

FIELD AUDITING PROGRAM

STANDARD OPERATING PROCEDURES SOP

PRIMUSLABS.COM

SEPTEMBER 1999

SOP #01-01

GENERAL INFORMATION

Field Auditor Qualifications

First approval by: _____ **Revision No.:** _____

Second approval by: _____ **Effective Date:** _____

Purpose:

To ensure auditor compliance with requirements of the position.

Requirements:

In order to assure the auditor's qualifications required for the auditing position, the following requirements and ongoing procedures should be followed:

1. Minimum of a Bachelor's degree (preference for Food Science, Agriculture, or related field) or applied experience in production agriculture with demonstrated competency in all aspects of field auditing. (Bilingual English/Spanish or biliterate preferred.)
2. The auditor must be knowledgeable of the crops and cultural practices in the area.
3. The auditor must be aware of current food safety issues and practices at the field level.
4. The auditor must be familiar with all-applicable federal, state, and local regulations regarding food safety as they apply to field operations. As a part of the auditor training program he/she should carefully review the Good Agricultural Practices Manual, including Standard Operating Procedures that PrimusLabs.com have designed for growing and harvesting operations.
6. The auditor must have the ability to cross-train in other areas and continue with ongoing education and training in order to remain current with food safety practices in the agricultural environment.
7. The auditor must remain professional, impart integrity, respect, confidentiality, and remain free from any conflict of interest.
8. The auditor must have the ability to listen and continually assess the information they observe in conjunction with the information that is provided by the client and/or grower.

9. The auditor must possess excellent verbal and written communication skills.
Extremely important is attention paid to accuracy and detail.
10. The auditor must be computer literate (e.g., Internet applications, Windows, etc.).
11. The auditor must attend all PrimusLabs.com auditor training and meetings.

SOP #01-01*

GENERAL INFORMATION

*** Independent Third Party Auditor Qualifications**

First approval by: _____ **Revision No.:** _____

Second approval by: _____ **Effective Date:** _____

Purpose:

To ensure independent third party auditor compliance with requirements of the position.

Requirements:

In order to assure the auditor's qualifications to perform the PrimusLabs.com auditing function and post results to the PrimusLab.com website, the following requirements and ongoing procedures should be followed:

1. Acceptance of the completed Field Audit Contract between PrimusLabs.com and the independent third party auditor.
2. Minimum Bachelor's degree (preference for Food Science, Agriculture or related field) or applied experience in production agriculture with demonstrated competency in all aspects of field auditing.
 - The auditor's Curriculum Vitae or biography reviewed and approved.
3. Computer literacy (Internet applications, Windows, Word, etc.).
4. Strong observational, reporting, and organizational skills.
5. Excellent to superior verbal communication and writing skills. Extremely important is attention paid to accuracy and detail.
6. Excellent to superior interpersonal skills required to convey technical concepts to non-technical audiences.
7. Impart integrity, respect, and confidentiality.
 - Remain non-judgmental
 - Ability to listen
 - Solutions oriented
8. Consult with others regarding questions or other issues outside the immediate area of expertise.

9. Bilingual (English/Spanish) or biliterate preferred.
10. Professional appearance and manner.
11. Complete the PrimusLabs.com Field Audit Training program (SOPs).
12. The auditor will be subject to periodic review and audit by PrimusLabs.com personnel.

SOP # 01-02

GENERAL INFORMATION

Field Auditor Duties

First approval by: _____ Revision No.: _____

Second approval by: _____ Effective Date: _____

Purpose:

To ensure that the auditor performs their duties in accordance with PrimusLabs.com standards.

Requirements:

1. The auditor's duty is to objectively document and verify what is seen, heard, and stated during the audit and report the results in the format supplied by PrimusLabs.com.
 - a. Survey:
 - Gather information from conversation as well as sight and smell.
 - Look at the relevant parts of the growing operation (e.g., crop, equipment, water sources, pest management practices, fertilizer application practices, storage practices, supplies, etc.).
 - Look at all the borders of the growing area and the adjacent ground for potential off-farm sources of contamination risk.
 - Complete the audit questionnaire in the format required by PrimusLabs.com.
 - Note any deviations in the audit or make the appropriate comments when necessary.
 - b. Verify:
 - The information on the application and complete any missing information.
 - The crops that are to be covered in the audit as stated on application.
 - Adherence to standards.
 - Past history of fields.
 - Required audit records.
 - Compliance of what is stated in the audit questionnaire.
 - Take photographs, when permission has been granted, whenever needed for unusual situations. (It must
 - Document all unusual situations.
 - Visually verify the responses to audit questions as often as possible.
 - c. Report:

