



AUDIT CHECKLIST

VERIFYING COMMODITY SPECIFIC
GUIDELINES FOR THE PRODUCTION AND
HARVEST OF LETTUCE AND LEAFY GREENS

Effective 04.01.2018



GENERAL REQUIREMENTS

Page	Line #	Questions
15	11-13	<p>GR 01 - Is a written Leafy Greens Compliance Plan which specifically addresses the Best Practices of the LGMA available for review?</p> <p>GR 02 - Does it specifically address the following subjects consistent with the LGMA:</p> <p>GR 02a Water</p> <p>GR 02b - Soil Amendments</p> <p>GR 02c - Environmental Factors</p> <p>GR 02d - Work Practices</p> <p>GR 02e - Field Sanitation</p>
15	14	GR 03 - Is an up to date producers list with contact and location information available for review?
15	15-17	GR 04 - Is the shipper in compliance with the registration requirement of The Public Health Security and Bioterrorism Preparedness and Response Act of 2002?
15	15-17	<p>GR 05 - Does the Shipper have a traceability process?</p> <p>GR 05a - Does it enable identification of immediate non-transporter source?</p> <p>GR 05b - Does it enable identification of immediate non-transporter subsequent recipient?</p>
15	18	<p>GR 06 - Has the handler (or if applicable, the grower) designated someone to implement and oversee the food safety program?</p> <p>GR 06a - Is the name of the individual available?</p> <p>GR 06b - Is 24/7 contact information available for the individual available?</p>

RECORDS

Page	Line #	Questions
16	36-38	RE 01 – Did the Handler have records required in the Leafy Greens Compliance Plan?
15	24-30	<p>RE 02 – Do records include (as applicable):</p> <p>RE 02a – farm name and location</p> <p>RE 02b – actual values and observations obtained during monitoring</p> <p>RE 02c – an adequate description of the leafy green product</p> <p>RE 02d – growing area location</p> <p>RE 02e – date and time of the activity being documented</p>
16	32	RE 03 – Do records indicate they were created at the time the activity was performed?
16	34	RE 04 – Were the records signed and dated by the person performing the documented activity?
16	36-38	RE 05 – Were all records readily available and accessible for inspection during the audit? (e.g. logs, checklist, spreadsheets, etc..)
16	52	RE 06 – Do SOPs require documentation and records to be kept for 2 years?



PERSONEL QUALIFICATIONS AND TRAINING

Page	Line #	Questions
17	66-67	PE 01 – Do training records indicate all personnel receive training at hire and at least annually thereafter?
17	77-83	PE 02 – Does the training provided to all personnel who work with leafy greens or supervise those who do include: PE 02a – the principles of food hygiene and safety? PE 02b – the importance of health and personal hygiene? PE 02c – the standards established in these best practices that are applicable to the employee’s job responsibilities?
17	84-93	PE 03 – Do all harvest personnel receive additional training in: PE 03a – recognizing leafy greens that may be contaminated and therefore not be harvested? PE 03b – inspecting product containers, harvest equipment, and packaging materials to ensure they are working properly and do not pose a product contamination risk? PE 03c – how to correct problems with product containers, harvest equipment, and packaging materials or report problems to supervisors?
17	94-96	PE 04 – Has a food safety professional / representative for each farm completed the Produce Safety Alliance, "Grower Training" or a standard curriculum recognized by the FDA? PE 04a – Grower PE 04b – Harvester PE 04c – Cooler/Holder
17	97-99	PE 05 – Are there records of training events? Do they include: PE 05a – training date PE 05b – topics covered PE 05c – trainee name PE 05d – supervisor’s signature indicating a record review was performed within a week

ENVIRONMENTAL ASSESSMENTS

Page	Line #	Questions
18	112-114	Pre-Season Assessment: Animal Activity
48	624-653	EA 01 - Did the assessment indicate that the production area was free from evidence of animal intrusion?
If EA 01 is answered "NO" then EA 001-EA 003 will drop down		
51	Table 5	EA 001 - Was the animal hazard or potential risk of intrusion assessed by Food Safety professional?
		EA 002 - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"?
		EA 002a - If "YES" were corrective actions carried out according to company SOP?
51	Table 5	EA 003 - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"?



