	5	Extra stock of fresh water, soap, toilet paper and paper towels, etc. should be readily available in the event that replenishment is needed while harvesting is occurring.
4.04.04	Are there results for total coliforms (TC) and generic *E. coli* tests conducted on the water used for hand washing at the required and/or expected frequency?	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 4.04.04c). Total coliforms (TC) and generic *E. coli* testing should occur on a routine basis. All water sources used for hand washing throughout the harvesting season should be tested. One sample per water source should be collected and tested prior to use and then at least every 3 months, ideally monthly. A reduced sampling and testing frequency is acceptable if supported by a valid risk assessment, although there should be at least one water test per season. Water samples should be taken from as close to the point of use as is practical e.g., hand wash spigot/faucet. If there are multiple hand wash units, then samples should be taken from a different location each test (randomize or rotate locations). If there are multiple sources for hand wash water, testing should also account for each source used.
4.04.04a	Do written procedures (SOPs) exist covering proper sampling protocols, which include where samples should be taken and how samples should be identified?	10	There should be a documented procedure in place detailing how water samples are to be taken, including stating how samples should be identified i.e., clearly naming the location that the sample was taken, identifying the hand wash station, the water source, the date, testing methodology and lab that performs the tests.
4.04.04b	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 testing 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.
4.04.04c	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	15	For total coliforms (TC) and generic *E. coli*, there should be negative or < detection limit (MPN or CFU/100mL). Where thresholds have been exceeded, there should be recorded corrective actions, including investigations and water retests.

Question No.	Question	Total Points	Expectation
4.04.05	Are workers washing and sanitizing their hands before starting work each day, after using the restroom, after breaks, before putting on gloves and whenever hands may be contaminated?	15	Worker conformance to hand washing and sanitizing procedures should be assessed as washing hands is the first step in avoiding food contamination. Workers should be observed washing their hands prior to beginning work, after breaks, after using the toilets, before putting on gloves, and whenever hands may have become a source of contamination (e.g., after eating, after using a handkerchief or tissue, smoking, drinking, etc.).
4.04.06	Are secondary hand sanitation stations (e.g., hand dips, gels or spray stations) adequate in number and location, and are the stations maintained properly?	5	Secondary hand sanitation is required for items that may be “ready-to-eat” (e.g., herbs, tomatoes, edible flowers, etc.). Secondary hand sanitizers are optional for root vegetable crops or a commodity that requires cooking prior to eating. Secondary hand sanitation (hand dips, gels or sprays) does not replace hand washing requirements (lack surfactant qualities). Secondary hand sanitation stations should be unscented/non-perfumed, have 60% to 95% ethanol or isopropanol and should be located near hand washing and other easily accessible areas. Hand dips (if used) should contain a food grade sanitizer at a determined concentration. Refer to hand sanitizer manufacturer label for dilutions. Hand dips should be regularly monitored (recorded anti-microbial strength checks) to ensure their effectiveness with corrective actions recorded (e.g., dip solution replenishment and anti-microbial additions). Hand gel / spray stations should be well stocked and tested regularly to ensure they are at the required strength - checks should be recorded. The auditor should check that gel pack type stations are stocked and have the auditee check the strength of anti-microbial chemicals in hand dips. Strength checks do not need to be performed for commercially purchased sanitizers that have been purchased already mixed.
4.04.07	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.
4.04.08	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 maybe a source of foreign material contamination include studs, false fingernails and fingernail polish, false eye lashes, eye lash extensions and badges.
4.04.09	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.

Question No.	Question	Total Points	Expectation
4.04.10	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.
4.04.11	Where required, are workers wearing effective hair restraints that contain all hair?	5	If the operation requires the use of hair restraints, the harvest workers should be wearing appropriate hair restraints that restrain all hair. Baseball caps and head coverings are allowed in the harvesting area only if they are clean and worn with a clearly visible hair net.
4.04.12	Are all items removed from garment (shirt, blouse, etc.) top pockets, and unsecured items are not worn (e.g., pens, glasses on top of head, Bluetooth devices, etc.)?	3	There should be no items stored in workers' top pockets. Items in pockets and otherwise unsecured have the potential to fall into the product.
4.04.13	Are all workers wearing protective outer garments suitable for the operation (e.g., appropriate clean clothes, smocks, aprons, sleeves and non-latex gloves)?	5	Outer garment policy should consider potential for cross contamination, customer requirements, production risk, product type, etc. Outer garments include where applicable: smocks, aprons, sleeves, gloves, boots, etc. Workers should not wear personal clothes with sequins, pom-poms, fur, etc. No sleeveless tops without an over garment. Where dedicated protective clothing is not required/worn, it must be clear that outer street clothes are clean and not a potential source of contamination. If required, the policy should consider customer requirements, production risk, product type, etc.
4.04.14	Do workers remove protective outer garments (e.g., smocks, aprons, sleeves and gloves) when on break, before using the toilets and when going home at the end of their shift?	5	When worn, protective clothing (e.g., aprons, smocks, sleeves, and gloves) should be removed when workers leave the work area (e.g., when they go to the toilet facility, break areas, etc.). Workers cannot smoke, eat, or use the restroom while wearing these garments.
4.04.14a	Is there a designated area for workers to leave protective outer garments (e.g., smocks, aprons, sleeves, and gloves) when on break and before using the toilet?	5	There should be a designated area for workers to leave protective clothing when they are worn (e.g., aprons, smocks, sleeves, and gloves). Workers are observed using the designated area when they leave the work area (e.g., when they go to the toilet facility, break areas, etc.).