- Clear, accurate, thorough, and concise reports.
 - Use the PrimusLabs.com audit format to maintain consistency and assure that all the relevant information is reported.
 - When applicable, comments should be made about any special conditions regarding questions in the audit or other food safety issues.
 - Reports must be submitted in the appropriate format and in a timely manner. Submission to PrimusLabs.com on the day of the audit is preferable.
 - Include a summary of concerns if needed.
2. The auditor may offer suggestions; however, consulting or making recommendations are not part of the auditor's duties.
 3. The auditor should be familiar with all aspects of the field-auditing program and the principles on which the program is based. As a part of the auditor training program he/she should carefully review the Good Agricultural Practices Manual, including Standard Operating Procedures that PrimusLabs.com have designed for growing and harvesting operations.
 4. The auditor may be a source of food safety references or other information; however, the auditor should not attempt to interpret specific laws and regulations. During the audit, the recommendation of useful references should make the client and/or grower more willing to work with a program they have perceived as being helpful to them. The auditor may suggest the appropriate websites or other areas of reference (e.g., CFR, EPA, FDA, etc.) that relate to specific regulatory issues.
 5. The auditor should maintain confidentiality and remain impartial.
 - a. Some programs may require a signed confidentiality agreement.
 - b. Establish open communication and rapport with the client and/or grower.
 - c. Listen carefully to the client and/or grower.
 - d. Make no exceptions. Allowing exceptions will directly affect the credibility of PrimusLabs.com's field audit program.
 - e. Document the client and/or grower point of view in the comment section when applicable.
 6. The auditor should be prepared and always practice good etiquette.
 - a. Be clear regarding the type and number of audits to be performed as specified in the contract.
 - b. Do not schedule too many audits per day and be punctual.

- c. Review the questionnaires from previous audits.
 - d. Organize the audit, equipment, and other materials so they are easily accessible.
 - e. Be attentive, patient, respectful and professional at all times.
 - f. Be knowledgeable regarding the crops and the agricultural practices in the area.
 - g. Avoid discussing the food safety programs of other companies. (Examples may be provided without naming specific companies.)
 - h. Dress appropriately for the field.
 - i. Respect the rules of the farm.
 - j. Drive at a speed to minimize production of dust. Do not drive faster than the posted speed.
 - k. Be careful in muddy roads.
 - l. Do not leave or park vehicles where they may interfere with the movement of farm equipment or other vehicles.
 - m. When in the field, walk in the furrows when appropriate. Do not walk on the bed tops.
 - n. Ask for permission before taking any photographs.
 - o. Reschedule the audit if it is an inconvenient time (e.g., harvest crew not present, hostile situation, etc.) and report this situation to your supervisor.
 - p. If an adversarial situation is encountered, simply thank the grower and/or harvest foreman for their time and leave. Report the situation to your supervisor for transmission to the contracting client.
7. Other duties that may be periodically assigned.

SOP #01-03

GENERAL INFORMATION

Audit Design

First approval by: _____ **Revision No.:** _____

Second approval by: _____ **Effective Date:** _____

Purpose:

To ensure the auditor's complete understanding of the program and questionnaire format.

Procedures:

1. Structure of Field Auditing Program

- a. The field-auditing program provides third party verification for the client and/or grower's food safety production practices at the field and harvesting level. A comprehensive questionnaire has been developed to audit specific areas of the growing operation of each ranch that has been specified in the contract with the client. Audit questions are often designed as a tool to raise the level of awareness regarding specific areas of risk..
- b. At the scheduled time, the auditor arrives and conducts an onsite inspection of the growing area and all applicable support documentation. After the audit, the completed questionnaire, photographs, and any other information obtained during the site visit are submitted for analysis and scoring. An audit report is compiled and submitted to the client detailing those items that do not meet regulatory requirements or conform to Good Agricultural Practices (GAP). A corrective measures letter is sent to the client. The date of this mailing and return (i.e., client response) are noted on the Intranet.
- c. The Auditing Programs consist of two kinds of audits:
 - The Annual Ranch Audit
 - The Harvest Crew Audit.

The Annual Ranch Audit is performed one time each year or growing season.

The Harvest Crew Audits are performed periodically during the harvest season.

2. Audit Questionnaire Format:

- a. Both the Annual Ranch Audit and the Harvest Crew Audit have a Cover Page with information that must always be filled out completely.

