

VERSION NOTE: Updated October 16, 2007

**Commodity Specific Food Safety Guidelines for the Production and Harvest of lettuce and Leafy Greens
Process Verification Review**

Company Name, Address, Phone Number:	Date Start/End:
	Start time:
	End time:
	Lunch/Dinner time, if taken:
Name & Title of Company Escort (Circle if Declined):	
Name of Auditor(s):	
Processes Reviewed:	
Location of Review:	

Grower	Harvester	Handler	Other(Specify):
Grower or harvester or cooler name and address, if different from Company shown above.			

Audit Criteria

Pre-Requisite Criteria	Work Practices
Water Use and Testing	Field Sanitation
Soil Amendments	Field Observations
Environmental Factors	

This report is to provide information about the above referenced person, persons or organization’s adherence to the *Commodity Specific Food Safety Guidelines for the Production and Harvest of Lettuce and Leafy Greens* (June 8, 2007 Revision). It does not provide any level of verification or certification that the processes verified are effective to reduce microbial contamination in Leafy Greens.

Directions:

Handler:

Identify location of documentation to support each question on the Process Verification Review template. (Handler, Grower, Harvester or 3rd Party)

Provide a current Grower Ranch List.

Maintain a current¹ record of required documentation (1: file within 7 days) (file date noted)

Maintain records for period of at least two years.

Be prepared to provide this information upon arrival of the Auditor.

Grower:

Provide information as stated in the current version of the “Commodity Specific Food Safety Guidelines for the Production and Harvest of Lettuce and Leafy Greens” in a timely fashion.

Maintain records for period of at least two years.

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Work Practices	
Field Sanitation	

General Requirements		
Page & Line Numbers.	Question	Comment
Pp12 Line 284 - 287	Is a written Leafy Greens Compliance Plan which specifically addresses the Best Practices of the LGMA available for review?	
	Does it specifically address the following subjects consistent with the LGMA:	
	Water	
	Soil Amendments	
	Environmental Factors	
	Work Practices	
	Field Sanitation	
Pp12 Line 288 - 289	Is an up to date growers list with contact and location information available for review?	
Pp12 Line 290 - 293	Is the <u>handler</u> in compliance with the registration requirement of <i>The Public Health Security and Bioterrorism Preparedness and Response Act of 2002</i>	
Pp12 Line 292 - 293	Does the Handler have a traceability process?	
	Does it enable identification of immediate non-transporter source?	
	Does it enable identification of immediate non-transporter subsequent recipient?	
Pp12 Line 294 - 296	Has the Handler (or if applicable the grower) designated someone to implement and oversee the food safety program?	
	Is the name of the individual available?	
	Is 24/7 contact information for the individual available?	

Environmental Assessments

Page & Line Numbers.	Question	Comment
Pp 12 Line 305 - 306	Pre-Season Assessment	Note: If "Yes" along with yellow fill color has been added to the document to make it clear that these questions are conditional. They should only be asked and answered as part of an audit IF the leading question is answered affirmatively.
Pp 13 Line 313 - 316	Animal Activity	
	Did the assessment identify any of the following:	
Pp 44 Table 5	Presence or evidence of animals of significant risk	
Pp 44 Table 5	Downed fencing	
Pp 44 Table 5	Tracks	
Pp 44 Table 5	Feeding	
	Feces of animals of significant risk identified in the field?	
Pp 44 Table 5	If "Yes" were specific actions identified to correct any deficiencies?	
Pp 44 Table 5	If "Yes" is documentation available to show that actions were implemented?	
Pp 43 Line 880 - 884 & pp 45 Table 5	If "Yes" are you periodically monitoring the effectiveness of any corrective actions?	
pp 13 Line 317-326	Adjacent Land Use	
Pp 46 Table 6	Have any compost operations within 400' of the crop edge been identified?	
	If "Yes" are there mitigation measures, topographical or climate features that indicate that the 400' recommendation should be modified?	
	If "Yes" are mitigation measures in place and documented?	
Pp 46 Table 6	Have any confined animal feeding operations (CAFO) within 400' of the edge of the crop been identified?	

