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Food Safety Management System Requirements

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FSMS – Management System

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.01.01	Is there a Food Safety Manual or other documented food safety management system covering the scope of business included in this audit and procedures/instructions for all food safety processes?	Total Compliance	5	5	Yes. Food Safety Management Systems Manual which included policies and procedures as required by the PGFS V 2.1 Module 1 FSMS. Supporting documentation e.g., blank logs, policies, and procedures are held by the organization and also maintained in manuals at the farm.	
1.01.02	Is there a documented food safety policy detailing the company's commitment to food safety?	Total Compliance	5	5	Yes, there was a signed and dated food safety policy detailing the company's commitment to food safety. The statement was located in a visible location at the employee's break area posting board. The policy outlined the dynamics of the organization and the scope of business.	
1.01.03	Is there an organizational chart of all employees who have food safety related activities?	Total Compliance	3	3	Yes, for Hinton Farms Produce, Inc. This is a company with less than 10 full time year round workers.	
1.01.04	Is there a food safety committee and are there logs of food safety meetings with topics covered and attendees?	Minor Deficiency	3	5	There is a team however the team members were not literally listed. There are monthly meetings. Food safety, safety, and food defense topics are raised and recorded in the meetings.	
1.01.05	Is there documented management verification of the entire food safety management system at least every 12 months?	Total Compliance	5	5	Yes, team listed as well as the monthly manager food safety meetings. Food safety topics are raised and recorded in the meetings.	
1.01.06	Is there a documented analysis detailing resources required to implement and improve the food safety management system processes with documented commitment from management to provide these resources?	Total Compliance	5	5	Yes. The titled document: Food Safety Resource Analysis, 12/10/2014 outlined resources required to implement and improve food safety. Examples included continuing education to meet food safety and state requirements (continuing hours for maintaining pesticide certification). Analysis form in place to show the resources required. Examples include HACCP training, infrastructure, service providers, and testing– microbial analysis at the farm and at the facility.	

FSMS – Control of Documents and Records

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.02.01	Is there a written document control procedure describing how documents will be maintained, updated and replaced?	Total Compliance	3	3	Yes. This procedure was outlined in the titled document: Document Control Procedure.	
1.02.02	Are all records stored for a minimum period of 12 months or for at least the shelf life of product if greater than a year?	Total Compliance	5	5	Yes. This element was outlined in the titled document: The Document Control Procedure which stated that the minimum time requirement for the storage of records is one year.	
1.02.03	Are food safety related documents and records stored and handled in a secured manner?	Minor Deficiency	2	3	The Document Control Procedure stated the requirements for storage and record maintenance however auditor noted a pencil text entry at the farm level on fertilizer logging reports.	
1.02.04	Are the records maintained in an organized and retrievable	Total	3	3	Yes. This element was outlined in the titled	

manner?

Compliance

document: Document Control Procedure.

FSMS – Procedures and Corrective Actions

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.03.01	Are there documented instructions for the creation of Standard Operating Procedures?	Total Compliance	5	5	Yes. This element was outlined in the titled document: SOP Creation Procedure, 11/13/2014.	
1.03.02	Are the written procedures available to relevant users and is a master copy maintained in a central file?	Total Compliance	5	5	Yes. SOPs, blank logs, policies, and procedures are held by the organization and also maintained in manuals at the farm for the appropriate employees to review and use.	
1.03.03	Is there a corrective action procedure that describes the requirements for handling deficiencies affecting food safety and prevention of future occurrences?	Total Compliance	5	5	Yes. This element was outlined in the titled document: Corrective Action Procedure, 12/1/2014.	
1.03.04	Is there a daily incidents report, sometimes called a Notice(s) of Unusual Occurrence and Corrective Actions Log (NUOCA) ?	Total Compliance	5	5	Yes.	

FSMS – Internal and external inspections

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.04.01	Is there documented program for internal audits to be performed at the operations, covering all processes impacting food safety and the related documents and records?	Total Compliance	3	3	Yes. This element was outlined in the titled document: Internal Audit SOP. Doc HFP-125, revised 10/12/2014. The program detailed the frequency (quarterly minimum) responsible employee(s), and checklists to use. The auditee is subject to their sales and marketer's internal audits.	
1.04.02	Are there written procedures for handling regulatory inspections?	Total Compliance	3	3	Yes. There was a procedure for handling regulatory inspections. Auditor did not record the name or the title information of this document however did note that the procedure listed all of the PrimusGFS scheme's minimum requirements.	
1.04.03	Are there records of regulatory inspections and/or contracted inspections, company responses and corrective actions, if any?	Total Compliance	5	5	Yes. Auditee is subject to PGFS re-certification audits. A 2013 PrimusGFS certification audit report, certificate, and corrective actions available for review.	
1.04.04	Are there documented calibration procedures for measuring and monitoring devices used in the operations that are related to the safety of the product?	Major Deficiency	3	10	The procedure was outlined in an SOP with an accompanying form (Form CAL-001). The frequency showed the pulp thermometers to be calibrated bi-annually. Bi-annually is too infrequent.	