- The information required for the Annual Ranch Audit Cover Page includes the audit start date and time, audit finish date and time, auditor, customer, grower, ranch name, county, state, city, ranch manager and phone number, commodities, pest control company, fertilizer company, compost supplier, and source(s) of water.
 - The information required for the Harvest Crew Audit Cover Page includes the audit start date and time, audit finish date and time, auditor, customer, grower, ranch name or other identification, county, state, county where the harvest crew is working, nearest city within the same county, harvest crew foreman, crew name, and commodity.
- b. The auditor must have a map of the ranch that includes neighboring cities and cross streets to assure the location or correct identification of the ranch.
- c. The Annual Ranch Audits are divided into sections that correspond to areas of potential contamination risk in the field operation. These areas include Site Selection, Adjacent Land Use, Fertilizer Usage, Water Usage, Pesticide Usage, Pest Control, Employee Safety & Hygiene, and Harvest Practices.
- d. The audit questions have been designed using a Yes/ No response format. A N/A response is also included as a response for those questions that are not applicable in specific cases.
- e. Another box for the visual verification of the response to each question is included. This box needs to be marked any time the auditor can visually verify the client and/or grower response for that specific question.
- f. Some of the questions are grouped as questions that are dependent on the response for the previous question. The applicability of the following questions depends upon the answer to the previous question. The numbering for these questions is as follows: 2.0; 2.0a; 2.0b. The questions numbered 2.0a and 2.0b are only answered only if the response to 2.0 makes them applicable.
- g. The field auditing staff has designed an audit point system. The questions are categorized according to how critical they are considered to be as potential food safety issues. The severity categories assigned to the questions are explained as follows:
- **Category A** – Questions relate to issues of critical risk significance that require immediate action. Observations under this category result in PrimusLabs.com staff immediately notifying the client of the deficiency.
 - **Category B** – Questions relate to unacceptable growing conditions that should be corrected within 24 hours of the audit. Confirmation of the grower's implementation of corrective measures will be made during the subsequent minor audit.

- **Category C** – Questions involve growing practices that are undesirable but not necessarily unacceptable. Clients are encouraged to address these observed deficiencies at the earliest possible time.

SOP #01-04

GENERAL INFORMATION

Audit Administration System

First approval by: _____ **Revision No.:** _____

Second approval by: _____ **Effective Date:** _____

Purpose:

To articulate procedures to carry out the mission of audit and contract administration. To ensure performance of PrimusLabs.com relative to contracts with its clients.

Procedures:

1. Once the Field Audit Department gets a signed contract, basic client information is compiled. The client information includes the client contact person, the location, the time frame for completion of the audits, the commodities to be included in the audits, the grower names and addresses, the number of ranches, the number of harvest crews, the number of estimated audits. The contract will also specify who is to receive the audit results and reports. The Field Office will maintain a complete list of data needed.
2. Once the auditor has taken responsibility for a particular audit, the auditor will be responsible for scheduling and preparation.
3. The report should be submitted on the day the audit is completed, preferably electronically or on the Annual Ranch Audit Fax Sheet or Harvest Crew Audit Fax Sheet. NOTE: It may be necessary to occasionally send incomplete Annual Ranch Audits. If this occurs, note the reason that the audit is incomplete and the approximate date for completion.
4. After the audit response data has been submitted, no responses may be changed without a written explanation from the auditor and approval by their supervisor.
5. After the auditor has transferred the audit responses in the appropriate format, the completed audit questionnaire should be sent to the Field Audit Department within the following 48 hours. For each client, the original audit questionnaires are archived in the Field Auditing Program File for future reference.
6. Once the Field Auditing Department has reviewed the audit question responses and the comments, the results are input into the database. The Information System Department will be informed to post this data in to the PrimusLabs.com or other

websites as specified in the client contract. NOTE: The auditor should review this periodically to insure the timely and accurate posting of audit results.

7. The Field Auditing Department is responsible for ensuring that the audit report will be submitted to the client and/or grower as specified in the contract. This is not the responsibility of the individual auditor.

SOP # 02-01

AUDITING PROGRAM PROCEDURES

Audit Preparation

First approval by: _____ **Revision No.:** _____

Second approval by: _____ **Effective Date:** _____

Purpose:

To ensure consistency in the preparation procedures prior to the audit and maximize the effectiveness and precision of the audit execution.

Concern:

To make certain that effective coordination between the auditor and Field Auditing Department is taking place.

Procedures:

1. Pre-Audit
 - a. Read any notes from account representatives or audit coordinators who have screened the preliminary audit surveys.
 - b. Review the audit survey and make notes of questions to ask.
 - c. Review prior audits if applicable. Be aware of any deficiencies found in prior audits.
 - d. Including maps, contact names, and phone numbers, make sure the audit survey is complete.
 - e. Copies of the Annual Ranch Audit must be sent to the client and/or grower prior to the scheduled audit appointment. Advise the client and/or grower of the documentation that will need to be verified during the audit.
 - f. Schedule all Annual Ranch Audits with the client and/or grower. Make sure the client and/or grower knows how much time to allow for the audit (estimated time of two to four hours). Major Audits may be done at any time of the year.
 - g. Harvest Crew Audits must be done while harvesting is in progress. It is best to schedule these audits early in the day before the crews stop for the day. These audits are usually performed with the crew supervisor and take

approximately 30 minutes or less. Schedule these audits in conformity with instructions in PrimusLabs.com client files.

