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Regulatory
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Agricultural
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Specialty
Crops
Program

Specialty
Crops
Inspection
Division

Harmonized GAP Plus+ Standard

A global market-access solution for the
specialty crops industry

February 9, 2024

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The United States Department of Agriculture (USDA) Harmonized Good Agricultural Practices (GAP) Plus+ Standard is based on the Produce GAPs Harmonized Food Safety Standard developed by the GAPs Harmonization Initiative. Use of the Harmonized Food Safety Standard has been granted by the Secretariat of the GAPs Harmonization Initiative through a non-exclusive copyright license agreement which includes permission to insert additional audit requirements beyond those listed in the Harmonized Standard. Additional requirements are designated by any requirement number ending in a letter. (i.e. G-1.1.a)

This issue of the USDA's Harmonized GAP Plus+ Standard supersedes the previous issue which has been in effect since August 31, 2022.

A summary of changes and the Program Manual are available on the AMS website:

<https://www.ams.usda.gov/services/auditing/gap-ghp/harmonized>

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Harmonized GAP Plus+ Standard

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INTRODUCTION

The USDA Harmonized GAP Plus+ Standard is based on the Harmonization Initiative Harmonized Food Safety Standards located at: <https://www.freshproduce.com/resources/food-safety/produce-gaps-harmonized-audit-standard/>. This standard was built on the concepts of risk identification, control and mitigation of risks, monitoring, verification, and documentation.

These mirror the Codex Alimentarius Principles of HACCP

(<http://www.fao.org/docrep/005/y1579e/y1579e03.htm>).

Requirements of the USDA Harmonized GAP Plus+ Standard reference adherence to “current industry practices”, “regulatory requirements”, and “prevailing regulations” – these may include, but are not limited to, the Food and Drug Administration Produce and Plant Products Guidance Documents

(<https://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/ProducePlantProducts/ucm187676.htm>), the Food Safety Modernization Act (FSMA): Produce Safety Rule

(<https://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm334114.htm>), Codex Alimentarius Recommended International Code of Practice – General Principles of Food Hygiene

(<http://www.fao.org/3/a1552e/a1552e00.htm>), and the WHO Guidelines on the Safe Use of Wastewater and Excreta in Agriculture

(<https://www.who.int/publications/i/item/9241546824>). Additional requirements are included to align this standard with the Global Food Safety Initiative (GFSI) Guidance Document Version 2020, Part III, Scopes of Recognition BI- Farming of Plants (other than grains and pulses), and BIII- Pre-Processing Handling of Plant Products.

SCOPES OF AUDIT

The Harmonized GAP Plus+ Audit is comprised of four scopes: General Questions, Field Operations and Harvesting, Post-Harvest Operations, and Logo Use. The General Questions scope is required to be completed for every audit. One or both of the Field Operations and Harvesting and/or Post-Harvest Scopes will be completed based on the type of operation being audited. The Logo Use scope must be completed for any operation who intends to use the USDA GAP & GHP Logo on packaging or promotional materials. There are four optional scopes that are available for operations that produce, harvest, pack, store, distribute or repack tomatoes which provide verification of requirements specific to tomato operations. These are: Tomato Audit Protocol for Open-field Production and Harvesting, Packinghouse, Greenhouse, Repack and Distribution.

STANDARD LAYOUT

The standard has specified columns for the Requirement (Req. # and Requirement Description), Documentation (DOC), Mandatory (MAN), Procedure, Verification and Corrective Action.

Requirement: Is a specification of the conditions expected to be met by the auditee.

DOC: The auditing standards require verification of written policies, procedures and plans (WP); records (R); and risk assessment (A). To help auditors identify where documents (DOC)

are required, the Standard includes a DOC column that designates the type of documentation to verify WP, R, A, or a combination of these document types.

- **Written Policies, Procedures, and/or Plans (WP)** – A policy is high-level guidance that describes general goals and acceptable procedures for an organization. A procedure is a specified way to carry out an activity or process. A plan outlines actions that will be taken by an organization to mitigate risk. Policies, procedures and plans may be communicated orally or in writing. They are only required to be written if a WP is indicated in the DOC column in this standard.
- **Records (R)** – A record is a document stating results achieved or providing evidence of activities performed. Records may include checklists, service records, billing forms, and water tests.
- **Risk Assessment (A)** – A risk assessment is a process to identify potential hazards on a farm and/or packinghouse as well as the likelihood the hazards will impact the safety of fruits and vegetables. Risk assessments should be documented in the manner which best represents the operation and the type of risk assessment required. This may include a combination of WP and/or R documents.

MAN: A ● in this column indicates a requirement that is mandatory and must either be assessed as compliant (C) or not applicable (N/A) in order to meet USDA Acceptance Criteria.

Procedure: Is a more detailed explanation of the conditions expected to be met by the auditee in order to meet the requirement.

Verification: Are the conditions verified by the auditor to determine if the auditee meets the requirement.

Corrective Actions: Are actions to be taken by the auditee if it is found that they do not meet the requirement.

GENERAL QUESTIONS (G)

G-1: Management Responsibility

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-1.1	A food safety policy shall be in place.	WP	•	A written policy shall outline a commitment to food safety and food safety culture, in general terms. Everyone in the organization shall understand the policy and be aware of their role in insuring that this is met (e.g., through training initiatives, communication efforts, feedback to management, performance measurements related to food safety). The policy shall be communicated in a language understood by employees and workers. The policy shall be signed by senior management, and includes a date when the policy was created and any dates of revision.	The auditor reviews the food safety policy, observes that it includes a proactive approach to promoting food safety culture, observes that it is signed by senior management, has been communicated and made accessible to all employees and workers in a manner that can be understood, and includes a date when the policy was created or revised.	The operation creates or revises the policy, or its communication to employees and workers to be in compliance.

G-1.1.a	The food safety policy shall include measurable objectives for meeting the safety needs of products.	WP		A written policy shall include measurable objectives, each of which is defined and includes a plan to achieve it. The plan must include the timeline in which the objective will be accomplished, who is responsible for ensuring it is accomplished, and how the progress of completion will be documented and verified.	The auditor observes that the food safety policy contains measurable objectives and that the operation is progressing toward their completion.	The operation adds or revises its measurable objectives.
G-1.2	Management has designated individual(s) on-site and remote, including a list of alternatives authorized to act in absence of designated individuals, with roles, responsibilities, and resources for food safety functions.	WP	•	The food safety plan shall designate who has the responsibility and authority for food safety on-site, including a provision for the absence of key employees and workers. Twenty-four-hour contact information shall be available for these individuals in case of food safety emergencies. These roles and responsibilities shall be communicated within the organization. The organization's senior management shall determine and provide, in a timely manner, the resources needed to implement and maintain the food safety plan.	Auditor observes that the food safety plan has identified individual(s) for key food safety activities. Auditor verifies that procedures include provisions for when the identified individual is not present. Auditor observes whether senior management has provided the resources needed to implement and maintain the food safety plan.	Operation identifies individual(s) for key food safety activities in the food safety plan. Operation identifies actions to be taken when the identified individual(s) are not present. Senior Management commits resources needed to implement and maintain the food safety plan.
G-1.2.a	The food safety plan outlines an organizational structure for at least those staff whose activities affect food safety.	WP		The food safety plan defines and documents the job functions and responsibilities related to on farm activities of at least those staff whose activities affect food safety.	Auditor observes documentation of job functions and responsibilities related to on farm food safety activities.	The operation creates or revises the documentation of job functions and responsibilities related to on farm food safety activities.

G-1.3	There is a corrective action policy for food safety violations resulting from employees and workers.			There shall be a policy that establishes corrective actions for employees and workers who violate established food safety policies or procedures.	Auditor observes the policy and checks for examples of enforcement.	The operation creates or revises the policy, and trains or retrain employees, to be in compliance.
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G-2: Food Safety Plan or Risk Assessment

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-2.1	There shall be a written food safety plan. The plan shall cover the operation. The operation and products covered shall be defined.	WP	•	The food safety plan shall identify all locations of the operation covered by the plan. The plan shall address physical, chemical, and biological hazards reasonably likely to occur as well as hazard control procedures, including monitoring, verification, and recordkeeping, for all provisions covered by this audit.	Auditor shall observe the food safety plan and verify that the plan has considered potential physical, chemical, and biological hazards and has identified preventive controls for hazards that may reasonably affect food safety.	Operation develops or completes a food safety plan for all products and locations of operation.
G-2.2	The food safety plan shall be reviewed at least annually and when changes that affect the operation occur.	R		Operation shall be responsible for reviewing their food safety plan at least annually or anytime changes that affect the operation occur (e.g., purchase of new packing equipment, changes in management, new product type), documenting the review procedure and revising the plan as necessary. Updated or revised on date shall be indicated, and a written record of review shall be signed by senior management.	Auditor shall review documentation that the food safety plan is reviewed and revised at least annually, or when changes that affect the operation occur.	Operation reviews the food safety plan at least annually or when changes that affect the operation occur.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-2.3	Operation has an approved supplier program for all incoming materials, including packaging, soil amendments, and alternative growing media, soil-less media, and substrates.	R	●	Operation has and maintains a current list of approved raw material suppliers relevant to food safety. Approved supplier program includes a procedure for accepting materials from primary and alternate sources to ensure that materials will not serve as a potential source of contamination (e.g., obtaining Certificate of Analysis for soil amendments).	Auditor verifies a list of material suppliers is maintained and current. Auditor verifies that all materials received from alternate sources have followed established procedure.	Operation develops an approved supplier program and maintains current list. Operation develops a procedure for accepting materials from alternate sources. Operation ceases accepting or shipping materials from non-compliant suppliers.
G-2.4	Operation has an approved services program for all services which may impact the safety of the product.	R	●	Operation has and maintains a current list of approved service providers which could impact the safety of the product such as portable sanitation unit servicers, equipment technicians, or field workers. All approved service providers are provided at minimum the operation's food safety policies for proper restroom use and handwashing, illness policies, and other policies relevant to the service provider's job (e.g., food safety practices during equipment maintenance).	Auditor verifies a list of approved service providers is maintained and current. Auditor verifies that all services received from alternate sources have been provided food safety policies and procedures prior to work occurring.	Operation develops an approved services program and maintains a current list. Operation develops a procedure for accepting services from alternate providers. Operation ceases utilizing service providers who have not been provided the operation's food safety policies.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-2.4.a	Approved supplier program contains written procedures for the evaluation, approval, and continued monitoring of suppliers and service providers.	WP, R		The operation shall document the procedures for evaluation, approval, and continued monitoring of suppliers and service providers which have an effect on food safety. Results of evaluations, investigations, and follow up actions shall be recorded for each supplier and service provider.	Auditor verifies documentation for procedures for evaluation, approval, and continued monitoring of suppliers and service providers, as well as records documenting these activities.	Operation develops procedure and/or records for the evaluation, approval, and continued monitoring of suppliers and service providers.

G-3: Documentation & Recordkeeping

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-3.1	Documentation shall be kept that demonstrates the food safety plan is being followed.	R	●	Documents and records of procedures, standard operating procedures (SOPs) and policies shall be in place for meeting each of the food safety standards identified in the food safety plan. Employees and workers have access to the most current version of the operation's documents and records of procedures as related to the employee's job responsibilities. Records comply with prevailing regulations.	Auditor reviews food safety plan and verifies that all required documentation relevant to employee's and worker's job responsibilities is available and up to date.	Operation develops missing documentation or recordkeeping procedures. Operation provides employees and workers with the most up-to-date versions of documents and records of procedures as related to the employee's and worker's job responsibilities.
G-3.2	Documentation shall be readily available for inspection.		●	Documents and records may be maintained on-site or at an off-site location, or accessible electronically, and shall be available for inspection in a reasonable timeframe or as required by prevailing regulation. Records shall be protected to prevent unauthorized access or potential falsification.	Auditor verifies that required documentation can be accessed in a reasonable timeframe.	Operation defines in food safety plan where and how documentation is maintained and expected retrieval time.
G-3.3	Documentation shall be retained for a minimum period of two years, or as required by prevailing regulation.	R	●	Document and record handling policy or procedures require that documentation required by the food safety plan shall be retained for a minimum of two years, or as required by prevailing regulation.	Auditor reviews document handling procedures and verifies that required documentation is available for at least two years, or as required by prevailing regulation.	Operation revises documentation procedures.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-3.3.a	Food safety plan documentation and records shall be securely stored and effectively controlled.			The food safety plan, documentation, and any records required to demonstrate the implementation of food safety are securely stored and effectively controlled. They shall be stored for the time required to meet customer requirements, or for a period exceeding the shelf-life of the food if customer requirements are not available.	Auditor verifies that documentation and records are securely stored, effectively controlled, and stored for the length of time to meet customer requirements or exceed the shelf-life of the food.	Operation stores their documentation and records in a secure location and implements effective controls for these records and stored for the length of time to meet customer requirements or exceed the shelf-life of the food.

G-4: Worker Education and Training

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-4.1	All employees and workers shall receive food safety training, appropriate to their job responsibilities.	R	•	All employees and workers shall receive training in the food safety policy and plan, food safety procedures, sanitation, and personal hygiene appropriate to their job responsibilities. Employees and workers shall be trained to notify a designated individual if a food safety risk is identified. All concerns are promptly considered, and when appropriate to the circumstance, acted upon. Employees and workers shall receive training at hire, refresher training at prescribed frequencies (at least annually), and retraining when deficiencies are identified, and as required by prevailing regulation. Documentation of training is available.	Auditor reviews program of required training and examines training records for evidence of compliance.	Operation shall develop and deliver required training.
G-4.2	Employees and workers with supervisory food safety responsibilities shall receive training sufficient to their responsibilities.		•	The individual designated for food safety responsibilities demonstrates knowledge of food safety principles. Food safety designate has sufficient on the job training/experience or has completed at least one adequate food safety course/workshop, or as required by prevailing regulation.	Auditor reviews the evidence of the individual's training relevant to produce food safety, such as a degree or course certificate or receipt, or attendance at a relevant food safety meeting, company training record, and/or auditor interview.	Individual must obtain demonstrable food safety training.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-4.3	Contracted workers are held to the relevant food safety standards as they would be as employees or workers.	R	•	Operation shall have procedures and/or records to demonstrate that contracted workers whose activities can affect food safety have been informed of and, to the extent that can be verified, comply with the relevant requirements of this standard.	Auditor reviews operation's evidence that contracted workers are trained to the same food safety requirements as employees and workers would be and, if practical during the audit, observes contracted workers for compliance.	Operation obtains evidence, trains, or discontinues using contracted workers.

G-5: Sampling and Testing

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-5.1	Where laboratory analysis is required in the food safety plan, testing shall be performed by a GLP laboratory or laboratory participating in a proficiency testing program using scientifically valid methods.	R		Operation utilizes laboratories that have, at minimum, passed a Good Laboratory Practices (GLP) audit or participates in a proficiency testing program, and utilizes FDA's Bacteriological Analytical Manual BAM, AOAC International or testing methods that have been validated for detecting or quantifying the target organism(s) or chemical(s). At a minimum, laboratory procedures are scientifically valid methods and in accordance with prevailing regulation.	Auditor reviews operation's evidence that only GLP or laboratories participating in a proficiency testing program and scientifically valid methods are used.	Operation discontinues using non-GLP or non-accredited laboratory and not scientifically valid testing methods.
G-5.2	Where microbiological analysis is required in the food safety plan, samples shall be collected in accordance with an established sampling procedure and prevailing regulations and records kept.	WP, R		Operation utilizes a written sampling protocol that includes test frequency and procedures when collecting samples for microbiological testing for food safety. All results for microbiological testing, including lab reports or certificates of analysis, required in the operation's food safety plan shall be recorded and the records maintained for two years or as required by prevailing regulation.	Auditor observes that the operation has a sampling protocol for each type of microbiological testing required in the operation's food safety plan. Auditor reviews operation's recordkeeping of microbiological test results.	Operation develops or obtains written sampling protocols for each type of microbiological testing required in their food safety plan. Operation maintains test records for at least two years for all required microbiological tests.

G-5.3	All microbiological testing as directed by the food safety plan shall include procedures and actions to be taken based on the results.	WP	•	For all microbiological testing required by the food safety plan, operation has a written policy describing responsibilities and actions to be taken based on results. If finished product is tested for pathogens or other adulterants, operation's procedures require that it shall not be distributed outside the operation's control until test results are obtained (i.e., test and hold).	Auditor reviews the operation's microbiological testing policy for completeness.	Operation revises testing policy and actions for completeness and to meet expectations of the food safety plan.
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G-6: Traceability

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-6.1	A documented traceability program shall be established.	WP, R	•	Records that enable reconciliation of product delivered to recipients (one step forward) shall be maintained except for direct-to-consumer sales. Records shall be maintained that link product with source of the produce or production inputs, e.g., soil amendments, fertilizers, seeds/transplants, agricultural chemicals, and homemade preparations (one step backward). Records shall include the items, the date of receipt or harvest, quantities, and lot numbers or farm identification (field or block), and transporter. Additional information may be included. Contents and retention of records shall be consistent with prevailing regulation. If using reusable containers, procedures ensure that labels are accurate prior to packing.	Auditor reviews traceability program and verifies Operation's ability to trace product accurately one step forward and one step back.	Operation establishes an effective traceability program.
G-6.1.a	Packaging must include product identification.			Operation must include product identification on all packaging. The product identification at a minimum must include the name and address of the farm, packer, or distributor of the produce and meet the requirements of the prevailing regulation.	Auditor reviews the product identification on all packaging.	Operation establishes product identification on all packaging.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-6.1.b	If product is intended for export, product meets labeling regulations of the country(ies) the product is being exported to.			Product shall be labeled according to the applicable regulations in the country(ies) in which the product is intended to be sold, if known during production.	Auditor reviews operation's procedure for ensuring adherence to food labeling regulations in country(ies) of destination. If the country of destination is unknown during production, this item is not applicable.	Operation develops procedures and diverts non-compliant product to a market in which the product meets standards.
G-6.1.c	If a post-harvest operation supplies product to a farm stand or Community Supported Agriculture (CSA), records tracing the product from the post-harvest operation to the farm stand or CSA are required.	R		If a post-harvest operation supplies product to a farm stand or CSA, records tracing the product from the post-harvest operation to the farm stand or CSA are required.	Auditor reviews operation's traceability records.	Operation develops procedures and keeps traceability records for product supplied to a farm stand or CSA.
G-6.2	A trace back and trace forward exercise shall be performed at least annually.	R		The trace back and trace forward records check exercise shall achieve accurate traceability within 4 hours or as required by applicable regulations. Trace exercise shall achieve 100% reconciliation of product to recipients.	Auditor reviews records of most recent trace exercise. If no trace exercise was performed in the past year, the operation will perform the exercise during the audit.	Operation performs exercise and/or improves traceability program to achieve accurate reconciliation.

G-7: Recall Program

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-7.1	A documented recall program, including written procedures, shall be established.	WP, R	•	Operation shall have written procedures that detail each step of the recall process including tasks and responsibilities. Written procedures detail communication with customers about recalled products, including how to withdrawal, return, dispose, or divert the affected product. Verification procedures shall document that the recall was conducted effectively.	Auditor shall review documentation of the recall program and written procedures.	Operation develops a recall program including written procedures.
G-7.2	The recall program shall have a designated recall team.	R		Operation has an established recall team and keeps up-to-date contact information for the internal and external individuals involved in the operation's recall activities (e.g., key company employees, legal counsel, regulatory agencies, insurance agent, media spokesperson).	Auditor reviews operation's established recall team contact information.	Operation develops a recall team and keeps up-to-date contact information for all team members.
G-7.3	A mock recall exercise shall be performed at least annually at the operation being audited.	R		The mock recall shall include a trace back and trace forward exercise for a hypothetical product on the market and include involvement by designated recall team members as established by the recall program.	Auditor reviews records of most recent mock recall exercise performed at the operation.	Operation develops a written recall plan, performs a mock recall exercise, and keeps records.

