

PrimusLabs.com

Harvest Crew Audit Recommendations (To be used in conjunction with v04.11)

Attention Auditee:

Please see http://www.caleafygreens.ca.gov/pdf/metrics_070418.pdf and <http://www.wga.com/Default.aspx?tabid=250> (Support Documents) for the latest development in GAP Metrics. This document is currently in draft format. Once the final version has been created, PrimusLabs.com will review and amend audit templates and supporting documentation.

Harvest Crew Audit Recommendations

The document is for guidance only and in no way replaces any Regulatory Legislation or Guidance. The PrimusLabs.com Harvest Crew Recommendations Document details minimum requirements by means of short statements related to audit questions. There will be variations in applicability to a harvesting operation based on the process(es), locations, equipment, and commodities involved. PrimusLabs.com accepts no liability for the contents of this document, nor how an individual chooses to apply this document.

This document has been developed to enable harvesting operations to evaluate the food safety risks of their operation. They are intended to help management identify preventative programs that need to be in place and identify problems that may currently exist. Used in combination with our self-audit program, <http://www.primuslabs.com/fs/self.html>, a harvesting operation can prepare for a Third Party Audit.

Recommendations are based on:

Food Producers, Processors, Transporters, and Retailers: Food Security Preventive Measures Guidance <http://vm.cfsan.fda.gov/~dms/secguid.html>

Field Cored Lettuce “FC Lettuce” Best Practices
http://www.uffva.org/news/fccbest8_3a.pdf

CA Code of Regs, Title 8, Sec. 3457, Field Sanitation
<http://are.berkeley.edu/heat/sec3457.html>

Buyer specifications and requirements.

Field harvesting operations located outside the U.S. must meet U.S. regulations and customer requirements as indicated above.

Audit Format and Scoring Guidelines

The numbering system in this guide is based on the v04.11 Harvest Crew Audit Template and broken up into 4 categories: Self Inspection, Employee Safety & Hygiene, Harvest Practices, and Food Security.

In this audit, questions are scored as full compliance, non-compliance, or non-applicable (where allowed).

Currently there are 4 severity A questions (Automatic Failure questions) which are listed in the chart below. If one of these questions is answered no, the entire audit will fail resulting in a score of zero. The electronic report will list each non-compliant question with corresponding recommendations.

Currently there are 8 questions that will not be scored until the next revision of this audit. “New question” has been inserted at the end of the question for the reader to distinguish which questions will not affect the total audit score. The purpose of this is to prepare the auditee for scoring assignments at a later date.

The Food Security Section is scored independently from the total score.

Automatic Failure Questions

<i>Severity</i>	<i>Category</i>	<i>Question Number</i>	<i>Question</i>	<i>Desired Answer</i>	<i>Possible Score</i>	<i>Recommendation</i>
A	Employee Safety & Hygiene	05	Are toilet facilities provided? If NO, go to 06.	Yes	15	Portable or stationary toilet facilities (including urinals if applicable) should be available for all harvesting employees to prevent contamination onto product, packaging, equipment, and growing area. No bore hole/ long drop toilets allowed.
A	Employee Safety & Hygiene	06	Is there evidence of human or livestock fecal contamination in the growing area?	No	15	There should be no evidence of human or livestock fecal contamination in the growing area, area being harvested, packaging area, equipment area, or in any other area that would cause a microbiological contamination issue.
A	Employee Safety & Hygiene	07	Are there hand washing facilities provided? If NO, go to 08.	Yes	15	There should be functioning hand washing facilities (portable or stationary) provided for all employees involved in harvesting.
A	Employee Safety & Hygiene	10	Are all commodities that come in contact with blood destroyed?	Yes	20	Any commodity that comes into contact with blood must be destroyed.