Environmental Assessments

Page & Line Numbers.	Question	Comment
	If "Yes" are there mitigation measures, topographical or climate features that indicate that the 400' recommendation should be modified?	
	If "Yes" are mitigation measures in place and documented?	
Pp 46 Table 6	Are there non-synthetic soil amendments stored within 400' of the edge of the crop?	
	If "Yes" are there mitigation measures or topographical features that indicate that the 400' recommendation should be modified?	
	If "Yes" are mitigation measures in place and documented?	
Pp 47 Table 6	Have any-grazing lands/domestic animals within 30' from the edge of the crop been identified?	
	If "Yes" are there topographical or climate features that indicate that 30' recommendation should be modified?	
	If "Yes" are mitigation measures in place and documented?	
Pp 47 Table 6	Have any septic leach fields (home or other building) within 30' of the edge of the crop been identified?	
	If "Yes" are there mitigation measures, topographical or climate features that indicate that 30' should be modified is too short a distance?	
	If "Yes" are mitigation measures in place and documented?	
Pp 47 Table 6	Have any well heads within 200' from untreated manure been identified?	
	If "Yes" are there topographical or climate features that indicate that 200' is too short a distance?	
	If "Yes" are mitigation measures in place and documented?	
Pp 47 Table 6	Does documentation justify the buffer zone distance for all surface water sources on the ranch and their separation from untreated manure (raw manure and partially composted manure) as follows?	
	100' for sandy soil with a slope <6%	
	200' for loamy or clay soil with a slope <6%	
	300' for all slopes >6%	

Environmental Assessments		
Page & Line Numbers.	Question	Comment
Pp 43 Line 890	Have other adjacent land uses that pose a food safety risk to crops been identified?	
	If "Yes" has a risk assessment been conducted to evaluate the risk?	
	If "Yes" have corrective measures been put in place and documented?	
	Recent Field History	
	Did the assessment identify any of the following:	
335	History of flooding within the last 60 days	
Pp 13 Line 321	History of grazing on the crop land within the last 1 year	
Pp 13 Line 327 - 331	History of hazardous activity including but not limited to CAFO, municipal waste, toxic waste, landfill, etc?	
	If yes, were specific actions implemented and documented to mitigate the issue(s)?	
	Pre-Harvest Assessment	
Pp 13 Line 309, Pp 42 Line 880 - 884, Pp 44 Table 5	Was a Pre-Harvest Assessment conducted within 7 days for each harvested lot?	
	Did it address the following areas?	
	Intrusion by animals of significant risk	
	Flooding	
	Potential contamination materials	
	Condition of water source and distribution system	
	Unexpected adjacent land activity that will pose a risk to food safety	
	Worker hygiene and sanitary facilities	
	Animal Intrusion	
	Did the assessment identify any of the following:	
Pp 44 Table 5	Presence or evidence of animals of significant risk	
Pp 44 Table 5	Downed fencing	

Environmental Assessments		
Page & Line Numbers.	Question	Comment
Pp 44 Table 5	Tracks	
Pp 44 Table 5	Feeding	
	Feces of animals of significant risk identified in the field?	
Pp 44 Table 5	If "Yes", was a food safety assessment completed?	
	Did the food safety assessment identify any remedial actions?	
	Is the individual who conducted the assessment identified?	
	Is the date of the assessment documented?	
	Was the field harvested?	
	If "Yes", is there documentation to show the remedial actions were followed?	
	Unusual Events	
Pp 13 Line 332 - 335	Does the Pre-Season Ranch Assessment identify any blocks for the potential of past or present flooding?	
	If "Yes" do the records indicate that any of the fields were flooded at any time during the crop cycle?	
	If "Yes" is there documentation to indicate the extent of flooding and the area of crop impacted?	
	If "Yes", was the product harvested?	
	If "yes", was a 30' (min) "no harvest" buffer from the high water mark established?	
	Are these remedial activities documented?	
Pp 13 Line 327 - 331	Is there any evidence of any other type of potential source of <i>human pathogen contamination</i> ? OR Has the food safety status of the adjacent land changed since the pre-season assessment was conducted?	
	If "Yes", was a food safety assessment completed?	
	Is the individual who conducted the assessment identified?	
	Is the date of the assessment documented?	