G-8: Corrective Actions and Food Safety Incidents

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-8.1	The operation shall have documented corrective action procedures.	WP, R	•	A documented corrective action is required for an observation or audit that contains a non-conformance with food safety requirements. The responsibility, methods, and timelines to address corrective actions (e.g., root cause analysis exercise) shall be documented and implemented.	Auditor reviews corrective action procedures and examines records for evidence of compliance.	Operation develops and implements corrective action procedures.
G-8.1.a	Corrective action procedures shall include a procedure to evaluate complaints.	WP		For the purpose of preventing recurrence, there shall be a documented corrective action procedure to evaluate food safety related complaints, and to investigate non-conformities. It shall include a plan to address the issue; a plan to prevent recurrence; and demonstration of the evidence of effectiveness. The time frame necessary for corrective action shall be documented. Objective evidence shall demonstrate that the procedure is effective.	Auditor shall verify the operation has a procedure to evaluate complaints.	The operation shall develop a procedure for evaluating complaints.
G-8.1.b	Food safety incidents are recorded and assessed to determine severity and risk and are addressed according to a documented food safety incident management procedure.	R		A food safety incident management procedure shall be in place. Relevant staff shall be aware of their obligations in case of an incident. Incidents which could lead to unsafe or non-conforming product are recorded and assessed in a timely manner to establish their severity and consumer risk. Corrective actions are taken and documented.	Auditor verifies operation has a food safety incident management procedure, that food safety incidents are recorded and assessed, and risk is addressed by the operation accordingly.	A food safety incident management mechanism will be implemented. Staff is trained to record and assess the severity of risk and to respond accordingly.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-8.2	Non-conforming product on hold for food safety is clearly identified and segregated from other products and packaging materials.	WP, R	•	Operation has written hold and release procedures to identify and segregate on-hold, quarantined, and rejected product and materials when held for food safety reasons, to prevent commingling with other products or adulteration of products, production area, or packaging materials. Disposition must be documented (e.g., if the product was released, destroyed, donated, redirected).	Auditor reviews procedure, reviews records and observes all currently on-hold, quarantined, and rejected materials for compliance with procedure and their disposition. Product release procedure is being followed and release records are kept.	Non-compliances are corrected on site. If on-hold, quarantined or rejected materials are not segregated or released according to procedure, operation shall assess potential for product adulteration. Procedures are developed or revised. Retraining is performed.

G-9: Self-Audits

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-9.1	The operation shall have documented self-audit procedures.	R		Internal audits will be conducted at a minimum annually by an assigned individual who is knowledgeable in this standard, utilizing this standard to assist in the self-audit. All aspects of the operation’s food safety plan will be audited annually and a written record of required corrective action will be documented.	Auditor reviews internal audit procedures and examines records for evidence of compliance.	Operation develops and implements internal audit procedures.

G-10: Worker Health/Hygiene and Toilet/Handwashing Facilities

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-10.1	Operation shall have a policy for toilet, handwashing, hygiene, and health.	WP	●	Each operation shall establish written policies for their specific operations, which shall comply with prevailing regulations for worker health and hygiene practices.	Auditor ensures that policies for toilet, handwashing, hygiene, and health exist.	Operation develops written policies covering toilets, handwashing, hygiene, and health.
G-10.2	Employees, workers, and visitors shall be made aware of and follow all personal hygiene practices as designated by the operation.		●	Operation's hygiene policies shall apply to all employees, workers, contractors, visitors, buyers, product inspectors, auditors, and other personnel in the operation. The operation shall designate competent supervisory personnel to ensure compliance by all employees, workers, and visitors with the requirements in this section.	Auditor observes employees, workers, and visitors in operation for evidence of compliance.	Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
G-10.3	Toilet facilities and restrooms shall be designed, constructed, and located in a manner that minimizes the potential risk for product contamination and are directly accessible for servicing.		●	Toilet and handwashing facilities are situated during operation, serviced, and maintained so as not to pose a hazard to the produce or other opportunity for contamination. Restrooms are located away from produce handling areas whenever possible. If in a building, restrooms should not open directly into product handling areas. Those that do open directly into produce handling areas should have additional measures in place to mitigate risk, such as a self-closing mechanism, a maze-type entrance/exit, or distance.	Auditor visually verifies that toilet and handwashing facilities are not positioned, leaking, or serviced in a manner that poses a risk of produce contamination.	Toilet or handwashing facility is replaced, repaired or repositioned to be compliant.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-10.4	Toilet facilities shall be of adequate number, easily accessible to employees, workers, and visitors and in compliance with applicable regulations.		•	The operation will have verification that the number of toilet facilities and their location relative to employees and workers meets the more stringent of federal, state, or local regulations.	Auditor verifies that the number of available toilet facilities and their location is compliant with prevailing regulation for the number of employees and workers.	Operation obtains a sufficient number of toilet facilities to be compliant.
G-10.5	The practice of disposing of used toilet tissue on the floor, in trash receptacles, or in boxes is prohibited except in situations where waste systems are not capable of handling toilet paper.		•	Operation shall instruct employees and workers that used toilet tissue shall only be disposed of in the toilet. If toilet paper cannot be disposed of in the toilet, the use of toilet paper disposal containers is acceptable. Containers must be used only for toilet paper or other hygiene products and must be distinguishable from towel waste containers. Operation shall develop SOPs for the sanitary disposal of waste, ensuring adequate monitoring and cleaning frequencies to prevent unsanitary conditions.	Auditor observes restrooms for evidence of compliance. Auditor observes evidence or existence of toilet paper disposal, if applicable.	Retraining is performed and documented.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-10.6	Toilet and wash stations shall be maintained in a clean and sanitary condition.	R	•	Toilet paper shall be available in the toilet facility. Wash stations shall include hand wash facilities with water that meets the microbial standard for drinking water, hand soap, disposable towels or other hand drying device, towel disposal container, and a tank that captures used hand wash water for disposal. If portable hand wash water tanks are used, they are cleaned and sanitized at a prescribed frequency and the water is changed at prescribed frequencies adequate to prevent unsanitary conditions.	Auditor observes toilet and handwashing facilities for compliance. Auditor observes checklist or other evidence of a documented system for tracking cleaning of toilets and wash stations.	Toilet or handwashing facility is replaced, repaired or maintained to be compliant.
G-10.7	A response plan is in place for spills or leaks of field sanitation units.	WP		A written response plan is developed and implemented in the event of a leak or spill.	Auditor verifies existence of the plan and interviews the responsible individual for knowledge.	Operation prepares or edits the plan or receives plan from contractors of sanitation units. The responsible individual is retrained.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-10.8	Employees and workers shall wash their hands at any time when their hands may be a source of contamination.		•	Employees and workers shall wash their hands prior to start of work, after each visit to a toilet, after using a handkerchief/tissue, after handling contaminated material, after smoking, eating or drinking, after breaks and prior to returning to work, after touching animals or waste and at any other time when their hands may have become a source of contamination. Handwashing shall be monitored by visible observation when possible and/or confirming use of handwashing resources such as towels and soap to verify adequate handwashing is occurring. Antiseptic hand rubs may not be used as a substitute for soap (or other effective surfactant) and water. Operation management reinforces importance of and compliance with handwashing policy.	Auditor observes employees and workers for evidence of compliance. If handwashing practices are observed to be compliant, auditor will judge management emphasis to be sufficient.	Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
G-10.9	Signage requiring handwashing is posted.			Signage in applicable languages and/or pictures shall be provided adjacent to hand wash facilities requiring people to wash their hands after each toilet visit.	Auditor verifies that signage is present adjacent to all hand wash facilities and is in appropriate language or pictures to clearly communicate requirements to all employees.	Operation obtains and posts signage to be compliant.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-10.10	Clothing, including footwear, shall be effectively maintained, laundered, and worn so as to protect product from risk of contamination.		•	Operation shall have a policy that employee clothing shall be clean at the start of the day and appropriate for the operation. Clothing shall be replaced if it becomes reasonably likely to serve as a source of contamination of product or food contact surfaces.	Auditor reviews policy and observes compliance with operation's policy.	Operation develops or revises clothing policy. Retraining is performed and documented.
G-10.11	If gloves are used, the operation shall have a glove use policy.		•	If rubber, disposable, cloth or other gloves are used in contact with product, the operation shall have a glove use policy that specifies how and when gloves are to be used, cleaned, replaced and stored. Hands must be washed before putting on gloves. Policy shall be in compliance with current industry practices or prevailing regulation for that commodity.	If gloves are used, auditor observes glove use for compliance with the operation's policy and current industry practices or regulatory requirements.	Operation develops or revises glove policy. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-10.12	If protective outer garments are worn in product handling areas, they shall be handled in a manner to protect against contamination.			When employees and workers wear protective outer garments, such as aprons and sleeves, the operation shall have a policy that employees shall wear suitable outer garments, not reasonably likely to serve as a source of contamination of product or food contact surfaces. The protective clothing shall not be left on product, work surfaces, equipment or packaging material or taken into restrooms but hung on racks or in designated areas. When appropriate, racks shall be available and located to avoid potential contamination. In addition, storage containers or designated storage areas shall be provided to ensure tools used by employees are properly stored prior to entering toilet facilities. Operation shall have a policy regarding whether protective clothing can be taken home.	If protective clothing is used, auditor observes use for compliance with the operation's policy and current industry practices or regulatory requirements. If employees and workers wear protective clothing, auditor observes whether storage areas are designated, available and used.	Operation develops or revises protective clothing policy or procedures. Operation obtains and positions racks and storage containers as necessary. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
G-10.13	The wearing of jewelry, body piercings and other loose objects shall be in compliance to company policy and applicable regulation.			Operation shall have a policy that personal effects such as jewelry, false nails or eyelashes, watches, personal electronics (e.g., ear buds), or other items (including decorations that may fall from clothing and become a physical hazard) shall not be worn or brought into fresh fruit and vegetable production areas if they pose a threat to the safety and suitability of the food. Policy shall be in compliance with current industry practices or regulatory requirements for that commodity.	Auditor observes employees and workers for evidence of compliance.	Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-10.14	The use of hair coverings shall be in compliance to company policy and applicable regulation.			The operation shall have a policy that addresses use of hair coverings (e.g., hair nets, beard nets, caps), which is in compliance with prevailing regulation.	Auditor reviews the operation's policy and observes employees for compliance.	Operation develops policy. Retraining is performed.
G-10.15	Employee's and worker's personal belongings shall be stored in designated areas.			Operation shall have a policy for when and how employee's and worker's personal belongings shall be stored so as not to be a source of product contamination.	Auditor observes employee and worker produce handling areas and designated area for evidence of compliance.	Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
G-10.16	Smoking, chewing, eating, drinking (other than water), chewing gum, spitting, urinating, defecating, and using tobacco, shall be prohibited except in clearly designated areas.		●	Operation shall have policy prohibiting smoking, eating, spitting, chewing gum or tobacco, or drinking (other than water) except in designated areas. Such areas shall be designated so as not to provide a source of contamination. Operation shall have policy prohibiting spitting, urinating or defecating in any production area.	Auditor observes employees and workers for evidence of compliance.	Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
G-10.17	Operation shall have a policy that break areas are located so as not to be a source of product contamination.			Break areas shall be designated and located away from food contact/handling zones and production equipment.	Auditor observes break areas for evidence of compliance with operation policy.	Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-10.18	Drinking water shall be available to all field employees and workers.	R		Drinking water, which meets drinking water standards, shall be easily accessible to field workers and in compliance with applicable regulation. Bottled water or potable drinking water stations with single-use cups and a trash receptacle shall be available to all employees and workers.	Auditor observes evidence of drinking water accessibility and operation's evidence that water supplied to employees and workers meets drinking water standards.	Operation makes drinking water available to employees, in compliance with prevailing regulation.
G-10.19	Workers and visitors who show signs of illness shall be excluded from direct contact with produce or food-contact surfaces and from entering produce handling areas.	WP	•	Operation shall have a written policy that restricts employees, workers, contractors, visitors, buyers, product inspectors, auditors, and other personnel in the operation who show signs of foodborne illness (e.g., vomiting, jaundice, diarrhea) from contact with product or food contact surfaces and from entering produce handling areas where direct or indirect contamination could occur (e.g., shared use of tools by workers) until their condition no longer presents a risk to public health. Policy shall require that any person affected to immediately report illness or symptoms of illness to the management.	Auditor reviews written policy and observes workers and visitors for evidence of compliance.	Operation develops and implements policy. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

G-10.20	Employees and workers with exposed cuts, sores or lesions shall not be engaged in handling product.		•	Minor cuts or abrasions on exposed parts of the body are acceptable if covered with a non-permeable covering, bandage, or glove. Bandages on hands shall be covered with gloves in compliance with operation's glove policy. Bandages or other coverings for cuts, sores, or lesions shall not pose a physical hazard to produce.	Auditor observes employees and workers for evidence of compliance.	Affected product is evaluated for potential contamination and disposition. Retraining is performed and documented.
G-10.21	Operation shall have and implement a blood and bodily fluids policy.	WP	•	There shall be a written policy specifying the procedures for the handling/ disposition of food or product contact surfaces that have been in contact with blood or other bodily fluids.	Auditor reviews policy and observes operation for evidence of compliance.	Operation develops and implements policy. Affected product is evaluated for potential contamination and disposition. Retraining is performed and documented.
G-10.22	First aid kits shall be accessible to all employees and workers.			The kits shall be readily available in the vicinity of field work in the operation and maintained in accordance with prevailing regulation. The kit materials shall be kept in a sanitary and usable condition.	Auditor observes that provisions exist for first aid kit to be readily available in vicinity of workers and is stocked in accordance with prevailing regulation.	Operation obtains and stocks a first aid kit and ensures it is readily accessible near employees and workers.

G-11: Agricultural and Cleaning Chemicals

G-11.1	Use of pesticides and other agricultural chemicals shall comply with label directions and prevailing regulation.	R	●	Agricultural chemicals, including post-harvest chemicals such as biocides, waxes, and plant protection products, must be registered for such use as required by prevailing regulation, and used in accordance with label directions including application rates, worker protection standards, personal protection equipment, container disposal, storage, and all requirements specified for the chemical or compound. Chemicals that are not registered pesticides may be permitted for food contact use if allowed under regulations of the prevailing agency. Records of chemical agricultural use are maintained, and include crop date and location of application, chemical used, application rate and method, and preharvest interval.	Auditor reviews agricultural chemical use records for evidence of compliance with approved uses or label directions.	Operation develops and maintains agricultural chemical use records and maintains evidence of proper use of each chemical use. Affected product is evaluated for potential contamination and disposition. Retraining is performed and documented.
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G-11.2	Pre- and postharvest agricultural chemical use, shall consider the maximum residue limit (MRL) requirements in the country of origin or intended country of destination.	R		The operation shall have procedures, such as review of preharvest intervals and adjustment of postharvest application rates and communication with buyers about potential countries where product is intended to be sold sufficient to meet the MRL requirements of the country/countries in which the product is grown and intended to be sold/distributed, if known during production or postharvest handling.	Auditor reviews operation's procedure for complying with agricultural chemical restrictions in countries of destination. If the country of destination is unknown during production or postharvest handling by this operation, the auditor will review the operation's compliance with agricultural chemical restrictions for the country where the produce was grown.	Operation develops procedures, and diverts non-compliant product to a market in which the product meets standards.
G-11.3	Agricultural chemicals shall be applied by trained, licensed, or certified applicators as required by prevailing regulation.	R		Operation maintains records demonstrating that all personnel responsible for chemical applications are trained and/or licensed, or supervised by licensed applicators, in compliance with prevailing regulation. The responsible person(s) must be able to prepare the required application mix according to the label instructions.	Auditor reviews records demonstrating that applicators are licensed and/or trained in compliance with prevailing regulation. Auditors shall verify agricultural chemical mixes are prepared properly by interviewing the responsible person(s), if available.	Operation utilizes applicators who are appropriately licensed and/or trained. Retraining is performed and documented.

G-11.4	Water used with agricultural chemicals shall not be a potential source of product or field contamination.	R		Water used to dilute or deliver agricultural chemicals shall be from a source in compliance with the water system risk assessment and water management plan, consistent with current industry practices or regulatory requirements for that commodity.	Auditor reviews the water system risk assessment for evidence that water used with agricultural chemicals has been considered, and that agricultural chemical use policies are in compliance with the water system risk assessment.	Operation revises the water system risk assessment. Operation uses a water source in compliance with the water system risk assessment. Affected product is evaluated for potential contamination and disposition. Retraining is performed and documented.
G-11.5	Use of water treatment agricultural chemicals shall comply with label directions and prevailing regulation.	R	●	Agricultural chemicals used to manage water quality, including sanitizers and disinfectants, must be registered for such use as required by prevailing regulation, and used in accordance with label directions including application rates, worker protection standards, personal protection equipment, container disposal, storage, and all requirements specified for the chemical or compound. Chemicals that are not registered antimicrobial pesticides may be permitted for use if allowed under regulations of the prevailing agency. Records of water treatment are maintained, and include crop, date and location of application, chemical used, application rate and method.	Auditor reviews agricultural chemical use records for evidence of compliance with approved uses or label directions.	Operation develops and maintains agricultural chemical use records and maintains evidence of proper use of each chemical use. Affected product is evaluated for potential contamination and disposition. Retraining is performed and documented.

G-11.6	Agricultural chemical disposal shall not be a source of product or field contamination.	R		Operation shall have procedures for disposal of waste agricultural chemicals and for cleaning of application equipment that protects against contamination of product and growing areas.	Auditor reviews procedures and observes chemical handling records for evidence of compliance.	Operation develops and implements procedures. Steps are taken to mitigate any contamination events.
G-11.6.a	Agricultural chemicals approved for use on the crops being grown are stored separately from agricultural chemicals used for other purposes.	R		Only the agricultural chemicals currently in the approved agricultural chemicals list are kept in the storage area. Agricultural chemicals used for purposes other than application on crops within the rotation for the last 12 months are clearly identified and stored separately within the chemical storage area.	Auditors shall verify that only chemicals approved for use on crops being grown by the operation are stored in a designated storage area.	Operation will establish a designated storage for approved agricultural chemicals for use on the crops being grown separated from agricultural chemicals used for other purposes.
G.11.7	All cleaning agents shall be appropriate for use on food contact surfaces.			All chemicals used for cleaning of food contact equipment, tools, utensils, containers, and other food contact surfaces shall be appropriate for that use, according to the chemical manufacturer or supplier and all federal, state, and local requirements, and shall be used in a manner consistent with the labeled use. SDS are on file for all chemicals used in the operation and are readily accessible.	Auditor reviews cleaning and sanitizing chemicals purchasing practices or procedures, storage area, and use procedures to verify compliance.	Operation ceases use of unapproved chemicals. Affected product is evaluated for potential contamination and disposition. Retraining is performed and documented.

G-11.8	Compressed air or other gases that contact food or food contact surfaces must be maintained in a manner that does not serve as a potential source of product contamination.	R		Compressed air or other gases that are used in produce handling equipment, contact produce directly, or used in the process to clean food-contact surfaces must be properly maintained and inspected regularly. Compressed air or other gases must be properly stored and handled according to the label or manufacturer's instructions. When the food safety plan indicates that microbial or chemical testing is required to minimize potential food safety risks, documentation of test results and corrective actions are kept. Records of compressed air and gas system maintenance is documented.	Auditor reviews records of maintenance and testing results (when required by the food safety plan) of the compressed air or gas system. Auditor observes the appropriate use, storage, and/or handling of the compressed air or other gases used in contact with food and food contact surfaces.	Operation develops records to document maintenance and test results of compressed air and other gas systems that contact food or food contact surfaces. Retraining is performed and documented.
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G-12: Waste Management

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-12.1	Operation has implemented a waste management plan.			Operation implements procedures for the control, storage and disposal of trash, litter, and waste in areas used for produce handling activities. Such procedures minimize the potential for trash, litter, or waste to attract or harbor pests and protect against contamination of produce, food contact surfaces, areas used for produce handling activities, water sources, and water distribution systems. Waste treatment and disposal systems operate so that they do not constitute a potential source of contamination in produce growing and handling areas.	Auditor verifies the operation has implemented a waste management plan.	Operation implements a waste management plan.
G-12.2	Trash shall not come in contact with produce.		●	Trash handling and removal shall not pose a hazard of contamination of produce.	Auditor reviews trash handling procedures for field operation and observes trash handling practices for evidence of compliance.	Operation revises procedures. Affected product is evaluated for potential contamination and disposition. Retraining is performed and documented.