Non-scored Questions

<i>Severity</i>	<i>Category</i>	<i>Question Number</i>	<i>Question</i>	<i>Desired Answer</i>	<i>Possible Score</i>	<i>Recommendation</i>
0	Employee Safety & Hygiene	05a	Are toilet facilities in a suitable location to prevent contamination to the growing area or to the harvesting equipment?	Yes	0	Placement of toilet facilities should be in a suitable location to prevent contamination to product, packaging, equipment, and growing areas.
0	Employee Safety & Hygiene	05i	Are there sanitation servicing records for the toilets?	Yes	0	Self contained toilets should be emptied and serviced regularly to prevent overflow. Servicing records (either contracted service or in-house) should be available for review.
0	Employee Safety & Hygiene	07a	Are the hand washing facilities placed within ¼ mile or 5 minutes walking distance of all employees?	Yes	0	Hand washing facilities should be provided and placed within 1/4 mile or 5 minutes walking distance of the harvest crew Or prevailing national/ local guidelines.
0	Employee Safety & Hygiene	07b	Are hand wash stations clearly visible (e.g. situated outside the toilet facility) and easily accessible to workers?	Yes	0	So employee's hand washing activities can be verified, hand wash stations should be clearly visible (e.g. situated outside the toilet facility) and easily accessible to workers.
0	Employee Safety & Hygiene	10a	Is there a written policy in place and available for all commodities that come in contact with blood to be destroyed?	Yes	0	There should be a written policy that is communicated to harvest crew workers detailing that if product has come into contact with blood, all affected product must be destroyed.
0	Harvest Practices	12c	Are cartons and other packing materials in the harvesting process free from exposure to the ground and or any handling contamination?	Yes	0	Cartons and other packing materials used in the harvesting process should be placed with protection underneath and handled in a manner to eliminate contamination from the ground or from inappropriate human handling.
0	Harvest Practices	12e	If cartons are left in the field overnight are they kept protected?	Yes	0	All containers, cartons, packing material should be stored in a protected area to reduce the risk of contamination and tampering that can occur if cartons are left in field overnight.
0	Harvest Practices	15b	Are harvest tools (e.g., knives, coring rings, etc.) not being taken into break/toilet areas or used for any other purpose other than product harvesting?	Yes	0	In order to prevent contamination, harvest tools (e.g., knives, coring rings, etc.) should not be taken into break/toilet areas or used for any other purpose other than product harvesting.
0	Harvest Practices	17c	If the harvesting machinery is cleaned, sanitized and inspected	Yes	0	Harvesting machinery needs to be cleaned, sanitized, and inspected

			prior to use each day are records kept?			prior to use each day. Records should be kept detailing information of chemicals used, strengths, activity date, and responsible personnel conducting activity.
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PrimusLabs.com Harvest Crew Score System

<i>Percentage (%)</i>	<i>Category</i>
95-100%	Superior
85-94%	Excellent
73-84%	Standard
61-72%	Marginal
<60%	Unsatisfactory

Recommendations

SELF INSPECTION

01 Have self-inspections been completed for each harvest crew?

Frequent inspections should be done to identify problems and/or situations which need improvement. Records should show corrective actions and/or (if using a high frequency e.g. weekly) action verifications should be shown on the next inspection report.

EMPLOYEE SAFETY & HYGIENE

02 Are there any employees observed with improperly covered open wounds?

There should be no employees in harvesting with exposed boils, sores, infected wounds, or any other source of abnormal contamination. All bandages must be covered with a non-porous covering such as latex or plastic gloves.

03 Are any employees eating in actively harvested areas?

Eating and drinking (other than water), including gum chewing must be restricted to areas away from production to prevent contamination of product, packaging, equipment, and the growing area.

04 Are any employees using tobacco products in areas of production/actively harvested areas?

Smoking or chewing tobacco must be restricted to areas away from production to prevent contamination of product, packaging, equipment, and the growing area. There shall be no evidence of spitting. Butts should be disposed of appropriately.

05 Are toilet facilities provided? If NO, go to 06.

Portable or stationary toilet facilities (including urinals if applicable) should be available for all harvesting employees to prevent contamination onto product, packaging, equipment, and growing area. No bore hole/ long drop toilets allowed.

05a Are toilet facilities in a suitable location to prevent contamination to the growing area or to the harvesting equipment? New question.

Placement of toilet facilities should be in a suitable location to prevent contamination to product, packaging, equipment, and growing areas.