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		EA 003a - If "YES" were corrective actions formulated? EA 003b – N/A EA 003c - If "YES" is documentation available to show that actions were implemented? EA 003d - If "YES" are you periodically monitoring the effectiveness of any corrective actions?
53	Table 6	EA 02 - Was the adjacent land area free from compost operations within 400' of the crop edge? EA 02a - If "No" are there mitigation measures, topographical or climate features that indicate that the 400' recommendation should be modified? EA 02b - If "No" are mitigation measures in place and documented?
53	Table 6	EA 03 - Was the adjacent land area free from confined animal feeding operations (CAFO) within 400' of the crop edge? EA 03a - If "No" are there mitigation measures, topographical or climate features that indicate that the 400' recommendation should be modified? EA 03b - If "No" are mitigation measures in place and documented?
53	Table 6	EA 04 - Is the adjacent land area free from non-synthetic soil amendments stored within 400' of the edge of the crop? EA 04a - If "No" has the non-synthetic crop treatment been treated using a validated process and no closer than 30' from the edge of the crop? EA 04b - If "No" are there mitigation measures or topographical features that indicate that the 400' recommendation should be modified? EA 04c - If "No" are mitigation measures in place and documented?
54	Table 6	EA 05 - Is the adjacent land area free from grazing lands/domestic animals within 30' from the edge of the crop? EA 05a - If "No" are there topographical or climate features that indicate that 30' recommendation should be modified? EA 05b - If "No" are mitigation measures in place and documented?
54	Table 6	EA 06 - Is the adjacent land area free from any septic leach fields (home or other building) within 30' of the edge of the crop? EA 06a - If "No" are there mitigation measures, topographical or climate features that indicate that 30' should be modified is too short a distance? EA 06b - If "No" are mitigation measures in place and documented?
54	Table 6	EA 07 - Are all well heads at least 200' from untreated manure? EA 07a - If "No" are there topographical or climate features that indicate that 200' is too short a distance? EA 07b - If "No" are mitigation measures in place and documented?
54	Table 6	EA 08 - Does documentation justify the buffer zone distance for all surface water sources on the ranch and their separation from untreated manure (raw manure and partially composted manure) as follows? EA 08a - 100' for sandy soil with a slope <6% EA 08b - 200' for loamy or clay soil with a slope <6% EA 08c - 300' for all slopes >6%
18	116-120	EA 09 - Is the adjacent land free from uses or conditions that pose a food safety risk to crops? EA 09a - If "No" has a risk assessment been conducted to evaluate the risk? EA 09b - If "No" have corrective measures been put in place and documented?



ENVIRONMENTAL ASSESSMENTS: Recent Field History

Page	Line #	Questions
18	126-127	EA 10 - Are production blocks free from all of the following: EA 10a - History of flooding within the last 60 days
18	116-124	EA 10b - History of grazing on the crop land within the last 1 year EA 10c - History of hazardous activity including but not limited to CAFO, municipal waste, toxic waste, landfill, etc.?
EA 10a - EA 10c if any of these are answered "NO" then EA 10d will drop down		
48	639-640	EA 10d - If no, were specific actions implemented and documented to mitigate the issue(s)?

ENVIRONMENTAL ASSESSMENTS: Pre-harvest Assessment

Page	Line #	Questions
18	106-110	EA 11 - Was a Pre-Harvest Assessment conducted within 7 days for each harvested lot?
51	Table 5	EA 11a - Did it address the following areas? EA 11b - Intrusion by animals
18	126-127	EA 11c - Flooding
18	106-110	EA 11d - Potential contamination materials EA 11e - Condition of water source and distribution system
18	116-120	EA 11f - Unexpected adjacent land activity that will pose a risk to food safety
42	480-498	EA 11g - Worker hygiene and sanitary facilities

ENVIRONMENTAL ASSESSMENTS: Animal Intrusion

Page	Line #	Questions
51	Table 5	EA 12 - Did the assessment indicate that the production area was free from evidence of animal intrusion?
If EA 12 is answered "NO" then EA 12a - EA 12f will drop down.		
50	Figure 5	EA 12a - Was the animal hazard or potential risk of intrusion assessed by food safety professional or food safety personnel? EA 12b - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"? EA 12c - If "YES" were corrective actions carried out according to company SOP? EA 12d - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"? EA 12e - If "YES" were corrective actions carried out per the LGMA requirements? EA12f - If "YES" is documentation available to show that actions were implemented?