Question No.	Question	Total Points	Expectation
4.04.15	Is fresh potable drinking water in clean containers readily accessible to workers?	10	Water should be suitably cool and in sufficient amounts, taking into account the air temperature, humidity and the nature of the work performed, to meet the needs of all workers. Fresh potable water meeting the quality standards for drinking water should be available for workers on-site to prevent dehydration. The term "potable" meaning that the water is of drinking water quality (e.g., the EPA Drinking Water Standard or equivalent). If water containers are used, they should be maintained in a clean condition, free from residues and contamination to ensure workers are not adversely affected by contaminated water from unclean containers. 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.
4.04.15a	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.
4.04.16	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.
4.04.17	Are all commodities that come in contact with blood and/or other bodily fluids destroyed? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Any commodity that comes into contact with blood and/or other bodily fluids must be destroyed. If this occurs during the time of inspection, auditor must witness that product is destroyed. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
4.04.18	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.
4.04.19	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.
Harvest Practices			
4.05.01	Is there no evidence of animal presence and/or animal activity (wild or domestic) in the harvest area? If Total Compliance, go to 4.05.02.	15	Animals can represent potential contamination to the harvesting area, to the crop, to the equipment, etc., and therefore, should not be present in the operations. Evidence of animal presence can include tracks, fecal matter, feathers, etc.

Question No.	Question	Total Points	Expectation
4.05.01a	Is there no evidence of animal fecal matter in the harvest area? **A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	Fecal matter is a potential contaminant to the product being grown. Produce that has come into direct contact with fecal material is not to be harvested. A "no harvest zone" approximately 5ft (1.5 m) radius should be implemented unless or until adequate mitigation measures have been considered. If evidence of fecal matter is found, a food safety assessment should be conducted by qualified workers. Consideration of the maturity stage and type of crop involved is required. Any evidence of human fecal matter in the growing area is an automatic failure (score under 4.05.02).
4.05.02	Is there no evidence of human fecal contamination in the harvest area? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	There should be no evidence of human fecal contamination in the harvesting area, area being harvested, packaging area, equipment area, or in any other area that would cause a contamination issue. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
4.05.03	Is there no evidence of infants or toddlers in the harvest area?	10	Infants and toddlers can represent potential contamination to the growing area, to the crop, to packaging and should not be present in the operations, including chemical or equipment storage areas.
4.05.04	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 containers should be stored and disposed of safely. Chemical storage requirements must meet local and national requirements.
4.05.05	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 requirements.
4.05.06	Are "food grade" and "non-food grade" chemicals used appropriately, according to the label and not commingled?	10	All chemicals applied should be approved by the prevailing authority for their designated use and used according to label instructions. Only food grade lubricants should be used anywhere near product and packaging materials. "Food grade" and "non-food grade" materials should be stored in separate designated areas and adequately labeled. Grease guns and containers should be labeled adequately. Access to non-food grade materials should be limited to those entrusted with the correct use of chemicals.

Question No.	Question	Total Points	Expectation
4.05.07	Does the operation have a preventative maintenance program that includes a schedule and completion records?	10	There should be a list of preventive maintenance tasks with frequencies that includes routine maintenance, periodic maintenance and annual tasks including a hygienic design review to evaluate areas of concern and how to minimize. A preventative maintenance program can help prevent production and ancillary equipment, structures and fittings failure that can result in biological, physical or chemical contamination of products. Equipment includes harvesting equipment, compressed air equipment, water treatment equipment, etc. Use of predictive maintenance systems are also acceptable for this question.
4.05.08	Are there logs of maintenance work and repairs and are they signed off when work is completed?	10	A log of maintenance for unscheduled repair work and request orders is necessary to track improperly working equipment, repairs and similar issues not covered under the preventative 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.
4.05.09	Is there a written cleaning schedule (Master Sanitation Schedule) that shows what and where is to be cleaned and how often?	10	A master sanitation program should be in place that covers all the harvest equipment, storage areas, break areas, restrooms, transportation and waste areas. The master sanitation program should reflect the type of harvesting operation. Areas that require periodic disassembly/deep cleaning should be listed (e.g., wear strips under belts, difficult to reach locations (i.e., incline belts, cog wheels), sandwich spots, framework, cutting board attachments, mechanical drive and support rollers, bearings) as well as any light covers, overhead structures, etc. List should include food and non-food contact equipment (e.g., harvest buckets, harvest tools/machines, carts, tables, pallet jacks, forklifts, and company owned trailers, etc.) The master sanitation schedule should include a detailed list of areas and equipment to be cleaned as well as the frequency.
4.05.10	Are there records of microbial testing for water used for postharvest product contact (e.g., washing, re-hydrating) and product contact surfaces (e.g., cleaning grading or packing tables and harvest tools) showing that there are no detectable total coliforms and generic *E. coli* in the water?	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 including investigations and water retests. (see 4.05.10b). All water sources that are used for postharvest contact with the edible portion of a crop (e.g., washing, re-hydrating) and product contact surfaces (e.g., cleaning grading or packing tables and harvest tools) should be tested on a routine basis. One sample per water source should be collected and tested prior to use and then at least quarterly thereafter, or at a frequency relative to the associated risks. For commodities under the Leafy Greens Marketing Agreement, one sample per water source should be collected and tested prior to use if >60 days since the last test of the water source. Additional samples shall be collected at intervals of no less than 18 hrs. and at least monthly during use. Results of water testing for total coliforms and generic E. coli should meet the US EPA drinking water microbiological specification. For total coliforms and generic E. coli, there should be negative or < detection limit (MPN or CFU/100mL).
4.05.10a	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 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.