FSMS – Rejection and release of product

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.05.01	Is there a written procedure for handling on hold or rejected products?	Total Compliance	5	5	Yes. This procedure was outlined in the document title: Material On Hold Rejected SOP. Doc HFP-108, 11/05/2014	
1.05.02	Are there records of the handling of on hold or rejected products kept on file?	N/A	0	0	N/A. Verbally told there have not been any on hold or rejected items either products returned back or held in storage.	
1.05.03	Is there a documented product release procedure available?	Total Compliance	5	5	Yes. This procedure was outlined in the document title: Loading SOP.	
1.05.04	Are there records of product releases kept on file?	Total Compliance	5	5	Yes, support documentation to 1.05.03 is Pick Tickets and Bill of Ladings (BOLs).	
1.05.05	Is there a documented system for dealing with customer and buyer food safety complaints/feedback along with records and company responses, including corrective actions?	Total Compliance	10	10	Yes. This procedure was outlined in the document title: Buyer Rejection and Customer Complaint Form Rej-200. In the records there were no food safety issues noted only quality issues such as decay. Sales and marketing is done by other entities from the organization.	

FSMS – Supplier Control

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.06.01	Are there current written food safety related specifications for all raw products, ingredients, materials and services purchased?	Total Compliance	5	5	Yes. Specifications were made available for Strawberries, packaging, as well as the organization's shipper's specifications e.g., California Giant Berry Farms.	
1.06.02	Is there a written procedure detailing how suppliers are evaluated, approved and monitored?	Total Compliance	5	5	Yes. This procedure was outlined in the document title: Sam-100, 1/16/2012.	
1.06.03	Is there a list of approved suppliers?	Minor Deficiency	3	5	There was a listing of approved product and service providers however lacking Southern Analytical Laboratories, Inc. the laboratory currently used for the farm's water testing.	
1.06.04	Does the organization have documented evidence to ensure that all products, ingredients or materials and services suppliers comply with the approval requirements and that they are being monitored as defined in the procedure?	Total Compliance	15	15	Yes. Examples of documented evidence included packaging letters of guarantee, audit certificates, and reports (clamshells, corrugated). Also for product in storage there were letters of guarantee and/audit certificates.	
1.06.05	If the organization is outsourcing any processes that may affect food safety, are there control procedures over such processes?	Total Compliance	15	15	Yes. Examples of outsourced activities included the portable toilet service, refrigeration, forklifts, and pest control service.	
1.06.06	If tests and/or analysis within scope to food safety are performed by external laboratories, are they licensed/accredited (e.g. ISO 17025 or equivalent, National Regulations, State Department, etc.)?	Total Compliance	5	5	Yes. Southern Analytical Laboratories, Inc. is the laboratory used for the water testing at the farm level. There was proof of valid certification to NELAP Cert E84129, Drinking Water Standards. Certification was issued by Florida Department of Health. Certificate expiry: June 30, 2015. There was current certification (AOAC, A2LA) for Thornton Laboratories who is responsible for environmental testing in the facility.	

FSMS – Traceability and Recall

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.07.01	Is there is a document that indicates how the company product tracking system works, thereby enabling trace back and trace forward to occur in the event of a potential recall issue?	Total Compliance	10	10	Yes. This procedure was outlined in the titled document: Traceability System SOP BC-117, 10/06/2013.	
1.07.02	Does the organization have a documented recall program including procedures, recall team roles and contact details, external contact listings and explanation of different recall classes?	Total Compliance	15	15	Yes. This procedure was outlined in the titled document: Traceability System SOP BC-117, 10/06/2013. The traceability system to the customer from the cooler and back to the grower is achieved through Famous software, a tracking and inventory system.	
1.07.03	Is testing of recall procedures (including trace back) performed and documented at least every six months? Can the company identify where affected product was sent?	Total Compliance	10	10	Yes. The drill was last conducted on 11/12/2014. The drill last from 9:15am-10:25am. The drill involved shipping code 6001314, tag # H30193, 69 flats of unlabeled clamshells of strawberries, a class 3 recall. The product was still in the cooler and had not been shipped. Receiving and inventory information was available as well as a overall mock recall summary sheet and "lessons learned."	

FSMS – Food Defense

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.08.01	Does the company have a documented food defense policy based on the risks associated with the operation?	Total Compliance	5	5	Yes. This element was outlined in the titled document: Food Defense Plan.	
1.08.02	Is there a current list of emergency contact phone numbers for management, law enforcement and appropriate regulatory agencies?	Total Compliance	3	3	Yes. Emergency listing detailed company supervisors, 911, Police, Fire, Poison Control, and FDA.	
1.08.03	Are visitors to the company operations required to adhere to food defense policies?	Total Compliance	3	3	Yes. There was an overview of the food defense policies and a Visitor's log at the Hinton Farms Produce office.	

GAP – General GAP

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.01.01	Is there a designated person responsible for the food safety program in the field?	Yes	10	10	Yes. The grower John Jerrigan and Audra Maxwell, Hinton Farms Produce Food Safety Coordinator are the designated employees responsible for the food safety program. On the farm, the grower manages crop protection, fertility, harvesting, and training. Documentation development and internal audits are done by Audra Maxwell.	
2.01.02	Is there documented evidence of the internal audits performed to the audited operations, detailing findings and corrective actions?	Yes	10	10	Yes, as detailed in FSMS 1.04.01 there is an internal auditing program. The operation under the scope of the audit is a seasonal farming entity where growing and harvesting does not last year round. At least one internal audit is done each season.	
2.01.03	Are the necessary food security controls implemented in the operation?	Yes	5	5	Yes. Examples include employee verification, company and employee training, employees and supervisor's responsibility to report suspicious activity.	