2. Things to take on the audit may include all of the following:
 - Identification and business cards
 - Audit questionnaires
 - Pens and highlighting markers
 - A copy of the client GAPs
 - Reference materials, lists and/or other example documents
 - Camera with flash
 - Watch
 - Calculator
 - Rubber boots/rain gear
 - Flashlight
 - Tape recorder
 - Tape measure
 - Spare batteries for camera, flashlight, etc.
 - Mileage logbook

SOP # 02-02

AUDITING PROGRAM PROCEDURES

Audit Execution-Annual Ranch Audit

First approval by: _____ **Revision No.:** _____

Second approval by: _____ **Effective Date:** _____

Purpose:

To ensure consistency in the procedures taken by the auditor during the Annual Ranch Audit execution.

Concern:

Lack of understanding between the auditor, client, and/or grower during the audit execution. Incomplete information obtained during the information gathering process.

Procedure

Annual Ranch Audits are to be performed once each year. The Annual Ranch Audit is often referred to as a Major Audit. This audit includes meeting with the client and/or grower, verification of the applicable records, and touring the ranch.

1.The Grower Meeting:

- a. Explain the role of the auditor.
- b. Reaffirm confidentiality.
- c. Review the auditing process.
- d. Review audit questionnaire and ranch maps
- e. Verify and/or complete the information on the Annual Ranch Audit Cover Page.
 - Write legibly in ink.
 - Provide any information that may be missing.

2.Complete the Audit Questions:

- a. The auditor will ask the client and/or grower all audit questions. Responses must be recorded in the audit questionnaire.
- b. Visually verify as many responses as possible during the ranch tour. A true audit relies on auditor observations to the greatest extent possible.

- c. Be sure to note all questions or other areas of concern the grower may express.
 - d. Take good notes regarding all areas of doubt or inconsistency that may become apparent during the ranch tour. Note these in the appropriate comment section of the questionnaire.
 - e. If the client and/or grower answered some of the questions incorrectly, the auditor will mark the appropriate response based on their observations and visual verification during the ranch tour.
- 3.Verification of Records
- a. Verify all written farm policies.
 - b. Verify all required documentation (e.g., qualified applicators license, SOPs, etc.).
 - c. Tour the ranch and storage facilities and complete the audit questions. The field auditor will verify the responses to questions while touring the ranch.
 - d. Be sure to make a note of all areas of non-compliance or unusual occurrences.
 - e. Be accurate and specific.
 - f. Make detailed observations taking into account any possible sources of contamination.
 - g. When applicable, photo document areas of concern or to verify responses.

SOP #02-03

AUDITING PROGRAM PROCEDURES

Audit Execution-Harvest Crew Audit

First approval by: _____ Revision No.: _____

Second approval by: _____ Effective Date: _____

Purpose:

To ensure consistency in the procedures taken by the auditor during Harvest Crew Audit.

Concern:

Lack of understanding between the auditor, client, and/or grower during the audit execution. Incomplete information obtained during the information gathering process. Caution: Growing, harvesting, and shipping relationships can be extremely complex. Many times, a harvesting supervisor may actually not know the growing entity or shipper whose product is being harvested. Attempt to collect all possible information for the client prior to the audit.

Procedures:

Harvest Crew Audits are to be performed only while harvesting is in progress. A Harvest Crew Audit takes place on the ranch and may or may not require a prior appointment or notice depending on the contract specifications. For efficiency, complete harvest audits early in the day before crews finish their work. The Harvest Crew Audit consists of questions addressing employee safety and hygiene and harvest practices. This audit has many questions that require visual verification by the auditor. The main contact person (i.e., harvest supervisor or foreman) should be specified. The contact person should verify and/or obtain the information that is required on the Harvest Crew Audit Cover Page.

1. The Harvest Crew Audit:

- a. Introduction to contact person
- b. Explain the role of PrimusLabs.com
- c. Reaffirm confidentiality.
- d. Review the Harvest Crew Audit process.
- e. Verify and/or complete the information on the Harvest Crew Audit Cover Page.
 - Write legibly in ink.
 - Provide any information that may be missing.

2. Complete the Harvest Crew Audit:

- a. The harvest supervisor or foreman should answer all questions included in the harvest crew audit.
- b. Visually verify answers when possible.
- c. Questions regarding field toilets should always be visually verified.

SOP # 03-01
RANCH AUDIT QUESTIONNAIRE
Ranch History

First approval by: _____ **Revision No.:** _____

Second approval by: _____ **Effective Date:** _____

Purpose:

To ensure auditor consistency when assessing issues related to ranch history.

Concern:

Potential contamination of land affecting its suitability for food production. Caution: Potential problems will be identified by the responses to the audit questions. PrimusLabs.com technical staff for impact will assess mitigating circumstances (Parts 2 and 3).