05b Are separate toilet facilities provided for men and women in groups larger than 5 employees?

There should be separate toilet facilities provided for men and women in groups larger than 5 employees Or prevailing national/ local guidelines.

05c Is a minimum of one toilet facility provided for each group of 20 employees?

At least one toilet per 20 employees should be provided Or prevailing national/ local guidelines.

05d Are toilet facilities placed within ¼ mile or 5 minutes walking distance of all employees?

Toilet facility placement should be within 1/4 mile or 5 minutes walking distance of where harvesting crews are located Or prevailing national/ local guidelines.

05e Do toilet facilities have visuals or signs, written in the appropriate languages, reminding employees to wash their hands before returning to work?

Toilet facilities should have visuals or signs written in the appropriate languages, reminding employees to wash their hands before returning to work. The visuals or signs should be placed in key areas where employees can easily see them.

05f Are toilets constructed of materials that are easy to clean?

Toilet facilities should be constructed of materials that are easy to clean and sanitize.

05g Are the toilet's construction materials of a light color allowing easy evaluation of cleaning performance?

Toilets should be constructed of materials light in color allowing easy evaluation of cleaning performance.

05h Are the toilets maintained in a clean condition?

Toilets should be cleansed and sanitized regularly. Soiled tissue should not be placed in trash cans and/or on the floor. Toilets should be stocked with toilet paper, scentless soap (avoiding communal bar type) and single use paper towels.

05i Are there sanitation servicing records for the toilets? New question

Self-contained toilets should be emptied and serviced regularly to prevent overflow. Servicing records (either contracted or in-house) should be available for review.

05j Are the catch basins of the toilets designed and maintained to prevent contamination in the field (e.g. free from leaks and cracks)?

Catch basins from toilets must be designed and maintained properly to prevent contamination onto field, product, packaging, and equipment. Catch basins should be free of leaks, cracks and constructed of materials that will not degrade or decompose such as wood.

05k Are the toilets catch basins emptied properly?

If self contained toilets are used, the toilet basins should be emptied/ pumped in a manner to avoid contamination to product, packaging, equipment, and growing areas. Equipment used in emptying/pumping must be in good working order.

05l Are toilets supplied with toilet paper and is the toilet paper maintained properly (e.g. no toilet paper rolls on the floor or in the urinals).

Toilet paper should be available at each toilet location. Toilet paper should be available in a hygienic manner, held on rolls, and should not be placed in urinals or on the floor.

06 Is there evidence of human or livestock fecal contamination in the growing area?

There should be no evidence of human or livestock fecal contamination in the growing area, area being harvested, packaging area, equipment area, or in any other area that would cause a microbiological contamination issue.

07 Are there hand washing facilities provided? If NO, go to 08.

There should be functioning hand washing facilities (portable or stationary) provided for all employees involved in harvesting.

07a Are the hand washing facilities placed within ¼ mile or 5 minutes walking distance of all employees? New question.

Hand washing facilities should be provided and placed within 1/4 mile or 5 minutes walking distance of the harvest crew Or prevailing national/ local guidelines.

07b Are hand wash stations clearly visible (e.g. situated outside the toilet facility) and easily accessible to workers? New question.

So employee's hand washing activities can be verified, hand wash stations should be clearly visible (e.g. situated outside the toilet facility) and easily accessible to workers.

07c Is fresh water made available for hand washing at all facilities?

Only fresh water, odor free, uncontaminated water should be available at hand washing at all facilities.

07d Is soap made available at all hand washing facilities? If NO, go to 07f.

All hand washing facilities must be stocked with soap. Liquid/foam/powder with single use pump dispenser method preferred over communal bar type.

07e Is the soap scentless and does it have emulsifying capabilities?

Soap should be scentless and have emulsifying capabilities to aid in the hand washing procedure.

07f Are single-use towels available at all hand washing facilities?

To reduce the spreading of germs, single-use towels available at all hand washing facilities.

07g Are the hand wash stations designed and maintained properly (e.g. to capture or control rinse water to prevent contamination on to product, packaging, and growing area, free of clogged drains, etc)?