GAP – Site Identification

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.02.01	Is the growing area(s) adequately identified or coded to enable trace back and trace forward in the event of a recall?	Yes	15	15	Yes. Each growing site is identified on a map to show the farm site (GPS coordinates) and block identifications for each crop. Inputs (logs, crop protection materials and fertilizers) are traceable to each specific block.	

GAP – Ground History

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.03.01	Were farming area(s) used for growing food crops for human consumption last season?	Yes	0	0	Yes. The ground has not been used for any other purpose other than for growing agricultural crops.	
2.03.02	Has the growing area(s) been used for any non-agricultural functions? If No, go to 2.03.03	No	7	7	No. There are not any non agricultural activities carried out on the ground.	
2.03.02a	If the land had been used previously for non-agricultural functions have soil tests been conducted showing soil was negative or within an appropriate regulatory agency's approved limits for contaminants?	N/A	0	0		
2.03.03	Has the growing area(s) been used for animal husbandry or grazing land for animals? If No, go to 2.03.04	No	7	7	No.	
2.03.03a	If the land was used previously for animal husbandry or grazing land for livestock, has a risk evaluation been performed?	N/A	0	0		
2.03.04	Is there evidence of animal presence and/or animal activity in the audited area? If answer is NO, go to Q 2.03.05.	No	15	15	No.	
2.03.04a	Is the evidence of animal presence and/or animal activity found, in the form of fecal contamination? If answer is NO, go to Q 2.03.05.	N/A	0	0		
2.03.04b	Is the fecal matter found in the audited area, a systematic event (not sporadic)? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0		
2.03.05	Has flooding from uncontrolled causes occurred on the growing area(s) since the previous growing season? If No, go to 2.03.06	No	0	0	No.	
2.03.05a	If the growing area(s) and product was affected from the flood waters, is there documented evidence that corrective measures were taken to affected land and product?	N/A	0	0		
2.03.05b	Have soil tests been conducted on the flooded area(s) showing soil was negative or within an appropriate regulatory agency's approved limits for contaminants?	N/A	0	0		
2.03.06	Is the growing operation under organic principals? If No, go to 2.3.07	No	0	0	No. The organization is under conventional farming practices.	
2.03.06a	Is current certification by an accredited organic certification organization on file and available for review?	N/A	0	0		
2.03.07	Has a documented risk assessment been undertaken for the growing area with appropriate corrective actions to minimize identified hazards where necessary?	Yes	10	10	Yes. The date of the risk assessment was done on December 1, 2014 outlining potential risks. The farming ground uses well water for irrigation via drip and in freeze protection situations, pond water with overhead (sprinkler). Grazing cattle are located adjacent to the farm.	

GAP – Adjacent land use

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.04.01	Is the adjacent land to the growing area a possible source of contamination from intensive livestock production (e.g. feed lots, dairy operations, poultry houses, meat rendering operation)? If No, go to 2.04.02	No	10	10	No.	
2.04.01a	Have appropriate measures been taken to mitigate this possible contamination source onto the growing area (e.g. buffer areas, physical barriers, foundation, fences, ditches, etc.)?	N/A	0	0		
2.04.02	Are, or is there evidence of domestic animals, wild animals, grazing lands (includes homes with hobby farms, and non commercial livestock) in proximity to growing operation? If No, go to 2.04.03.	Yes	0	10	Grazing cattle were noted adjacent to the farm (north side). These are grazing cattle and have large pasture space to graze.	
2.04.02a	Have physical measures been put in place to restrain domestic animals, grazing lands, (includes homes with hobby farms, and non commercial livestock) and their waste from entering the growing area (e.g. vegetative strips, wind breaks, physical barriers, berms, fences, diversion ditches.)?	Yes	15	15	Yes. Fencing, ditching, and buffer zones of greater than 30 feet from the edge of the crop to the fence line are in place.	
2.04.02b	Is there a written policy supported by visual evidence that domestic, livestock, or wild animals are not allowed in the growing area? Note: This includes any packaging or equipment storage areas.	Yes	10	10	Yes. There was a written policy stating that there shall not be domestic, livestock, or wild animals are not allowed on the farm.	
2.04.02c	Are measures in place to reduce or limit the animal intrusion (i.e., monitoring field perimeter for signs of intrusion)?	Yes	15	15	Yes. Ensuring the cows are not escaped, buffer zones are respected, and fencing is sturdy are regular checks the grower makes on a daily basis.	
2.04.03	Are untreated animal manure piles, compost, biosolids, or nonsynthetic amendment stored and/or applied on adjacent land? If No, go to 2.04.04	No	10	10	No. The adjacent land was free of untreated animal manure piles, compost, biosolids, or nonsynthetic amendments.	
2.04.03a	Have physical measures been taken to secure untreated animal manure piles, compost, biosolids, or nonsynthetic amendment stored and/or applied on adjacent land?	N/A	0	0		
2.04.03b	If biosolids are stored and/or applied on adjacent land, has the adjacent landowner supplied paperwork confirming the biosolids meet prevailing guidelines, governmental, or local standards?	N/A	0	0		
2.04.04	Is the growing area situated in a higher risk location where contamination could occur from nearby operations or functions (e.g. leach fields, runoff or potential flooding from sewers, toilet systems, industrial facilities, labor camps)? If No, go to 2.04.05.	No	10	10	No. The adjacent land did not show potential contamination issues to the growing area.	
2.04.04a	Have appropriate measures been taken to mitigate risks related to nearby operations?	N/A	0	0		
2.04.05	Is there evidence of human fecal matter in the adjacent land to the audited area? If NO, go to 2.05.01 (Greenhouse Audit) or 2.07.01 (Ranch Audit)	No	15	15	No.	
2.04.05a	Does the human fecal matter found in the adjacent area, represents a high risk to the crop for potential of contamination due to conditions as: lack of access controls (barriers), closeness to the growing area and equipment, crop type and maturity, land condition, and others?	N/A	0	0		