Procedure:

Questions 1.01 through 1.06a of the Annual Ranch Audit are designed to identify and document areas of potential contamination.

1. Field auditor responses must document potential sources of contamination related to the past use of the agricultural land.
 - a. Land previously used for animal husbandry purposes.
 - b. Land previously used in a non-farming function such as toxic waste site, land fill or for the extraction of oil or natural gas.
 - c. Land used for the disposal of incinerator waste or mine tailings.
 - d. Land used for agricultural crops, which may have been treated with chemicals that result in persistent soil residue.
2. The auditor must document the conditions that can minimize or maximize the effect of the concerns listed above; therefore, the question may not be applicable.
 - a. How long ago the land was used for non-farming purposes.
 - b. There is still evidence of non-farming practices that can be potential contaminants.
3. The auditor must request proper documentation for visual verification if it is applicable.

- a. Soil test for potential contamination.
- b. If the farm is operating under organic principals.

SOP # 03-02

RANCH AUDIT QUESTIONNAIRE

Adjacent Land Use

First approval by: _____ **Revision No.:** _____

Second approval by: _____ **Effective Date:** _____

Purpose:

To ensure auditor consistency when assessing issues related to adjacent land use.

Concern:

Incorrect determination by the field auditor regarding the potential risk factors from the adjacent land use that can be possible sources of contamination.

Procedure:

Questions 2.01 through 2.06 of the Annual Ranch Audit are designed to identify and document areas of potential contamination.

1. The auditor must identify the possible sources of contamination from adjacent land.
 - a. Animal Husbandry operations (e.g., feedlots, meat rendering operations, pasture, etc.).
 - b. Storage and/or application of untreated or treated manure, municipal bio-solids, etc. in adjacent areas.
 - c. Flooded or breached containment systems.
 - d. Waste or other settling ponds.
 - e. Industrial plants.
 - f. Waste water facility.

2. The auditor must document conditions that can minimize or maximize the effect of the concerns listed above. These may then be considered as mitigating measures bearing on suitability for food production.
 - a. Type of crop.
 - b. Proximity of the animal husbandry operation may be relevant in considering it as a potential contaminant.

- c. Predominant winds.
 - d. Weather conditions.
 - e. Microbiological and chemical quality of the containment system.
 - f. Ground slope may allow contaminants to enter the crop or the slope may be a favorable factor that aids in avoiding the contamination of the crops.
3. The auditor must document mitigation measures that the grower has implemented in order to minimize the effect of these potential contaminants. These may include the following:
- a. Physical barriers.
 - b. Trenching or similar land preparation.
 - c. Storage practices of untreated manure and/or composted manure may minimize or maximize the risk of their presence in adjacent land.
 - d. Use of composted manure or composted bio-solids that meet the EPA requirements.
 - e. Practices for treating organic fertilizers.
 - f. Buffer zones
4. The auditor must request proper documentation for visual verification if it is applicable.
- a. If it is determined that the farm is near an industrial site or waste water facility that may emit toxic waste into the surrounding air or water, SARA (Superfund Amendments and Reauthorization Act) documents must be on file and available for review.
 - b. If organic fertilizers are used, records that prove compliance with applicable requirements should be kept on file.¹ For example, records that verify composted manure was applied.

¹ Requirements for the use of bio-solids are set out in Title 40 of the Code of Federal Regulations, part 503 (40 CFR part 503). Growers using bio-solids must also comply with any additional state requirement. Additional information can be obtain from USDA's NRCS Conservation Practice Standard 317, and Cooperative State Research, Education and Extension Service (CSREES).

SOP # 03-03

RANCH AUDIT QUESTIONNAIRE

Fertilizer usage

First approval by: _____ Revision No.: _____

Second approval by: _____ Effective Date: _____

Purpose:

To ensure auditor consistency when assessing issues related to fertilizer usage.

Concern:

Determining practices related to fertilizer usage that can be a potential source of crop contamination.

Procedure:

Questions 3.01 through 3.06d of the Annual Ranch Audit are designed to identify and document areas of potential contamination.

1. The auditor must document fertilizer use practices that can be potential sources of contamination.
 - a. Use of organic fertilizer, including application and storing practices.
 - Animal manure
 - Municipal bio-solids
 - b. Use of chemical fertilizers.
2. The auditor must document the mitigation measures that the grower has implemented in order to minimize the effect of these potential contaminants.
 - a. If animal manure is used:
 - It should be composted according to the federal, state or local minimum composting guidelines.²
 - Untreated manure should not be applied within 60 days of harvest or longer depending on the specific crop. (e.g., stone fruits require a longer interval between application and harvest).
 - It should be incorporated to the soil immediately to facilitate rapid incorporation into soil organic matter.