G-13: Food Defense

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-13.1	Operation shall assess the potential for unauthorized access to growing and/or packing areas and its impact on food safety.	A	●	Operation shall demonstrate an awareness of site security and, if deemed necessary for food safety, take reasonable measures to minimize the potential for unauthorized access to growing and/or packing areas.	Auditor interviews the responsible individual for awareness of site security, and security measures, if applicable.	Security assessment is performed.
G-13.2	Operation shall develop an emergency response plan.	WP, R		A response plan is in place in the event of a security event potentially impacting food safety. Action taken to reduce risk to product shall be documented by means of an incident report or other record of response.	Auditor interviews the responsible individual for knowledge of the emergency response plan and, if applicable, reviews incident response records.	Emergency response plan is developed.
G-13.2.a	Initially and at least annually thereafter, the operation shall evaluate and document the risks associated with security (food defense), including unintentional security risks.	A	●	A review or new assessment shall be conducted seasonally and any time there is a change made to the system or a situation occurs that provides the opportunity for the intentional or unintentional introduction of a hazard. The risk assessment shall address potential physical, chemical, and biological hazards.	Auditor reviews the risk assessment for completeness of consideration of potential hazards.	Operation develops or updates the risk assessment.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-13.2.b	There shall be a written food defense plan to mitigate risks identified in the food defense risk assessment.	WP, R		The food defense plan shall include the following: preventive controls, monitoring and verification procedures, corrective actions, and documentation. The plan shall be reviewed following any changes made to the food defense risk assessment and adjusted accordingly to incorporate such changes. Evidence of management commitment to the food defense plan shall be documented. Training and/or retraining of personnel having oversight or performance duties shall be documented.	Auditor reviews the food defense plan for accuracy and completeness relative to the risk assessment.	Operation develops or updates the food defense plan.

G-14: Food Fraud

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
G-14.1.a	The operation shall initially and at least annually thereafter, evaluate and document the risks associated with food fraud.	A	●	A review or new assessment shall be conducted seasonally and any time there is a change made to the system or a situation occurs that could provide an opportunity for the misrepresentation of product.	Auditor reviews the risk assessment for completeness of consideration of potential hazards.	Operation develops or updates the risk assessment.
G-14.1.b	There shall be a written food fraud plan to mitigate risks identified in the food fraud risk assessment.	WP, R		The food fraud plan shall include the following: preventive controls, monitoring and verification procedures, corrective actions, and documentation. The plan shall be reviewed following any changes made to the food fraud risk assessment and adjusted accordingly to incorporate such changes. Evidence of management commitment to the food defense plan shall be documented. Training and/or retraining of personnel having oversight or performance duties shall be documented.	Auditor reviews the food fraud plan for accuracy and completeness relative to the risk assessment.	Operation develops or updates the food fraud plan.

FIELD OPERATIONS AND HARVESTING (F)

Field Production

F-1: Field History and Assessment

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-1.1	The food safety plan shall, initially and at least annually thereafter, evaluate and document the risks associated with land use history and adjacent land use including equipment and structures.	A	●	When land use history or adjacent land use indicates a possibility of physical, chemical, or biological contamination, preventive controls shall be performed and documented to mitigate food safety risk. The assessment is re-performed, and documented, at least annually and upon significant events, for environmental conditions or risk awareness that has changed since the last assessment. The assessment shall address flooding and shall include indoor growing facilities and structures such as green houses and hydroponics.	Auditor reviews food safety plan to verify that risks associated with field history, adjacent land use and indoor growing facilities have been evaluated at least annually and preventive controls implemented for identified risks.	Operation evaluates and documents risks associated with land use history, adjacent land use, indoor growing facilities and implements preventive controls for identified risks.
F-1.1.a	Operation has performed and documented a risk assessment of each production area prior to the harvest of that location. The risk assessment must include potential cross contamination between production sites.	A	●	A system shall be established to maintain the record of agricultural activities undertaken at each production unit and records shall be available to demonstrate that sites (on farm and adjacent sites) have been evaluated with regards to potential food safety hazards. The risk assessment must include potential cross contamination between production sites.	Auditors verify the operation has performed and documented a risk assessment of each production area.	The operation shall perform and document a risk assessment for each production area. Training of appropriate personnel may need to take place on conducting and recording this assessment.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-1.1.b	Operation has identified control measures for all significant hazards identified during risk assessment.	WP	●	Workers shall be trained on what the food safety hazards are and how to manage them. There shall be responsibilities assigned to maintain records on the food safety hazards and their management.	Auditor verifies that control measures for all significant hazards identified during the risk assessment are implemented.	Operation trains workers on the maintenance of the food safety hazards identified and how to manage and record the management of these hazards.
F-1.2	For indoor growing and field storage buildings, building shall be constructed and maintained in a manner that prevents contamination of produce.		●	Building and equipment structures and surfaces (floors, walls, ceilings, doors, frames, hatches, etc.) shall be constructed in a manner that facilitates cleaning and sanitation and does not serve as harborage for contaminants or pests. Chill and cold storage loading dock areas shall be appropriately sealed, drained, and graded. Fixtures, ducts, pipes and overhead structures shall be installed and maintained so that drips and condensation do not contaminate produce, raw materials or food contact surfaces. Water from refrigeration drip pans shall be drained and disposed of away from product and product contact surfaces. Drip pans and drains shall be designed to assure condensate does not become a source of contamination. Air intakes shall not be located near potential sources of contamination.	Auditor observes building and equipment for evidence that the building can be cleaned and maintained to prevent product contamination.	Building deficiencies are corrected. Affected product is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-1.3	Sewage or septic systems are maintained so as not to be a source of contamination.		•	After a significant event (such as flooding or an earthquake) that could negatively impact a sewage or septic system, operation takes appropriate steps to ensure that sewage and septic systems continue to operate in a manner that does not contaminate produce, food contact surfaces, areas used for produce handling, water sources, or water distribution systems.	If a significant event has occurred, Auditor reviews steps taken by operation to verify sewage or septic system is not a source of contamination.	Sewage or septic systems deficiencies are corrected. Affected product is evaluated for potential contamination and disposition.

F-2: Water System Description

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-2.1	A water system description shall be available for review.	WP	•	Water sources and the production blocks they may serve shall be documented and current. The description shall include one or more of the following: type of water source (e.g., surface, ground, reuse) maps, photographs, drawings (hand drawings are acceptable) or other means to communicate the location of water source(s), permanent fixtures and the flow of the water system (including holding systems, reservoirs or any water captured for re-use). Permanent fixtures include wells, gates, reservoirs, valves, returns and other above ground features that make up a complete irrigation system shall be documented in such a manner as to enable location in the field or in hydroponic, aeroponic or aquaponics operations.	Auditor reviews water system description or map, and verifies accuracy during inspection.	Operation develops or corrects the water system description or map.
F-2.2	The water source shall be in compliance with prevailing regulations.			Water shall be sourced from a location and in a manner that is compliant with prevailing regulations for water quality as it relates to food safety.	Auditor determines whether the water source is compliant with regulations relevant for the intended use of the water.	Operation discontinues use of the source until compliant with regulations. Affected produce is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-2.3	Water systems shall not be cross-connected with human or animal waste systems.		•	Water systems intended to convey untreated human or animal waste shall be separated from conveyances utilized to deliver water. Septic tanks and sewage conveyance locations are identified by the operation in relation to water systems.	Auditor reviews water system for cross-connections with human or animal waste conveyances.	Operation discontinues use of the system until they are separated.

F-3: Water System Risk Assessment

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-3.1	An initial risk assessment shall be performed and documented that takes into consideration the historical testing results of the water source, the characteristics of the crop, the stage of the crop, and the method of application.	A	•	A review or new assessment shall be conducted seasonally and any time there is a change made to the system or a situation occurs that could introduce an opportunity to contaminate the system. The risk assessment shall address potential physical, chemical, and biological hazards and hazard control procedures for the water distribution system.	Auditor reviews the risk assessment for completeness of consideration of potential hazards.	Operation develops or updates the risk assessment.

F-4: Water Management Plan

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-4.1	There shall be a water management plan to mitigate risks associated with the water system on an ongoing basis.	WP	●	The water management plan shall include the following: preventive controls, monitoring and verification procedures, corrective actions, and documentation. The plan shall be reviewed following any changes made to the water system risk assessment and adjusted accordingly to incorporate such changes. Training and/or retraining of employees and workers having oversight or performance duties shall be documented.	Auditor reviews the water management plan for accuracy and completeness relative to the risk assessment.	Operation develops or updates the water management plan.
F-4.2	Water testing shall be part of the water management plan, as directed by the water risk assessment and current industry standards or prevailing regulations for the commodities being grown.	WP	●	As required, there shall be a written procedure for water testing during the production and harvest season, which includes frequency of sampling, who is taking the samples, where sample is taken, how the sample is collected, type of test and acceptance criteria. If all water is sourced from a municipal source, the municipal testing shall suffice. The frequency of testing and point of water sampling shall be determined based on the risk assessment and current industry standards or prevailing regulations for commodities being produced.	Auditor verifies that a water testing program is in compliance with the risk assessment and current industry standards or prevailing regulations and is included in the water management plan.	Operation develops a testing program consistent with risks identified in the risk assessment and with current industry standards or prevailing regulations for the commodities being produced.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-4.3	The testing program shall be implemented consistent with the water management plan.	R	●	Testing shall be performed and documented according to procedures described in the water management plan.	Auditor reviews testing records for compliance with the written plan.	Operation shall revise testing to be in compliance with the written plan. The corrective actions noted in the water management plan shall be followed until the conditions have been mitigated and the non-conformity has been resolved.
F-4.4	If water is treated to meet microbiological criteria, the treatment is approved and effective for its intended use, and is appropriately monitored.	R	●	Treatment is approved for its intended use (e.g., EPA-registered antimicrobial pesticide, or registration as required by the prevailing regulation of the country of use) and is delivered in a manner to ensure that the treated water is consistently safe and of adequate sanitary quality for its intended use and/or consistently meets the microbial quality criteria indicated by current industry standard or prevailing regulation. Treatment is monitored at a frequency sufficient to meet treatment objectives.	Auditor verifies that water treatment is approved for its intended use, reviews documentation that it is used effectively to meet the intended microbiological criteria, and reviews monitoring records for compliance with the operation's established procedure and acceptance criteria.	Operation discontinues use of unapproved treatments, uses approved treatments in an effective manner, and monitors the treatment at an adequate frequency.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-4.5	If microbial die-off is used to achieve the operation's microbial criteria, operation has documentation supporting its use.	R	●	If die-off or removal rates or other methods (e.g., commercial washing) are used to achieve microbial criteria of water used during growing, Operation has scientific data or information used to support its effectiveness. Documentation includes the specific time interval or log reduction applied, how the time interval or log reduction was determined, and the dates of corresponding activities such as the dates of last irrigation and harvest, the dates of harvest and end of storage, and/or the dates of activities such as commercial washing.	Auditor verifies documentation for completeness.	Operation obtains documentation on, or discontinues use of, unsupported methods, uses approved methods in an effective manner, and maintains required documentation.
F-4.6	If operation uses an alternative approach to regulatory microbiological testing compared to current industry standards or regulations, operation has scientific data or information to support the alternative as providing the same level of public health protection.	R	●	If operation uses an alternative testing method, frequency or criteria compared to industry standards or regulatory requirements, operation has documentation to support the alternative as providing the same level of public health protection.	Auditor verifies documentation for completeness.	Operation obtains documentation on, or discontinues use of, the alternative.

F-5: Animal Control

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-5.1	The operation has a written risk assessment on animal activity in and around the production area.	A	●	There shall be a written assessment of the growing fields and adjacent land, prior to each growing season, focusing on domesticated and wild animal activity including grazing and feeding operations, noting crop characteristics (e.g., does crop grow on ground vs. tree), type, concentration and occurrences of animals, proximity to the growing field, water sources, and other relevant factors.	Auditor reviews the written assessment to ensure it has been performed for this season and is complete.	Operation performs and documents the assessment.
F-5.2	The operation routinely monitors for animal activity in and around the growing area during the growing season.	R		There shall be scheduled monitoring of growing fields and adjacent land for evidence of animal activity. A frequency of monitoring and assessment shall be established based on production factors, such as the crop, geography, and other conditions.	Auditor reviews monitoring records to ensure the frequency of monitoring is consistent with the schedule.	Operation develops and implements a monitoring schedule.

F-5.3	Based on the risk assessment, there shall be measures to prevent or minimize the potential for contamination from animals, including domesticated animals used in farming operations.	WP, R	●	The operation shall have risk-appropriate actions to prevent or minimize the potential for contamination of produce with pathogens from animal feces, including from domesticated animals used in farming operations. There shall be a written record of any mitigation (e.g., installation of buffer zones, fences, ditches, berms, etc.) or corrective actions. Preventive measures and corrective actions shall comply with all local, state, and federal regulations concerning animal control and natural resource conservation.	Auditor reviews preventive measures and corrective action plans.	Operation develops and implements risk-appropriate corrective actions for animal intrusions reasonably likely to contaminate produce in the field.
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F-6: Soil Amendments and Alternative Growing Media/Substrate

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-6.1	The food safety plan shall address risk, preparation, use, and storage of animal-based soil amendments or biosolids.	A, R	●	If animal-based soil amendments or biosolids are used, records of composition, dates of treatment (if produced by your operation), application methods and application dates must be documented. Evidence of processing adequate to eliminate pathogens of human concern, such as letter of guarantee, certificate of analysis (COA) or any test results or verification data (e.g., time and temperature) demonstrating compliance with process or microbial standards, shall be documented. Such soil amendments must be produced, handled, stored, and applied in accordance with applicable federal, state, or local regulations.	Auditor reviews soil amendment records for completeness and evidence of compliance with prevailing regulations. If biosolids are used, it shall be noted.	Operation discontinues use of untreated, partially treated or undocumented animal-based soil amendments or biosolids. Operation develops and implements policies to obtain treatment information for all animal-based soil amendments.
F-6.2	If a soil amendment containing raw or incompletely treated manure is used, it shall be used in a manner so as not to serve as a source of contamination of produce as required by current industry standard or prevailing regulation.	R	●	If such a product is used, there shall be documentation of the composition, and time and method of application. Such use will be consistent with current industry practices or regulatory restrictions for that commodity. Untreated human waste shall not be used.	Auditor reviews records for any soil amendment use that may contain raw or incompletely treated manure.	Operation discontinues use or develops and implements policies to safely use animal-based soil amendments that may contain raw or incompletely treated manure. Produce grown without such controls are either diverted to thermal-processed products or destroyed.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-6.3	If an alternative growing media, soil-less media, or substrate not of animal-origin is used (e.g., perlite, peat, coconut fiber, rock wool, clay pebbles), it is appropriate for its intended use and stored and handled in a manner to minimize the risk of contamination.	WP, R		The operation shall have a procedure for storing and handling alternative growing media, soil-less media, and substrate so that it does not pose a food safety risk to produce. Operation maintains a record of type, supplier, and use (e.g., clay pebbles used for growing hydroponic herbs).	Auditor reviews procedure and records to determine the media or substrate is appropriate for its intended use and being stored and handled in a manner that does not introduce contamination.	Operation develops a procedure for storing and handling growing media or substrate being used and develops the records needed for verification.

F-7: Vehicles, Equipment, Tools and Utensils

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-7.1	Equipment, vehicles, tools utensils and other items or materials used in farming operations that may contact produce are identified.	R		Operation maintains a list of equipment, vehicles, tools, utensils and other items or materials that may pose a risk of produce contamination during normal use.	Auditor reviews the list for completeness.	Operation develops a list of equipment, vehicles, tools and utensils that may pose a risk of produce contamination during normal use.
F-7.2	Equipment, vehicles, tools and utensils used in farming operations which come into contact with product are in good repair, fit for purpose, and are not a source of contamination of produce.	WP, R		The operation shall develop, implement, and schedule repair, cleaning, sanitizing, storage and handling procedures of all food contact surfaces to reduce and control the potential for contamination. Records must include the date and method of cleaning and sanitizing equipment. As necessary for food safety, vehicles and equipment shall be properly calibrated, operated, maintained, and used as intended. Equipment and foot traffic is managed to prevent the introduction of potential food safety hazards. These procedures shall be documented. Product contact tools, utensils and equipment shall be made of materials that can be cleaned and sanitized. Procedures include equipment and vehicles that are in the field infrequently.	Auditor observes production and harvest vehicles, equipment, tools and utensils which may come into contact with produce for evidence of food safety risks. Auditor reviews maintenance, cleaning and sanitation records that demonstrate compliance with procedures.	Operation develops maintenance, cleaning and sanitation, and traffic procedures for equipment, vehicles, workers, tools, and utensils that may pose a risk for produce contamination. Affected product is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-7.2.a	All equipment and instruments which have an effect on food safety shall be identified, adequately maintained and calibrated at a frequency sufficient to assure continuous accuracy.	R	•	The operation shall have a list of equipment and instruments that have an effect on food safety (e.g. thermometers, pH meters, scales, chemical application or monitoring devices). This equipment shall be adequately maintained and calibrated at a frequency sufficient to assure continuous accuracy. A record of calibration shall be maintained.	Auditor reviews equipment and instrument list and calibration records.	Operation develops a list of equipment and instruments. Calibration will be performed and recorded.
F-7.2.b	Calibration of equipment is traceable to a recognized standard.	WP		Calibration of measuring and monitoring equipment (thermometers, pH meters, scales, chemical application or monitoring devices) is performed using a recognized standard or method.	Auditor reviews the calibration procedures to determine if they follow a recognized standard or method.	Operation develops calibration procedures which are traceable to a recognized standard or method.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-7.2.c	The cleaning and sanitation program shall include measures for monitoring to verify effectiveness.	WP, R		The operation's cleaning and sanitation procedures must demonstrate frequency, approved cleaning and sanitizing agents, and methods of cleaning and sanitizing chemical use are appropriate and effective.	Auditor reviews the cleaning and sanitation program procedures and records for inclusiveness of frequency, approval and proper use of cleaning and sanitizing agents, and methods of cleaning and sanitizing agent use. Auditor reviews chemical records regarding use of approved chemicals used for cleaning and sanitizing.	Operation develops and implements program procedures for cleaning and sanitation. Operation identifies chemicals approved-for-use in the cleaning and sanitation program and establishes and maintains records of all cleaning and sanitizer concentrations. Retraining of cleaning and sanitation program policies and procedures are performed and documented.
F-7.3	Vehicles, equipment, tools and utensils shall be controlled so as not to be a source of chemical hazards.	WP		Operation shall have a written procedure to address the spills and leaks (fuel, oil, hydraulic fluids) which might occur during equipment operation in the field.	Auditor observes production and harvest vehicles, equipment, tools and utensils which may come into contact with produce for evidence of food safety risks.	Operation repairs leaks and cleans any food contact surfaces. Affected product is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-7.4	Vehicles, equipment, tools and utensils shall be controlled so as not to be a source of physical hazards.	R		Operation has a glass and brittle plastic policy that addresses glass on production and harvesting vehicles, equipment, tools, and utensils in the growing area. Inspections performed in compliance with the policy shall be documented.	Auditor observes production and harvest vehicles, equipment, tools and utensils which may come into contact with produce for evidence of food safety risks and for compliance with the glass and brittle plastic policy.	Operation develops policy. Source of food safety risk is mitigated. Retraining is performed and documented.
F-7.5	Cleaning and sanitizing procedures do not pose a risk of product contamination.			Equipment cleaning and sanitizing operations shall be conducted in a manner that minimizes the risk of becoming a source of contamination in growing and/or product storage areas. Water used for cleaning and sanitizing shall meet the microbial standards for drinking water.	Auditor reviews cleaning and sanitizing procedures for steps to prevent contamination of produce and observes operation's evidence of compliance.	Operation develops and implements procedures. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
F-7.6	Water tanks are cleaned at a sufficient frequency so as not to be a source of contamination.	WP	●	There shall be a written procedure for cleaning water tanks and other water holding containers (e.g., cisterns, water totes, agricultural chemical tanks, dust control tanks), from which water may contact produce in the field.	Auditor reviews water tank cleaning procedures for steps to prevent contamination of produce and observes operation's evidence of compliance.	Operation develops and implements procedures. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

Harvesting

F-8: Preharvest Risk Assessment

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-8.1	A preharvest risk assessment shall be performed.	A	•	The operation shall have a preharvest risk assessment procedure, which describes when the assessment is performed and that it includes an evaluation of conditions that may be reasonably likely to result in physical, chemical, or biological contamination of the produce, and demonstrates that the operation is in compliance with the food safety plan. Results of the evaluation shall be documented.	Auditor reviews most recent preharvest assessment for completeness and consistency with the food safety plan.	Operation develops and implements a preharvest assessment procedure.