Question No.	Question	Total Points	Expectation
4.05.10b	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	15	For total coliforms and Generic *E. coli*, there should be negative or < detection limit (MPN or CFU/100mL). Where thresholds have been exceeded, there should be recorded corrective actions, including investigations, water retests, and if required, crop testing (*E. coli* O157:H7 and *Salmonella* < detection limits or Negative-zero tolerance). For operations 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.
4.05.11	Is the product harvested and transported to a facility for additional handling and/or final packing?	0	Information gathering question. This question refers to product that is harvested in the growing area and then taken to a facility for handling and/or packing.
4.05.12	Is the product packed in the final packing unit in the growing area? If No, go to 4.05.13.	0	Information gathering question. This question refers to product packed in the growing area that is in the final unit for shipping (i.e., clamshell, wrapped products, carton boxes, etc.), that usually bypasses any selection packing lines in a facility i.e. goes to a cooling process as opposed to a packing line.
4.05.12a	Is packing material (e.g., cartons, bags, clamshells, sacks, RPCs) intended for carrying product used for that purpose only?	5	All containers intended for product should not be used for any other purpose besides product storage.
4.05.12b	Is packing material inspected prior to use and is product and packing material free from handling contamination and exposure to the ground?	10	Avoid stacking soiled bins on top of each other if the bottom of the bin has had direct contact with soil/substrate. Product and packing materials used in the harvesting process should be placed with protection underneath and handled in a manner to eliminate contamination from the ground or from inappropriate human handling, which includes commodities where it is industry practice to place the products on the ground after harvest. Crops down scored for exposure to the ground do not include root crops that are grown underground (e.g., carrots, potatoes, onions, garlic, etc.) or crops that are grown with harvested portion in contact with the ground or plastic (e.g., melons). Handling contamination could also be caused by using cloths or towels to remove dirt and/or debris from packaging and/or product, standing on the sides of beds/trays during mushroom harvest, standing in bins of product on trucks, etc.
4.05.12c	If packing material is left in the growing area unattended, is it stored secured and protected?	5	All containers, cartons, packing material should be stored in a protected area to reduce the risk of contamination and tampering that can occur if packing material is left in the growing area unattended.

Question No.	Question	Total Points	Expectation
4.05.13	Is the crop, harvested product, 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, harvested product, ingredients (including water), food contact packaging and food contact surfaces should be free from spoilage, adulteration and/or gross contamination (21 CFR 110.3g). If legislation exists, then the contamination should be viewed against this legislation (e.g., USDA Grading Standards often include decay tolerances). Spoilage and adulteration would include any physical, chemical or biological contamination including blood and bodily fluids. Measures should be taken to prevent any known or reasonably foreseeable hazard (e.g., Clostridium botulinum in mushrooms). Other examples might include glass, trash/litter, motor oil in products, etc. 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.**
4.05.14	Are grading and packing surfaces, carts, ladders and other harvest aids used? If No, go to 4.05.15.	0	Information gathering question. This refers to food contact surfaces used to grade, inspect, re-pack, or pack product (e.g., grading tables, mushroom grading platforms, picking carts, ladders, etc.).
4.05.14a	Does the design and condition of the grading and packing surfaces (e.g., smooth surfaces, smooth weld seams, non-toxic materials, no wood) facilitate effective cleaning and maintenance?	10	Grading and packing surfaces should be made of materials suitable for food contact that can be easily cleaned, sanitized and maintained. Equipment should be designed to allow access and easy cleaning (including hollow structures on supports, rollers, racks, etc.), with no hard to get to (debris catching) areas. Surfaces that are porous, trap debris, or are badly damaged should be replaced. Wood, for example, is porous and can trap moisture. Welds should be smooth and not "bobbly".
4.05.14b	Are there readily available written cleaning and sanitation procedures (Sanitation Standard Operating Procedures) for the grading and packing surfaces that include the frequency of cleaning and sanitizing, and the procedures used, and chemical use details?	5	Food contact surfaces used to grade, inspect, re-pack, or pack product (e.g., picking carts, grading tables, ladders, etc.) should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). The program should state the frequency of cleaning and sanitizing, detail what, who, where, how (including water source) and when, including chemical details (name, dilution/concentration), and cleaning verification procedures.
4.05.14c	Are cleaning and sanitation logs on file for grading and packing surfaces that show what was done, when, where, by who, who verified, water source used, and detailing concentration testing of anti-microbial solution used to sanitize surfaces?	10	Sanitation logs should include: date/time, list of areas/equipment that were cleaned and sanitized, where cleaned, why cleaned, water source, sanitizer concentration test, the individual accountable who signed-off for each task completed, who verified cleaning effectiveness and, any deviations against SSOPs.