Environmental Assessments		
Page & Line Numbers.	Question	Comment
	Were remedial actions formulated?	
	If "yes", was the field harvested?	
	If "Yes", is there documentation to show the remedial actions were followed?	
Pp 42, Lines 865-869	Did the remedial action include creation "no harvest" buffer or separation zones around the potentially contaminated area(s)?	
Pp 45, Table 5	Is documentation which fully delineates the potential contamination available for review?	
	Daily Harvest Assessment	
	Note: The daily harvest environmental requirement is addressed in the Field Sanitation section of this checklist	

Water Use		
Page & Line Numbers.	Question	Comment
General Requirements		
Pp 14 Line 358 - 364	Is a ranch map-indicating the sources of water and distribution systems available for review?	
Pp 14 Line 358 - 364	Does the map identify permanent above ground fixtures and directional flow of the irrigation system.	
Pp 14 Line 366 - 368	Was a sanitary survey completed prior to use for each water source?	
Pre-Harvest Foliar and non-Foliar Water Applications		
Table 1 & Figure 1A & 1B		
Pp 15 Table 1	Was a source water test conducted for each source of water within 60 days of first use on post germinated fields?	
Pp 15 Table 1	Are records available to demonstrate that water samples have been collected from each water distribution system within the last 30 days?	
Pp 15 Table 1	Records show that the water samples are taken no less than 18 hours apart.	
Pp 16 Table 1	Is the 5-sample geometric mean less than or equal to 126 MPN/100 ml?	
Pp 16 Table 1	Are all individual samples less than or equal to 235MPN/100 ml (foliar) or 576 MPN/100m ml (non-Foliar)?	
Pp 15 Table 1	The location where the sample was taken is recorded.	
Pp 15 Table 1	Show the name of the test laboratory.	
Pp 15 Table 1	The generic E.coli testing methodology is specified on the test report and meets the 15 tube MPN (FDA BAM) or other U.S. EPA, AOAC, or other method accredited for quantitative monitoring of water for generic E. coli.	
	If the answer to Q 11 and Q 12 are "No" then proceed to Q 17 thru Q 25, otherwise go to Q 27	
Pp 15 Table 1	The water system was discontinued after the tests indicated the water source failed to meet the minimum water quality requirements.	
Pp 15 Table 1	A sanitary survey was completed on the water source and distribution system for possible contamination.	
Pp 15 Table 1	Records show that corrective actions were taken to eliminate the contamination sources.	

Water Use		
Page & Line Numbers.	Question	Comment
Pp 15 Table 1	Samples for the required water retesting were taken at the previous sampling point.	
Pp 15 Table 1	One water test was taken daily (not less than 18 hours apart) for 5 days.	
Pp 15 Table 1	These 5 test results met the acceptance criteria: average less than 126 MPN/100ml (based on rolling geometric mean=5) and no sample exceeded greater than 235 MPN/100 ml (foliar) or 576 MPN/100 ml (non-foliar).	
Pp 15 Table 1	Records show the water system was not used while the water quality was inadequate.	
Pp 15 Table 1	If "No" to Q 23 then was product sampled for E coli 157:H7 and Salmonella.	
Pp 15 Table 1	Or records show that the crop was not harvested for human consumption when the tests were positive for E coli O157:H7 or Salmonella.	
	Municipal Supply or Well Exemption	
Pp 15 Table 1	Is the source water from a municipal supply or well?	
Pp 15 Table 1	Does this source qualify for the 5 consecutive monthly samples below the generic E. coli detection limit on record (2.2 MPN) exemption?	
Pp 15 Table 1	Is the last sample recorded within 6 months of the audit date?	
	Post Harvest- Direct Produce Contact or Food Contact Surfaces	
	Table 1 & Figure 1C	
Pp 16 Table 1	Is the water from a source that meets the USEPA MCLG for microbial quality- Negative per 100ml (<2.2 MPN/100ml)?	
Pp 16 Table 1	If "No" to 3.1 above has the water received sufficient disinfection to meet the USEPA MCLG for microbial quality?	
Pp 17 Table 1	If the water is reused, is sufficient disinfection added and monitored to prevent possible cross-contamination? (Chlorine-more than 1ppm free chlorine and PH 6.5-7.5 or ORP-more than 650mV or other approved treatment per product EPA label for human pathogen reduction in water.)	