² Requirements for the use of bio-solids are set out in Title 40 of the Code of Federal Regulations, part 503 (40 CFR part 503). Growers using bio-solids must also comply with any additional state requirement. Additional information can be obtain from USDA's NRCS Conservation Practice Standard 317, and Cooperative State Research, Education and Extension Service (CSREES).

- Time between application and harvest has been maximized.
 - Type of crop rotation.
 - Storage practices should not represent a potential risk for the operation.
- b. If municipal bio-solids are used:
- Bio-solids should be composted according to the federal, state or local minimum composting guidelines for these materials.³
 - Bio-solids should be incorporated to the soil immediately to facilitate rapid incorporation into soil organic matter.
 - Time between application and harvest has been maximized.
 - Type of crop rotation.
 - Storage practices should not represent a potential risk for the operation
3. The auditor must request the proper documentation for visual verification that supports any mitigation measures taken if applicable.
- a. If manure is used as a soil supplement and/or nutrient source, the following types of documentation should be available for review:
- If animal manure is composted, general composting record, detailing temperature, time/day and turns performed should be available.⁴
 - If animal manure is sterilized: documentation indicating temperature and duration of treatment on material should be kept on file.
 - Records indicating manure application as it corresponds to the stage of crop development.
 - Records must be for current growing season.
 - If animal manure comes from an outside source, a letter from the compost supplier stating compliance with Federal, state or local guidelines.
- b. If bio-solids are used as a soil supplement and/or nutrient source:
- If municipal bio-solids are composted: general composting records, detailing temperature, time/day and turns performed should be available.
 - Records that indicate municipal bio-solids application as it correspond to the stage of crop development.

³ Requirements for the use of bio-solids are set out in Title 40 of the Code of Federal Regulations, part 503 (40 CFR part 503). Growers using bio-solids must also comply with any additional state requirement. Additional information can be obtained from USDA's NRCS Conservation Practice Standard 317, and Cooperative State Research, Education and Extension Service (CSREES).

⁴ **Windrow composting**: active compost maintained under aerobic conditions at 55 °C (131 °F) or higher for 15 days or longer. During period when compost is maintained at 55 °C (131 °F) there should be a minimum of five turnings of the windrow. Reference the microbial analysis

Aerated static pile composting and enclosed or within-vessel: active compost covered with 6-12 inches of insulating material, and active compost maintained at 55 °C (131 °F) or higher for a period of three days.

- Records must be for current growing season.
 - If municipal bio-solids came from an outside source, a letter from the compost supplier stating compliance with Federal, state or local guidelines.
- c. If chemical fertilizers are utilized:
- Records indicating the type of fertilizer applied.
 - Records must pertain to the current growing season.
 - The supplier must provide a letter of guarantee detailing active and inert ingredients. Note: This issue is intended to raise grower awareness regarding the presence of contaminants, such as heavy metals, which may be a component of the fertilizer inert (i.e., carrier) ingredients.

SOP #3-04

RANCH AUDIT QUESTIONNAIRE

Water Usage

First approval by: _____ Revision No. _____

Second approval by: _____ Effective Date: _____

Purpose:

To ensure auditor consistency when assessing issues related to water usage.

Concern:

Factors or situations from the source of water used for irrigation that can be a potential source of contamination.

Procedure:

Questions 4.01 through 4.14a of the Annual Ranch Audit are designed to identify and document areas of potential contamination.

1. The auditor must document the possible sources of contamination related to the source of water.
 - a. Microbial contamination from wells, reservoirs, canals, ditches, or re-used irrigation water.
 - b. Chemical contamination from wells, reservoirs, canals, ditches, or re-used irrigation water.
2. The auditor must document the mitigation measures that the grower has implemented in order to minimize the effect of these potential contaminants.
 - a. Physical barriers to prevent animal access (e.g., fences, barriers, etc.).
 - b. Check valves installed to prevent back flow.
 - c. Performing microbial testing on the water.
 - d. Performing visual inspections and removing any inappropriate matter.
 - e. Use of chlorine for decreasing any microbial contaminants.
 - f. Having written Standard Operating Procedures (SOPs) which restrict the storage, loading, or diluting of agricultural chemicals near the water sources.

- g. Having written SOPs that restrict the cleaning of spray tanks and related equipment near the water source.
3. The auditor must request the proper documentation for verification if it is applicable.
- a. Log books on measures taken to minimize microbial contamination of water (e.g., chlorination, service or any general inspection).
 - b. Documented measures of any inspection, removal of debris from reservoirs, changing filters on irrigation pumps, etc.
 - c. Written policies covering corrective measures when the results of the elected type of microbial test, may indicate the possibility of contamination (such as E.coli is a standard indicator for fecal pollution), according to the requirements established by either the customer or the consideration of an officially recognized laboratory.
 - d. Written policies covering corrective measures when harmful substances are found in the water.