GAP – Fertilizer/Crop Nutrition

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.07.01	Is untreated human sewage sludge used in the growing cycle? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	No	20	20	No. Treated or untreated human fertilizer is not used.	
2.07.02	Is compost produced from animal derived materials used by the grower? If No, go to 2.07.03	No	0	0	No. Inorganic materials are used in the growing cycle.	
2.07.02a	Are compost applications incorporated into the soil prior to planting or bud burst for tree crops and not applied during the growing season?	N/A	0	0		
2.07.02b	Are there compost use records available for each growing area, including application records which shows that the interval between application and harvest was not less than 45 days (unless validation studies prove a shorter interval is acceptable)?	N/A	0	0		
2.07.02c	Are there Certificate(s) of Analysis (CoA) from the compost supplier(s) that covers pathogen testing (plus any other legally/best practice required testing) and does the grower have relevant letters of guarantee regarding SOP's and logs?	N/A	0	0		
2.07.02d	Are there Certificate(s) of Analysis (COA), letters of guarantee or some other documents from the compost supplier(s) that covers heavy metal testing?	N/A	0	0		
2.07.03	Are biosolids used? If No, go to 2.07.04. NOTE: Special attention to commodity specific guidelines rules (e.g., Californian Leafy Greens) which ban the use of biosolids, see 2.07.03d	No	0	0	No. Inorganic materials are used in the growing cycle.	
2.07.03a	Are biosolids incorporated into the soil prior to planting or bud burst for tree crops and not applied during the growing season?	N/A	0	0		
2.07.03b	Are the grower's biosolids use records available for each growing area, especially application records?	N/A	0	0		
2.07.03c	Is there a Certificate(s) of Analysis (COA) from the biosolid supplier(s) certifying compliance with prevailing national/ local	N/A	0	0		

	standards and guidelines (microbiological analysis)? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.				
2.07.03d	Are there Certificate(s) of Analysis (COA), letters of guarantee or some other documents from the biosolid supplier(s) certifying compliance with prevailing national/ local standards and guidelines (heavy metal test analysis)?	N/A	0	0	
2.07.03e	Are biosolids being applied to crops where the country of production regulations/guidelines ban the use such materials e.g. Leafy Green Commodity Specific Guidelines in California? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	
2.07.04	Is untreated animal manure used? If No, go to 2.07.05. NOTE: Special attention to commodity specific guidelines rules (e.g., Californian Leafy Green Commodity Specific Guidelines) which ban the use of untreated animal manures. See 2.07.04d	No	15	15	No. Inorganic materials are used in the growing cycle.
2.07.04a	Is untreated animal manure incorporated into the soil prior to planting or bud burst for tree crops and not applied during the growing season?	N/A	0	0	
2.07.04b	Are there untreated animal manure records available for each growing area including application records which shows that the interval between application and harvest was not less than 120 days (unless more stringent laws or guidelines exist)?	N/A	0	0	
2.07.04c	Are there Certificate(s) of Analysis (COA), specification or some other document available for review provided by the untreated animal manure supplier stating the components of the material?	N/A	0	0	
2.07.04d	Are untreated animal manures being used where the country regulations/guidelines ban the use such materials (e.g., Californian Leafy Green Commodity Specific Guidelines)? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	
2.07.05	Are other nonsynthetic crop treatments used (e.g. compost teas, fish emulsions, fish meal, blood meal, "bio fertilizers")? If No, go to 2.07.06	No	0	0	No. Inorganic materials are used in the growing cycle.
2.07.05a	Are nonsynthetic treatments that contain animal products or animal manures applied to the edible portions crops?	N/A	0	0	
2.07.05b	Are nonsynthetic crop treatment records available for each growing area including application records demonstrating the interval between application and harvest was not less than 45 days (unless validation studies prove a shorter interval is acceptable)?	N/A	0	0	
2.07.05c	Are there Certificate(s) of Analysis available from the nonsynthetic crop treatment suppliers that covers pathogen testing (plus any other legally/best practice required testing)?	N/A	0	0	
2.07.05d	Are there Certificate(s) of Analysis (COA), letters of guarantee or some other documents from the nonsynthetic crop treatment suppliers that covers heavy metal testing?	N/A	0	0	
2.07.06	Are any soil or substrate amendments (except inorganic nutrients/fertilizers) used that do not contain animal products and/or animal manures? If No, go to 2.07.07	No	0	0	No. Inorganic materials are used in the growing cycle.
2.07.06a	Are the grower's soil or substrate amendment (except inorganic nutrients/fertilizers that do not contain animal products and/or animal manures) records available for review including application records?	N/A	0	0	
2.07.06b	Are there Certificate(s) of Analysis (COA) and/or letters of guarantee stating that the materials used are free from animal products and/or animal manures?	N/A	0	0	
2.07.07	Are inorganic fertilizers used? If No, go to 2.07.08	Yes	0	0	Yes, under a inorganic fertility program. Liquid materials used (fertigation). Delivery tickets also in place to show when the product was delivered from the supplier to the farm. The records showed the date, the product analysis, the amount/rate per acre, and method used.
2.07.07a	Are the grower's inorganic fertilizer records available for review including application records?	Yes	10	10	Yes. Fertigation systems are in use. Daily logging/recordings made and recorded on a calendar type of day planner to show when the injections are to take place; and then when the cycle took place e.g., start time and end cycle.
2.07.07b	Are there Certificate(s) of Analysis (COA), letters of guarantee or some other documents from the inorganic fertilizer supplier(s) that specifies the all the ingredients including inert materials?	Yes	7	7	Yes, on file for this season there were product guaranteed analyses and an updated letter of assurance provided by the fertilizer supplier stating the components of the inorganic fertilizer blends do not contain animal derivatives and fertilizer is manufactured in accordance to the US Fertilizer Act.
2.07.08	If fertilizers and/or fertilizer containers are stored on the property, are they stored in a manner to prevent contamination to the growing area(s), product or any of water sources?	Yes	3	3	Yes, liquid containers are situated next to the pump stations where the injection process is done since fertigation method is used.