Question No.	Question	Total Points	Expectation
4.05.15	Are re-useable containers (e.g., buckets, totes, lugs, RPCs, bins) used in the harvesting operation? If No, go to 4.05.16.	0	Information gathering question. This refers to any re-useable containers used in the harvesting operation (e.g., buckets, totes, lugs, RPCs, bins, etc.) used in the harvesting operation.
4.05.15a	Does the design and condition of re-usable containers (e.g., smooth surfaces, smooth weld seams, nontoxic materials, non-porous, non-absorbent, no fabric) facilitate effective cleaning and maintenance?	10	All re-useable containers (e.g., totes, bins, buckets, etc.) should be made of easy to clean, smooth seamed materials that do not flake or oxidize. Efforts should be made to eliminate wooden surfaces because of its porous nature. Where wood containers are used, they should be in a state of good repair and covered by a documented repair program.
4.05.15b	Are re-useable containers free from any handling contamination?	10	Re-useable containers used in the harvesting process should be managed to eliminate contamination from inappropriate handling practices. Handling contamination could also be caused using cloths or towels to remove dirt and/or debris from packaging. Avoid stacking soiled bins on top of each other if the bottom of the bin has had direct contact with soil.
4.05.15c	Are there readily available written cleaning and sanitation procedures (Sanitation Standard Operating Procedures) for the reusable containers that includes the frequency of cleaning and sanitizing, and the procedures used and chemical use details?	5	Re-usable containers should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). The program should state the frequency of cleaning and sanitizing, detail what, who, where, how (including water source) and when, including chemical details (name, dilution/concentration), and cleaning verification procedures.
4.05.15d	Are cleaning and sanitation logs on file for reusable containers that show what was done, when, where, by who, who verified, water source used, and detailing concentration testing of anti-microbial solution used to sanitize surfaces?	10	Sanitation logs should include: date/time, list of areas/equipment that were cleaned and sanitized, where cleaned/sanitized, why cleaned, water source, sanitizer concentration tests, the individual accountable who signed-off for each task completed, who verified cleaning effectiveness and any deviation against SSOPs. Where cleaning & sanitizing is handled by a 3rd party (packinghouse, contract RPC company) auditee is expected to provide evidence of cleaning & sanitizing activities.
4.05.16	Are tools (e.g., knives, clippers, scissors, etc.) used in harvesting? If No, go to 4.05.17.	0	Information gathering question. This refers to harvest tools (e.g., knives, clippers, scissors, etc.) used in harvesting.
4.05.16a	Does the design and condition of harvest tools (e.g., smooth surfaces, smooth weld seams, nontoxic materials, no wood, no	10	To prevent contamination issues, harvest tools (e.g., knives, coring rings, etc.) should be constructed of easy to clean materials. Tools should be shard free, and smooth seamed so that they do not have the ability to flake or oxidize.

Question No.	Question	Total Points	Expectation
	fabric) facilitate effective cleaning and maintenance?		
4.05.16b	Are harvest tools free from exposure to the ground and/or any handling contamination?	5	Harvest tools (e.g., knives, clippers, scissors, coring rings, holsters, etc.) should be free from exposure to the ground and/or any handling contamination.
4.05.16c	Is there a tool accountability, storage and control program for knives and similar cutting hand tools used in the harvest area when not in use?	5	There should be an accountability, storage and control program in place for knives and similar cutting hand tools to prevent potential product contamination. Tool accountability should include the inspection of the cutting surfaces for wear and tear, as well as a tool inventory check at the start and end of each shift. Workers should not be taking tools, such as knives, from the work area and should be required to use knife scabbards that can easily be cleaned i.e. non-porous. Leather scabbards should not be used.
4.05.16d	Are there readily available written cleaning and sanitation procedures (Sanitation Standard Operating Procedures) for harvest tools that includes the frequency of cleaning and sanitizing, and the procedures used and chemical use details?	5	Harvest tools should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). The program should state the frequency of cleaning and sanitizing, detail what, who, where, how (including water source) and when, including chemical details (name, dilution/strength), and cleaning verification procedures.
4.05.16e	Are cleaning and sanitation logs on file for harvest tools that show what was done, when, where, by who, who verified, water source used, and detail concentration testing of anti-microbial solution used to sanitize surfaces?	10	Sanitation logs should include: date/time, list of areas/equipment that were cleaned and sanitized, where cleaned/sanitized, why cleaned, water source, sanitizer concentration tests, the individual accountable who signed-off for each task completed, who verified cleaning effectiveness and any deviation against SSOPs.
4.05.16f	Are harvesting tool dips being maintained properly in terms of anti-microbial solution strength and are records of the solution checks being maintained? **AUDITORS SHOULD REQUIRE A TEST AT THE TIME OF THE AUDIT.**	5	There should be records to show that the tool dip solutions (e.g., knife dips) are being maintained on a regular basis. The strength of the sanitizers should be checked on a regular basis (e.g., hourly) and recorded. All test solutions/strips should be within date code, appropriate for the concentrations used and stored correctly (especially light and temperature sensitive materials). Anti-microbial chemicals must be food grade. AUDITORS ARE INSTRUCTED TO REQUIRE A TEST AT THE TIME OF THE AUDIT.