ENVIRONMENTAL ASSESSMENTS: Unusual Events

Page	Line #	Questions
43	543-549	EA 13a - Do the records indicate that no fields were flooded at any time during the crop cycle?
46	553-588	EA 13b - If production blocks were flooded is there documentation to indicate the extent of flooding and the area of crop impacted? EA 13c - Was the product left un-harvested?
45	Table 4	EA 13d - If product was harvested, was a 30' (min) "no harvest" buffer from the high water mark established? EA 13e - Are these remedial activities documented?
18	106-110 116-120	EA 14 - Is the pre-harvest lot free from all evidence of any other type of potential source of human pathogen contamination AND the food safety status of the adjacent land remains unchanged since the pre-season assessment was conducted?
If EA 14 is answered "NO" then EA 14a - EA 14h will drop down		
50	Figure 5	EA 14a - If "No", was a food safety assessment completed? EA 14b - Is the individual who conducted the assessment identified?
51	Table 5	EA 14c - Is the date of the assessment documented? EA 14d - Were remedial actions formulated? EA 14e - If "No", was the field harvested?
53	Table 6	EA 14f - If "No", is there documentation to show the remedial actions were followed? EA 14g - Did the remedial action include creation of "no harvest" buffer or separation zones around the potentially contaminated area(s)? EA 14h - Is documentation which fully delineates the potential contamination available for review?

WATER USE

Page	Line #	Questions
19	148-153	WU 01 - Is a ranch map (or other documentation) indicating the sources of water and distribution systems available for review? WU 01a - Does the map (or other documentation) identify permanent above ground fixtures such that they can be located in the field? WU 01b - Does the map or other documentation identify
19	159-161	WU 01c - Was a sanitary survey completed prior to the use of each water source?
19	154-155	WU 01d - Are effluent systems (that convey untreated human or animal wastes) separated from irrigation water systems?
21	Table 1	WU 02 - Was a source water test conducted for each source of water within 60 days of first use on post germinated fields? Note: Reclaimed water sample results and analysis provided by the water district or provider may be utilized as records of water source testing for verification and validation audits.
24	Figure 1A	WU 02a - Are records available to demonstrate that water samples have been collected from each water distribution system on a monthly basis?



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25	Figure 1B	<p>WU 02b - Records show that the water samples are taken no less than 18 hours apart.</p> <p>WU 02c - Is the geometric mean less than or equal to 126 MPN/100 ml?</p> <p>WU 02d - Are all individual samples less than or equal to 235MPN/100 ml (foliar) or 576 MPN/100m ml (non-Foliar)?</p> <p>WU 02e - The location where the sample was taken is recorded.</p> <p>WU 02f - Show the name of the test laboratory</p> <p>WU 02g - The generic <i>E. coli</i> testing methodology is specified on the test report and meets the FDA BAM method or any U.S. EPA approved or AOAC accredited for quantitative monitoring of water for generic <i>E. coli</i>.</p>
WU 02c or WU 02d answered "no" then WU 02h-WU 02p will drop down		
21	Table 1	<p>WU 02h - The water system was discontinued after the tests indicated the water source failed to meet the minimum water quality requirements.</p>
24	Figure 1A	<p>WU 02i - A sanitary survey was completed on the water source and distribution system for possible contamination.</p>
25	Figure 1B	<p>WU 02j - Records show that corrective actions were taken to eliminate the contamination sources.</p> <p>WU 02k - Samples for the required water retesting were taken at the previous sampling point.</p> <p>WU 02l - One water test was taken daily (not less than 18 hours apart) for 5 days.</p> <p>WU 02m - These 5 test results met the acceptance criteria: average less than 126 MPN/100ml (based on rolling geometric mean=5) and no sample exceeded greater than 235 MPN/100 ml (foliar) or 576 MPN/100 ml (non-foliar).</p> <p>WU 02n - Records show the water system was not used while the water quality was inadequate.</p> <p>WU 02o - Was product sampled for <i>E. coli</i> 157:H7 and <i>Salmonella</i>.</p> <p>WU 02p - Or records show that the crop was not harvested for human consumption when the tests were positive for <i>E. coli</i> O157:H7 or <i>Salmonella</i>.</p>
21	Table 1	<p>WU 03 - Is the source water from a municipal supply or well?</p> <p>WU 03a - Does this source qualify for the 5 consecutive monthly samples below the generic <i>E. coli</i> detection limit on record (2.2 MPN) exemption?</p> <p>WU 03b - Is the last sample recorded within 180 days of the audit date?</p>
21	Table 1	<p>WU 04 - Is the water from a source that meets the USEPA MCLG for microbial quality (Negative per 100ml (<2.2 MPN/100ml))?</p> <p>WU 04a - If "No" has the water received sufficient disinfection to meet the USEPA MCLG for microbial quality?</p> <p>WU 04b - If the water is reused, is sufficient disinfection added and monitored to prevent possible cross-contamination? (Chlorine-more than 1ppm free chlorine and PH 6.5-7.5 or ORP-more than 650mV or other approved treatment per product EPA label for human pathogen reduction in water)</p> <p>WU 04c - Was a source water test conducted for each source of water within 60 days of first use?</p> <p>WU 04d - Are records available to demonstrate that water samples or monitoring results have been collected from each water distribution system within the last month?</p>
If WU 04 and WU 04a are answered "NO" then WU 04e - WU 04n will drop down.		