GAP – Irrigation/Water Use

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.08.01	Does the growing operation practice dryland farming? If No, go to 2.08.02.	No	0	0	No. The rest of this section is not applicable. See 2.08.01.	
2.08.01a	If the growing operation practices dryland farming, are there water systems used in the growing operation to supply for crop needs such as crop protection/fertilizer applications, and frost or freeze prevention program? If No, go to 2.08.02	N/A	0	0		
2.08.01b	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.01d	N/A	0	0		
2.08.01c	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0		
2.08.01d	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	N/A	0	0		
2.08.01e	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0		
2.08.01f	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0		
2.08.02	Is the water used for the growing operation sourced from Municipal or District water pipeline systems? If No, go to 2.08.03	No	0	0	No. The rest of this section is not applicable. See 2.08.01.	
2.08.02a	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.02c.	N/A	0	0		
2.08.02b	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0		
2.08.02c	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	N/A	0	0		
2.08.02d	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0		
2.08.02e	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0		
2.08.02f	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0		
2.08.02g	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0		
2.08.02h	Are the crops irrigated by flood irrigation or a furrow system?	N/A	0	0		
2.08.02i	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0		
2.08.03	Is the water used in the growing operation sourced from wells? If No, go to 2.08.04	Yes	0	0	Yes. Wells supply water and the method of irrigation is drip system.	
2.08.03a	Are all well heads at adequate distance from untreated manure?	N/A	0	0	N/A. Treated or untreated manure is not stored near the well area.	
2.08.03b	Is the well designed to prevent contamination?	Yes	10	10	Yes, modern permitted wells (through Southwest Florida Water Management District) in use. The wells were covered, sealed and located on a concrete pad station.	
2.08.03c	Is it evident that the well(s) is free from contamination issues and are measures taken to minimize contamination of wells?	Yes	10	10	Yes. During the inspection there was no evidence of leaks, weeds, or oil.	
2.08.03d	Are records kept for periodic inspections and treatment of wells (if performed) available for review?	Yes	7	7	Yes. The Farm Manager's Daily Farm Records show that the well areas is checked.	
2.08.03e	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.03g	Yes	20	20	Yes, the testing regime is outlined within an SOP. E. coli, Fecal Coliform, and Total Coliform are the testing organisms. Testing is done one time within each season.	
2.08.03f	Are the microbiological tests current and conducted at the required and/or expected frequencies?	Yes	15	15	Yes. The date of the last test was done on November 13, 2014.	
2.08.03g	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	Yes	10	10	Yes, the testing regime is outlined within an SOP which also included sampling protocols. Water sampling at the farm level is done by a service contractor with the analytical laboratory.	
2.08.03h	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	Yes	10	10	Yes, the testing regime outlined how to handle corrective measures for unsuitable or abnormal water testing results. E.coli must be less than 126 MPN/100ML.	
2.08.03i	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	N/A. According to the results there was no requirement for corrective action. Specifications had been met.	
2.08.03j	Are the crops irrigated by a micro irrigation or drip system?	Yes	0	0	Yes. Drip system in use for irrigation and fertilizer needs.	
2.08.03k	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	No	0	0	No.	
2.08.03l	Are the crops irrigated by flood irrigation or a furrow system?	No	0	0	No.	
2.08.03m	Are the crops sub irrigated (also known as seepage irrigation)?	No	0	0	No.	
2.08.04	Is the water used in the growing operation sourced from ponds, reservoirs, watersheds or other surface water source? If No, go to 2.08.05	Yes	0	0	Yes. Surface water can supply for cold protection needs.	