F-9: Water/Ice Used in the Harvesting and Post-Harvest Operations

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-9.1	Operation has procedures for water used in contact with product or food contact surfaces.	WP, R	●	Standard Operating Procedures (SOPs), including water-change schedules, shall be developed for all uses of water. Microbial and/or physical/ chemical (e.g., test strips) testing shall be performed, as appropriate to the specific operation, to demonstrate that acceptance criteria have been met.	Auditor observes evidence of existence of water use SOPs.	Operation develops the SOPs.
F-9.2	Water use SOPs address the microbial quality of water or ice that directly contacts the harvested crop or is used on food-contact surfaces.	R	●	If water or ice directly contacts the harvested crop or is used on food-contact surfaces, such as in the field, as the final wash step prior to consumer packaging, or as a cooling aid in a consumer package, operation's water use SOP requires that water or ice when applied meets the microbial standards for drinking water, as defined by prevailing regulation. Water may be treated (e.g., with chlorine) to achieve the microbial standards or to prevent cross-contamination. Ice and water shall be sourced/manufactured, transported, and stored under sanitary conditions. Special considerations or variances may be appropriate for some crops, e.g. cranberries and watercress, where deliberate flooding of the field is part of production and harvest practices.	Auditor reviews operation's policy regarding water quality and its transport and observes evidence that water or ice that contacts harvested crop or food contact surfaces meets the microbial standards for drinking water.	Operation discontinues using water or ice that does not meet the microbial standards of drinking water. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-9.3	If an antimicrobial process or chemical treatment is used for harvest or post-harvest water, it shall be used in accordance with manufacturer instructions and the operation's written SOP.	WP, R	●	Operation's water use SOPs require re-used water to be treated using an antimicrobial pesticide (e.g., sanitizer or disinfectant) to prevent it from becoming a source of contamination. Treatment is delivered in a manner to ensure that the treated water is consistently safe and of adequate sanitary quality for its intended use and/or consistently meets the relevant microbial quality criteria indicated by current industry standard or prevailing regulation. Treatment is monitored at a frequency to meet treatment objectives. Records shall be kept.	Auditor reviews water use SOP for completeness and observes water treatment records for adequacy and consistency of treatment.	Operation discontinues using re-used water that is not treated sufficiently to prevent contamination of the produce. Operation develops, documents, and implements procedures for use of the antimicrobial system in compliance with manufacturer's label and instructions including monitoring for meeting the established acceptance criteria. Affected product is evaluated for potential contamination and disposition. Retraining is performed and documented.
F-9.4	If water contacting product or food contact surfaces is re-used, it shall be treated using a registered or approved antimicrobial process or chemical treatment.		●	Re-used water shall be managed using an antimicrobial treatment sufficient to prevent cross-contamination, unless current industry standard or prevailing regulation provide an alternative.	Auditor reviews water treatment process and evidence of compliance with regulation and the operation's established procedure.	Operation suspends operation until water treatment functions to prevent risk of product contamination. Affected product and product handling areas are evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-9.5	Water use SOPs address condition and maintenance of water-delivery system.	R	•	The water-delivery system shall be maintained so as not to serve as a source of contamination of produce, water supplies or equipment with pathogens, or to create an unsanitary condition.	Auditor reviews the SOP for inclusion of condition and maintenance of water-delivery system, and observes maintenance records for evidence of compliance.	Operation revises SOP and implements maintenance procedures.
F-9.6	If applicable to the specific commodity, water use SOPs address control of wash water temperature.	R		For produce demonstrated as being susceptible to microbial infiltration from wash water, wash water temperature differentials during immersion shall be controlled in accordance with current industry standards or prevailing regulations.	If applicable to the commodity being immersed, auditor reviews the SOP for inclusion of water temperature control, and observes monitoring records for evidence of compliance.	Operation revises SOP to address and control wash water temperature.

F-10: Containers, Bins and Packaging Materials

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-10.1	Operation has written policy regarding storage of harvesting containers.	WP		Harvesting containers shall be stored in a manner so as not to serve as a source of contamination to the extent feasible and appropriate.	Auditor observes whether operation has a policy regarding storage of harvesting containers used in the field. Auditor observes current practices for compliance with policy.	Operation develops the policy. Retraining is performed and documented.
F-10.2	Operation has written policy regarding inspection of food contact containers prior to use.	WP		Food-contact totes, bins, packing and packaging materials, other harvest containers, and pallets shall be visually inspected, clean, intact, and free of any foreign materials prior to use. Containers shall be sufficiently maintained so as not to become a source of contamination.	Auditor observes whether operation has a policy regarding inspection of food contact containers and observes current practices for compliance with policy.	Operation develops the policy. Retraining is performed and documented.
F-10.3	Operation has written policy regarding acceptable harvesting containers.	WP		The types and construction of harvest containers and packing materials shall be appropriate to the commodity being harvested and suited for their intended purpose.	Auditor observes whether operation has a policy regarding what types of containers and packing materials are acceptable for use during harvest, and observes current practices for compliance with the policy.	Operation develops the policy. Retraining is performed and documented.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-10.4	Operation has written policy prohibiting use of harvest containers for non-harvest purposes.	WP	•	Food-contact totes, bins packing and packaging materials and harvest containers designated for harvesting shall not be used for other purposes unless clearly marked or labeled for that purpose.	Auditor observes whether operation has a policy prohibiting use of harvest containers for other uses unless otherwise labeled, and observes current practices for compliance with the policy.	Operation develops the policy. Retraining is performed and documented.

F-11: Field Packaging and Handling

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-11.1	Operation shall have a written policy that visibly contaminated, damaged or decayed produce is not harvested, or is culled.	WP	●	Employees are trained that only sound produce appropriate for the intended use is harvested, and that produce that has been visibly contaminated or otherwise damaged to an extent that it poses a microbial food safety hazard is not harvested or is culled.	Auditor reviews written policy and evidence of employee training. Auditor inspects the harvest or sorting operation for evidence of compliance.	Operation develops the policy. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
F-11.2	Product that contacts the ground shall not be harvested unless the product normally grows in contact with the ground.	WP	●	Operation has considered and developed written policies regarding produce that comes in contact with the soil (e.g., drops) and to avoid, to the degree practicable, contact of cut surfaces of harvested produce with soil. Policy shall be consistent with industry standards or prevailing regulations.	Auditor reviews written policy and evidence of employee training. Auditor inspects the harvest or sorting operation for evidence of compliance.	Operation develops the policy. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
F-11.3	Harvest procedures shall include measures to inspect for and remove physical hazards.			Operation shall have procedures to detect glass/plastic breakage and remove possible physical contamination such as glass, metal, rocks, or other hazardous items, during harvesting operations.	Auditor inspects the harvest or sorting operation for evidence of hazard control.	Operation develops the procedure. Affected product is evaluated for potential contamination and disposition.
F-11.4	Cloths, towels, or other cleaning materials that pose a risk of cross-contamination shall not be used to wipe produce, unless risk mitigation procedures are in place.			Operations shall not use cloths or other cleaning materials to clean produce, unless there is a procedure to reduce risk of cross-contamination.	Auditor reviews whether operation uses cloths or other produce cleaning materials and, if so, how operation prevents cross-contamination between uses.	Operation ceases use of produce cleaning cloths or develops procedure to prevent cross-contamination. Affected product is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-11.5	Packaging materials shall be appropriate for their intended use.		•	The product contact packaging shall be appropriate to the commodity being harvested and suited for its intended purpose.	Auditor observes evidence (e.g., information from supplier, customer specification, industry standards, prevailing regulation) that the packaging does not create an unsafe condition.	Operation discontinues use of the packaging until information can be obtained demonstrating safe use. Affected product is evaluated for potential contamination and disposition.
F-11.6	Packaging shall be stored in a manner that minimizes contamination.			Packaging storage shall keep packaging dry, clean and free from dirt or residues so it remains fit for the purpose. Care shall be taken to prevent packaging from becoming a harborage for rodents and other vermin. Packaging shall be stored separately from hazardous chemicals, toxic substances and other sources of contamination.	Auditor inspects packaging storage area for evidence of compliance.	Operation designates a storage area and practices that reduce risk of contamination. Affected packaging is evaluated for potential contamination and disposition.
F-11.7	Operation has written policy regarding whether packaging materials are permitted in direct contact with the soil.	WP		If produce is packed in field, operation has considered and developed written policies regarding placement of packaging materials directly on the soil, or whether a physical buffer (e.g., buffer bin or slip sheet) is required. Policy shall be consistent with current industry standards or prevailing regulation.	Auditor observes whether operation has a policy regarding placement of packaging materials used in the field in direct contact with soil. Auditor observes current practices for compliance with policy.	Operation develops the policy. Retraining is performed and documented.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-11.8.a	The operation has implemented a product release procedure.	WP, R		Operation follows product release written procedure to inspect harvested and/or staged product for visible contamination prior to leaving the field. Release records must be kept.	Auditor observes product release procedure is being followed and release records are kept.	Operation develops a written release procedure. Release records are kept.

F-12: Post-Harvest Handling and Storage (Field Prior to Storage or Packinghouse)

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-12.1	Harvested produce is handled in a manner such that it is not likely to become contaminated.		●	Operation has a policy, in compliance with current industry practices or regulatory requirements for that commodity, regarding handling, walking, stepping, or lying on harvested produce, food contact surfaces or packaging materials, or coming in contact with produce that has not been handled in compliance with these standards, or that may otherwise result in contamination.	Auditor reviews policy and produce handling practices for evidence of compliance.	Operation develops the policy. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
F-12.1.a	When product is field packed, collection, storage, and distribution points are maintained in a clean and hygienic condition.			Areas of collection/storage/distribution points shall be identifiable on farm during harvesting. There shall be visual evidence that these areas are kept clean. Where there is temporary storage on farm, rodent and other animal control measures shall be present.	Auditors shall verify through observation that when products are field packed, collection, storage and distribution points are maintained in a clean and hygienic condition.	Operation will implement practices that during field packing of produce that collection, storage and distribution points are maintained in a clean and hygienic condition.
F-12.2	Materials that come in contact with the produce shall be clean and in good repair.	WP R	●	Operation has written procedures for cleaning and, if practicable, sanitizing of pallets, produce bins, totes and materials that come in contact with the produce during handling or storage so as not to be a source of contamination. Procedures require that cleaning and sanitizing be documented.	Auditor reviews SOP, cleaning logs and records, interviews responsible individuals for knowledge of the SOP and observes containers, employees and records for evidence of compliance.	Operation develops the policy. Retraining is performed and documented. Affected materials are evaluated for potential contamination and disposition.

F-13: Equipment Sanitation and Maintenance

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
F-13.1	The operation shall have a policy, written procedures, and a checklist to verify cleanliness and functionality of shipping units (e.g., trailer).	WP, R	●	Shipping units shall be clean, functional and free of objectionable odors before loading, in compliance with current industry practices or regulatory requirements for that commodity. Refrigeration units, if used, must be in working order.	Auditor reviews cleaning and inspection procedures and inspects produce transport vehicles for cleanliness.	Operation develops the policy. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
F-13.2	Loading/unloading procedures and equipment shall minimize damage to and prevent contamination of produce.			Employees and workers responsible for the loading and unloading of produce shall take steps to minimize the potential of physical damage to produce, which can introduce and/or promote the growth of pathogens. Loading/unloading equipment shall be clean and well maintained and of suitable type to avoid contamination of the produce.	Auditor observes loading/unloading procedures for evidence of practices that result in excessive damage to produce. Auditor observes loading/unloading equipment for suitability and condition.	Operation revises procedures. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

POST-HARVEST OPERATIONS (P)

P-1: Produce Sourcing

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-1.1	The operation has a policy and takes affirmative steps to ensure that all fresh produce that are packed or stored in the operation are grown following requirements in <i>Field Operations and Harvesting</i> harmonized standard.	R		The operation requires all raw product suppliers to provide evidence of food safety/Good Agricultural Practices (GAP) programs and compliance. Such evidence must include sufficient documentation to demonstrate that the supplier complies with the requirements in <i>Field Operations and Harvesting</i> harmonized standard.	Auditor reviews policy and verifies that operation’s evidence of supplier compliance with food safety/Good Agricultural Practices (GAP) programs is in compliance with the operation’s policy.	Operation obtains required documentation. Operation ceases accepting or shipping product from non-approved suppliers, until sufficient documentation demonstrating compliance is received by the operation.

P-2: Facility

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-2.1	Operation has initially and at least annually thereafter, performed a documented risk assessment of the packinghouse, and has addressed all identified risks.	A	•	Records shall be available to demonstrate that the packinghouse has been evaluated with regards to potential food safety risks associated with the packinghouse and the activities taking place within. Workers shall be trained on what the food safety risks are and how to manage them.	Auditors verify the operation has performed and documented a risk assessment of the packinghouse. Auditor verifies that control measures for all significant risks identified during the analysis are implemented.	The operation shall perform and document a risk assessment for the packinghouse. Training of appropriate workers may need to take place on conducting and recording this assessment. Operation trains workers on the maintenance of the food safety risks identified and how to manage and record the management of these risks.
P-2.1.a	If microbiological hazards requiring a control are identified in the risk assessment of the packinghouse a microbial environmental monitoring program shall be established.	WP, R		The operation has established an environmental monitoring program based on the packinghouse risk assessment. The program shall address microbiological risks and include procedures for sampling, testing and frequency. Acceptable results shall be clearly defined and include procedures for when unacceptable results have occurred. Records of environmental monitoring sampling, testing and any corrective actions shall be kept.	Auditor reviews the environmental monitoring program and records and observes current practices for compliance with policy.	Operation develops an environmental monitoring program. Retraining is performed and documented. Records of environmental monitoring and corrective actions are kept.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-2.2	Building shall be located, designed, constructed, and maintained in a manner that prevents contamination of produce during handling, storage, and cooling.			Product flow is designed to minimize risk of cross-contamination. Building and equipment structures and surfaces (floors, walls, ceilings, doors, frames, hatches, etc.) shall be constructed in a manner that facilitates cleaning and sanitation and does not serve as harborage for contaminants or pests. Drop ceilings shall enable cleaning and monitoring for pest activity. Chill and cold storage loading dock areas shall be sealed, drained, and graded, as appropriate for the operation. Fixtures, ducts, pipes and overhead structures shall be installed and maintained so that drips and condensation do not contaminate produce, raw materials or food contact surfaces. Drip pans and drains shall be designed to assure condensate does not become a source of contamination. Water from refrigeration drip pans shall be drained and disposed of away from product and product contact surfaces. Floors are designed to minimize and/or facilitate the removal of standing water. Air intakes shall not be located near potential sources of contamination.	Auditor observes building and equipment for evidence that the building can be cleaned and maintained to prevent product contamination.	Building deficiencies are corrected. Affected product is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-2.3	Adequate lighting shall be provided in all areas.			Lighting in all areas shall be sufficient to enable cleaning, sanitation, repairs, etc.	Auditor observes, directly or by other evidence, that sufficient lighting is provided to the worker to clearly see the task being performed.	Operation installs adequate, lighting.
P-2.4	Only essential glass and brittle plastic shall be present in the building.	R		Light bulbs, fixtures, windows, mirrors, skylights and other glass and brittle plastic in the building or in the product path entering or exiting the building shall be of the safety type or shall be otherwise protected to prevent breakage. If glass or brittle plastic must be used, there shall be a written glass and brittle plastic control policy, including a glass and brittle plastic register.	Auditor observes glass and brittle plastic use in building, and glass and brittle plastic control policy and glass and brittle plastic register for compliance.	Operation develops a glass and brittle plastic control policy or eliminates all glass and brittle plastic in the building.
P-2.5	Catwalks above product zones are protected to prevent produce or packaging contamination.			Where workers walk over product contact surfaces, those walkways are solid surface or have catch trays installed, are protected by kick plates, product covers or other barriers.	Auditor observes catwalks over product zones for evidence of protective measures.	Operation retrofits catwalks or product zones to protect against potential contamination. Affected product is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-2.6	If applicable, operation has a written Allergen Control Program.	A, WP	•	The Allergen Control Program lists the allergens in use or storage at the operation specific to country regulations. If applicable, procedures address identification and segregation of allergens during storage and handling as based on a risk assessment conducted by the operation.	Auditor reviews Allergen Control Program and inspects facility for evidence of allergen use, storage, and employee training.	Operation develops and implements an Allergen Control Program or eliminates allergens from the facility.

P-3: Pest and Animal Control

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-3.1	Operation has procedures to manage pests to the extent appropriate to the operation.	WP, R	•	Operation has a written pest control program, performed by a trained pest control operator (or licensed where required by prevailing regulation). The written program includes policies and procedures applicable to that operation, such as storage of outside equipment or other factors dealing with pest harborages, and maps of the location of pest traps outside and inside the operation. Operation maintains a pest-control log that includes dates of inspection, inspection reports and steps taken to eliminate any problems. Applications of pesticides (e.g., insecticides, rodenticides) shall be performed in compliance with local, state, and federal pesticide regulations.	Auditor reviews pest control program, pest control operator's credentials, and inspects operation for pest activity.	Operation develops, documents and implements an effective pest control program.
P-3.2	Operation restricts animals from food handling areas.		•	Domesticated animals are prohibited from pack house, cooling, and storage facilities unless procedures are in place for their safe presence. Procedures are in place to exclude wild and feral animals to the degree practical and to monitor for and mitigate contamination from animal excreta.	Auditor looks for evidence of animals or animal activity.	Operation develops and implements an effective animal control program.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-3.3	If used, pest control devices, including rodent traps and electrical flying insect devices, are located to not contaminate produce or food handling surfaces.			Only non-toxic traps and pest control devices are used inside the packing house or storage building.	Auditor reviews pest control program and placement of pest control devices.	Operation removes or repositions pest control devices to be compliant.

P-4: Equipment, Tools and Utensils

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-4.1	All food contact equipment, tools and utensils are designed and made of materials that are easily cleaned and maintained.	WP	●	The operation shall develop, implement, and schedule repair, cleaning, sanitizing, storage and handling procedures of all food contact surfaces to reduce and control the potential for contamination. These procedures shall be documented. Product contact tools, utensils and equipment shall be made of materials that can be cleaned and sanitized. Seams between food contact surfaces are smooth, cleanable, and well maintained to prevent bacterial harborage.	Auditor observes food contact surfaces for design and materials that can be easily cleaned and maintained. Auditor reviews cleaning, sanitizing, storage and handling procedures.	Operation develops and implements procedures. Operation replaces all non-compliant food contact equipment, tools and utensils.
P-4.2	Equipment is installed in a way that provides access for cleaning.			Cooling, packing and other food contact equipment is installed away from walls and otherwise positioned so as not to inhibit access for proper cleaning.	Auditor observes positioning of all food contact equipment for compliance.	Operation relocates the equipment to be compliant.
P-4.3	Equipment lubrication is managed so as not to contaminate food products.			Only food-grade lubricants are used on food processing and packaging equipment, or on any other equipment where incidental food contact may occur, unless the equipment manufacturer specifies only a non-food grade lubricant. Lubricant leaks are fixed or catch pans are installed to prevent product contamination.	Auditor reviews purchase or maintenance records to verify all lubricants used are food grade. Auditor observes lubrication points to verify leaks are controlled.	Operation replaces non-food grade lubricants. Operation fixes lubricant leaks or installs catch pans. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-4.4	All instruments or tools (e.g., test strips, titration kits) used to measure temperature, pH, antimicrobial levels and/or other important devices used to monitor requirements in this section shall be adequately maintained and calibrated at a frequency sufficient to assure continuous accuracy.	R	•	If an in-line system is used, an independent measurement shall be used to verify compliance. Test methods, electronic devices, or test strips (within valid expiration date) used to monitor parameters shall be appropriate to their use, sufficiently sensitive to their intended purpose, and available in adequate numbers for their designated use. Calibration of measuring and monitoring equipment (thermometers, pH meters, scales, chemical application equipment, or other monitoring devices) is performed using an established method or according to manufacturer's instructions. Records shall be kept.	Auditor reviews calibration and verification procedures to verify that an established method or manufacturer's instructions are followed and reviews records.	Operation develops, documents and implements calibration and verification procedures and records.
P-4.4.a	Calibration of equipment is traceable to a recognized standard.	WP		Calibration of measuring and monitoring equipment (thermometers, pH meters, scales, chemical application or monitoring devices) is performed using a recognized standard or method.	Auditor reviews the calibration procedures to determine if they follow a recognized standard or method.	Operation develops calibration procedures which are traceable to a recognized standard or method.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-4.5	Foreign material control devices are inspected and maintained.	R		If included in the food safety plan, foreign material control devices shall be included as part of a preventive maintenance schedule or other program and maintained to ensure effective operation. Calibration checks shall be performed according to written procedure or manufacturer's recommendations and conform to current industry standard or prevailing regulation.	Auditor inspects any foreign material control devices and maintenance and calibration check records for compliance.	Operation develops written procedures for inspection, calibration checks and maintenance of foreign material control devices. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
P-4.5.a	Metal detection equipment, if utilized, shall be checked at a scheduled frequency as outlined in the operation's food safety/HACCP plan using iron, non-iron and stainless-steel testing wands.	R		These systems should be frequently checked to ensure that they are working correctly (recorded). Foreign material issues should be documented and corrective actions implemented as written in the food safety program.	Auditors shall review equipment records to ensure frequency is according to established food safety plan.	Procedure is developed and implemented at an established frequency. Training is performed and documented.