Question No.	Question	Total Points	Expectation
4.05.17	Is machinery used in the harvesting process? If No, go to 4.05.18.	0	Information gathering question. This includes equipment with the potential to affect product (e.g., conveyor belts, mechanical harvesting units, field packing rigs, field packing buses, live bottom trailers, coring rigs and any "in-field" processing rigs). Please note that there are some more specific questions for coring rigs and any "in-field" processing rigs in a later section.
4.05.17a	Are food contact machinery surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g., tape, string, cardboard, etc.)?	15	Food contact surfaces on machinery should be free of flaking paint, corrosion, rust, and/or unhygienic materials, as they can pose foreign material and/or microbiological hazards. Food contact surfaces should be made of non-toxic, non-porous materials. Surfaces should be maintained in good condition.
4.05.17b	Are food contact machinery surfaces clean?	15	Unsanitary food contact surfaces can directly lead to contamination of the product. Food debris, bio films, excessive dust, etc., should be cleaned off equipment.
4.05.17c	Are non-food contact machinery surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g., tape, string, cardboard, etc.)?	10	Flaking paint, corrosion, rust and/or unhygienic materials should not be present on any surfaces. Where possible, equipment framework is not penetrated by bolts or studs.
4.05.17d	Are non-food contact machinery surfaces clean?	10	Unsanitary non-food contact surfaces can indirectly lead to contamination of the product. Food debris, bio films, excessive dust, etc., should be cleaned off equipment.
4.05.17e	Does the design and condition of the machinery (e.g., smooth surfaces, smooth weld seams, nontoxic materials, no wood) facilitate effective cleaning, sanitation and maintenance?	10	Machinery should be made of appropriate materials that can be easily cleaned and maintained, that are not porous or toxic and can withstand the cleaning process. Equipment should be designed to allow access and easy cleaning (including hollow structures on supports, rollers, racks, etc.), with no hard to get to (debris catching) areas. Surfaces that are porous, trap debris, badly damaged should be replaced. Wood, for example, is porous and can trap moisture. Welds should be smooth and not "bobbly".
4.05.17f	Is machinery designed and used properly to minimize product contamination (e.g., drip pans utilized, dedicated tractor pathways)?	5	Overhead contamination from materials such as hydraulic fluid can result in product and packaging contamination, and therefore, equipment should be fitted with catch pans. Dedicated tractor pathways should also be used to minimize product contamination.
4.05.17g	Are all glass issues on harvesting machines, in-field trucks, and tractors protected in some manner?	3	Glass located on the harvesting machinery (e.g., lights, night lights) that may pose a threat of contamination onto product, packaging, and re-useable containers should be protected. Machinery includes tractors and other equipment that may come into contact with product. There should be no evidence of cracked lenses.

Question No.	Question	Total Points	Expectation
4.05.17h	Are all platforms above product, packaging, or food contact surfaces (e.g., belts) on the harvest machinery and in-field trucks fitted with protection to prevent product contamination?	3	Overhead contamination of exposed product areas can result in microbiological, chemical and/or physical contamination. Measures should be taken to eliminate or reduce potential contamination by placing protection on areas of equipment above product, food contact surfaces, and belts.
4.05.17i	Are there readily available written cleaning and sanitation procedures (Sanitation Standard Operating Procedures) for the harvest machinery that includes the frequency of cleaning and sanitizing, the procedures used and chemical use details?	5	Harvest machinery should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). The program should state the frequency of cleaning and sanitizing, detail what, who, how (including water source) and when, including where cleaning takes place, chemical details (name, dilution/strength), and cleaning verification procedures. Frequency should reflect the type of machinery, type of harvesting practice and the risk associated with the crop involved. This includes water tanks used for post-harvest water use. For "in-field" processing, clean and core, etc., at least daily cleaning should be performed.
4.05.17j	Are cleaning and sanitation logs on file for harvest machinery that show what was done, when, where, by who, who verified, water source used, and detailing concentration testing of anti-microbial solution used to sanitize surfaces?	10	Sanitation logs should include: date/time, list of areas/equipment that were cleaned and sanitized, where cleaned/sanitized, why cleaned, water source, sanitizer concentration tests, the individual accountable who signed-off for each task completed, who verified cleaning effectiveness and any deviation against SSOPs.
4.05.17k	Is there written documentation showing that only food grade lubricants are used on the critical parts of the harvesting machinery that have the potential to contaminate product?	3	In order to prevent or reduce contamination to product/packaging, food grade lubricants (i.e., incidental food contact compounds or H1 materials) should be used on critical areas of the equipment where product exposure exists. Proof must be available that food grade lubricants are being used.
4.05.18	Is water used directly on product contact (e.g., re-hydration, core in field)? If No, go to 4.05.19.	0	Information gathering question. This refers to water that is used directly on product contact. Examples may include but are not limited to re-hydration, core in field.
4.05.18a	Are there specific Standard Operating Procedures (SOPs) for the monitoring of anti-microbial parameters in single-pass and/or recirculated/batch water systems and changing of	10	The addition of an anti-microbial is expected for product contact water and/or ice. This includes single-pass, recirculated and batch water systems. Monitoring organic and soil build-up (turbidity) is expected in recirculated and batch water systems. There should be specific SOPs that describe how they are managed, including the water change frequency (recirculated/batch water systems), anti-microbial(s) used, pH monitoring (if required), their concentration(s). monitoring method(s) and frequency and corrective action procedures. The anti-microbial monitoring frequency should be sufficient to demonstrate the required concentration is maintained throughout the time