2.08.04a	Is surface water in adequate distance from untreated manure?	N/A	0	0	N/A. No treated or untreated manure stored on the farm.
2.08.04b	Do animals (domestic, livestock, or wild) have access to the water source?	Yes	0	7	Yes, wild animals have access to the surface water.
2.08.04c	Is it evident that the water source is free of contamination issues and are measures taken to minimize contamination of the water source?	Yes	10	10	Yes. During the inspection there was no evidence of contamination issues in the pond.
2.08.04d	Are records kept for the periodic visual inspections and disinfection treatments (if used) available for review?	Yes	7	7	Yes. The Farm Manager's Daily Farm Records show that the pond is checked.
2.08.04e	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.04g	Yes	20	20	Yes, the testing regime is outlined within an SOP. E. coli, Fecal Coliform, and Total Coliform are the testing organisms. Testing is done one time within each season.
2.08.04f	Are the microbiological tests current and conducted at the required and/or expected frequencies?	Yes	15	15	Yes. The date of the last test was done on November 13, 2014. The surface water is only used in the event of a freeze situation.
2.08.04g	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	Yes	10	10	Yes, the testing regime is outlined within an SOP which also included sampling protocols. Water sampling at the farm level is done by a service contractor with the analytical laboratory.
2.08.04h	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	Yes	10	10	Yes, the testing regime outlined how to handle corrective measures for unsuitable or abnormal water testing results. E.coli must be less than 126 MPN/100ML.
2.08.04i	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	N/A. According to the results there was no requirement for corrective action. Specifications had been met.
2.08.04j	Are the crops irrigated by a micro irrigation or drip system?	No	0	0	No.
2.08.04k	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	Yes	0	0	Yes, for cold protection sprinklers may be used. Sprinklers are built into the beds within the growing area, not set on the ground.
2.08.04l	Are the crops irrigated by flood irrigation or a furrow system?	No	0	0	No.
2.08.04m	Are the crops sub irrigated (also known as seepage irrigation)?	No	0	0	No.
2.08.05	Is the water used in the growing operation sourced from canals, rivers, ditches, or other open flowing water systems? If No, go to 2.08.06	No	0	0	No. The rest of this section is not applicable. See 2.08.01.
2.08.05a	Is surface water in adequate distance from untreated manure?	N/A	0	0	
2.08.05b	Is the water source under the direction of a water authority or district?	N/A	0	0	
2.08.05c	Do animals (domestic, livestock, or wild) have access to the water source?	N/A	0	0	
2.08.05d	Is it evident that the water source is free of contamination issues and are measures taken to minimize contamination of the water source?	N/A	0	0	
2.08.05e	Are records kept for periodic visual inspection and disinfection (if occurring) of the water source and available for review?	N/A	0	0	
2.08.05f	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.05h	N/A	0	0	
2.08.05g	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0	
2.08.05h	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	N/A	0	0	
2.08.05i	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0	
2.08.05j	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	
2.08.05k	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0	
2.08.05l	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0	
2.08.05m	Are the crops irrigated by flood irrigation or furrow system?	N/A	0	0	
2.08.05n	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0	
2.08.06	Is reclaimed water used in the growing operation? NOTE: This refers to wastewater that has gone through a treatment process. If No, go to 2.08.07.	No	0	0	No. The rest of this section is not applicable. See 2.08.01.
2.08.06a	Is the reclamation process under the direction of a water reclamation management or authority?	N/A	0	0	
2.08.06b	Are microbial control measures for reclaimed water utilized?	N/A	0	0	
2.08.06c	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.06e	N/A	0	0	
2.08.06d	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0	
2.08.06e	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	N/A	0	0	
2.08.06f	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0	
2.08.06g	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	

2.08.06h	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0	
2.08.06i	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0	
2.08.06j	Are the crops irrigated by flood irrigation or a furrow system?	N/A	0	0	
2.08.06k	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0	
2.08.07	Are tail water (run off water) systems used in the growing operation? If No, go to 2.08.08.	No	0	0	No. The rest of this section is not applicable. See 2.08.01.
2.08.07a	Is surface water in adequate distance from untreated manure?	N/A	0	0	
2.08.07b	Do animals (domestic, livestock, or wild) have access to the tail water systems?	N/A	0	0	
2.08.07c	Is it evident that the water source is free of contamination issues and are measures taken to minimize contamination of the tail water system?	N/A	0	0	
2.08.07d	Are records kept for periodic visual inspection and disinfection (if occurring) of the water source and available for review?	N/A	0	0	
2.08.07e	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.07g	N/A	0	0	
2.08.07f	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0	
2.08.07g	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	N/A	0	0	
2.08.07h	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0	
2.08.07i	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	
2.08.07j	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0	
2.08.07k	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0	
2.08.07l	Are the crops irrigated by flood irrigation or furrow system?	N/A	0	0	
2.08.07m	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0	
2.08.08	Are check valves, anti-siphon devices, or other back flow prevention systems in use when and where necessary?	Yes	10	10	Yes. The wells were fitted with check valves.
2.08.09	Is irrigation equipment not in use free from pest contamination and stored clean, off the ground?	No	0	10	No. Using drip irrigation. Auditor noted a stack of piping to the east of the farm set on the side of the road (not a direct threat to the crop).