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SOP # 03-05

RANCH AUDIT QUESTIONNAIRE

Pest Control

First approval by: _____ **Revision No.** _____

Second approval by: _____ **Effective Date:** _____

Purpose:

To ensure auditor consistency when assessing issues related to pest control.

Concern:

Identification of pest control issues that represent a potential source of crop contamination.

Procedure:

The pest control section of the audit contains questions regarding the safety practices of using and storing pesticides. Questions 5.01 through 5.14b of the Annual Ranch Audit are designed to identify and document areas of potential contamination.

1. The auditor must document pest control practices within the operation that may be potential food safety issues:
 - a. Capabilities and official recognition (i.e., state or locally certified) of the pesticide consultant (e.g., PCA, etc.), the pesticide applicator and/or in-house pesticide applicator.
 - b. Suitability of water used for mixing of application of chemicals.
 - c. Method of pesticide application.
 - d. Storage and disposal of pesticide containers.
2. The auditor must document preventive or mitigation measures that the grower has implemented in order to minimize the effect of these potential contaminants.
 - a. Suitability of water used is to be verified by documentation.
 - b. Pesticide usage restricted to chemicals registered by the EPA. The pest control operator confirms, at least quarterly, that pesticide application is restricted by guidelines established by the product label as well as federal and state regulations.
 - c.
 - EPA guidelines to prevent ground water contamination.

- Harvesting restricted by time intervals established by US EPA as stated on the label.
 - Limited employee reentry to the field according to what is stated on the label.
 - Posting of field when category one materials are applied.
 - Pesticide applications restricted when wind gusts exceed what is specified in the label (i.e. "Do not apply with aerial equipment when wind speed is greater than 10 mph." Is an example of a labeling statement regarding this issue).
- c. Pesticides are stored in a secured locked area and the empty containers are disposed of according to the label.
3. The auditor must request proper documentation that supports any mitigation measures taken if applicable.
- a. Records of water testing if water used is from on-site source.
 - b. If water used is from an off-site source, a letter of guarantee from the contract applicator should be on file. This is to guarantee that the water is sourced from a clean supply and periodically tested for microbial contamination.
 - c. A Standard Operating Procedure (SOP) for a safe operation for pesticide applications if this activity is performed in-house.
 - d. Current pesticide application records should be on file and available for review.
 - e. If pesticide applications are performed in house, Standard Operating Procedures (SOPs) for routine inspection of pesticide application equipment and the replacement of equipment when needed.

SOP #3-06

RANCH AUDIT QUESTIONNAIRE

Employee Safety & Hygiene

First approval by: _____ Revision No.: _____

Second approval by: _____ Effective Date: _____

Purpose:

To ensure auditor consistency when assessing issues related to employee safety and hygiene.

Concern:

Identification of factors or situations from employee practices as a potential source of contamination.

Procedure:

Questions 6.01 through 6.19 of the Annual Ranch Audit are designed to identify and document areas of potential contamination.

1. The auditor must document the employee practices that may be a potential source of contamination.
 - a. Employees working with open wounds.
 - b. Employees eating in actively harvested areas.
 - c. Employees using tobacco products in actively harvested areas.
 - d. Availability of toilet facilities and toilet facilities not meeting all regulations.
 - e. Condition of hand washing facilities (i.e., clean, supplied with single-use towels, soap, etc).
 - f. Employee practices regarding hand washing (i.e., after breaks, after using restroom, etc.).
 - g. Disposal of wastewater (e.g., hand wash drainage, etc.).
2. The auditor must document mitigation measures that the grower has implemented in order to minimize the risk of these potential contaminants.
 - a. Corrective actions are taken when employees fail to comply with hand washing guidelines.

- b. Water containers are cleaned periodically.
 - c. Inventory in the first aid kit is maintained.
 - d. All commodities that come in contact with blood are destroyed.
 - e. Containers used to carry fresh produce are used solely for that purpose and are made of food grade materials.
 - f. The use of trash receptacles.
 - g. Eating is not allowed in actively harvested areas.
3. The auditor must verify proper documentation that supports the mitigation measures taken if applicable.
- a. Corrective action log sheets when employees are out of compliance.
 - b. Signs (in the appropriate language) in toilet facilities reminding employees to wash their hands after using the facilities.
 - c. Checklist for ensuring the toilets are stocked with all necessary items and that they are kept in a clean manner.

SOP #3-07

RANCH AUDIT QUESTIONNAIRE

Harvest Practices

First approval by: _____ Revision No.: _____

Second approval by: _____ Effective Date: _____

Purpose:

To ensure consistency in the auditor criteria when assessing issues related to harvest practices.

Concern:

Identification of the factors or situations from harvesting practices as a potential contamination source.

Procedure:

Applicable questions 7.01 through 7.10 of the Annual Ranch Audit are designed to identify and document areas of potential contamination.