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22-23 26	Table 1 Figure 1C	<p>WU 04e - Was use of the water system discontinued after the tests indicated the water source failed to meet the minimum water quality requirements?</p> <p>WU 04f - Was a sanitary survey completed on the water source and distribution system for possible contamination?</p> <p>WU 04g - Do records show that corrective actions were taken to eliminate the contamination sources?</p> <p>WU 04h - Were samples for the required water retesting taken at the previous sampling point?</p> <p>WU 04i - Was one water test taken daily (not less than 18 hours apart) for 5 days at the point closest to use?</p> <p>WU 04j - Did these 5 test results meet the acceptance criteria: less than 2.2 MPN/100ml?</p> <p>WU 04k - Do records show the water system was not used while the water quality was inadequate?</p> <p>WU 04l - Was product sampled for <i>E. coli</i> 157:H7 and <i>Salmonella</i>?</p> <p>WU 04m - Do records show that the crop was not harvested for human consumption when the tests were positive for <i>E. coli</i> O157:H7 or <i>Salmonella</i>?</p> <p>WU 04n - Do the records show that the product was not harvested?</p>
22-23	Table 1	<p>WU 05 - Do records show that all water used in equipment cleaning processes (Tables, belts, bins, etc.) is tested for generic <i>E. coli</i> or that sufficient disinfectant was used?</p> <p>WU 05a - Do the records document all of the following:</p> <p>WU 05b - The generic <i>E. coli</i> testing methodology is specified on the test report and meets the FDA BAM method or any U.S. EPA approved or AOAC accredited for quantitative monitoring of water for generic <i>E. coli</i>.</p> <p>WU 05c - The records indicate that the operation monitors disinfectant levels during rehydration, product coring in the field and product cooling.</p> <p>WU 05d - The records indicate the testing procedure/equipment that was used for monitoring the disinfectant levels (Indicate the procedure/equipment type).</p> <p>WU 05e - Is the location of where the sample was taken recorded?</p> <p>WU 05f - Do the records show the name of the test laboratory if applicable?</p>

SOIL AMENDMENTS

Page	Line #	Questions
All soil amendments are free from raw or partially composted animal manure and solids		
27	230-232	<p>SA 01 – Raw or partially composted animal manure, animal by-products or biosolids have not been applied in the last 1 year?</p> <p>SA 01a – If "No" to the above were any of these fields used in the production of leafy greens?</p>
29	Table 2	<p>SA 02 – No soil amendment containing fully composted animal manure has been applied in the field within the last year</p>
If SA 02 is answered "NO" then SA 02a-SA 02u will drop down		
29	Table 2	SA 02a – Are Process Validation records available for review?



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32	Figure 2A	<p>SA 02b – If the Enclosed or Within-Vessel Composting method is used, do the records show:</p> <p>SA 02c – ...that the active compost maintained a minimum of 131°F for 3 days?</p> <p>SA 02C(1) – ...Is a Letter of Guaranty or other comparable documentation available that shows the soil amendment has been adequately cured?</p> <p>SA 02d – If the Windrow Composting method is used do the records show:</p> <p>SA 02e – ...that the active compost maintained aerobic conditions for a minimum of 131°F or higher for 15 days or longer?</p> <p>SA 02f – ...a minimum of five turnings during this period?</p> <p>SA 02f(1) – ...Is a Letter of Guaranty or other comparable documentation available that shows the soil amendment has been adequately cured?</p> <p>SA 02g – If the Aerated Static Pile Composting method is used do the records show that:</p> <p>SA 02h – ...the active compost was covered with 6 to 12 inches of insulating materials?</p> <p>SA 02i – ...maintain a minimum of 131°F for 3 days?</p> <p>SA 02i(2) – ...Is a Letter of Guaranty or other comparable documentation available that shows the soil amendment has been adequately cured?</p> <p>SA 02j – Has each lot of composted material that is equal to or less than 5000 cubic yards been tested as required?</p> <p>SA 02k – Has each lot of composted material been applied to the production location more than 45 days before harvest?</p> <p>SA 02k(1) – For on-farm compost, are process control monitoring records reviewed, dated and signed by supervisor or responsible party within a week after records were made?</p>
<p>Records must be available to document the following criteria have been meet for each lot of compost containing animal material used.</p>		
29 32	Table 2 Figure 2A	<p>a. Acceptance criteria</p> <p>SA 02l – Fecal coliforms: <1000 MPN/gram</p> <p>SA 02m – <i>Salmonella</i>: Negative per sample size of the prescribed test</p> <p>SA 02n – <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test</p> <p>b. Recommended test methods</p> <p>SA 02o – Fecal coliforms: U.S. EPA Method 1680; multiple- tube MPN</p> <p>SA 02p – <i>Salmonella</i> spp: U.S. EPA Method 1682</p> <p>SA 02q – <i>E. coli</i> O157:H7: Any laboratory validated method for compost</p> <p>SA 02r – Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate.</p> <p>c. Sampling plan</p> <p>SA 02s – A composite sample shall be representative and random and obtained as described in the California state regulations.</p> <p>SA 02t – Sample may be taken by the supplier if trained by a testing laboratory or state authority.</p> <p>SA 02u – Laboratory must be certified/accredited for microbial testing by a certification or accreditation body.</p>
28	261 - 270	<p>SA 03 - Is a Letter of Guaranty or other comparable documentation (ingredient statement, bag label, etc.) available that shows the soil amendment does not contain animal manure or is composed of a single ingredient?</p>