Water Use		
Page & Line Numbers.	Question	Comment
Pp 16 Table 1	Was a source water test conducted for each source of water within 60 days of first use?	
Pp 16 Table 1	Do records available to demonstrate that water samples or monitoring records have been collected from each water distribution system within the last 30 days?	
	If the answer to Q 33, 34, 35 is "No" then proceed to Q 38 thru Q 47 otherwise go to Q 48	
Pp 16 Table 1	Was use of the water system discontinued after the tests indicated the water source failed to meet the minimum water quality requirements?	
Pp 16 Table 1	Was a sanitary survey completed on the water source and distribution system for possible contamination?	
Pp 16 Table 1	Do records show that corrective actions were taken to eliminate the contamination sources?	
Pp 16 Table 1	Were samples for the required water retesting taken at the previous sampling point?	
Pp 16 Table 1	Was one water test taken daily (not less than 18 hours apart) for 5 days at the point closest to use?	
Pp 16 Table 1	Did these 5 test results meet the acceptance criteria: less than 2.2 MPN/100ml?	
Pp 16 Table 1	Do records show the water system was not used while the water quality was inadequate?	
Pp 16 Table 1	If "No" to Q 44, then was product sampled for E coli 157:H7 and Salmonella?	
Pp 16 Table 1	Do records show that the crop was not harvested for human consumption when the tests were positive for E coli O157:H7 or Salmonella?	
Pp 16 Table 1	If "No" to Q 45, do the records show that the product was not harvested?	
Pp 16 Table 1	Do records show that all water used in equipment cleaning processes (Tables, belts, bins, etc.) is tested for generic E. coli or that sufficient disinfectant was used?	
Pp 17 Table 1	Do the records document all of the following:	

Water Use		
Page & Line Numbers.	Question	Comment
Pp 17 Table 1	The generic E.coli testing methodology is specified on the test report and meets the 15 tube MPN (FDA BAM) or other U.S. EPA, AOAC, or other method accredited for quantitative monitoring of water for generic E. coli.	
Pp 17 Table 1	The records indicate that the operation monitors disinfectant levels during rehydration, product coring in the field and product cooling.	
Pp 17 Table 1	The records indicate the testing procedure/equipment that was used for monitoring the disinfectant levels (Indicate the procedure/equipment type).	
Pp 17 Table 1	Is the location of where the sample was taken recorded?	
Pp 17 Table 1	Do the records show the name of the test laboratory if applicable?	