Hand wash stations should be free of clogged drains, designed and maintained properly to capture or control rinse water that could cause contamination onto product, packaging, equipment, and growing area.

07h Are the employees washing their hands prior to beginning work?

To prevent contamination to product, packaging, and equipment, employees should wash their hands prior to beginning work. Fingernails can harbor dirt and debris and therefore should be clean and short.

07i Are the employees washing their hands after break periods?

To prevent contamination to product, packaging, and equipment, employees should wash their hands after break periods. Fingernails can harbor dirt and debris and therefore should be clean and short.

07j Are the employees washing their hands after using the toilet facilities?

To prevent contamination to product, packaging, and equipment, employees should wash their hands after using toilet facilities. Fingernails can harbor dirt and debris and therefore should be clean and short.

07k Is it evident that corrective action is taken when employees fail to comply with hand washing guidelines?

It should be evident that corrective action is taken by a supervisor in charge when employees fail to comply with hand washing guidelines as mentioned in 07h-07j.

08 Is fresh potable drinking water provided for field workers? If NO, go to 09.

Only fresh potable water fit for human consumption should be available for employees on site to prevent dehydration.

08a Are the water containers maintained in a clean condition?

Water containers should be maintained in a clean condition, free from residues and contamination to ensure employees are not adversely affected by contaminated water from unclean containers.

08b Are single-use paper cups or a drinking fountain available for employees?

To avoid contamination to one another, communal drinking containers should not be used. Single use paper cups or a drinking fountain should be available.

09 Are first-aid kits available and is the inventory maintained properly?

There should be a first-aid kit available at harvesting site stocked with inventory (e.g. disposable gloves, bandages, etc), and accessible for employees Or prevailing national/ local guidelines.

10 Are all commodities that come in contact with blood destroyed?

Any commodity that comes into contact with blood must be destroyed.

10a Is there a written policy in place and available for all commodities that come in contact with blood to be destroyed? New question.

There should be a written policy that is communicated to harvest crew workers detailing that if product has come into contact with blood, all affected product must be destroyed.

HARVEST PRACTICES

11. Is there on-site carton storage? If NO, go to 12.

On-site carton/container storage areas must be secure, clean, and maintained properly to reduce pest and foreign material contamination.

11a Are cartons stored in a manner that will prevent contamination (e.g. isolated from farm chemicals, on pallets, under tarps, etc.)?

Cartons (including bins, returnable plastic crates (RPC's), etc) should be stored away from farm chemicals, sanitizers, fertilizers, etc. All packaging materials should be stored off the ground (i.e. on racks, pallets, shelves, etc). Cartons and other packing materials should be properly protected during storage to prevent contamination.

11b Does the carton storage area have a rodent control program?

All carton storage areas should have a pest control program in place. Poisonous block bait must not be placed in areas where contamination can occur to cartons, clamshells, cartons, bins, etc. Pellet or grain bait should not be used.

11c Is the carton/bin storage area subject to a cleaning and/or sanitation program?

All carton/ bin storage areas should be clean and well ventilated, protected from the elements and subject to a cleaning and/or sanitation program.

12 Is the product field/greenhouse packed? If NO, go to 13.

No recommendation.

12a Are all containers intended for carrying product used for that purpose only?

All containers intended for product should not be used for any other purpose than product storage.

12b Are cartons and other packing materials free from evidence of pest activity, foreign materials, and chemicals and inspected prior to use?

Cartons and other packing materials need to be free from evidence of pest activity, foreign materials, and chemicals. They must also be inspected prior to use by responsible employees. If contamination is found, corrective measures must be taken.

12c Are cartons and other packing materials in the harvesting process free from exposure to the ground and or any handling contamination? New question

Cartons and other packing materials used in the harvesting process should be placed with protection underneath and handled in a manner to eliminate contamination from the ground or from inappropriate human handling.

12d Are corrective measures taken when a contaminated carton is discovered (including the evidence mentioned in 12b & 12c)?

Only cartons/containers in suitable condition should be used. Corrective measures should be taken when a damaged carton is discovered. Damage may include, but not limited to evidence of pest droppings, glass and chemical contamination.