		SA 03a - Is the name of the authority issuing the Letter of Guaranty or other comparable document shown?
Soil Amendments that contain animal manure that are heat treated or processed to equivalent methods		
30	Table 2	<p>SA 04 - No soil amendment containing animal manure that has been heat treated or processed by other equivalent methods have been applied in the field within the last year</p> <p style="text-align: center;">If SA 04 is answered "NO" then SA 04a-SA 04m will drop down</p> <p>SA 04a – Are process records or other comparable documentation available that show the lethality of the process?</p> <p>SA 04b – Is the name of the process authority issuing the Letter of Guaranty or other comparable document shown?</p> <p>Records must be available to document the following criteria have been meet for each lot of heat treated or processed by other equivalent method compost containing animal material used.</p> <p>a. Acceptance criteria</p> <p>SA 04c – Fecal coliforms: Negative MPN/gram</p> <p>SA 04d – <i>Salmonella</i> spp.: Negative per sample size of the prescribed test</p> <p>SA 04e – <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test</p> <p>SA 04e(1) – <i>Listeria monocytogenes</i>: Negative per sample size of the prescribed test</p> <p>b. Recommended test methods</p> <p>SA 04f – Fecal coliforms: 9 tube MPN</p> <p>SA 04g – <i>Salmonella</i> spp: U.S. EPA Method 1682</p> <p>SA 04h – <i>E. coli</i> O157:H7: Any laboratory validated method for compost</p> <p>SA 04i – Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate.</p> <p>SA 04i(1) – <i>Listeria monocytogenes</i>: Any laboratory validated method for testing soil amendments</p> <p>c. Sampling plan</p> <p>SA 04j - Take at least 12 equivolume samples from 12 or more separate locations or 12 samples from 12 individual bags, if bagged individually.</p> <p>SA 04k - Sample may be taken by the supplier if trained by a testing laboratory or state authority.</p> <p>SA 04l - Laboratory must be certified/accredited by a certification or accreditation body.</p> <p>SA 04m - If testing records are NOT available is a Certificate of Process Validity as defined by the "Guidelines" available for review?</p>
Soil Amendments that are Non-Synthetic Treatments (compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc.) Table 3 & Figure 3		
34		<p>SA 05 - No non-synthetic crop treatment has been applied to the crop?</p> <p style="text-align: center;">If SA 05 if answered "NO" then SA 05a - SA 05v will drop down</p>
35	Table 3	<p>SA 05a – If "No" to the above, the product (non-synthetic soil amendment) was not applied to the edible portion of the crop?</p> <p>SA 05b – Is a letter of compliance or comparable document outlining the actual conditions of use and conformance to standards available for review (including presence of animal products or manure)?</p>