1. The auditor must document harvesting practices that may be a potential source of contamination.
 - a. Multi-use of transport vehicles (i.e. transport of livestock, chemicals, manure, etc.).
 - b. Cross contamination due to using cartons, bins, harvesting tools and containers that were previously used for carrying items other than fresh produce.
 - c. Use of cartons that may be contaminated with rodent or bird droppings, glass fragments, metal filings, chemical stains, etc.
2. The auditor must document mitigation measures that the grower has implemented in order to minimize the effect of these potential contaminants.
 - a. An inspection program in place.
 - b. Proper cleaning schedule and procedures for vehicles, cartons, bins harvesting tools and harvesting equipment.
 - c. Only using cartons, bins, containers, etc. for food storage purposes.
 - d. A rodent control program has been implemented.
3. The auditor must request proper documentation, if it is applicable.

- a. Standard Operating Procedures written addressing the proper cleaning of vehicles.
- b. Inspection logs that include an authorized individual's signature, confirming the completion of the inspection.

SOP #4-01

HARVEST CREW AUDIT QUESTIONNAIRE

Employee Safety & Hygiene

First approval by: _____ Revision No.: _____

Second approval by: _____ Effective Date: _____

Purpose:

To ensure auditor consistency when assessing issues related to employee safety and hygiene during the harvest crew audit execution.

Concern:

Identification of factors or situations from employee practices as a potential source of contamination.

Procedure:

Questions 01 through 12 of the Harvest Crew Audit are designed to identify and document areas of potential contamination.

1. The auditor must document the employee practices that may be a potential source of contamination, according to what he is visually verifying. It is important to verify as many of the questions as possible.
 - a. Employees working with open wounds.
 - b. Employees eating in actively harvested areas.
 - c. Employees using tobacco products in actively harvested areas.
 - d. Availability of toilet facilities and toilet facilities not meeting all regulations.
 - e. Availability and condition of hand washing facilities (i.e., clean, supplied with single-use towels, soap, etc).
 - f. Employee practices regarding hand washing (i.e., after breaks, after using restroom, etc.).
 - g. Availability of fresh drinking water.
 - h. Disposal of wastewater (e.g., hand wash drainage, etc.).

2. The auditor must document mitigation measures that the grower has implemented in order to minimize the potential risk associated with these practices. This documentation must be performed according to what the auditor is visually verifying.
 - a. Corrective actions are taken when employees fail to comply with hand washing guidelines.
 - b. Water containers are cleaned periodically.
 - c. Inventory in the first aid kit is maintained.
 - d. All commodities that come in contact with blood are destroyed.
 - e. Containers used to carry fresh produce are used solely for that purpose and are made of food grade materials.
 - f. The use of trash receptacles that are well maintained (i.e., bags, lids, etc.).
 - g. Eating is not allowed in actively harvested areas.
3. The auditor must verify proper documentation that supports the mitigation measures taken if applicable.
 - a. Corrective action log sheets when employees are out of compliance.
 - b. Signs (in the appropriate language) in toilet facilities reminding employees to wash their hands after using the facilities.
 - c. Checklist for ensuring the toilets are stocked with all necessary items and that they are kept in a clean manner.

SOP #03-07

HARVEST CREW AUDIT QUESTIONNAIRE

Harvest Practices

First approval by: _____ Revision No.: _____

Second approval by: _____ Effective Date: _____

Purpose:

To ensure consistency in the auditor criteria when assessing issues related to harvest practices.

Concern:

Identification of the factors or situations from harvesting practices as a potential contamination source.

Procedure:

Applicable questions 13 through 20 of the Harvest Crew Audit are designed to identify and document areas of potential contamination.

1. The auditor must document harvesting practices that may be a potential source of contamination, according to what he is visually verifying. It is important to verify as many of the questions as possible.
 - a. Multi-use of transport vehicles (i.e. transport of livestock, chemicals, manure, etc.).
 - b. Cross contamination due to using cartons, bins, harvesting tools and containers that were previously used for carrying items other than fresh produce.
 - c. Use of cartons that may be contaminated with rodent or bird droppings, glass fragments, metal filings, chemical stains, etc.
 - d. Tracking practices for the harvested product.
2. The auditor must document mitigation measures that the grower has implemented in order to minimize the potential risk associated with these practices. This documentation must be performed according to what the auditor is visually verifying.
 - a. An inspection program in place.
 - b. Proper cleaning schedule and procedures for vehicles, cartons, bins, harvesting tools and harvesting equipment.

- c. Only using cartons, bins, containers, etc. for food storage purposes.
 - d. A rodent control program has been implemented.
 - e. Container/boxes/pallets are marked with lot # (date of harvest, farm number, etc.)
3. The auditor must request proper documentation, if it is applicable.
- a. Standard Operating Procedures written addressing the proper cleaning of vehicles.
 - b. Inspection logs that include an authorized individual's signature, confirming the completion of the inspection