12e If cartons are left in the field overnight are they protected? New question

All containers, cartons, packing material should be stored in a protected area to reduce the risk of contamination and tampering that can occur if cartons are left in field overnight.

13 Are packing tables, bins, etc. used to harvest or pack the crop? If NO, go to 14.

No recommendation.

13a Does the packing surface allow for easy sanitation?

Packing surfaces should be made of materials suitable for food contact that can be easily cleaned. Efforts should be made to eliminate wooden surfaces because of its porous nature.

13b Are packing tables, bins, etc. subject to a cleaning program? If NO, go to 14.

There must be evidence of a sanitation program is in place for packing tables, bins, etc. subject to a cleaning program.

13c Is an antimicrobial solution (e.g. chlorinated or equivalent) used in cleaning packing surfaces?

Packing surfaces should be thoroughly cleaned after use using an appropriately approved detergent type material, then sanitized with a suitable approved antimicrobial solution (fit for food use). Antimicrobial solutions, if properly managed ensure that surfaces are sanitized after the cleaning process.

14 Are re-useable containers (e.g., picking buckets, field totes, bins, etc.) used in the harvesting operation? If NO, go to 15.

No recommendation.

14a Are all re-useable containers made of easy to clean materials?

All re-useable containers (totes, bins, buckets, etc) should be made of easy to clean, smooth seamed materials that do not flake or oxidize. Efforts should be made to eliminate wooden surfaces because of its porous nature.

14b Are all re-useable containers subject to a cleaning program? If NO, go to 15.

There must be evidence that a sanitation program is in place and all re-useable containers subject to a cleaning program.

14c Is an antimicrobial solution (e.g. chlorinated solution or equivalent) used in cleaning re-useable containers?

Antimicrobial solutions, if properly managed ensure that re-useable containers are sanitized after the cleaning process. The strength of sanitizers (fit for food use) should be checked on a regular basis and recorded. Solutions too weak may be ineffective, while those too strong may leave residues.

15 Are harvest tools (e.g. knives, decappers, corers, etc.) used during the harvest operation? If NO, go to 16.

No recommendation.

15a Are harvest tools (e.g. knives, coring rings, holsters, etc.) being used, made of non corrosive and easy to clean materials (e.g. no wood or fabric parts)?

To prevent foreign contamination issues, harvest tools (e.g., knives, coring rings, etc.) should be constructed of easy to clean materials. Tools should be shard free, smooth seamed that do not have ability to flake or oxidize.

15b Are harvest tools (e.g., knives, coring rings, etc.) not being taken into break/toilet areas or used for any other purpose other than product harvesting?

In order to prevent contamination, harvest tools (e.g., knives, coring rings, etc.) should not be taken into break/toilet areas or used for any other purpose other than product harvesting.

15c Are harvest tools required to be cleaned in an antimicrobial solution (e.g. chlorinated or equivalent) and is the solution properly checked?

Harvest tools are required to be cleaned in an antimicrobial solution (e.g. chlorinated or equivalent fit for food use). The strength of sanitizers should be checked on a regular basis and recorded. Solutions too weak may be ineffective, while those too strong may leave residues.

16 Is harvesting machinery used? If NO, go to 17.

No recommendation.

16a Are all hydraulics on the harvesting equipment (including tractors) protected with drip catch pans?

Overhead contamination from materials such as hydraulic fluid can result in product, packaging, contamination; therefore equipment should be fitted with catch pans.

16b Are only food grade lubricants used on the critical parts of the harvesting machinery that have the potential to contaminate product?

In order to prevent or reduce contamination to product/packaging, food grade lubricants (i.e. incidental food contact compounds or H1 materials) should be used on critical areas equipment where product exposure exists.

16c Is there not any unprotected glass on the harvesting machinery or tractors (e.g. drink containers, lights, etc.)?

All glass on the harvesting machinery (e.g. lights) should be protected to prevent contamination onto product, packaging, and re-useable containers. Machinery includes tractors and other equipment used in harvesting process.