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34	293-294	SA 05b(1) – If compost / treated ag tea containing nutrients intended to increase microbial biomass (e.g., molasses, yeast extract, algal powder) is applied to edible portion of the crop, do records indicate that the nutrients were added prior to treatment?
Records must be available to document the following criteria have been meet for each lot of non-synthetic crop treatment used.		
35	Table 3	<p>SA 05c – Did each lot/batch used meet the microbial criteria identified below? SA 05c(1) – Fecal coliforms: Negative MPN/gram SA 05d – <i>Salmonella</i>: Negative per sample size of the prescribed test SA 05e – <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test SA 05e(1) – <i>Listeria monocytogenes</i>: Negative per sample size of the prescribed test SA 05f – If this treatment is applied as a liquid was the solution made with water that meets the quality standard for post-harvest water listed n Table 1. Application intervals were met: SA 05g – Was this non-synthetic crop treatment produced using a validated process for pathogen control? SA 05h – If "No" to above, was the treatment applied at least 45 days before harvest? SA 05i – If "Yes", are process validation records and documentation available to show that the process is capable of reducing pathogens of human health significance to acceptable levels. Acceptable testing methods were followed: SA 05i(1) - Fecal coliforms: Negative MPN/gram SA 05j – <i>Salmonella</i> spp: U.S. E.P.A. Method 1682 SA 05k – <i>E. coli</i> O157:H7: Any laboratory validated method for compost sampling SA 05l(1) – <i>Listeria monocytogenes</i>: Negative per sample size of the prescribed test SA 05l – Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate. The proper sampling plan was followed: SA 05m – Solid: 12 point sampling plan composite sample SA 05n - Liquid: Single well-mixed sample per lot SA 05o - Sample may be taken by the supplier if trained by the testing laboratory SA 05p - Laboratory must be certified/accredited by annual review of laboratory protocols based on GLPs by a certification or accreditation body. Testing Frequency: SA 05q - Each lot before application to production fields. SA 05r - Identify the crop treatment. SA 05s - Show the name of the laboratory completing the testing. SA 05t - Show date of application ? SA 05u - Does it show the date of harvest? SA 05v - Show the supplier name?</p>
34	298-300	SA 06 - Is there a written policy implementing management plans (e.g. timing of applications, storage location, source and quality, transport, etc.) that significantly reduce the likelihood that soil amendments and/or crop treatments being used contain human pathogens and assure to the greatest degree practicable that the use of crop treatments does not pose a significant pathogen contamination hazard?



WORKER PRACTICES: General Requirements

Page	Line #	Questions
41	443-445	WP 01 - Is there a written policy for all employees and all visitors to the field location which describes the required hygiene rules? WP 01a - Does the Policy address the following:41
41	450-453	WP 01b - Sanitary Facilities
41-42	443-470	WP 01c - Field Worker Practices (GMP's, GHP's, etc.)
42	471-479	WP 01d - Worker Health Practices

WORKER PRACTICES: Sanitary Facilities

Page	Line #	Questions
42	480-498	WP 02 - Is there a documented field sanitary facility program that addresses the following? WP 02a - N/A WP 02b - The number, condition, and placement of field sanitation units complies with applicable state and/or federal regulations. WP 02c - Sanitary facilities are readily accessible (proximate) to the work area. WP 02d - Sanitary facilities are regularly maintained according to schedule. WP 02e - Sanitary facilities have sufficient consumable supplies (i.e.: hand soap, water that meets the postharvest acceptance criteria, paper towels, toilet paper, etc.). WP 02f - Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work. WP 02g - Field sanitation facilities are cleaned and serviced with waste disposed of on a scheduled basis and at a location that minimizes the potential risk for product contamination. WP 02h - Address the placement of the sanitary facility in order to minimize any impact on the crop in the field including: WP 02i - Minimize the impact on the crop from leaks and/or spills WP 02j - Ability to access the unit for service WP 02k - Documented response plan in the event of a major leak and/or spill.
41	449-463	WP 03 - Is there a written worker practices program that establishes employee work rules that address the following: WP 03a - N/A WP 03b - Training on proper sanitation and hygiene practices WP 03c - Requirement for workers to wash their hands with soap and water before beginning or returning to work, and any other time when hands may have become contaminated. WP 03d - Confine smoking, eating and drinking (except water) to designated areas. WP 03e - Storage requirements for personal items in/or adjacent to the field? WP 03f - The appropriate use and sanitation of gloves. WP 03g - Avoid contact with animals



41-42	464-470	<p>WP 03h - For materials targeted for further processing, is there a written physical hazard prevention program which includes the following?</p> <p>WP 03i - The proper wearing of head and facial hair restraints.</p> <p>WP 03j - The proper wearing of apron and other food safety apparel.</p> <p>WP 03k - Removal of visible jewelry (rings, bracelets, necklaces, body piercings, etc.) or covering of hand jewelry prior to the start of work.</p> <p>WP 03l - Removal of all objects from upper pockets.</p> <p>WP 03m - Prohibitions on spitting, urinating or defecating in the field.</p>
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WORKER PRACTICES: Worker Health Practices

Page	Line #	Questions
42	471-479	<p>WP 04 - Is there a written worker health practices program that establishes employee work rules which address the following?</p> <p>WP 04a- N/A</p> <p>WP 04b - Workers with diarrheal disease or symptoms of other infectious disease are prohibited from being in the field or handling fresh produce or food-contact surfaces?</p> <p>WP 04c - Workers with open cuts or lesions are prohibited from handling fresh produce.</p> <p>WP 04d - Actions for employee to take in the event of injury or illness (e.g. notifying supervisor).</p> <p>WP 04e - A policy describing procedures for handling/disposition of produce or food contact surfaces that have come into contact with blood or other body fluids.</p>