P-5: Maintenance and Sanitation

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-5.1	A preventive maintenance schedule with related SOPs shall be established.	WP, R	●	There is a written preventative maintenance schedule for all food and non-food contact surfaces including equipment, floors, drains, walls, ceilings and other surfaces that may pose a source of product contamination. Roof leaks shall be promptly identified, controlled and repaired. Operation has procedures for maintenance of cooling equipment. Drip pans and drains shall be maintained to assure condensate does not become a source of contamination. Floors are maintained to minimize and/or facilitate the removal of standing water.	Auditor reviews preventive maintenance schedule and observes building and equipment for evidence that the building is maintained to prevent product contamination. Auditor reviews building maintenance records for evidence of repairs.	Operation develops a Preventive Maintenance Schedule, with related SOPs. Building deficiencies are corrected. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
P-5.1.a	Routine housekeeping practices must be implemented.			Routine housekeeping practices must be implemented. These could include sweeping, mopping, emptying trash and cull piles, cleaning up spills, and keeping storage areas neat and tidy.	Auditor verifies operation for evidence of routine housekeeping.	Operation implements routine housekeeping.

P-5.2	A master cleaning schedule with related SOPs shall be established.	WP, R	●	There is a written cleaning schedule for all food and non-food contact surfaces including equipment, floors, drains, walls, ceilings, and other surfaces which may pose a source of product contamination. Established SOPs shall include instructions, person(s) responsible, specific frequency, and cleaning products and concentration. Sanitation tools must be appropriate for their designated purpose.	Auditor reviews cleaning records and associated SOPs and observes that food and non-food contact surfaces are cleaned in a manner and frequency sufficient to preventing product contamination.	Operation develops a master cleaning schedule with related SOPs. Cleaning deficiencies are corrected. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
P-5.3	Any temporary repairs on food contact surfaces are constructed of food-grade material. Operation has a procedure to ensure that permanent repairs are implemented in a timely manner.			Operation has procedures to ensure temporary repairs are compliant with all food safety requirements, and do not create potential sources of chemical, microbiological or physical contamination. Permanent repairs are implemented as soon as practical; Operation establishes timelines and responsibilities for completion. Cleaning and sanitation protocols are reviewed and updated respective to temporary repairs. Equipment is cleaned and sanitized after repair prior to being used.	Auditor observes temporary repairs, if present, and operation's plans for timely completion of permanent repairs and cleaning and sanitation protocols.	Operation develops and implements a temporary repair procedure and a plan for permanent repairs. Operation immediately fixes any non-compliant temporary repairs. Affected product is evaluated for potential contamination and disposition.

P-5.4	Cleaning equipment and tools are clean, in working order and stored properly away from product handling areas.			Equipment, utensils and tools used for cleaning or sanitizing, including food contact and non-food contact surfaces, are maintained in a manner sufficient to avoid becoming a source of produce contamination and are stored away from product handling areas.	Auditor reviews practices or procedures for use and storage of cleaning and sanitizing equipment, tools and utensils, and observes storage area for compliance.	Operation develops written procedures for maintaining and storing cleaning and sanitizing equipment, tools and utensils. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
P-5.5	Food contact surfaces shall be cleaned, sanitized, and maintained according to the food safety plan.	R	•	Prior to use, the lines used for washing, grading, sorting, or packing shall be cleaned and sanitized as appropriate per risk assessment or prevailing regulations. Records must include the date and method of cleaning and sanitizing equipment. When in use, the lines shall be maintained so as not to be a source of contamination with pathogens.	Auditor reviews cleaning and sanitizing procedures and records and observes food contact surfaces to verify compliance.	Operation develops written cleaning and sanitizing procedures and records consistent with the food safety plan. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

P-5.5.a	The cleaning and sanitation program shall include measures for monitoring to verify effectiveness.	WP, R		The operation's cleaning and sanitation procedures must demonstrate frequency, approved cleaning and sanitizing agents, and methods of cleaning and sanitizing chemical use are appropriate and effective.	Auditor reviews the cleaning and sanitation program procedures and records for inclusiveness of frequency approval and proper use of cleaning and sanitizing agents, and methods of cleaning and sanitizing agent use. Auditor reviews chemical records regarding use of approved chemicals used for cleaning and sanitizing.	Operation develops and implements program procedures for cleaning and sanitation. Operation identifies chemicals approved-for-use in the cleaning and sanitation program and establishes and maintains records of all cleaning and sanitizer concentrations. Retraining of cleaning and sanitation program policies and procedures are performed and documented.
P-5.6	Transporting equipment shall be maintained to prevent contamination of products being transported.	R		Pallet jacks, carts, trolleys, and forklifts shall be maintained to prevent contamination of products being transported and are listed on the Preventive Maintenance and/or Master Cleaning Schedules.	Auditor observes transporting equipment and reviews Schedules and records for evidence of compliance.	Operation develops and implements Preventive Maintenance and/or Master Cleaning Schedules.
P-5.7	Waste materials and their removal are managed to avoid contamination.		•	Trash, leaves, trim, culls, wastewater and other waste materials are removed from the produce handling areas at a frequency sufficient to avoid becoming a source of produce contamination.	Auditor observes waste control procedures in produce handling areas.	Operation develops a waste control procedure. Operational deficiencies are corrected. Retraining is performed and documented.

P-5.8	Outside garbage receptacles/ dumpsters are closed and located away from building entrances and the area around such sites is reasonably clean.			Waste containers and compactors are located away from produce handling areas, are closed or have lids (except for waste collection/cull trailers in active use), are emptied on a scheduled basis or as needed, and weeds and other pest harborage are minimized around the containers.	Auditor observes waste container location and management practices.	Operation relocates waste containers. Building deficiencies are corrected. Retraining is performed and documented.
P-5.9	The plant grounds are reasonably free of litter, waste culls, vegetation, debris and standing water.			Operation has procedures to maintain the grounds surrounding the building in a manner to minimize sources of contamination, such as litter, vegetation, waste culls, debris and standing water that may be pest attractants or harborages. Equipment and materials stored outside are stored away from the building perimeter. Outside storage areas are included in pest control program. Vegetation that does not serve as an attractant or harborage is permitted.	Auditor observes the grounds for compliance.	Operation removes the attractants and harborages and develops procedure to maintain grounds in compliance.
P-5.10	Sewage or septic systems are maintained so as not to be a source of contamination.		•	After a significant event (such as flooding or an earthquake) that could negatively impact a sewage or septic system, Operation takes appropriate steps to ensure that sewage and septic systems continue to operate in a manner that does not contaminate produce, food contact surfaces, areas used for produce handling, agricultural water sources, or agricultural water distribution systems.	If a significant event has occurred, auditor reviews steps taken by operation to verify sewage or septic system is not a source of contamination.	Sewage or septic systems deficiencies are corrected. Affected product is evaluated for potential contamination and disposition.

P-5.11	The sewage disposal system is adequate for the process and maintained to prevent direct or indirect product contamination.		●	The human waste and gray water sewage system has sufficient capacity to handle the operation's peak flows and not cause direct or indirect product contamination. Cross-connections with product contact water systems are prohibited. Floor drains are adequate, functional, free of obstruction, and are properly maintained and cleaned to prevent them from becoming sources of contamination.	Auditor observes operation for evidence of compliance.	Operation suspends operation until sewage disposal system functions so as to prevent risk of product contamination. Affected product and product handling areas are evaluated for potential contamination and disposition.
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P-6: Post-Harvest Water/Ice

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-6.1	A postharvest water system description shall be prepared.	R	•	Postharvest water sources and the operations they serve shall be documented and current. The description shall include one or more of the following: maps, photographs, drawings (hand drawings are acceptable) or other means to communicate the location of water source(s), permanent fixtures and the flow of the water system (including holding systems, reservoirs or any water captured for re-use). Permanent fixtures include wells, gates, reservoirs, valves, returns, backflow prevention and other above ground features that make up a complete water distribution system shall be documented in such a manner as to enable location in the operation.	Auditor reviews the postharvest water system description or map and verifies accuracy during operation inspection.	Operation develops or corrects the postharvest water system description or map.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-6.2	Documented scheduled assessment of water system including delivery equipment shall be performed.	R	●	The water-delivery system shall be maintained so as not to serve as a source of contamination of produce, water supplies or equipment with pathogens, or to create an unsanitary condition. Water installations and equipment are constructed and maintained to prevent back siphonage backflow and cross connections between product contact water and wastewater. Routine checks verify that back siphonage and backflow prevention units are functioning properly (annual or as needed to maintain continuous protection). Results are documented.	Auditor reviews maintenance records and examines water system for compliance with water system maintenance program, including backflow prevention and cross-connections.	Operation corrects deficiencies in ability of water system to reliably distribute safe water and schedules water system assessments. Affected product is evaluated for potential contamination and disposition.
P-6.3	Water use SOPs address the microbial quality of water or ice that directly contacts the harvested crop or is used on food-contact surfaces.	R	●	If water or ice directly contacts the harvested crop or is used on food-contact surfaces, operation's water use SOP requires that water or ice when applied meets the microbial standards for drinking water, as defined by prevailing regulation or the country in which the product is intended to be traded, whichever is more stringent. Water may be treated (e.g., with chlorine) to achieve the microbial standards or to prevent cross-contamination. Ice and water shall be sourced/manufactured, transported, and stored under sanitary conditions.	Auditor reviews operation's policy regarding water quality and its transport and observes evidence that water or ice that contacts harvested crop or food contact surfaces meets the microbial standards for drinking water.	Operation discontinues using water or ice that does not meet the microbial standards of drinking water. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-6.4	The operation's food safety plan includes the produce washing process, if used.	A, WP	•	If produce is washed, a risk assessment of the washing process includes the commodity, type of wash system, type of sanitizer, and water quality.	Auditor reviews food safety plan and operational procedures to determine if washing process has been considered.	Operation revises food safety plan to include produce washing process.
P-6.5	Re-used water that contacts product or food contact surfaces shall be treated using a registered or approved antimicrobial process or chemical treatment.		•	Re-used water shall be treated using an antimicrobial treatment sufficient to prevent cross-contamination, according to current industry standard or prevailing regulation.	Auditor reviews water treatment process and evidence of compliance with regulation and the operation's established procedure.	Operation suspends operation until water treatment functions to prevent risk of product contamination. Affected product and product handling areas are evaluated for potential contamination and disposition.

P-6.6	If a postharvest water antimicrobial treatment is used, it shall be used in accordance with established operational procedure and manufacturer instructions.	R	●	Treatment is delivered in a manner to ensure that the treated water is consistently safe and of adequate sanitary quality for its intended use and/or consistently meets the relevant microbial quality criteria indicated by current industry standard or prevailing regulation. Treatment is monitored at a frequency to meet treatment objectives. Records shall be kept.	Auditor reviews water use SOP for completeness and observes water treatment records for adequacy and consistency of treatment. Water treatment outcomes align with current industry standard or prevailing regulation.	Operation develops, documents, and implements procedures for use of the antimicrobial in compliance with manufacturer's label and instructions including monitoring for meeting the established acceptance criteria established by current industry standard or prevailing regulation. Affected product is evaluated for potential contamination and disposition. Retraining is performed and documented.
P-6.7	If applicable to the specific commodity, water use SOPs address control of immersion water temperature.	R		For produce that is immersed in water and demonstrated as being susceptible to microbial infiltration from water, water temperature differentials during immersion shall be controlled in accordance with current industry standards or prevailing regulation.	If applicable to the commodity being immersed, auditor reviews the SOP for inclusion of water temperature control, and observes monitoring records for evidence of compliance.	Operation revises SOP to address and control water temperature.

P-6.8	Water change schedules shall be developed for all uses of water where water is re-used.			Operation shall have procedures for changing water that is re-used, such as recirculated water, flumes, and dump tanks.	Auditor observes water use procedures and evidence of compliance.	Operation develops water use procedures. Affected product is evaluated for potential contamination and disposition.
P-6.9	Debris, damaged and/or visibly contaminated produce shall be removed from wash areas/dump tanks to the extent possible.			Operation has procedures to determine how and when debris, damaged and/or visibly contaminated produce shall be removed from wash areas/dump tanks.	Auditor reviews procedures and observes wash areas for evidence of compliance.	Operation develops, documents and implements a wash area control program. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

P-7: Containers, Bins and Packaging

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-7.1	Specifications for all packaging materials and labels that impact finished product safety shall be provided and comply with prevailing regulations.	R		The methods and responsibility for developing and approving detailed specifications and labels for all packaging shall be documented. A register of packaging specifications and label approvals shall be maintained and kept current.	Auditor reviews documentation on methods and responsibilities for packaging materials and label approvals.	Operation revises labels and packaging materials to be compliant with prevailing regulations.
P-7.2	Operation has a written procedure for inspecting incoming packaging materials.	WP, R		All packaging materials are inspected for evidence of contamination upon arrival. Results are recorded.	Auditor reviews procedure and examples of packaging for compliance.	Operation creates or revises policy. Contaminated or adulterated packaging material is rejected or discarded. Retraining is performed.
P-7.3	Operation has written policy regarding storage and post-storage handling of product-contact containers.	WP		Product-contact containers, as appropriate to the specific operation (e.g., harvest bins, totes, crates, sacks, buckets, finished product clam shells, bags or packaging films), shall be stored, or handled (e.g., cleaned prior to post-storage use), in a manner so as not to serve as a source of contamination.	Auditor observes whether operation has a policy regarding storage and handling of product-contact containers used in the operation. Auditor observes current practices for compliance with policy.	Operation develops the policy. Retraining is performed and documented.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-7.4	Materials that come in contact with the produce shall be clean and in good repair.	WP, R		Operation has written procedures for cleaning and, if practicable, sanitizing of pallets, produce bins, totes and materials that come in contact with the produce during handling or storage so as not to be a source of contamination. Procedures require that cleaning and sanitizing be documented.	Auditor reviews SOP, cleaning logs and records, interviews responsible individuals for knowledge of the SOP and observes containers, employees and records for evidence of compliance.	Operation develops the policy. Retraining is performed and documented. Affected materials are evaluated for potential contamination and disposition.
P-7.5	Operation has written policy regarding whether product-contact containers are permitted in direct contact with the ground or floor.	WP		Operation has considered and developed written policies regarding placement of product-contact containers directly on the ground or floor, or whether a physical buffer (e.g., buffer bin or slip sheet) is required, or use of containers constructed to prevent contact of the produce or produce contact surfaces with the ground. Policy shall be consistent with industry standards.	Auditor observes whether operation has a policy regarding placement of product-contact containers in direct contact with the ground. Auditor observes current practices for compliance with policy.	Operation develops the policy. Retraining is performed and documented.
P-7.6	Operation has written policy regarding inspection of food contact containers and bins prior to use.	WP		Food-contact totes, bins, packing and packaging materials, other harvest containers, and pallets shall be visually inspected, clean, intact and free of any foreign materials prior to use. Containers shall be sufficiently maintained so as not to become a source of contamination.	Auditor observes whether operation has a policy regarding inspection of food contact containers and observes current practices for compliance with policy.	Operation develops the policy. Retraining is performed and documented.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-7.7	Operation has written policy regarding acceptable product-contact containers.	WP	•	The types and construction of product-contact containers and packing materials shall be appropriate to the commodity being handled and suited for their intended purpose. Produce shall only be stored in clean and sanitary containers.	Auditor observes whether operation has a policy regarding what types of containers and packing materials are acceptable for use and observes current practices for compliance with the policy.	Operation develops the policy. Appropriate product-contact containers are obtained. Affected product is evaluated for potential contamination and disposition.
P-7.8	Operation has written policy prohibiting use of product-contact containers for non-product purposes unless clearly marked or labeled for that purpose.	WP		Food-contact totes, bins and other product-contact containers shall not be used for other purposes unless the operation has a policy or procedure that clearly designates approved non-product contact uses and how the containers are to be marked or labeled for that purpose. Food-contact totes, bins and other packing containers and equipment that are no longer cleanable shall not be used for packing but can be used for other non-food uses if clearly marked/labeled.	Auditor observes whether operation has a policy prohibiting use of product-contact containers for other uses unless otherwise labeled and observes current practices for compliance with the policy.	Operation develops the policy. Retraining is performed and documented.
P-7.9	Pallets shall be kept clean and in good condition as appropriate for their intended use.			Operation inspects pallets prior to use for conditions that may be a source of produce contamination. Pallets that are not cleanable are removed from use. Pallets and other wooden surfaces are properly dried after being washed.	Auditor observes pallets for compliance.	Operation removes noncompliant pallets from use.

P-8: Storage

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-8.1	Product storage areas and conditions shall be appropriate to the commodities stored.			Produce storage locations and conditions shall minimize risk of produce contamination, consistent with current industry standards or prevailing regulation.	Auditor observes storage area for evidence that stored produce is protected from contamination.	Operation designates and maintains storage areas to prevent contamination of produce.
P-8.2	Iced produce is handled so as not to serve as a source of contamination.			Protective measures are provided in areas where iced product is stored over food items to prevent melting ice from contaminating product below.	Auditor inspects any iced product on premises for compliance.	Operation develops written procedures to handling and storage of iced product. Operational deficiencies are corrected. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
P-8.3	Non-product storage areas shall be maintained so as not to be a source of product or materials contamination.			Areas designated to store materials and equipment, whether indoors or out, shall be clean, well ventilated, and designed to protect materials and produce from contaminants.	Auditor observes storage area for evidence that stored materials are protected from contamination.	Operation designates and maintains storage areas to prevent contamination of non-product materials.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-8.4	Food packaging and packing materials shall be stored in a manner that minimizes contamination.			Food packaging and packing materials stored in uncovered areas shall be protected from condensate, sewage, dust, dirt, chemicals, allergens, or other contamination. Materials shall be stored off the floor/ground on pallets, slip-sheets or stands and covered where applicable.	Auditor observes stored materials for protection from contamination.	Operation develops and implements written procedures for materials storage. Operational deficiencies are corrected. Affected product is evaluated for potential contamination and disposition.
P-8.4.a	The operation has a procedure to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.	WP		The operation clearly outlines a procedure in which work in progress, finished products, purchased materials, such as packing materials, cleaning chemicals and any other materials that may have an impact on food safety, shall be used in accordance with the allocated shelf life, i.e., materials used on a first in first out basis or in the correct order as established by the policy or procedure.	Auditor observes the procedure for stock management is implemented effectively.	Operation develops and implements effective procedures for stock management.
P-8.5	Adequate space shall be maintained between rows of stored materials to allow cleaning and inspection.	WP		Materials shall be stored away from walls and ceilings. Written procedures shall be followed to guarantee the proper cleaning, inspection, and monitoring for pest activity in storage areas.	Auditor reviews the procedures and observes the storage area to determine whether storage practices allow cleaning, inspection, and monitoring for pest activities.	Operation develops and implements a written procedure and moves material into compliance.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-8.6	All chemicals shall be stored in a secure separate area. All chemicals shall be properly labeled.			Chemicals, including cleaning and maintenance compounds and lubricants, when not being used, are stored away from product handling areas and in a manner that inhibits unauthorized access. Food-grade and non-food-grade lubricants are kept separate from each other.	Auditor observes that chemicals are properly labeled, and storage practices protect against product contamination.	Operation designates a secure area for storage of chemicals. Unlabeled chemicals are labeled or properly discarded. Retraining is performed and documented.
P-8.7	When produce is cooled, it is cooled to temperatures appropriate to the commodity according to current established regulatory or industry standards.	R		When required by the food safety plan or by industry guidelines for food safety, steps are taken to minimize temperature increases and minimize the time between produce receipt and cooling at the operation. The product temperature and equipment control mechanisms are monitored at a defined frequency and temperatures are kept appropriate to the commodity. Records are maintained.	Auditor reviews cooling procedures for commodities requiring temperature control, and reviews temperature logs for evidence of compliance.	Operation develops and implements procedures to monitor cooling procedures in compliance with current established regulatory or industry standards.
P-8.8	Where temperature control is required by the food safety plan, cooling facilities shall be fitted with temperature monitoring equipment or suitable temperature monitoring device.	R		Temperature monitoring equipment shall be located in all temperature-controlled areas and shall be located so as to accurately monitor the temperature. Temperature measuring devices shall be monitored and calibrated on a scheduled basis or as needed.	Auditor observes evidence that temperatures are being monitored, and reviews calibration records and procedures for temperature monitoring equipment.	Operation establishes and implements temperature monitoring procedures.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-8.9	Cooling equipment shall be maintained so as not to be a source of product contamination.	WP, R	•	Cooling equipment (e.g., hydrocoolers, air coolers), shall be inspected, all debris removed, and cleaned and sanitized according to written sanitation SOPs.	Auditor reviews cooling equipment maintenance and sanitation procedures and inspects equipment for compliance with procedures.	Operation develops and implements effective maintenance and sanitation procedures.