Question No.	Question	Total Points	Expectation
	recirculated/batch water systems (e.g., dump tanks) and for pH and monitoring water temperature (if applicable)?		the system is operated. Methods and monitoring procedures for measuring build-up of organic material (soil and plant debris) in recirculated and batch water systems should be described. Water should be changed when it is dirty or when switching products. If product(s) immersed in water are known to be susceptible to infiltration, the SOP should include water and product temperature parameters and monitoring frequency. There should be sufficient validation to support the anti-microbial concentration used, the water changing frequency (if less than daily) and water testing frequency. Measuring total chlorine is not acceptable for recycled/batch water systems. Concentrations should be properly justified with supporting documents, rationale and evidence. Other anti-microbials include peracetic acid, chlorine dioxide, etc.
4.05.18b	Are there records (with corrective actions) that show anti-microbial (e.g., free chlorine, peroxyacetic acid) concentration testing of product contact water and ice solutions prior to start up and throughout the run?	10	Water systems using anti-microbial agents should have records showing that the concentration of the solution is within stated parameters. For "single pass" systems, this should be every batch of anti-microbial solution that is mixed. Recirculated/batch water systems should be checked hourly by measuring the "free anti-microbial" as opposed to bound microbial (e.g., testing for free chlorine as opposed total chlorine). Re-circulated/ batch water systems using chlorine should have records showing the pH is controlled. Where out of specification results are recorded, there should be corrective action records, including root cause analysis and preventive actions (where relevant).
4.05.18c	Are there records of monitoring for build-up of organic material (turbidity) and changing of recirculated and batch water systems (e.g., dump tanks, flumes, hydro vacuums, hydro coolers, etc.)?	5	There should be records of visual monitoring, testing and changing of recirculated and batch water systems during use. Water should be changed at least daily and when it is dirty and when switching products. Frequency of water changing is at least daily.
4.05.19	Does the operation use the appropriate test strips, test kits or test probes for verifying the concentrations of anti-microbial chemicals (e.g., postharvest product contact water, dip stations, etc.) being used, are they in operational condition and are they being used correctly?	15	The strength (concentration, pH, etc.) of anti-microbial chemicals should be checked on a regular basis and recorded. All test solutions/strips should be within date code, appropriate for the concentrations used and stored correctly. If the ORP meter controls the pumps that are injecting the anti-microbial and/or buffer, there should be an independent calibrated ORP probe or other method (e.g., test strip papers, titration) in order to verify injector readings.
4.05.20	Is the harvested product "in-field processed" or "in-field semi-processed" (e.g., core in field, top & tail, florets)? If No, go to 4.06.01.	0	Information gathering question. "In field processed" products are subject to all the questions in this audit and these extra requirements below. "In field processed" usually refers to product having multiple cuts surfaces created in the field (e.g., coring in field, topping & tailing, florets).

Question No.	Question	Total Points	Expectation
4.05.20a	Where harvested product is "in-field processed" or "in-field semi-processed," does the process flow, machine layout, worker control, utensil control, etc. ensure that processed products are not contaminated by unprocessed products?	5	The design, worker management, utensil management and general practice should avoid contact between processed and unprocessed product, contact surfaces and tools.
4.05.20b	Are all plastic bin liners closed immediately after harvest to avoid contamination of the harvested product?	3	All plastic bin liners should be closed immediately and appropriately secured after harvest to avoid product contamination.
Post-harvest Treatments			
4.06.01	Is there any post-harvest treatment performed to the product in the growing area? If No, go to 4.07.01.	0	Information gathering question. This refers to any post-harvest treatments taking place in the growing area (e.g., blueberries packed in the field with sodium metabisulphite pads, tables grapes packed in the field treated/gassed with sulfur dioxide, etc.).
4.06.01a	Are there up to date records of all pesticides applied to the harvested product? **A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	15	The operation should follow a pesticide application record keeping program for all postharvest treatments that at least includes the following: date of application, product identity (e.g., lot or batch number/code), brand/product name, EPA registration number (or country of production equivalent registration information), active ingredient, amount applied (rate/dosage), applicator identification, application equipment identification “and/or” type of treatment, and target pest/disease. Information may be recorded on separate documents providing all information is available and consistent. **A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**
4.06.01b	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.**	15	Application records should 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 the program is operated by the government and considers at a minimum the target crop, pesticide trade name and active ingredient, formulation, dosage, pre-harvest intervals and target pest(s) or in cases where the government authorizes an active ingredient but not a trade name, there must be evidence of compliance with the MRLs of the destination countries for the applied "authorized" active ingredient (see 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