FIELD SANITATION: General Requirements

Page	Line #	Questions
40-41	425-433	<p>FS 01 - Is there a written policy for all employees and all visitors in the field location which describes the required field sanitation SOPs?</p>

FIELD SANITATION: Field Activities

Page	Line #	Questions
41	446-447	<p>FS 02 - Does the written field activity SOP address the following:</p> <p>FS 02a(a) – is a specific individual assigned the food safety responsibility for growing operations?</p>
42-43	505-515	<p>FS 02a - Cross contamination by farming equipment and tools that comes into contact with raw manure, untreated compost, waters of unknown quality, animal hazards or other potential sources.</p> <p>FS 02b - If "yes", does it appropriately restrict the use or require a documented cleaning and sanitation program of the equipment?</p> <p>FS 02c - If cleaning and sanitation is required, are records of the cleaning/sanitation available for review.</p>



FIELD SANITATION: Harvest Activities

Page	Line #	Questions
41	446-447	FS 03 - Does the written harvest activity SOP address the following: FS 03a - Is a specific individual assigned the food safety responsibility for harvesting?
48	628-631	FS 03b - Is a documented daily food safety harvest assessment available for review? FS 03c - Is the assessment dated? FS 03d - Is the individual who conducted the assessment identified?
50	Figure 5	FS 03e - Are the specific growing blocks associated with the assessment clearly identified? FS 03f - Is the Harvester name and contact information documented? FS 03g - Did the assessment indicate that the production area was free from evidence of animal intrusion?
If FS 03g is answered NO the FS 03gg – FS 01i2 will drop down		
48	628-631	FS 03gg - Was the animal hazard or potential risk of intrusion assessed by food safety professional or food safety personnel? FS 03h - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"?
50	Figure 5	FS 03h1 - If "YES" were corrective actions carried out according to company SOP? FS 03i - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"?
		FS 03i1 - If "YES" were corrective actions carried out per the LGMA requirements? FS 03i2 - If "YES" is documentation available to show that actions were implemented?
39	385-387	FS 03j - Is there an SSOP for food-contact surfaces of harvest equipment, tools and containers addressing the following: FS 03k - Method and frequency of cleaning and sanitation
41	448	FS 03l - Chemical usage and record keeping (e.g. soap, detergent, sanitizer, etc.) FS 03m - Equipment specific cleaning instructions FS 03n - Chemical storage FS 03o - All chemical storage containers are labeled appropriately
39	388	FS 03p - Sanitation Procedures Verification
38	342	FS 03q - Daily inspection
39	385-387	FS 03q (1) - Is there an SOP for non-food-contact surfaces of harvest equipment, tools, and containers addressing the following: FS 03q(2) – Method and frequency of cleaning
41	448	FS 03q(3) - Chemical usage and record keeping? (e.g. soap, detergent, sanitizer, etc.) FS 03q(4) - Equipment-specific cleaning instructions?
39	388	FS 03q(5) - Cleaning verification?
38	342	FS 03q(6) - Daily inspection?
39	389-390	FS 03r - Question deleted per LGMA Board action on 7/10/2009 FS 03r (1) - Has a supervisor or responsible party signed and dated equipment cleaning and sanitation records within a week of the activities being performed?
38	347-352	FS 03s - Is there an SOP for handling and storage of product containers which addresses the following:



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		<p>FS 03t - Overnight storage</p> <p>FS 03u - Contact with the ground</p> <p>FS 03v - Container assembly (RPC, fiber bin, plastic bin, etc.)</p> <p>FS 03w - Damaged containers</p> <p>FS 03x - Use of containers only as intended</p>
38-39	347-342	<p>FS 03y - Is there an SOP for sanitary operation of equipment?</p> <p>FS 03z - Are spills and leaks addressed?</p>
39 40	391 - 392 402-403	<p>FS 03aa - Harvest equipment protection</p> <p>FS 03bb - Overnight equipment and tool storage</p> <p>FS 03cc - Does the SOP for Sanitary Operation of Equipment, address remedial actions taken as necessary?</p>
39	357-360	FS 03dd - Is there an SOP for water tanks, containers, and equipment used for hydration.
40	389-401	<p>FS 03zd – Are packing materials or containers cleanable or designed for single use?</p> <p>FS 03ze – Are reusable packing materials or containers cleaned and sanitized or fitted with a clean liner?</p>
39	368-372	<p>FS 03zf – Are instruments or controls used to measure, regulate, or record temperature, hydrogen ion concentration, pH, sanitizer concentration or other conditions:</p> <p>FS 03zf (1) - Accurate and precise as necessary and appropriate for their intended use?</p> <p>FS 03zf (2)– Adequately maintained?</p> <p>FS 03zf (3) – Adequate in number for their intended use?</p>
39	373-376	FS 03zf (4)– Is waste, trash, and other debris conveyed, stored, and disposed of in a manner that protects product and production area from contamination?
40	406-417	<p>FS 03zg – Are there any buildings used to store packing material?</p> <p>FS 03zg (1) – Does the building have proper drainage and protection from condensate or drips to keep food-contact surfaces from getting wet?</p> <p>FS 03zg (2) – Are packaging materials and other food-contact surfaces kept separate from contamination sources by partition, time, location, enclosed system, or other effective means?</p>
50 51	Figure 5 Table 5	FS 04 - Is there a written SOP which addresses corrective actions for "Low Hazard" animal intrusion?

FIELD OBSERVATIONS: Water Use

Page	Line #	Questions
19	153	FO 01 - Are all active and/or inactive water sources recorded in the Water Use Audit?
19	154 159	<p>FO 01a - From visual inspection, there is no evidence that the water sources and distribution systems may pose a contamination risk (damage, inadequately maintained, evidence of animal activity, connection with effluent systems)?</p> <p>FO 01b - No other observations of improper use of water</p>



FIELD OBSERVATIONS: Soil Amendments

Page	Line #	Questions
27 – 33	229-272 Table 2	FO 02 - No evidence of undocumented use of soil amendments? FO 02a - No evidence of improperly applied soil amendments? FO 02b - No evidence of improperly stored soil amendments? FO 02c - No other observations of improper use of soil amendments

FIELD OBSERVATIONS: Environmental Factors

Page	Line #	Questions
50	Fig. 5	FO 03 - No evidence of fecal contamination in the field? FO 03a - No evidence of animal hazards in the field?
51 - 52	Table 5	FO 03b - No evidence of non-compliance with distances as outlined in the Environmental Assessment? FO 03c - No evidence that remedial actions such as animal barriers (fences, gates, grates, etc.) are not in good repair and operational? FO 03d - No evidence that worker hygiene rules have been violated during the crop cycle? FO 03e - No other observations of environmental risk factors.

FIELD OBSERVATIONS: Worker Practices

Page	Line #	Questions
41	459	FO 04 - No employees eating, drinking (except water), chewing tobacco or smoking in crop production actively harvested areas?
41	450-453	FO 04a - All employees observed to have washed their hands after; restroom usage, work breaks or any returning to work occasion?
42	480-498	FO 04b - No evidence that sanitary facilities are not routinely clean and operational?
		FO 04c - No evidence that worker hygiene rules have been violated during the crop cycle? FO 04d - No evidence that sanitary facilities are not adequately stocked with disposable supplies?
41-42	464-469	FO 04e - No improperly stored personal items observed in the field?
41	460	FO 04f - No evidence or observations that employees are not using the restrooms?
42	472-475	FO 04g - No employees with uncovered wounds, boils or cuts?
		FO 04h - No employees with symptoms of infection or contagious disease?
41-42	434-479	FO 04i - No other observations of improper work practices.



FIELD OBSERVATIONS: Field Sanitation

Page	Line #	Questions
		FO 05 - No evidence of excessive non-vegetative debris in the field? FO 05a - No evidence of open and/or unsupervised chemicals in the field? FO 05b - No evidence of leaks and spills on equipment in the field? FO 05c - No evidence of the use of non-sanitized farm equipment that may have come in contact with raw manure, untreated compost, waters of unknown quality, wildlife or domestic animals? FO 05d - No evidence of other cross-contamination potential of product and/or product contact surfaces? FO 05e - No other evidence of improper field sanitation.

SOIL FERTILITY

Page	Line #	Questions
57	693 - 705	SF 01: Have all production blocks intended for spinach been evaluated for the presence of cadmium? SF02: Has a soil fertility program been developed

TRANSPORTATION

Page	Line #	Questions
57	712 - 715	TR 01 – Is there an inspection program for equipment and shipping containers used to transport leafy greens from the farm and on the farm? TR 01a - Are shipping units and equipment used to transport leafy greens on the farm or from the farm to a cooling, packing, or processing facility part of an inspection program? TR 01b – Is the condition of shipping units and equipment checked for cleanliness before being used to ship leafy greens?