P-9: Transportation (Packinghouse to Customer)

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-9.1	There is a written policy for transporters and conveyances to maintain a specified temperature(s) during transit.	WP		When refrigerated transport is required by the food safety plan, transporters have written, predetermined temperature ranges for commodities being transported.	Auditor reviews documentation of predetermined temperature ranges.	Operation develops, documents and implements temperature range requirements.
P-9.2	Prior to loading, the vehicle shall be pre-cooled.	WP, R		When refrigerated transport is required by the food safety plan, the proper temperature for pre-cooling is appropriate to the type of produce and as specified by documented protocol.	Auditor reviews documented protocol, shipping checklist records, and observes vehicles during loading for compliance.	Operation develops, documents and implements vehicle cooling requirements.
P-9.3	The refrigerated transport vehicles shall have properly maintained and fully functional refrigeration equipment.	WP		When refrigerated transport is required by the food safety plan, operation has a written policy that refrigerated transportation equipment shall be controlled by a thermostatic device as necessary to maintain temperatures in the cargo area for the type of produce being transported and as specified by documented protocol.	Auditor reviews written policy and observes refrigerated transport vehicles in use at the time of the audit.	Operation develops, documents and implements a policy. Retraining is performed and documented.
P-9.4	Where required, temperatures of product are taken and recorded prior to or upon loading.	WP, R		When refrigerated transport is required by the food safety plan, operation has a written procedure for when and how to measure product temperatures prior to or during loading.	Auditor reviews written procedure and observes temperature monitoring procedures and temperature records during loading.	Operation develops, documents and implements a policy. Retraining is performed and documented.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
P-9.5	The operation shall have a policy, written procedures, and a checklist to verify cleanliness and functionality of shipping units (e.g., trailer).	WP, R	•	Shipping units shall be clean, functional and free of objectionable odors before loading, in compliance with current industry practices or regulatory requirements for that commodity. Refrigeration units, if used, must be in working order. Procedures prohibit raw animal or animal product transport, or other materials that reasonably may be a source of contamination with biological, chemical (including allergens) or physical hazards, unless appropriate risk mitigation strategies are in place. Shipping units shall be washed between loads if prior transport included materials that reasonably may be a source of contamination. A responsible individual shall sign or initial the completed checklist or inspection report.	Auditor reviews cleaning procedures and inspection records and inspects produce transport vehicles for cleanliness.	Operation develops the policy and written procedures. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
P-9.6	Loading/unloading procedures and equipment shall minimize damage to and prevent contamination of produce.			Employees and workers responsible for the loading and unloading of produce shall take steps to minimize the potential of physical damage to produce, which can introduce and/or promote the growth of pathogens. Loading/unloading equipment shall be clean and well maintained and of suitable type to avoid contamination of the produce.	Auditor observes loading/unloading procedures for evidence of practices that result in excessive damage to produce. Auditor observes loading/unloading equipment for suitability and condition.	Operation revises procedures. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.

LOGO USE (L)

L-1: Food Safety Plan or Quality Manual

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
L-1.1	The operation's food safety plan or quality manual contains procedures on how the USDA GAP & GHP logo will be used.	WP	•	The operation shall have a written policy describing proper use of the logo including having attained approved GAP & GHP program status by meeting the acceptance criteria for the audit being performed covering all scopes of the audit which are applicable to their operation. All commodities grown, handled or processed by the operation must be covered by the audit.	Auditor shall review the food safety plan for detailed and complete procedures on logo use.	The operation shall develop procedures on USDA GAP & GHP logo use.
L-1.2	There is a designated person to be responsible for the control of inventory bearing the logo.	WP	•	The operation shall designate, in their food safety plan or quality manual, an individual or individuals that are responsible for the control of inventory (any containers or labels) bearing the logo or language.	Auditor verifies there is a designated person responsible for control of inventory bearing the logo.	Operation designates an individual, in their food safety plan or quality manual, to be responsible for the inventory bearing the USDA logo.

L-2: Traceability and Recall Programs

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
L-2.1	The operation uses the USDA GAP & GHP logo only on packages, containers, or consumer units which are traceable.	WP	•	The operation shall have a policy that prohibits the use of the logo on any packages, containers or consumer units that are not part of the established traceability program.	Auditor reviews policy and observes packages labeled at the facility with the USDA GAP & GHP logo are traceable.	Operation develops a policy.

L-3: Approved Suppliers

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
L-3.1	The operation has supplied a list of approved suppliers to the local Federal or State auditor's office.	R	●	Operation supplies the local Federal or State office who conducts the audit, with a current list of approved suppliers. The operation will notify the office of any additions to the suppliers list as well as if a supplier is no longer in compliance and must be removed from the list.	Auditor reviews record showing all names of suppliers and verifies dates of when their names were given to the local auditor's office.	Operation supplies list to the local office.
L-3.2	All suppliers currently in use by the operation are listed on the supplied list of approved suppliers.	WP, R	●	Operation procures ingredients and materials only from approved suppliers.	Auditor reviews receipt records and compares suppliers of ingredients and materials against list of approved suppliers.	Operation updates and/or creates list of approved suppliers, and procures only from these suppliers.
L-3.3	All suppliers have successfully completed and met the requirements of a USDA approved GAP & GHP audit (USDA GAP&GHP audit, commodity specific audit, Produce GAPs Harmonized Audit, or Harmonized GAP Plus+ Audit).	R	●	The operation requires the packinghouses, distribution centers and other post-farm gate operations who wish to utilize the logo, to have an approved supplier program, which at a minimum verifies that all suppliers of fresh produce have successfully completed and met the requirements of a USDA approved GAP & GHP audit. All audits must be conducted by a licensed USDA auditor under federal oversight.	Auditor reviews evidence of suppliers having met the requirements of a USDA GAP & GHP audit.	Operation ceases to use non-compliant suppliers. Non-compliant suppliers must discontinue use of the logo immediately.

L-4: GAP & GHP Logo Approved Use

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
L-4.1	The logo is only used on products, processes, and packaging as approved on the SC-652.	R	●	The operation shall have a copy of the approved SC-652 which lists the products, processes, and packaging types the logo is approved to be used on. The logo is being used as approved.	Auditor verifies that the operation is only using the logo as approved on the SC-652.	Operation discontinues use of packaging on unapproved products, processes, and/or packaging.
L-4.2	All packaging or labels, which bear the GAP & GHP logo, are accountable items.	WP, R	●	The operation shall have a policy stating all packaging or labels are accounted for.	Auditor reviews policy.	Operation develops policy that ensures accountability of all packaging or labels bearing the logo.
L-4.3	The operation's inventory list of these packaging or labels is maintained and current.	R	●	The operation shall have an inventory list of any packaging or labels bearing the logo or language.	Auditor reviews records for accuracy and to ensure inventory list is up to date.	Operation develops and maintains an inventory list of all packaging and labels.
L-4-4	The logo is only used on packaging and labels that are clean and bright in appearance, without marks, stains, or other evidence of previous use.	R	●	The operation is only using packaging and labels that are clean and bright in appearance without marks, stains, or other evidence of previous use.	Auditor verifies that packaging and labels are clean and bright in appearance.	Operation updates their practices to use the logo on packaging and labels that are clean and bright in appearance.

TOMATO AUDIT PROTOCOL OPEN-FIELD PRODUCTION AND HARVESTING

TOF-1: Management Responsibility

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-1.1	Operation has current copies of the Commodity Specific Food Safety Guidelines for the Fresh Tomato Supply Chain, Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain, the relevant Harmonized Food Safety Standard, and additional food safety documents as required by state and/or federal regulation.	R	•	Operation has a current copy of the Guidelines, this audit document and all other required documents.	Auditor observes the current copies at the operation.	Operation obtains current copies.

TOF-2: Self Audits

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-2.1	Operation has procedures for conducting self-audits and conducts self-audits to verify compliance with established internal policies and procedures.	WP, R	•	In addition to the requirements of the Harmonized Standards, the operation’s self-audit procedure ensures compliance with established internal policies and procedures, <i>Commodity Specific Food Safety Guidelines for the Fresh Tomato Supply Chain</i> , these Tomato Metrics, and additional food safety documents as required by state and/or federal regulation.	Auditor reviews the self-audit procedures, and records of self-audits to verify compliance with the procedures.	Operation develops and maintains self-audit program, with corrective actions preventive measures, documentation and follow-up.

TOF-3: Field History and Pre-harvest Assessments

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-3.1	If the field is subject to flooding, operation has an established decision tree or corrective action plan in the event of flooding in the production area. Procedures prohibit harvest of product that has come into contact with flood waters.	WP	●	Flooding is defined as the uncontrolled introduction of large amounts of water of unknown quality into the production area that is reasonably likely to come into contact with the edible portion of the crop, or otherwise cause adulteration of the crop. If the field is subject to flooding, procedure is established that includes a decision tree or corrective action to take in the event of flooding in a production area. Procedure specifies performance of a written risk assessment, which will consider whether there is an increased potential of contamination from the flood event. If warranted by the risk assessment, a no-harvest zone is positioned so that operations in the non-flooded zone are not compromised by the flooded zone; for example, 10 feet.	If the field is subject to flooding, auditor verifies that the operation has a policy/procedure regarding flooded fields. Auditor looks for evidence of flooding in the field. If the field has flooded since the last audit, the auditor observes the operation's risk assessment for current acceptability of the field and/or crop.	Operation develops a written procedure for flooded fields. Operation must obtain/develop a written risk assessment for the relevant field.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-3.2	Operation shall conduct the required Combined Harmonized Standard F-9.1 pre-harvest risk assessment no more than five (5) days from the first scheduled harvest date.	A	•	The environmental assessment is reperformed, and documented, for environmental conditions that reasonably may have changed since the last assessment, including flooding, adequacy of water sources for their intended use, adjacent land uses, animal migrations, debris, worker health and hygiene, or other potential sources of fruit adulteration.	Auditor reviews the reassessment document, including corrective action documents for mitigations or deficiencies identified in the pre-production risk assessment, and confirms the assessment occurred within five (5) days of the first scheduled harvest date.	Operation develops or modifies the document, or reviews, as needed. Perform training as needed.

TOF-4: Workers Health/Hygiene and Toilet/Handwashing Facilities

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-4.1	A response plan is in place in the event of a major spill or leak of field sanitation units.	WP, R	●	A written corrective response plan is developed and implemented in the event of a major leak or spill.	Auditor verifies existence of the plan and interviews the responsible person for knowledge.	Operation prepares or edits the plan. Retrain or replace the responsible person.
TOF-4.2	If hand wash water tanks are used, they are cleaned and sanitized and the water is changed periodically.	R	●	Water tanks used to provide hand wash water shall be maintained at a prescribed frequency in a clean and sanitary manner.	Auditor reviews cleaning and sanitizing protocol and service logs, and visually observes condition of water tanks for signs of noncompliance.	Clean and sanitize the tank, replace water to compliance.
TOF-4.3	Policies shall require hand washing with soap and potable water at the appropriate time, such as before starting work, after use of toilet facilities, after breaks and when hands may have become contaminated. Policy shall apply to employees, outside contractors, inspectors, and visitors. Compliance is emphasized by management.	WP, R	●	Operation shall have a written SOP regarding hand washing practices. Operation management reinforces importance of and compliance with handwashing policy. Sanitizers may not be used in lieu of soap and water hand washing, but may be used to supplement. If gloves are used when contacting tomatoes or food contact surfaces, policies will clearly communicate that gloves are not a replacement for good handwashing practices.	Auditor observes handwashing practices of employees and visitors for compliance. If handwashing practices are observed to be compliant, auditor will judge management emphasis to be sufficient. Affected product is evaluated for potential contamination and disposition.	SOP is developed or revised. Retraining is performed. Management increases frequency of or approach to reinforcing hand washing policy.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-4.4	If gloves are used, there must be a written SOP regarding their use.	WP, R	•	If gloves are used for product or food contact purposes, operation shall have a written policy and SOP regarding their use, maintenance and disposal, including cleaning of reusable gloves, not taking gloves into restrooms or eating areas, replacing gloves that may be damaged or have become a source of contamination. The SOP should also address limitations of use of non-sanitary gloves (i.e., work gloves). The SOP will require that reusable gloves shall not be taken home by workers for cleaning and sanitizing.	If gloves are used, auditor reviews the SOP, records of SOP performance, and visually verifies that glove use is consistent with the SOP; i.e., gloves at the beginning of tomato handling activities are clean and not damaged; workers are observed to not take gloves into restrooms or eating areas; and that gloves are not taken into restrooms or eating areas.	SOP is developed or revised. Non-compliances are corrected on site. Retraining is performed.

TOF-5: Pesticides

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-5.1	Pesticide Usage Water used to mix pesticides meets FDA E. coli standards for water in 21 CFR § 112.44(a); i.e., no detectable generic E. coli in 100 mL of agricultural water.	R	•	Operation has a written policy requiring foliar-application pesticides to be diluted only with water that meets FDA microbial standards for post-harvest agricultural water. Operations will have documentation demonstrating compliance, such as test results for the water source used.	Auditor reviews the policy and inspects pesticide mixing and application records.	Operation develops a written policy. Retraining of pesticide applicator as needed. If unknown or non-drinking quality water was used to prepare pesticides, then test the water source for compliance with FDA <i>E.coli</i> standards for post-harvest agricultural water. Do not harvest product unless water test results demonstrate compliance.

TOF-6: Water Used in Growing Activities

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-6.1	Non-Foliar The water test meets FDA <i>E. coli</i> standards for foliar application water as described in 21 CFR § 112.44(b).	R	<ul style="list-style-type: none"> • 	Written procedure requires a BAM or other testing procedure validated for generic <i>E.coli</i> quantitation in water.	Auditor reviews water test results and any corrective actions taken to bring the water source into compliance.	Perform a sanitary survey for each affected water source, perform any remedial action as required and retest. If the retest also exceeds the standard, further evaluate potential corrective actions, such as treatment, retreatment, or discontinue use of source.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-6.2	Foliar The water test meets FDA standards for water in 21 CFR § 112.44(a); i.e., no detectable generic <i>E. coli</i> in 100 milliliters (mL) of agricultural water.	R	●	Written procedure requires a BAM or other testing procedure validated for generic <i>E.coli</i> quantitation in water.	Auditor reviews water test results and any corrective actions taken to bring the water source into compliance. If tomatoes have been contacted with noncompliant water, auditor reviews the risk assessment and disposition.	Perform a sanitary survey for each affected water source, perform any remedial action as required and retest. If the retest also exceeds the standard, further evaluate potential corrective actions, such as treatment, retreatment, or discontinue use of source. Operation shall evaluate tomatoes that have been contacted with noncompliant water to assess food safety risk. The assessment is documented and tomatoes dispositioned accordingly.

TOF-7: Soil Amendments

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-7.1	If fertilizers containing manures or composts are used, only properly treated (composted or heat treated) manures are allowed for use in fields. Biosolids are not permitted.	R	<ul style="list-style-type: none"> • 	Soil amendment use records are available, reviewed and current (conventional or organic). If treated manures are used, records of composition, dates of treatment, methods utilized, application dates and letter of guarantee, certificate of analysis (COA) or any test results or verification data demonstrating compliance with process or microbial standards must be documented. For non-composted animal by-products-containing soil amendments, the operations shall retain a certificate or letter showing the lethality of the process. Compost applications shall be no less than 45 days prior to harvest.	Auditor reviews the amendment use documents and records demonstrating compliance with prevailing national or local established composting or heat treatment standards or guidelines.	Operations must obtain the necessary documents. If the documents cannot be obtained, field cannot be harvested for that crop cycle.

TOF-8: Sanitizing Agents Used During Harvest

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-8.1	All compounds used to clean or sanitize food contact containers, tools, utensils, equipment or other food contact surfaces are approved for that use by the US EPA, FDA or other prevailing agency. Actual use conforms to label directions.	R	•	Documentation is available to demonstrate that cleaning and sanitizing products are approved for their use and are used according to label directions. Sanitizing chemicals uses shall be documented.	Auditors review documentation and supplies to confirm approved use, and interview individuals responsible for their use for knowledge of approved use. Auditor reviews records of use, and visually observes use, to verify compliance with label directions.	Non-compliances are corrected on-site. Records are reviewed for potential product adulteration. Retraining is performed.

TOF-9: Product Containers

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-9.1	Reusable product bins, trays and containers are made of impervious materials that can be cleaned and sanitized.	WP	●	Written SOP requires that all re-usable product containers are made of materials that can be sanitized, or clean and sanitary liners are used. Wood is not an appropriate food contact surface. Procedures require damaged containers that are no longer easily cleanable or sanitary shall be removed from service of food contact purposes.	Auditor reviews SOP, visually observes product bins, trays and containers and their use for evidence of noncompliance.	Policy is developed or revised. Non-compliances are corrected. Operation makes a commitment for phasing out nonconforming product containers; e.g., wooden bins, in a reasonable timeline. Retraining is performed.
TOF-9.2	Operation has a policy that requires bins trays and boxes made of corrugated cardboard are for single use only.	WP	●	Written policy prohibits re-use of single-use bins, trays and boxes made of corrugated cardboard or fiberboard for product contact purposes.	Auditor reviews policy, observes practices related to corrugated cardboard or fiberboard bins, trays and boxes for evidence of noncompliance.	Policy is developed or revised. Tomatoes that have been packed in a reused cardboard or fiberboard bin, tray or box shall be corrected, which may include tomatoes are segregated, washed and repacked in new containers, or discarded. Retraining is performed.
TOF-9.3	SOP specifies that workers do not remove harvest buckets from the field.	WP	●	Written SOP prohibits taking harvest buckets home.	Auditor reviews SOP and observes practices related to handling of harvest buckets.	Policy is developed or revised. Retraining is performed.

TOF-10: Field Packing of Tomatoes

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TOF-10.1	Packing containers shall be labeled as to their source, and to identify that the product has been field packed.	R	•	Cartons or other primary packaging shall be labeled accurately and shall clearly communicate the tomatoes were packaged in the field.	Auditor observes packaging for accuracy and is clearly labeled as field packed.	Operation ceases to use non-compliant packaging or labeling. Noncompliances are corrected on-site.

TOMATO AUDIT PROTOCOL PACKINGHOUSE

TPH-1 Management Responsibility

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-1.1	Operation has current copies of the Commodity Specific Food Safety Guidelines for the Fresh Tomato Supply Chain, Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain, the relevant Harmonized Food Safety Standard, and additional food safety documents as required by state and/or federal regulation.	R	•	Operation has a current copy of the Guidelines, this audit document and all other required documents.	Auditor observes the current copies at the operation.	Operation obtains current copies.
TPH-1.2	Operation has been registered or permitted as a food handling establishment as required by state or federal regulation.	R	•	Operation demonstrates knowledge of prevailing requirements and has a copy of required permit(s) or registration.	Auditor reviews copies at the operation to verify they are current and complete.	Operation applies for or renews required permits or registration.