Question No.	Question	Total Points	Expectation
			considered. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**
4.06.01c	Are all pesticides applied post-harvest used as recommended/directed in the label? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	15	Application records should show all post-harvest pesticides are applied in accordance with label directions and any local or national regulation(s). In operations applying post-harvest pesticides "authorized" by the government, where use directions are not in the label, application records should show "authorization program" use/applications directions are followed.
4.06.01d	Is there documentation of post-harvest pesticide Maximum Residue Limits (MRLs) compliance 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 post-harvest pesticide (active ingredient) applied. If there is no MRL defined by the country of destination for any active ingredient applied, the operation shall have documented evidence of the applicable regulations in that country (e.g., default MRL, Codex Alimentarius, non-detectable, etc.). In the case where the MRLs have been standardized or harmonized for a group of countries (i.e., European Union) it is acceptable that the operation demonstrate compliance by referencing the "list" of MRLs issued from the formal body that represents those countries for this purpose.
4.06.01e	Where the Maximum Residue Levels (MRLs) of the destination countries are lower (stricter) than the country of production or where required by buyer, do test results show that the MRLs of the intended markets are met?	15	Maximum Residue Limits (MRLs) analysis should be performed when the MRL of the destination countries are lower (stricter) than the country of production. This assumes that grower is meeting country of origin MRL 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.
4.06.01f	Is there a documented procedure that is followed for the post-harvest pesticide applications, considering mixing and loading, transporting, applying, surplus mix/tank rinsate disposal and equipment cleaning?	15	There should be a documented procedure describing how to mix and load post-harvest pesticides, how to transport posts-harvest pesticides, how to apply post-harvest pesticides and how to rinse and clean post-harvest pesticide application equipment. The procedure should adhere to the product label and include: requiring activity to be in a well-ventilated, well-lit area away from unprotected people, food and other items that might be contaminated; necessary PPE, re-entry intervals, excessive winds, posting of treated areas, etc.; 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.
4.06.01g	Is there documentation that shows the individual(s) making decisions for post-harvest pesticide applications is competent?	15	Current valid certificates, licenses or another form of proof of training recognized by prevailing national/local standards and guidelines should be available for the individual(s) making decisions on pesticide applications (e.g., choice of pesticides, application timings, rates, etc.).

Question No.	Question	Total Points	Expectation
4.06.01h	Is there documentation that shows that individuals who handle post-harvest 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.
Transportation and Tracking			
4.07.01	Are the vehicles loading and transporting fresh produce from growing area to facility limited to this function only, maintained in proper condition, and adequate for the purpose?	5	Vehicles loading and transporting product should be limited to this function only and should be adequate for transporting produce. Vehicles should be part of the sanitation program, in a good state of repair, clean, odor free, free from personal items, and free from chemical and microbiological contamination. If loads are tied down, tarps, belts, ropes, etc., should also be in good working order, without contamination risk to product.
4.07.02	During loading and transporting are harvested products protected from potential contamination?	5	Personnel conducting loading and transporting activities should ensure that potential cross-contamination is prevented.
4.07.03	Are cleaning and sanitation logs on file for transport vehicles that show what was done, when, where, by who, water source used, and who verified?	10	Sanitation logs should include: date/time, list of areas/equipment that were cleaned and sanitized, where cleaned/sanitized, why cleaned, water source, sanitizer concentration tests, the individual accountable who signed-off for each task completed, who verified cleaning effectiveness and any deviation against SSOPs.
4.07.04	Is there a system in place to track product from the growing area?	10	There should be a tracking system in place to ensure that product can be traced back to each exact growing location and harvest date (e.g., grower identification, farm identification, block, harvesting date, etc.). Traceability lot codes must meet local and national requirements e.g., FDA Traceability Rule requirements (if applicable).
4.07.04a	If product is being packed in the growing area, are the cartons, boxes, RPCs or any other packaging material used, identified with the harvesting date and growing location information? packinghouse or processing facility.	10	For finished goods packed in the growing area, there should be date coding on each external package, such as cartons, boxes, reusable plastic containers or any other. The information should be enough to identify the date of harvest and the exact location of where the product was grown. Traceability lot codes must meet local and national requirements e.g., FDA Traceability Rule requirements (if applicable). This question is not-applicable for raw material/bulk product destined for further handling in a packinghouse or processing facility.