Soil Amendments		
Page & Line Numbers.	Question	Comment
	1. Soil amendments contain raw or partially composted animal manure .	
Pp 21 Line 434 - 436	Have raw or partially composted animal manure or biosolids been applied in the last 1 year?	
Pp 21 Line 434 - 436	If "Yes" to Q 4 were any of these fields used in the production of leafy greens?	
	2. Soil amendments contain composted manure	
	Has a soil amendment containing fully composted animal manure been applied to the field within the last year?	
Pp 22 Line 467- 474 & 479 - 481	Are Process Validation records available for review?	
Pp 23 Table 2	If the <u>Enclosed or Within-Vessel Composting</u> method is used, do the records show:	
Pp 23 Table 2	...that the active compost maintained a minimum of 131oF for 3 days?	
Pp 23 Table 2	If the <u>Windrow Composting</u> method is used do the records show:	
Pp 23 Table 2	...that the active compost maintained aerobic conditions for a minimum of 131oF for 15 days?	
Pp 23 Table 2	...a minimum of five turnings?	
Pp 23 Table 2	If the <u>Aerated Static Pile Composting</u> method is used do the records show that:	
Pp 23 Table 2	...the active compost was covered with 6 to 12 inches of insulating materials?	
Pp 23 Table 2	...maintain a minimum of 131oF for 3 days?	
Pp 24 Table 2	Has each lot of composted material that is equal to or less than 5000 cubic yards been tested as required?	
Pp 24 Table 2	Has each lot of composted material been applied to the production location more than 45 days before harvest?	
	Records must be available to document the following criteria have been meet for each lot of compost containing animal material used.	
	a. Acceptance criteria	
Pp 23 Table 2	· Fecal coliforms: <1000 MPN/gram	

Soil Amendments		
Page & Line Numbers.	Question	Comment
Pp 23 Table 2	<ul style="list-style-type: none"> · <i>Salmonella</i>: Negative per sample size of the prescribed test 	
Pp 23 Table 2	<ul style="list-style-type: none"> · <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test 	
	b. Recommended test methods	
Pp 24 Table 2	<ul style="list-style-type: none"> · Fecal coliforms: 9 tube MPN 	
Pp 24 Table 2	<ul style="list-style-type: none"> · <i>Salmonella spp.</i>: U.S. EPA Method 1682 	
Pp 24 Table 2	<ul style="list-style-type: none"> · <i>E. coli</i> O157:H7: Any laboratory validated method for compost 	
Pp 24 Table 2	<ul style="list-style-type: none"> · Other U.S. EPA, FDA, or AOAC-accredited methods may be used as appropriate. 	
	c. Sampling plan	
Pp 24 Table 2	<ul style="list-style-type: none"> · 12 point sampling plan composite sample 	
Pp 24 Table 2	<ul style="list-style-type: none"> · Sample may be taken by the supplier if trained by the testing laboratory 	
Pp 24 Table 2	<ul style="list-style-type: none"> · Laboratory must be certified/accredited 	
	3. Soil amendments that do not contain animal manure	
Pp 21 Line 441 - 445, Pp 26 Table 2	Is a Letter of Guaranty or other comparable documentation (ingredient statement, bag label, etc) available that shows the soil amendments do not contain animal manure?	
Pp 26 Table 2	Show the name of the authority issuing the Letter of Guaranty or other comparable document	
	4. Soil amendments that contain animal manure that are physically heat treated or processed by other equivalent methods	
Pp 25 Table 2	Are process records or other comparable documentation available that show the lethality of the process?	
Pp 25 Table 2	Show the name of the process authority issuing the Letter of Guaranty or other comparable document	
	Records must be available to document the following criteria have been meet for each lot of physically heat treated or processed by other equavalent method compost containing animal material used.	
	a. Acceptance criteria	
Pp 25 Table 2	<ul style="list-style-type: none"> · Fecal coliforms: Negative MPN/gram 	