16d Are all platforms above product, packaging, or food contact surfaces (e.g. belts) on the harvest machinery fitted with protection to prevent product contamination?

Measures should be taken to eliminate or reduce potential contamination by placing protection on areas of equipment above product, food contact surfaces, and belts.

16e Does the packing surface allow for easy sanitation?

Packing surfaces should be made of sanitary, food grade material that can be easily cleaned. Efforts should be made to eliminate wooden surfaces.

16f Is harvesting equipment cleaned with an antimicrobial solution (e.g. chlorinated solution or equivalent) after use?

After use, harvesting equipment should be cleaned with a suitable material, then before being returned to work, sanitized with an antimicrobial solution (fit for food use).

16g If product is rinsed on the harvesting machinery, is the water treated with an antimicrobial solution (e.g. chlorine or equivalent)?

If product is rinsed on the harvesting machinery, the water should be treated with a suitable antimicrobial solution fit for food use.

16h Are antimicrobial solutions checked properly and are there records for the checks?

Antimicrobial solutions should be checked properly with records for the checks. Solutions too weak may be ineffective, while those too strong may be harmful to employees and or consumers.

17 Is the product being semi-processed in the harvesting area (e.g. cleaned & cored, top & tail, florets, etc.)? If NO, go to 18.

No recommendation.

17a Are all food contact surfaces on the machinery constructed of food grade materials or stainless steel?

Food contact surfaces on equipment shall be free of flaking paint corrosion, rust, and other materials. Food contact surfaces should be made of non-toxic, non-porous materials. Surfaces should be maintained in good condition.

17b Is the harvesting machinery cleaned, sanitized and inspected prior to use each day? If No, go to 17d.

Harvesting machinery needs to be cleaned, sanitized, and inspected prior to use each day.

17c If the harvesting machinery is cleaned, sanitized and inspected prior to use each day and are the records kept?

Harvesting machinery needs to be cleaned, sanitized, and inspected prior to use each day. Records should be kept detailing information of chemicals used, strengths, activity date, and responsible personnel conducting activity.

17d Do all employees that come in contact with the product being harvested wear clean protective outer garments (e.g. hairnets, plastic gloves, and aprons)?

An outer garment policy considering potential cross contamination and foreign material risks should be established.

17e Do all employees that wear protective outer garments remove and keep them in a clean and secure area during breaks or when using the toilet facilities?

Protective outer garments shall be removed and kept clean and in a secure area during breaks or when using the toilet facilities.

17f Are all the employees not wearing loose objects above the waist (e.g. jewelry, etc)?

There shall be no employees wearing loose objects above the waist (e.g. jewelry, etc).

17g Are all harvesting knives being collected, cleaned, and sanitized each day?

All harvesting knives shall be collected, cleaned, and sanitized, and stored properly after use. Employee's knives should not be taken home.

17h Are all plastic bin liners closed immediately after harvest to avoid contamination of the harvested product?

All plastic bin liners should be closed immediately and appropriately secured after harvest to avoid product contamination.

18 Are the vehicles transporting fresh produce from field to facility limited to this function only and maintained in proper condition?

Vehicles transporting product should be limited to this function only. Vehicles should be in a good state of repair, clean, odor free, free from personal items, and free from chemical and microbiological contamination. If loads are tied down, tarps, belts, ropes, etc, should also be in good working order, without contamination risk to product.

19 Is there a system in place to track product from the farm? If No, go to 20.

There should be a tracking system in place to ensure product can be traced back to each exact growing location (e.g. grower identification, farm identification, harvest crew details, block, etc.).

19a Is product being harvested (each individual unit) properly identified with date of harvest information?

To maintain traceability in the distribution chain, product being harvested into packaging should be properly identified with harvest date. For finished goods, details should be displayed on each unit of packaging (e.g. clamshell, carton, bag, etc). Pallet tagging is acceptable for raw material destined for further handling in a packinghouse or processor.

19b Is product being harvested (each individual unit) properly identified with information of the production area (e.g. field/lot/greenhouse)?