GAP – Crop Protection

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.09.01	Is there a documented procedure for the mixing/loading of crop protection materials?	Yes	5	5	Yes, documented SOP: Pesticide Usage SOP detailed the requirements for the mixing/loading of crop protection materials. Activities must be in accordance to the pesticide label and FL state pesticide use regulation. The farmer must undertake special precautions when using fumigation materials at pre plant.	
2.09.01a	If observed, is the mixing/loading of crop protection materials performed according to the procedure and label instructions?	N/A	0	0	N/A. Not observed during the inspection.	
2.09.02	Is there a documented procedure for the application of crop protection materials?	Yes	5	5	Yes, documented SOP: Pesticide Usage SOP detailed the requirements for the application of crop protection materials. Activities must be in accordance to the pesticide label and FL state pesticide use regulation. The farmer must undertake special precautions when using fumigation materials at pre plant.	
2.09.02a	If observed, is the application of crop protection materials performed according to the procedure and label instructions?	N/A	0	0	N/A. Not observed during the inspection.	
2.09.03	Is there a documented procedure for the rinsing and cleaning of crop protection equipment?	Yes	5	5	Yes, documented SOP: Pesticide Usage SOP detailed the requirements for the rinsing and cleaning of crop protection equipment. Activities must be in accordance to the pesticide label and FL state pesticide use regulation.	
2.09.03a	If observed, is the rinsing and cleaning of crop protection equipment performed according to the procedure and label instructions?	N/A	0	0	N/A. Not observed during the inspection.	
2.09.04	Is there documentation that shows the individual(s) making decisions for crop protection applications are competent?	Yes	10	10	Yes. Farm Manager, John Jerrigan of the organization's manager's hold valid FL state Private Certified Applicator's Licenses (FDACS Bureau of Licensing and Enforcement, Pesticide Certification Section) # PV 42171.	
2.09.05	Is there documentation that shows employees who handle crop protection materials are trained or are under the supervision of a trained individual?	Yes	15	15	Yes. Worker Protection Standard training held for the employees involved in the crop protection application program. Last training was dated October 3, 2014.	

2.09.06	Are there up to date records of all crop protection products applied during the growing cycle? A 'NO' TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Yes	20	20	Yes. Formal documented pesticide recording system in place. Records are placed in a container at the farm entrance posting board which is a state requirement for agricultural worker standards. Formal pesticide application logging program which details: application date, start and end, location (section, township, range), chemical material used (trade name/ active ingredient), / method of application, /amount of chemical per tank, amount of water volume of the tank, and applicator.
2.09.07	Are there plant protection products registered and/or authorized by a government agency for use in the target crops in the country of production? If No, go to 2.09.08.	Yes	0	0	Yes. According to the materials used in the crop protection records, these were EPA registered pesticides. Copies of the product labels were available for review.
2.09.07a	Does the growing operation have the information available for the plant protection products registered and/or authorized for use for the target crops in the country of production? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Yes	20	20	Yes. "Information" provided are the pesticide labels showing that products used are EPA registered pesticides.
2.09.07b	Are crop protection applications restricted by the guidelines established by the product label, manufacturer recommendation, or by prevailing national/ local standards and guidelines? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Yes	20	20	Yes. There was no evidence to show that products were being used inconsistent to the label dictation. According to the use reports, the applications were made per label instructions.
2.09.07c	Where harvesting is restricted by pre-harvest intervals (as required on the crop protection chemical product labels, manufacturer recommendations and/or by prevailing national/ local standards) is the grower adhering to these pre-harvest interval time periods? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Yes	20	20	Yes. A harvest audit was included in the scope of the PrimusGFS application so the Auditor reviewed crop protection records versus area which was under harvest on the day of the audit (block 4). According to the reports, the PHIs were respected. Typically the grower will use 0 to 2 day (average) materials during the active period of harvest. Longer PHI materials are typically used during the non harvested timing.
2.09.08	If applicable, for those plant protection products that are not registered for use on target crops in the country of production, if the country has no or a partial legislative framework to cover plant protection products, can the grower show that they have registration information, label information, MRL tolerances, etc. for the country of destination? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	N/A. The operation only uses materials which are EPA registered and registered for the products under survey. Not using plant protection products that are not registered for use on target crops in the country of production or exportation.
2.09.09	Is there evidence available that the grower is taking all the necessary measures to comply with the country(ies) of destination expectations regarding crop protection products used (e.g. registration information, label information, MRL tolerances or any other guidelines applicable)? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Yes	10	10	Yes. The product is grown and destined to the US market.
2.09.10	If crop protection containers are stored on the property (even temporarily), are they stored in a manner to prevent contamination and disposed of responsibly?	Yes	10	10	Yes.
2.09.11	Have documented policies and/or procedures been developed for the monitoring of crop protection application equipment (e.g. calibration procedures, inspections, replacement)?	Yes	10	10	Yes. Crop protection equipment was last calibrated on 10/7/14 according to the records.
2.09.11a	Is it evident that the equipment used for crop protection applications is in good working order?	Yes	10	10	Yes.