Soil Amendments		
Page & Line Numbers.	Question	Comment
Pp 25 Table 2	<ul style="list-style-type: none"> <i>Salmonella</i>: Negative per sample size of the prescribed test 	
Pp 25 Table 2	<ul style="list-style-type: none"> <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test 	
	b. Recommended test methods	
Pp 25 Table 2	<ul style="list-style-type: none"> Fecal coliforms: 9 tube MPN 	
Pp 25 Table 2	<ul style="list-style-type: none"> <i>Salmonella spp.</i>: U.S. EPA Method 1682 	
Pp 25 Table 2	<ul style="list-style-type: none"> <i>E. coli</i> O157:H7: Any laboratory validated method for compost 	
Pp 25 Table 2	<ul style="list-style-type: none"> Other U.S. EPA, FDA, or AOAC-accredited methods may be used as appropriate. 	
	c. Sampling plan	
Pp 25 Table 2	<ul style="list-style-type: none"> 12 point sampling plan composite sample 	
Pp 25 Table 2	<ul style="list-style-type: none"> Sample may be taken by the supplier if trained by the testing laboratory Pp 25 	
Pp 25 Table 2	<ul style="list-style-type: none"> Laboratory must be certified/accredited 	
Pp 26 -27 Table 2	If testing records are NOT available is a <u>Certificate of Process Validity</u> as defined by the "Guidelines" available for review?	
	5. Soil amendments that are Non-Synthetic Crop Treatments (compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc) Table 3 & Figure 3).	
Pp 29 Line 502 - 504	Has a non-synthetic crop treatment been applied to the crop?	
Pp 30 Table 3	If "yes" to Q 57 was this application to the edible portion of the crop?	
Pp 30 Table 3	Is a letter of compliance or comparable document outlining the actual conditions of use and conformance to standards available for review (including presence of animal products or manure)?	
	Records must be available to document the following criteria have been meet for each lot of non-synthetic crop treatment used.	
Pp 30 Table 3	Did each lot/batch used meet the microbial criteria identified below?	
Pp 30 Table 3	<i>Salmonella</i> : Negative per sample size of the prescribed test	
Pp 30 Table 3	<i>E. coli</i> O157:H7: Negative per sample size of the prescribed test	

Soil Amendments		
Page & Line Numbers.	Question	Comment
Pp 30 Table 3	If this treatment is applied as a liquid does the solution meet the microbial criteria set forth for pre-harvest water application? (5-sample geometric mean of 126 MPN/100 ml and no sample >235 MPN/100ml (Foliar) or 576 MPN/100 ml (non-foliar))	
	Application intervals were met:	
Pp 30 Table 3	Was this non-synthetic crop treatment produced using a validated process for pathogen control?	
Pp 30 Table 3	If "No" to above, was the treatment applied at least 45 days before harvest?	
Pp 30 Table 3	If "Yes", are process validation records and documentation available to show that the process is capable of reducing pathogens of human health significance to acceptable levels.	
	Acceptable testing methods were followed:	
Pp 30 Table 3	<i>Salmonella spp:</i> U.S. E.P.A. Method 1682	
Pp 30 Table 3	<i>E. coli</i> O157:H7: Any laboratory validated method for compost sampling	
Pp 30 Table 3	Other U.S. EPA, FDA, or AOAC-accredited methods may be used as appropriate.	
	The proper sampling plan was followed:	
Pp 30 Table 3	Solid: 12 point sampling plan composite sample	
Pp 30 Table 3	Liquid: Single well-mixed sample per lot	
Pp 30 Table 3	Sample may be taken by the supplier if trained by the testing laboratory	
Pp 30 Table 3	Laboratory must be certified/accredited by annual review of laboratory protocols based on GLPs by recognized NGO.	
	d. Testing Frequency:	
Pp 30 Table 3	Each lot before application to production fields.	
Pp 30 Table 3	Identify the crop treatment.	
Pp 30 Table 3	Show the name of the laboratory completing the testing.	
Pp 30 Table 3	Show date of application ?	
Pp 30 Table 3	Does it show the date of harvest?	
Pp 30 Table 3	Show the supplier name.	