TPH-2: Raw Material Sourcing

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-2.1	The operation has a policy and takes affirmative steps to ensure that all fresh tomatoes that are packed or stored in the facility are grown following requirements in Tomato Metrics Audit - Open Field Production, Harvest and Field Packing.	WP	•	The packinghouse requires all raw product suppliers to provide evidence of food safety/GAP programs and compliance. Such evidence must include sufficient documentation to demonstrate that the supplier complies with the requirements in <i>Tomato Metrics Audit - Open Field Production, Harvest and Field Packing</i> .	Auditor reviews policy and verifies that operation's evidence of supplier compliance with food safety/GAP programs is in compliance with the operation's policy.	Operation obtains required documentation. Operation ceases accepting or shipping product from non-approved suppliers, until sufficient documentation demonstrating compliance is received by the operation.
TPH-2.2	Operation has procedures to ensure that the tomato staging area and staging practices do not pose a risk of tomato contamination.	WP	•	The packinghouse staging area is designed so that overhead areas do not pose a contamination risk of uncovered tomatoes, or that tomatoes are protected during staging to prevent contamination.	Auditor reviews procedures and inspects staging area for potential sources of contamination.	Operation develops procedures and/or redesigns staging area or staging practices to prevent reasonably likely to occur opportunities for contamination. Tomatoes that have become contaminated are discarded.

TPH-3: Traceability

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-3.1	Lot identification shall be labeled on all cases and clearly legible.	WP	•	A product coding system is in place where product or raw material shall be labeled with grower and lot identification, and coded to enable access to date of harvest and/or packing, origin (name of farm, grower and/or packing location), and country of origin for traceback purposes.	Auditor reviews coding procedures, observes cases for appropriate coding, and verifies compliance by review of records.	Boxes with missing, inaccurate or illegible coding are labeled with appropriate identification. Procedure is developed or revised. Retraining is performed.

TPH-4: Self Audits

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-4.1	Operation has procedures for conducting self-audits and conducts self-audits to verify compliance with established internal policies and procedures	WP, R	•	In addition to the requirements of the Harmonized Standards, the operation’s self-audit procedure ensures compliance with established internal policies and procedures, the Commodity Specific Food Safety Guidelines for the Fresh Tomato Supply Chain, these Tomato Metrics, and additional food safety documents as required by state and/or federal regulation.	Auditor reviews the self-audit procedures, and records of self-audits to verify compliance with the procedures.	Operation develops and maintains self-audit program, with corrective actions preventive measures, documentation and follow-up.

TPH-5: Product Containers and Packaging Materials

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-5.1	Tomato-contact bulk bins, gondolas, totes and trays shall not be constructed of wood.	WP	●	In accordance with the Post-Harvest Operations Harmonized Standard P-8.7 regarding acceptable product-contact containers, operation has eliminated or has a plan to eliminate the use of wooden product contact containers.	Auditor reviews SOP, visually observes product bins, trays and containers and their use for evidence of non-compliance.	Policy is developed or revised. Non-compliances are corrected. Operation removes non-conforming product containers from food contact purposes. Retraining is performed. Operation develops a plan to phase out wooden bins, and demonstrates compliance with the plan.
TPH-5.2	The operation has written procedures for cleaning and sanitizing of produce food contact containers, requiring that bulk bins, gondolas, totes and trays are cleaned and sanitized periodically and is documented.	WP, R	●	Written SOP is established to ensure that bulk bins, gondolas, totes, trays and other food contact containers and implements are adequately cleaned and sanitized at a frequency sufficient to maintain clean and sanitary food contact surfaces, and documentation of compliance is maintained.	Auditor reviews SOP, cleaning logs and records, interviews responsible individuals for knowledge of the SOP and observes containers, employees and records for evidence of compliance.	Policy is developed or revised. Non-compliances are corrected on site. Retraining is performed.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-5.3	Operation has a policy that requires bins trays and boxes made of corrugated cardboard are for single use only.	R	•	Written policy prohibits re-use of single-use bins, trays and boxes made of corrugated cardboard or fiberboard for product contact purposes. Repacking of tomatoes into a corrugated cardboard container that contained the same lot of tomatoes is acceptable, provided the container is clean, sanitary and properly labeled.	Auditor reviews policy, observes practices related to corrugated cardboard or fiberboard bins, trays and boxes for evidence of non-compliance.	Policy is developed or revised. Tomatoes that have been packed in a re-used cardboard or fiberboard bin, tray or box shall be corrected, which may include tomatoes are segregated, washed and repacked in new containers, or discarded. Retraining is performed.

TPH-6: Packinghouse Condition and Equipment

A. General Building

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-6.1	Facility is constructed/ arranged to allow separation of incoming, in-process and finished products.	R	●	Facilities or processes assure separation and positioning of incoming raw materials so as not to become a source of contamination of in-process and finished product.	Auditor observes placement of incoming raw materials, in-process and finished products for opportunities for cross-contamination.	Procedures are developed or revised. Non-compliances are corrected on site. Retraining is performed.
TPH-6.2	Operation has procedures that minimize the accumulation of standing water.	WP	●	If floor drains exist, they are adequate, functional, free of obstruction and are properly maintained and cleaned sufficient to prevent them from becoming sources of contamination. If standing water exists, it is removed from floors and floors cleaned in a manner and at a frequency sufficient to prevent creation of a source of contamination.	Auditor observes floor drains and evidence of standing water for compliance with procedures.	Floor drains are installed, repaired or maintained, or procedures are modified, to prevent standing water from becoming a potential source of contamination.

B. Facility and Equipment

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-6.3	All food contact surfaces are made of material and designed to be easily cleaned and sanitized, and are maintained in good condition.		●	All tomato contact surfaces and equipment are made of materials, designed or constructed to be easily cleaned and sanitized, all food contact surfaces are free of rust or corrosion, and seams between food contact surfaces are smooth or accessible for cleaning.	Auditor observes product contact surfaces and equipment and their use for evidence of non-compliance.	Non-compliances are corrected or replaced. Operation makes a commitment for phasing out non-conforming tomato contact surfaces and equipment, in a reasonable timeline. Retraining is performed.
TPH-6.4	Wood is not used as a food contact surface.		●	Operation has eliminated, or has a plan to eliminate, use of wooden items as food contact surfaces.	Auditor inspects facility for evidence of wooden food contact surfaces.	Operation that still utilizes wood as a food contact surface has a plan to phase out such surfaces, and is in compliance with the plan.
TPH-6.5	SDS are on file for all chemicals used in the facility, and readily accessible.	R	●	Operation maintains a list of all chemicals approved for use in facility and maintains SDS for all. SDS are in a location easily accessible by employees.	Auditor reviews SDS binder and observes chemicals in facility for evidence of compliance.	Obtain missing SDS. Relocate SDS.

TPH-7: Worker Health/Hygiene and Toilet/Handwashing Facilities

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-7.1	If portable hand wash water tanks are used, they are cleaned and sanitized and the water is changed periodically.	R	•	Water tanks used to provide hand wash water shall be maintained at a prescribed frequency in a clean and sanitary manner.	Auditor reviews cleaning and sanitizing protocol and service logs, and visually observes condition of water tanks for signs of non-compliance.	Clean and sanitize the tank, replace water to compliance.

TPH-8: Product Wash Water Management

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-8.1	In systems where tomatoes are submerged or dwell in water, water temperature is monitored and controlled. Water temperature should be at least 10°F above average pulp temperature of tomatoes when entering the water.	R	<ul style="list-style-type: none"> • 	Operation shall have methods for determining average pulp temperature of a minimum of 5 tomatoes, a procedure for control of water temperature, shall monitor temperature at a prescribed frequency sufficient to assure continuous compliance (minimum of hourly), and shall maintain records of water temperature. Operation shall have a procedure as to what corrective actions are taken if criteria are not met. Water spray or shower systems, wherein tomatoes are not submerged or dwell, do not require temperature control.	Auditor shall review the procedure and shall review records of temperature monitoring. Auditor observes process including the operation’s sampling of pulp and water temperatures. Auditor reviews records for deviations and their disposition.	Procedure is developed or revised. Retraining is performed. Tomatoes washed in water at temperatures less than the average measured pulp temperature shall be discarded back to the last evidence of compliance.
TPH-8.2	Operations utilizing spray systems in place of whole tomato immersion shall design the line so that the entire tomato surface is rinsed.		<ul style="list-style-type: none"> • 	Spray systems shall be designed such that rinse water contacts all surfaces of the tomato.	Auditor observes spray system for compliance.	Equipment or process is redesigned or retrofitted to ensure all surfaces of tomato are contacted.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-8.3	If a spray bar system is used, operation has a water use SOP that addresses treatment of that water.	WP	•	Operation's water use SOP requires spray bar water to be treated using an approved antimicrobial to maintain a microbially hostile environment on equipment.	Auditor shall review water use SOP for completeness, and observes water treatment records for adequacy and consistency of treatment.	Operation discontinues using spray bar water that is not treated sufficiently to maintain a hostile environment on equipment. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
TPH-8.4	If water quality is based upon a chlorine-based sanitizer, the process shall be targeted to be at least 100 ppm free available chlorine (FAC), measured at the exit of the product from the water system, unless validation data are available to demonstrate a lower FAC is effective under operating conditions.	R	•	Operation shall have a procedure to manage FAC levels, shall establish process adjustments for when the FAC drops below 100 ppm, and shall maintain records to verify proper management of levels.	Auditor shall review the procedure and shall review records of FAC measurement and appropriate management. Auditor reviews records for deviations and their disposition.	Procedure is developed or revised. Retraining is performed. Tomatoes washed in water at FAC less than 100 ppm shall be discarded back to the last evidence of compliance.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-8.5	If water quality is based upon a peroxyacetic, peracetic or peracid system, levels shall be maintained in accordance with manufacturer's label directions.	R	•	Operation shall have a procedure to manage peracid levels, shall establish process targets so as not to drop below the minimum ppm, shall establish adjustments for when the peracid level drops below the target ppm, and shall maintain records to verify proper management of levels.	Auditor shall review the procedure and shall review records of peracetic measurement and appropriate management. Auditor reviews records for deviations and their disposition.	Procedure is developed or revised. Retraining is performed. Tomatoes washed in water at less than manufacturer's recommendation shall be discarded back to the last evidence of compliance.

TPH-9: Quarantine or On-hold Materials

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-9.1	Materials placed on hold, quarantined or rejected are clearly identified and segregated from other products and packaging materials.	R	<ul style="list-style-type: none"> ● 	Operation has a written procedure to clearly identify and segregate on-hold, quarantined and rejected materials, to prevent commingling with other products or adulteration of products, production area or packaging materials.	Auditor reviews procedure, reviews logs and observes all currently on-hold, quarantined and rejected materials for compliance with procedure.	Non-compliances are corrected on site. If on-hold, quarantined or rejected materials are not segregated according to procedure, operation shall assess potential for product adulteration. Procedures are developed or revised. Retraining is performed.

TPH-10: Tomato Rerunning Processes

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-10.1	Tomato lots shall not be commingled in a rerunning process. Boxes shall not be reused if prohibited by prevailing regulation or law	R	<ul style="list-style-type: none"> • 	Operation has a policy prohibiting commingling of tomato lots if lots are rerun.	Auditor reviews the policy, observes packing records and, if possible, example of rerunning process, for compliance.	Operation ceases commingling lots. Boxes with commingled lots are labeled with component tomato sources and lot identification. Policy is developed or revised. Retraining is performed.

TPH-11: Food Defense Awareness

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPH-11.1	The facility is registered with FDA as required by the Public Health Security and Bioterrorism Preparedness and Response Act of 2002.	R	•	If required by 21 CFR Part 1, Subpart H, facility is registered with FDA and registration is current.	Auditor asks whether facility is registered. Facility is not required to demonstrate registration to auditor.	Facility registers with FDA as required.
TPH-11.2	There are procedures in place that readily identify employees, and those with specific access privileges, e.g., to chemical storage, to the water system.	R	•	Operation has a written procedure for identifying current employees. Procedure also indicates which employees have access to restricted areas or materials, and how access is restricted.	Auditor reviews procedure, verifies list of special access employees, observes restricted areas and materials for evidence of compliance and interviews employees for knowledge of procedure.	Procedures are developed or revised. Retraining is performed.

TOMATO AUDIT PROTOCOL GREENHOUSE

TGH-1 Management Responsibility

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-1.1	Operation has current copies of the Commodity Specific Food Safety Guidelines for the Fresh Tomato Supply Chain, Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain, the relevant Harmonized Food Safety Standard, and additional food safety documents as required by state and/or federal regulation.	R	•	Operation has a current copy of the Guidelines, this audit document and all other required documents.	Auditor observes the current copies at the operation.	Operation obtains current copies.

TGH-2: Recordkeeping and Traceability

A. Greenhouse Packing

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-2.1	Containers shall be accurately labeled with commodity name, greenhouse firm name and information sufficient to allow for source and lot identification.	WP	•	A product coding system is in place where product shall be labeled with grower and lot identification, and coded to enable access to date of harvest and/or packing, origin (name of greenhouse, grower and/or packing location), and country of origin for traceback purposes. If using reusable containers, procedures ensure that labels are accurate prior to packing.	Auditor reviews coding procedures, observes cases for appropriate coding, and verifies compliance by review of records.	Boxes with missing, inaccurate or illegible coding are labeled with appropriate identification Procedure is developed or revised. Retraining is performed.

B. Packinghouse Packed Greenhouse Tomatoes

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-2.2	The greenhouse shall maintain supply chain information available to the packinghouse to facilitate accurate traceability; i.e., quantity, greenhouse identification and date of harvest/pack.	WP	●	Operation has procedures to retain and provide to the packinghouse records of source of seed or transplants, soil inputs, irrigation water sources and test records, names of crews involved in greenhouse operations, and other crop history information relevant to product safety. Records are retained for at least two years or as required by prevailing regulation.	Auditor reviews policy and reviews records for compliance.	Policy is developed or revised. Non-compliances are corrected on-site. Retraining is performed.

TGH-3: Self-Audit

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-3.1	Operation has procedures for conducting self-audits and conducts self-audits to verify compliance with established internal policies and procedures	WP	●	In addition to the requirements of the Harmonized Standards, the operation’s self-audit procedure ensures compliance with established internal policies and procedures, the <i>Commodity Specific Food Safety Guidelines for the Fresh Tomato Supply Chain</i> , these Tomato Metrics and additional food safety documents as required by state and/or federal regulation.	Auditor reviews the self-audit procedures, and records of self-audits to verify compliance with the procedures.	Operation develops and maintains self-audit program, with corrective actions preventive measures, documentation and follow-up.

TGH-4: Greenhouse

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-4.1	The greenhouse shall be enclosed.	WP, R	●	The greenhouse shall be permanent or temporary structure, sufficiently enclosed to maintain a controlled environment. This does not apply to open structures such as shade or hoop houses, which should operate according to the auditing protocol for Open Field Production, Harvest and Field Packing.	The Auditor shall inspect the structure for compliance with this definition.	If the structure is not in compliance, either the facility must be brought into compliance or different audit criteria (i.e., auditing protocol for Open Field Production, Harvest and Field Packing) should be used.
TGH- 4.2	A foot dip station or other measure should be used to prevent the introduction of harmful microorganisms or agents and a written record of the sanitizer and maintenance kept.	WP, R	●	If the facility has determined that footborne contaminants are a risk to food safety, they shall have procedures that effectively prevent contaminants from being brought into the greenhouse on shoes. This could be by means of chemical disinfectants in foot dips, sprays or boot wash, or by means of a shoe change procedure. If chemical disinfectants are used, the chemical shall be used according to label instructions and monitored at a frequency sufficient to assure continual effectiveness, and records shall be maintained to demonstrate compliance.	If the facility is using footborne contamination controls, the auditor shall review the procedure, and will observe whether those procedures are being followed at the time of the audit. The auditor shall also review any associated records, including the label instructions for any chemical disinfectants used, for evidence of compliance with the facility's procedures.	If the facility is using footborne contamination controls, they shall develop or implement the procedures to be effective, including training in their use.

TGH-5: Worker Health/Hygiene and Toilet/Handwashing Facilities

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-5.1	Restrooms should not open directly into greenhouse production areas.		●	Restrooms that do open directly into greenhouse production areas shall be equipped with self-closing mechanisms or have a maze-type entrance/exit.	Auditor visually verifies that the toilet facilities are located and designed in a compliant manner.	Operation retrofits or relocates the toilet facility.
TGH-5.2	If portable hand wash water tanks are used, they are cleaned and sanitized and the water is changed periodically.	R	●	Water tanks used to provide hand wash water shall be maintained at a prescribed frequency in a clean and sanitary manner.	Auditor reviews cleaning and sanitizing protocol and service logs, and visually observes condition of water tanks for signs of non-compliance.	Clean and sanitize the tank, replace water to compliance.
TGH-5.3	Operation shall have a written policy regarding employees' outer garments.	WP	●	Policy includes that employees shall wear suitable outer garments, not reasonably likely to serve as a source of contamination of tomato or food contact surface, and, as appropriate to the operation, use of plastic aprons and sleeves, and empty pockets above the waist. Outer garments shall be changed after cleaning drains, restrooms or other activities that may result in contamination.	Auditor reviews the policy, observes employees for compliance and interviews employees for knowledge of the policy.	Policy is developed or revised. Non-compliances are corrected on site. Retraining is performed.

TGH-6: Pesticides

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-6.1	Water used to mix pesticides meets FDA E. coli standards for water in 21 CFR § 112.44(a); i.e., no detectable generic E. coli in 100 mL of agricultural water.	R	•	Operation has a written policy requiring foliar-application pesticides to be diluted only with water that meets FDA microbial standards for post-harvest agricultural water. Operations will have documentation demonstrating compliance, such as test results for the water source used.	Auditor reviews the policy and inspects pesticide mixing and application records.	Operation develops a written policy. Retraining of pesticide applicator as needed. If unknown or nondrinking quality water was used to prepare pesticides, then test the water source for compliance with drinking water E. coli standards. Do not harvest product unless test results demonstrate compliance.

TGH-7: Water Used in Growing Activities

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-7.1	Non-Foliar The water test meets FDA E.coli standards for foliar application of water as described in 21 CFR § 112.44(b).	R	●	Written procedure requires a BAM or other testing procedure validated for generic E. coli quantitation in water.	Auditor reviews water test results and any corrective actions taken to bring the water source into compliance.	Perform a sanitary survey for each affected water source, perform any remedial action as required and retest. If the retest also exceeds the standard, further evaluate potential corrective actions, such as treatment, retreatment, or discontinue use of source.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-7.2	Foliar The water test meets FDA standards for water in 21 CFR § 112.44(a); i.e., no detectable generic E. coli in 100 milliliters (mL) of agricultural water.	R	●	Written procedure requires a BAM or other testing procedure validated for generic E. coli quantitation in water.	Auditor reviews water test results and any corrective actions taken to bring the water source into compliance. If tomatoes have been contacted with non-compliant water, auditor reviews the risk assessment and disposition.	Perform a sanitary survey for each affected water source, perform any remedial action as required and retest. If the retest also exceeds the standard, further evaluate potential corrective actions, such as treatment, retreatment, or discontinue use of source. Operation shall evaluate tomatoes that have been contacted with noncompliant water to assess food safety risk. The assessment is documented and tomatoes dispositioned accordingly.

TGH-8: Soil and Soil Amendments

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-8.1	Soil or other growth medium shall be stored in a manner that minimizes opportunities for contamination.		●	If soil or growth medium is stored onsite, it is held in a sanitary manner to ensure it is not a source of contamination. Procedures for storage of growth media shall comply with prevailing laws or regulations in the location of the greenhouse.	The auditor shall observe storage location and procedures for evidence of compliance.	Operation develops a written procedure and provides training. If there is evidence of contamination of public health significance, the medium shall not be used.
TGH-8.2	Fertilizer manufacturer's instructions for usage and storage shall be followed.	R	●	Non-organic fertilizers must be used and stored in compliance with label instructions and any prevailing federal, state or local regulations. Fertilizer uses shall be documented.	Auditor reviews non-organic fertilizers used, storage location and application records.	Perform training on fertilizer handling and recordkeeping procedures, as needed.
TGH-8.3	If fertilizers containing manures or composts are used, only properly treated (composted or heat treated) manures are allowed for use in greenhouses. Biosolids are not permitted.	R	●	Soil amendment use records are available, reviewed and current (conventional or organic). If treated manures are used, records of composition, dates of treatment, methods utilized, application dates and letter of guarantee, certificate of analysis (COA) or any test results or verification data demonstrating compliance with process or microbial standards must be documented. For non-composted animal by-products containing soil amendments, the operations shall retain a certificate or letter showing the lethality of the process. Compost applications shall be no less than 45 days prior to harvest.	Auditor reviews the amendment use documents and records demonstrating compliance with prevailing national or local established composting or heat treatment standards or guidelines.	Operations must obtain the necessary documents. If the documents cannot be obtained, crop cannot be harvested for that crop cycle.