Question No.	Question	Total Points	Expectation
4.07.04b	If product is being packed in the growing area and individual packing units are used (e.g., clamshells, bags, baskets or others), are these individual units identified with the harvesting date and growing location information?	0	Information gathering question. For finished goods packed in the growing area, there should be date coding on each individual unit package, as clamshells, bags, baskets or others. The information should be enough to identify the date of harvest and the exact location of where the product was grown. Traceability lot codes must meet local and national requirements e.g., FDA Traceability Rule requirements (if applicable). This question is not-applicable for raw material/bulk product destined for further handling in a packinghouse or processing facility.
On-site storage			
4.08.01	Is there an on-site storage for items and/or equipment used in the harvesting process (e.g., packing material, cartons, clamshells, re-usable containers, disinfectants, grading/packing tables, RPCs, harvesting equipment, etc.)?	0	Information gathering question. This question refers to an on-site storage for items and/or equipment used in the harvesting process (e.g., packing material, cartons, clamshells, re-usable containers, disinfectants, grading/packing tables, RPCs, harvesting equipment, etc.).
4.08.01a	Is on-site storage for items and/or equipment used in the harvesting process (e.g., packing material, cartons, clamshells, re-usable containers, disinfectants, grading/packing tables, RPCs, harvesting equipment, etc.) clean and secure?	10	On-site storage (including inside vehicle storage) for items and/or equipment used in the harvesting process should be secure, clean, and maintained properly to reduce pest and foreign material contamination.
4.08.02	Are packaging, containers, and harvesting equipment stored to prevent cross contamination (this includes RPCs, cartons, clamshells, bins, and other harvesting type of containers that are single use or reusable, etc.)?	5	Packaging, containers, etc., should be stored away from farm chemicals, sanitizers, fertilizers, etc. All packaging materials should be stored off the ground (i.e. on racks, pallets, shelves, etc.). Cartons and other packing materials should be properly protected during storage to prevent contamination.
4.08.03	Are there cleaning logs for the storage area(s)?	5	All storage areas should have a sanitation program in place and there should be records of the cleaning and sanitation activities performed, including areas cleaned, dates and person performing the activity.

Question No.	Question	Total Points	Expectation
4.08.04	Is there a documented and effective pest control program in place for fixed location storage areas?	15	There should be a documented and effective, proactive pest control program (in-house or contracted) to control rodents (also insects, reptiles and birds where necessary) and prevent infestation in all fixed (permanent/dropped in place) storage areas. There should be a written scope of the program, indicating target pests and frequency of checks.
4.08.04a	Are pest control devices located away from items and/or equipment used in the harvesting process (e.g., packing material, cartons, clamshells, re-usable containers, disinfectants, grading/packing tables, RPCs, harvesting equipment, etc.), and poisonous bait stations are not used inside the storage areas?	5	Pest control devices should be located away from exposed food products, packaging materials, or equipment to prevent any physical or microbial contamination. Poisonous bait stations should not be used inside any storage areas. No bait should be found outside of bait stations.
4.08.04b	Are pest control devices maintained in a clean and intact condition and marked as monitored (or bar code scanned) on a regular basis?	5	All pest control devices should be maintained clean, in working order and replaced when damaged so that they will accomplish their intended use. Date of inspections should be posted on the devices (unless barcode scanned), as well as kept on file.
4.08.04c	Are pest control devices adequate in number and location?	5	The distance between devices should be determined based on the activity and the needs of the operation. As a reference, the following guidelines can be used to locate devices. Inside pest control: mechanical traps every 20-40 ft (6-12 m). Outside building perimeter: mechanical traps and/or bait stations every 50-100 ft (15-30 m). Interior and exterior devices should be placed on both sides of doorways. Land Perimeter (if used): within 50 ft (30 m) or buildings and at 50-100 ft (15-30 m).
4.08.04d	If storage areas are fully enclosed, are measures taken to prevent pest entry?	5	Fully enclosed storage buildings should have measures in place to prevent pest entry (i.e., pest proof doors, screened openings, etc.). Main doors should be kept closed unless in use.
4.08.04e	Are all pest control devices identified by a number or other code (e.g., barcode)?	5	All devices should be clearly identified (e.g., numbered) to facilitate monitoring and maintenance. All internal rodent devices should be located with wall signs (that state the trap number and also that they are pest control device identifier signs).
4.08.04f	Are all pest control devices effective and bait traps secured?	5	All devices should be correctly orientated with openings parallel with and closest to walls. Bait stations should be locked and tamper resistant in some way (e.g., locks, screws, etc.). Bait stations should be secured to prevent removal.

Question No.	Question	Total Points	Expectation
4.08.04g	Is there a schematic drawing/plan of the storage area showing numbered locations of all pest monitoring devices, both inside and outside the storage area?	5	A schematic drawing or map is on file, current, and details internal and external traps. All devices should be numbered and clearly identified on the map. Map numbers should match physical placement. The document should be accurate, dated and should show the type of device.
4.08.04h	Are service reports created for pest control checks detailing inspection records, application records, and corrective actions of issues noted (in-house and/or contract)?	5	Service reports from the contract pest control company should be available for review if pest control is contracted out. In-house inspection records should be available for review if pest control is conducted in-house. Records should include service(s) performed, date of service, chemicals used, signs of activity, corrective actions and trend reports.

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

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