Worker Practices		
Page & Line Numbers.	Question	Comment
	General Requirements	
Pp 35 Line 636 - 638	Is there a written policy for all employees and all visitors to the field location which describes the required hygiene rules?	SOP
	Does the Policy address the following:	
Pp 35 Line 664-682	Sanitary Facilities	
Pp 35 Line 636 - 647	Field Worker Practices (GMP's, GHP's, etc.)	
Pp 35 Line 639 - 647	Worker Health Practices	
	Sanitary Facilities	
Pp 35 Line 664-682	Is there a documented field sanitary facility program?	
	Does the Field Sanitary Facility Program address the following:	
Pp 35 Line 664-682	The number, condition, and placement of field sanitation units complies with applicable state and/or federal regulations.	
Pp 35 Line 664-682	Sanitary facilities are readily accessible (proximate) to the work area.	
Pp 35 Line 664-682	Sanitary facilities are regularly maintained according to schedule.	
Pp 35 Line 664-682	Sanitary facilities have sufficient consumable supplies (i.e.: hand soap, water, paper towels, toilet paper, etc).	
Pp 35 Line 664-682	Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work.	
Pp 35 Line 664-682	Field sanitation facilities are cleaned and serviced on a scheduled basis and at a location that minimizes the potential risk for product contamination.	
Pp 35 Line 664-682	Address the placement of the sanitary facility in order to minimize any impact on the crop in the field including:	
Pp 35 Line 664-682	Minimize the impact on the crop from leaks and/or spills	
Pp 35 Line 664-682	Ability to access the unit for service	

Worker Practices		
Page & Line Numbers.	Question	Comment
Pp 35 Line 664-682	Documented response plan in the event of a major leak and/or spill.	
Field Worker Practices (GMPs, GHPs, etc.)		
Pp 35 Line 636 - 654	Is there a written worker practices program?	
Pp 35 Line 636 - 654	Does the program establish employee work rules which address the following:	
Pp 35 Line 636 - 654	Training on proper sanitation and hygiene practices	
Pp 35 Line 636 - 654	Requirement for workers to wash their hands before beginning or returning to work.	
Pp 35 Line 636 - 654	Confine smoking, eating and drinking (except water) to designated areas.	
Pp 35 Line 636 - 654	Storage requirements for personal items in/or adjacent to the field?	
Pp 35 Line 633 - 635	The appropriate use and sanitation of gloves.	
Pp 33 Line 566 - 567	Proper cleaning, sanitation and storage of hand harvest equipment (knives, scythes, etc).	
Pp 35 Line 648 - 654	For materials targeted for further processing, is there a written physical hazrad prevention program which includes the following?	
Pp 35 Line 648 - 654	The proper wearing of head and facial hair restraints.	
Pp 35 Line 648 - 654	The proper wearing of apron and other food safety apparel.	
Pp 35 Line 648 - 654	Removal of visible jewelry (rings, bracelets, necklaces, body piercings, etc.) prior to the start of work.	
654	Removal of all objects upper from pockets.	

Worker Health Practices		
Pp 35 Line 655 - 656	Is there a written worker health practices program?	
	Are employee work rules established which address the following:	

Worker Practices		
Page & Line Numbers.	Question	Comment
Pp 35, 36 Line 657 - 663	Workers with diarrheal disease or symptoms of other infectious disease are prohibited from handling fresh produce.	
Pp 35, 36 Line 657 - 663	Workers with open cuts or lesions are prohibited from handling fresh produce.	
Pp 35, 36 Line 657 - 663	Actions for employee to take in the event of injury or illness.	
Pp 35, 36 Line 657 - 663	A policy describing procedures for handling/disposition of produce or food contact surfaces that have come into contact with blood or other body fluids.	

Field Sanitation		
Page & Line Numbers.	Question	Comment
	General Requirements	
Pp 35 Line 636 - 638	Is there a written policy for all employees and all visitors in the field location which describes the required field sanitation SOPs?	SOP
	Field Activities	
	Does the written field activity SOP address the following:	SOP
Pp 37 Line 698 - 700	Cross contamination by farming equipment that comes into contact with raw manure, untreated compost, waters of unknown quality, animals of significant risk or other potential sources.	
	If "yes", does it appropriately restrict the use or require a documented cleaning and sanitation program of the equipment?	
	If cleaning and sanitation is required, are records of the cleaning/sanitation available for review.	
	Harvest Activities	
	Does the written harvest activity SOP address the following:	SOP
Pp 38 Line 633 - 640	Is a specific individual assigned the food safety responsibility for harvesting?	
	Is a documented daily food safety harvest assessment available for review?	
	Is the assessment dated?	
	Is the individual who conducted the assessment identified?	
	Are the specific growing blocks associated with the assessment clearly identified?	
	Is the Harvester name and contact information documented?	
Pp 44 Table 5	Does it require a visual assessment for intrusion into the field for animals of significant risk?	
Pp 44 Table 5	If yes, is evidence of intrusion documented?	
Pp 44 Table 5	If yes, does it document that appropriate remedial actions been taken?	
	SSOP of harvest equipment addressing the following	SSOP
Pp 34 Line 595-597	Frequency of cleaning and sanitation	
Pp 35 Line 641	Chemical usage and record keeping	