To maintain traceability in the distribution chain, product being harvested into packaging should be properly identified with production details (e.g. field, lot, greenhouse). For finished goods, details should be displayed on each unit of packaging (e.g. clamshell, carton, bag, etc). Pallet tagging is acceptable for raw material destined for further handling in a packinghouse or processor.

20 Are garbage containers provided in the field for the disposal of food and beverage containers, cups, and paper towels? If NO, go to 20b.

Garbage containers should be provided in the field for the disposal of food and beverage containers, cups, and paper towels.

20a Are garbage containers constructed and maintained in such a manner (e.g., bags, lids, etc.) that protects against pre harvest or post harvest contamination of the crop?

Garbage containers should be constructed and maintained in such a manner with liners, bags, lids, etc.) that protects against pre harvest or post harvest contamination of the crop. Receptacles should be kept covered or closed to prevent attraction of pests. Liners are important so trash can be removed easily.

20b Is all garbage being disposed of properly?

Waste and garbage must be removed on a frequent basis to prevent contamination from occurring. Receptacles should be kept covered or closed to prevent contamination and attraction of pests.

21 Is there a policy in place for all commodities that are dropped on the ground to be discarded? (Non-applicable for commodities such as tubers, root crops, etc.)

There should be a documented policy that if products are dropped on ground the products are discarded. Non-applicable for tubers and root crops.

22 Are there any infant or toddler age children in the growing area?

There should not be any infants or toddlers in the growing area.

23 Are there any domestic animals in the growing area?

Animals should not be allowed in or around product, packaging, area under harvest, and growing areas because they may cause microbiological and foreign contamination.

FOOD SECURITY

24 Is access to the harvest area and related equipment controlled (unauthorized are not being allowed near the equipment)?

To reduce risk of tampering to equipment and harvest area (or areas still in production), access to should be limited.

25 Are Harvest Crew Forman and members directed to report entry of unauthorized individuals?

If entry of unauthorized individuals is recognized, harvest crew members/supervisors should report sightings.

26 Does the company have documented food security policies?

Documented food security policies should be in place (e.g. a document that summarizes the "rules" and expectations of personnel, site, and incoming material security).

27 Are materials such as sanitizers or packaging (cartons, film, wraps, etc.) stored in secured areas overnight? Sanitizers, containers, cartons, packing material should be stored in a protected area to reduce the risk of contamination and tampering that can occur if cartons are left in field or production site overnight. Verbal answers accepted, however auditor should look for evidence of security (e.g. fencing, storage, etc.).

28 Are materials such as sanitizers or packaging (cartons, wrap film, clamshells, etc.) when used in the field while harvesting, controlled in a manner that prevents unauthorized tampering e.g. On a truck near point of harvest?

Packaging material (cartons, wrap film, fruit cups, etc.) should be stored in secured areas with controlled access to reduce potential tampering.

29 Are background checks conducted on critical personnel?

Background checks (e.g. social security numbers, INS details, previous job references, etc) should be conducted on harvest crew personnel.

30 Are all personal materials kept away from the harvest and packaging of the harvesting operation?

Personal materials from harvesting personnel should be kept away from the harvest and packaging of the operation.

31 Are all personnel required to undergo training on food security issues and are records kept?

Food security topics can be included in tailgate meetings.

32 Are water sources tested periodically for contamination?

Water sources should be tested on a periodic basis. The water sample should be taken from the operation (either by the company itself or the local water company). Water samples taken from the site, account for the sites piping, holding tanks etc. Tests should be carried out to check to ensure that the water meets the EPA requirements (see <http://epa.gov/safewater/mcl.html#mcls>) including screening for microbial, chemical, and heavy metal contaminants. If out of specification results are detected, then full details of corrective actions must be noted.

33 Is packaging designed to be tamper-evident (not applicable if not packing into finished goods packaging)?

Packaging should be tamper evident or tamper proof. Tamper systems could be sealed bags or security tape on boxes.

34 Are off premises transportation vehicles (trucks, trailers, rail cars, etc) equipped with cell phones, two way radios, GPS or other positioning systems?

Transportation vehicles should be equipped with means of communication.