GAP – Field Employee Hygiene (Applies to on-the-farm or greenhouse workers not the harvesting workers)

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.10.01	Does the growing operation have a documented and implemented policy for dealing with employees who appear to be physically ill, or become ill while working?	Yes	10	10	Yes, this policy was part of the farm hygiene training program. Auditor did not note the name of this policy.	
2.10.02	Does the growing operation have a documented and implemented policy regarding employees with open sores and wounds?	Yes	10	10	Yes, this policy was part of the farm hygiene training program. Auditor did not note the name of this policy.	
2.10.03	Does the growing operation have documented and implemented procedures describing the disposition of product that has come into contact with blood or other bodily fluids? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Yes	20	20	Yes. There was a documented blood and bodily fluid policy and procedure. The SOP included the requirement for all affected or potentially affected products to be disposed of and also implementation of a buffer radius.	
2.10.04	Does the growing operation have documented and implemented policies prohibiting eating, drinking (including gum chewing) using tobacco in the growing area?	Yes	10	10	Yes, this policy was part of the farm hygiene training program. Auditor did not note the name of this policy.	
2.10.05	Is there a food safety hygiene training program covering new and existing employees and are there records of these training events?	Yes	15	15	Yes. Monthly training program in place for the employees which is held by the farm manager. Records available to show various safety, and hygiene topics. The training outline was available for review.	
2.10.06		Yes	20	20		

Are there operational toilet facilities provided? If NO, go to 2.10.07. A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.						
2.10.06a	Are toilet facilities placed within ¼ mile or 5 minutes walking distance of all employees?	Yes	10	10	Yes. Mobile portable self contained units are used which are situated on a trailer. The units are cleaned and serviced by a contracted company, Handy Cans. Yes. The portable self contained units are situated on a trailer and can be moved with the crew.	
2.10.06b	Are toilet facilities in a suitable location to prevent contamination to product, packaging, equipment and growing areas?	Yes	15	15	Yes.	
2.10.06c	Is a minimum of one toilet facility provided for each group of 20 employees?	Yes	5	5	Yes.	
2.10.06d	Do toilet facilities have visuals or signs, written in the appropriate languages, reminding employees to wash their hands before returning to work?	Yes	20	20	Yes. Pictorials and written instructions in English and Spanish were posted at the toilet–hand washing stations.	
2.10.06e	Are the toilets maintained in a clean and sanitary condition and are there records showing toilet cleaning, servicing and stocking is occurring regularly?	Yes	10	10	Yes. The portable toilet service provider submits cleaning–stocking reports.	
2.10.06f	Are the catch basins of the toilets designed and maintained to prevent contamination (e.g. free from leaks and cracks)?	Yes	5	5	Yes.	
2.10.06g	Is there a documented and implemented procedure for emptying the catch basin in a hygienic manner and also in a way that prevents product, packaging, equipment, water systems and growing area contamination?	Yes	5	5	Yes. The procedure provided by the service provider detailed emptying the catch basin in a hygienic manner and also in a way that prevents product, packaging, equipment, water systems and growing area contamination.	
2.10.07	Is there evidence of human fecal contamination in the growing area(s)? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	No	20	20	No.	
2.10.08	Are there operational hand washing facilities provided? If No, go to 2.10.09	Yes	15	15	Yes. Portable self contained hand washing units were observed. See 2.10.06, the hand washing units were located next to the toilets on the trailer.	
2.10.08a	Are the hand washing facilities placed within ¼ mile or 5 minutes walking distance of all employees?	Yes	10	10	Yes, the hand washing units were located next to the toilets on the trailer. The trailer is mobile and can be moved with the crew.	
2.10.08b	Are hand wash stations clearly visible (e.g. situated outside the toilet facility) and easily accessible to workers?	Yes	5	5	Yes, the hand washing units were located next to the toilets on the trailer.	
2.10.08c	Are hand wash stations properly stocked with soap, paper towels and trash can?	Yes	5	5	Yes.	
2.10.08d	Are the hand wash stations designed and being maintained to prevent contamination onto the growing area(s) (i.e. spent water does not go straight to the ground)?	Yes	5	5	Yes.	
2.10.08e	Does the growing operation have a documented and implemented policy and procedure in place requiring employees to wash their hands (e.g. prior to beginning work, after breaks, after toilet use)?	Yes	10	10	Yes, this policy and procedure was part of the farm hygiene training program. Auditor did not note the name of this policy.	
2.10.09	Is fresh potable drinking water provided for workers? If No, go to 2.10.10	Yes	10	10	Yes.	
2.10.09a	If used, are water containers maintained in a clean condition?	Yes	5	5	Yes.	
2.10.10	Are first–aid kits available and is the inventory maintained properly?	Yes	5	5	Yes. A stocked first aid kit was available at the Farm Manager's office.	
2.10.11	Are there trash cans available on the field placed in suitable locations?	No	0	5	No. Trash dumpster located at the farm yard area was not emptied.	
2.10.12	Are there any foreign material issues observed that are or could be potential risks to the product in the growing area(s)?	No	5	5	No. During the audit, there were no foreign material issues observed.	
2.10.13	Is there a documented and implemented policy that infant or toddler aged children are not allowed in the growing area? NOTE: This includes any packaging or equipment storage areas.	Yes	10	10	Yes, this policy was part of the farm hygiene training program. Auditor did not note the name of this policy.	