Field Sanitation		
Page & Line Numbers.	Question	Comment
Pp 34 Line 595-597	Equipment specific cleaning instructions	
Pp 35 Line 641	Chemical storage	
Pp 35 Line 641	All chemical storage containers are labeled appropriately	
Pg 33, Line 563	Sanitation verification	
Pg 33, Line 564	Daily inspection	
Pg 33, Line 656	Periodic microbial swabs or other equivalent indicator	
Pg 33, Line 571-572	SOP for handling and storage of product containers addressing the following	SOP
Pp 33 Line 573	Over night storage	
Pp 33 Line 574	Contact with the ground	
Pp 33 Line 575	Container assembly (RPC, fiber bin, plastic bin, etc)	
Pp 33 Line 576	Damaged containers	
Pp 33 Line 577	Use of containers only as intended	
Pp 33 Line 578	SOP for sanitary operation of equipment	
Pp 33 Line 579	Are spills and leaks addressed	
Pp 34 Line 602-604	Harvest equipment protection	
Pp 34 Line 602-604	Overnight equipment storage	
	As per the SOP for Sanitary Operation of Equipment, were the appropriate remedial actions taken as necessary?	

Field Observations				
	Question	YES	NO	Comment
	Water Use			
	Are there any active and/or inactive water sources that have not been recorded in the Water Use Audit?			
	From visual inspection, is there any evidence that the water sources and distribution systems may pose a contamination risk (damage, inadequately maintained, evidence of animal activity)?			
	Other			
	Soil Amendments			
	Is there any evidence of undocumented use of soil amendments?			
	Is there any evidence of improperly applied soil amendments?			
	Is there any evidence of improperly stored soil amendments?			
	Other			
	Environmental Factors			
	Is there evidence of fecal contamination in the field?			
	Is there evidence of animals of significant risk in the field?			
	Is there evidence of non-compliance with distances as outlined in the Environmental Assessment?			
	Is there evidence that remedial actions such as animal barriers (fences, gates, grates, etc) are not in good repair and operational?			
	Is there any evidence that worker hygiene rules have been violated during the crop cycle?			
	Other			
	Work Practices			
	Are any employees eating, drinking (except water), chewing tobacco or smoking in crop production actively harvested areas?			
	Were any employees observed to not have washed their hands after; restroom usage, work breaks, or any returning to work occasion?			
	Is there any evidence that sanitary facilities are not routinely clean and operational?			
	Is there any evidence that worker hygiene rules have been violated during the crop cycle?			
	Is there any evidence that sanitary facilities are not adequately stocked with disposable supplies?			
	Are improperly stored personal items observed in the field?			
	Is there any evidence or observations that employees are not using the restrooms?			
	Are there any employees with uncovered wounds, boils or cuts?			
	Are there any employees with symptoms of infection or contagious disease?			
	Other			
	Field Sanitation			

Field Observations				
	Question	YES	NO	Comment
	Is there any evidence of excessive non-vegetative debris in the field?			
	Is there evidence of open and/or unsupervised chemicals in the field?			
	Is there any evidence of leaks and spills on equipment in the field?			
	Is there any evidence of the use of non-sanitized farm equipment that may have come in contact with raw manure, untreated compost, waters of unknown quality, wildlife or domestic animals?			
	Is there any evidence of other cross-contamination potential of product and/or product contact surfaces?			
	Other			