TGH-9: Sanitizing Agents Used During Harvest

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-9.1	All compounds used to clean or sanitize food contact containers, tools, utensils, equipment or other food contact surfaces are approved for that use by the US EPA, FDA or other prevailing agency. Actual use conforms to label directions.	R	●	Documentation is available to demonstrate that cleaning and sanitizing products are approved for their use, and are used according to label directions. Sanitizing chemicals uses shall be documented.	Auditors review documentation and supplies to confirm approved use, and interview individuals responsible for their use for knowledge of approved use. Auditor reviews records of use, and visually observes use, to verify compliance with label directions.	Non-compliances are corrected on-site. Records are reviewed for potential product adulteration. Retraining is performed.
TGH-9.2	Chemicals used on product that are not registered pesticides may be permitted for food contact use if allowed under regulations of the FDA or prevailing agency.	R	●	Any product contact chemicals not specifically approved as registered pesticides shall be identified, the authority permitting their use identified and their uses documented.	Auditors review documentation and supplies to confirm approved use, and interview individuals responsible for their use for knowledge of approved use. Auditor reviews records of use, and visually observes use, to verify compliance with label directions.	Non-compliances are corrected on-site. Records are reviewed for potential product adulteration. Retraining is performed.

TGH-10: Product Wash Water Management

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-10.1	In systems where tomatoes are submerged or dwell in water, water temperature is monitored and controlled. Water temperature should be at least 10°F above average pulp temperature of tomatoes when entering the water.	R	•	Operation shall have methods for determining average pulp temperature of a minimum of 5 tomatoes, a procedure for control of water temperature, shall monitor temperature at a prescribed frequency sufficient to assure continuous compliance (minimum of hourly) and shall maintain records of water temperature. Operation shall have a procedure as to what corrective actions are taken if criteria are not met. Water spray or shower systems, wherein tomatoes are not submerged or dwell, do not require temperature control.	Auditor shall review the procedure and shall review records of temperature monitoring. Auditor observes process including the operation's sampling of pulp and water temperatures. Auditor reviews records for deviations and their disposition.	Procedure is developed or revised. Retraining is performed. Tomatoes washed in water at temperatures less than the average measured pulp temperature shall be discarded back to the last evidence of compliance.
TGH-10.2	Operations utilizing spray systems in place of whole tomato immersion shall design the line so that the entire tomato surface is rinsed.		•	Spray systems shall be designed such that rinse water contacts all surfaces of the tomato.	Auditor observes spray system for compliance.	Equipment or process is redesigned or retrofitted to ensure all surfaces of tomato are contacted.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-10.3	If a spray bar system is used, operation has a water use SOP that addresses treatment of that water.	WP	●	Operation's water use SOP requires spray bar water to be treated using an approved antimicrobial to maintain a microbially hostile environment on equipment.	Auditor shall review water use SOP for completeness, and observes water treatment records for adequacy and consistency of treatment.	Operation discontinues using spray bar water that is not treated sufficiently to maintain a hostile environment on equipment. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
TGH-10.4	If water quality is based upon a chlorine-based sanitizer, the process shall be targeted to be at least 100 ppm free available chlorine (FAC), measured at the exit of the product from the water system, unless validation data are available to demonstrate a lower FAC is effective under operating conditions.	R	●	Operation shall have a procedure to manage FAC levels, shall establish process adjustments for when the FAC drops below 100 ppm, and shall maintain records to verify proper management of levels	Auditor shall review the procedure and shall review records of FAC measurement and appropriate management. Auditor reviews records for deviations and their disposition.	Procedure is developed or revised. Retraining is performed. Tomatoes washed in water at FAC less than 100 ppm shall be discarded back to the last evidence of compliance.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-10.5	If water quality is based upon a peroxyacetic, peracetic or peracid system, levels shall be maintained in accordance with manufacturer's label directions.	R	•	Operation shall have a procedure to manage peracid levels, shall establish process targets so as not to drop below the minimum ppm, shall establish adjustments for when the peracid level drops below the target ppm, and shall maintain records to verify proper management of levels.	Auditor shall review the procedure and shall review records of peracetic measurement and appropriate management. Auditor reviews records for deviations and their disposition.	Procedure is developed or revised. Retraining is performed. Tomatoes washed in water at less than manufacturer's recommendation shall be discarded back to the last evidence of compliance.

TGH-11: Product Containers and Packaging Materials

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TGH-11.1	Operation has a written procedure for inspecting incoming packaging material.	R	●	All packaging materials are inspected for evidence of contamination upon arrival. Results are recorded.	Auditor reviews procedure and examples of packaging and receiving records for compliance.	Operation creates or revises policy. Contaminated or adulterated packaging material is rejected or discarded. Retraining is performed.
TGH-11.2	Reusable containers and food contact equipment and utensils shall be constructed of impervious materials that can be easily cleaned and sanitized.	R	●	Written SOP requires that all reusable product containers are made of materials that can be sanitized, or clean and sanitary liners are used. Wood is not an appropriate food contact surface. Procedures require damaged containers that are no longer easily cleanable or sanitary shall be removed from service of food contact purposes.	Auditor reviews SOP, visually observes product bins, trays and containers and their use for evidence of non-compliance.	Policy is developed or revised. Non-compliances are corrected. Operation makes a commitment for phasing out non-conforming product containers; e.g., wooden bins, in a reasonable timeline. Retraining is performed.
TGH-11.3	Finished product containers are prohibited from direct contact with the floor, and pallets, slip sheets, and supports used to keep product containers off the floor are clean and in good condition.	WP	●	Operation has a policy prohibiting finished product containers in direct contact with the floor, and that pallets, slip sheets, and supports used to keep product containers off the floor are maintained so as not to be a source of contamination.	Auditor reviews policy and examines finished product staging and storage areas and pallets, slip sheets, and supports for compliance with the policy.	Operation creates or revises policy. Non-compliances are corrected on site. Retraining is performed.

TOMATO AUDIT PROTOCOL REPACKING AND DISTRIBUTION

TPD-1 Management Responsibility

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-1.1	Operation has current copies of the Commodity Specific Food Safety Guidelines for the Fresh Tomato Supply Chain, Food Safety Programs and Auditing Protocol for the Fresh Tomato Supply Chain, the relevant Harmonized Food Safety Standard, and additional food safety documents as required by state and/or federal regulation.	R	•	Operation has a current copy of the Guidelines, this audit document and all other required documents.	Auditor observes the current copies at the operation.	Operation obtains current copies.
TPD-1.2	Operation has been registered or permitted as a food handling establishment as required by state or federal regulation.	WP	•	Operation demonstrates knowledge of prevailing requirements and has a copy of required permit(s) or registration.	Auditor reviews copies at the operation to verify they are current and complete.	Operation applies for or renews required permits or registration.

TPD-2 Raw Material Sourcing

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-2.1	The operation has a policy and takes affirmative steps to ensure that all fresh tomatoes that are packed or stored in the facility are grown following requirements in <i>Tomato Metrics Audit - Open Field Production, Harvest and Field Packing</i> .	WP	•	The packinghouse requires all raw product suppliers to provide evidence of food safety/GAP programs and compliance. Such evidence must include sufficient documentation to demonstrate that the supplier complies with the requirements in <i>Tomato Metrics Audit - Open Field Production, Harvest and Field Packing</i> .	Auditor reviews policy and verifies that operation's evidence of supplier compliance with food safety/GAP programs is in compliance with the operation's policy.	Operation obtains required documentation. Operation ceases accepting or shipping product from nonapproved suppliers, until sufficient documentation demonstrating compliance is received by the operation.
TPD-2.2	Operation has procedures to ensure that the tomato staging area and staging practices do not pose a risk of tomato contamination.	WP	•	The packinghouse staging area is designed so that overhead areas do not pose a contamination risk of uncovered tomatoes, or that tomatoes are protected during staging to prevent contamination.	Auditor reviews procedures and inspects staging area for potential sources of contamination.	Operation develops procedures and/or redesigns staging area or staging practices to prevent reasonably likely to occur opportunities for contamination. Tomatoes that have become contaminated are discarded.

TPD-3 Traceability

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-3.1	All levels of the tomato supply chain shall maintain adequate traceability to a minimum of immediate next recipient and immediate previous supplier.	WP	●	Operation shall have a procedure to identify the sources of incoming product and recipients of outgoing product (including trash).	Auditor shall review procedure.	Procedure is developed or revised.
TPD-3.2	Establish procedures to maintain lot identity of tomatoes, including setbacks and primary containers, throughout the repacking process.	WP	●	Operation shall have a procedure and maintain records to identify all outgoing product lots and shipments with all component tomato lots and prior lots in reused primary boxes, in both traceback and trace forward directions.	Auditor shall review procedure and review batch records for compliance. Auditor shall ask operation to traceback one, auditor selected product lot to all supplier lots and primary boxes, and trace forward one supplier lot to all product lots and shipments.	Procedure is developed or revised. Retraining is performed.
TPD-3.3	Establish procedures for reconciliation of incoming tomato lots to usage.	WP	●	Operation shall have a procedure and maintain records of tomato use and shrink to allow 100% reconciliation of tomato lots within 4 hrs.	Auditor reviews reconciliation procedure and asks operation to provide records to support one, auditor-selected reconciliation.	Procedure is developed or revised. Retraining is performed.

TPD-4: Self Audits

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-4.1	Operation has procedures for conducting self-audits, and conducts self-audits to verify compliance with established internal policies and procedures.	WP, R	●	In addition to the requirements of the Harmonized Standards, the operation’s self-audit procedure ensures compliance with established internal policies and procedures, the <i>Commodity Specific Food Safety Guidelines for the Fresh Tomato Supply Chain</i> , these Tomato Metrics and additional food safety documents as required by state and/or federal regulation.	Auditor reviews the self-audit procedures, and records of self-audits to verify compliance with the procedures.	Operation develops and maintains self-audit program, with corrective actions preventive measures, documentation and follow-up.

TPD-5: Product Containers and Packaging Materials

A. Bins, Gondolas, Totes

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-5.1	Tomato-contact bulk bins, gondolas, totes and trays shall not be constructed of wood.	WP	●	In accordance with the Post- Harvest Operations Harmonized Standard P-8.7 regarding acceptable product-contact containers, operation has eliminated or has a plan to eliminate the use of wooden product contact containers.	Auditor reviews SOP, visually observes product bins, trays and containers and their use for evidence of noncompliance.	Policy is developed or revised. Non-compliances are corrected. Operation removes non-conforming product containers from food contact purposes. Retraining is performed. Operation develops a plan to phase out wooden bins, and demonstrates compliance with the plan.
TPD-5.2	The operation has written procedures for cleaning and sanitizing of produce food contact containers, requiring that bulk bins, gondolas, totes and trays are cleaned and sanitized periodically and is documented.	WP, R	●	Written SOP is established to ensure that bulk bins, gondolas, totes, trays and other food contact containers and implements are adequately cleaned and sanitized at a frequency sufficient to maintain clean and sanitary food contact surfaces, and documentation of compliance is maintained.	Auditor reviews SOP, cleaning logs and records, interviews responsible individuals for knowledge of the SOP and observes containers, employees and records for evidence of compliance.	Policy is developed or revised. Non-compliances are corrected on site. Retraining is performed.

B. Primary Packing Boxes

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-5.3	The repacker must label the container as being repacked. The box contains information on the commodity, repacker identification and provides lot identification.	R	•	Operation shall ensure that all product containers containing repacked tomatoes are labeled as repacked. The container shall also include the commodity, repacker identification, and repacker lot identification.	Auditor observes repacked product boxes for compliance.	Procedure is developed or revised. Retraining is performed.
TPD-5.4	Operation has a process to ensure that inaccurate information on previously used boxes is obliterated, or otherwise made clear that original information no longer applies, to prevent misidentification.	WP	•	Boxes shall not be reused if prohibited by prevailing regulation or law.	Auditor observes one or more repacked lots and repacking documentation for those lots using reused cartons to verify that only the cartons from the original lot(s) are used to repack reworked tomatoes and a positive effort has been made to obliterate (mark out by any means) inaccurate information; OR a label that clearly states the information on the box is no longer valid has been affixed and has the proper lot information on the label.	Operation ceases using boxes inappropriately. Procedure is developed or revised. Retraining is performed.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-5.5	Used boxes may be used as secondary shipping containers, provided that the original identification information on the box has been obliterated or otherwise made clear that it is no longer accurate.		<ul style="list-style-type: none"> ● 	Operation may reuse tomato boxes as secondary (no product contact) shipping containers. Operation has a process to ensure that inaccurate information is obliterated, or otherwise made clear that original information no longer applies, to prevent misidentification.	If used boxes are used as secondary shipping containers, auditor observes one or more repacked lots and repacking documentation for those lots using reused cartons to verify that a positive effort has been made to obliterate (mark out by any means) inaccurate information; OR a label that clearly states the information on the box is no longer valid has been affixed and has the proper lot information on the label.	Operation relabels mislabeled boxes. Procedure is developed or revised. Retraining is performed.

TPD-6: Packinghouse Condition and Equipment

A. General Building

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-6.1	Facility is constructed/arranged to allow separation of incoming, in-process and finished products.	R	•	Facilities or processes assure separation and positioning of incoming raw materials so as not to become a source of contamination of in-process and finished product.	Auditor observes placement of incoming raw materials, in-process and finished products for opportunities for cross-contamination.	Procedures are developed or revised. Non-compliances are corrected on site. Retraining is performed.
TPD-6.2	Operation has procedures that minimize the accumulation of standing water.	WP	•	If floor drains exist, they are adequate, functional, free of obstruction and are properly maintained and cleaned sufficient to prevent them from becoming sources of contamination. If standing water exists, it is removed from floors and floors cleaned in a manner and at a frequency sufficient to prevent creation of a source of contamination.	Auditor observes floor drains and evidence of standing water for compliance with procedures.	Floor drains are installed, repaired or maintained, or procedures are modified, to prevent standing water from becoming a potential source of contamination.

B. Facility and Equipment

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-6.3	All food contact surfaces are made of material and designed to be easily cleaned and sanitized, and are maintained in good condition.		●	All tomato contact surfaces and equipment are made of materials, designed or constructed to be easily cleaned and sanitized, all food contact surfaces are free of rust or corrosion, and seams between food contact surfaces are smooth or accessible for cleaning.	Auditor observes product contact surfaces and equipment and their use for evidence of non-compliance.	Non-compliances are corrected or replaced. Operation makes a commitment for phasing out non-conforming tomato contact surfaces and equipment, in a reasonable timeline. Retraining is performed.
TPD-6.4	Wood is not used as a food contact surface.		●	Operation has eliminated, or has a plan to eliminate, use of wooden items as food contact surfaces	Auditor inspects facility for evidence of wooden food contact surfaces.	Operation that still utilizes wood as a food contact surface has a plan to phase out such surfaces, and is in compliance with the plan.
TPD-6.5	SDS are on file for all chemicals used in the facility, and readily accessible.	R	●	Operation maintains a list of all chemicals approved for use in facility, and maintains SDS for all. SDS are in a location easily accessible by employees.	Auditor reviews SDS binder and observes chemicals in facility for evidence of compliance.	Obtain missing SDS. Relocate SDS.

TPD-7: Worker Health/Hygiene and Toilet/Handwashing Facilities

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-7.1	If portable hand wash water tanks are used, they are cleaned and sanitized and the water is changed periodically.	R	•	Water tanks used to provide hand wash water shall be maintained at a prescribed frequency in a clean and sanitary manner.	Auditor reviews cleaning and sanitizing protocol and service logs, and visually observes condition of water tanks for signs of noncompliance.	Clean and sanitize the tank, replace water to compliance.

TPD-8: Product Wash Water Management

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-8.1	In systems where tomatoes are submerged or dwell in water, water temperature is monitored and controlled. Water temperature should be at least 10°F above average pulp temperature of tomatoes when entering the water.	R	●	Operation shall have methods for determining average pulp temperature of a minimum of 5 tomatoes, a procedure for control of water temperature, shall monitor temperature at a prescribed frequency sufficient to assure continuous compliance (minimum of hourly), and shall maintain records of water temperature. Operation shall have a procedure as to what corrective actions are taken if criteria are not met. Water spray or shower systems, wherein tomatoes are not submerged or dwell do not require temperature control.	Auditor shall review the procedure and shall review records of temperature monitoring. Auditor observes process including the operation's sampling of pulp and water temperatures. Auditor reviews records for deviations and their disposition.	Procedure is developed or revised. Retraining is performed. Tomatoes washed in water at temperatures less than the average measured pulp temperature shall be discarded back to the last evidence of compliance.
TPD-8.2	Operations utilizing spray systems in place of whole tomato immersion shall design the line so that the entire tomato surface is rinsed.		●	Spray systems shall be designed such that rinse water contacts all surfaces of the tomato.	Auditor observes spray system for compliance.	Equipment or process is redesigned or retrofitted to ensure all surfaces of tomato are contacted.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-8.3	If a spray bar system is used, operation has a water use SOP that addresses treatment of that water.	WP	●	Operation's water use SOP requires spray bar water to be treated using an approved antimicrobial to maintain a microbially hostile environment on equipment.	Auditor shall review water use SOP for completeness, and observes water treatment records for adequacy and consistency of treatment.	Operation discontinues using spray bar water that is not treated sufficiently to maintain a hostile environment on equipment. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
TPD-8.4	If water quality is based upon a chlorine-based sanitizer, the process shall be targeted to be at least 100 ppm free available chlorine (FAC), measured at the exit of the product from the water system, unless validation data are available to demonstrate a lower FAC is effective under operating conditions.	R	●	Operation shall have a procedure to manage FAC levels, shall establish process adjustments for when the FAC drops below 100 ppm, and shall maintain records to verify proper management of levels.	Auditor shall review the procedure and shall review records of FAC measurement and appropriate management. Auditor reviews records for deviations and their disposition.	Procedure is developed or revised. Retraining is performed. Tomatoes washed in water at FAC less than 100 ppm shall be discarded back to the last evidence of compliance.

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-8.5	If water quality is based upon a peroxyacetic, peracetic or peracid system, levels shall be maintained in accordance with manufacturer's label directions.	R	●	Operation shall have a procedure to manage peracid levels, shall establish process targets so as not to drop below the minimum ppm, shall establish adjustments for when the peracid level drops below the target ppm, and shall maintain records to verify proper management of levels.	Auditor shall review the procedure and shall review records of peracetic measurement and appropriate management. Auditor reviews records for deviations and their disposition.	Procedure is developed or revised. Retraining is performed. Tomatoes washed in water at less than manufacturer's recommendation shall be discarded back to the last evidence of compliance.

TPD-9: Quarantine or On-hold Materials

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-9.1	Materials placed on hold, quarantined or rejected are clearly identified and segregated from other products and packaging materials.	R	•	Operation has a written procedure to clearly identify and segregate on-hold, quarantined and rejected materials, to prevent commingling with other products or adulteration of products, production area or packaging materials.	Auditor reviews procedure, reviews logs and observes all currently on-hold, quarantined and rejected materials for compliance with procedure.	Non-compliances are corrected on site. If on-hold, quarantined or rejected materials are not segregated according to procedure, operation shall assess potential for product adulteration. Procedures are developed or revised. Retraining is performed.

TPD-10: Food Defense Awareness

Req. #	Requirement	DOC	MAN	Procedure	Verification	Corrective Action
TPD-10.1	The facility is registered with FDA as required by the Public Health Security and Bioterrorism Preparedness and Response Act of 2002.	R	•	If required by 21 CFR Part 1, Subpart H, facility is registered with FDA and registration is current.	Auditor asks whether facility is registered. Facility is not required to demonstrate registration to auditor.	Facility registers with FDA as required.
TPD-10.2	There are procedures in place that readily identify employees, and those with specific access privileges, e.g., to chemical storage, to the water system.	WP	•	Operation has a written procedure for identifying current employees. Procedure also indicates which employees have access to restricted areas or materials, and how access is restricted.	Auditor reviews procedure, verifies list of special access employees, observes restricted areas and materials for evidence of compliance and interviews employees for knowledge of procedure.	Procedures are developed or revised. Retraining is performed.