

General Requirements			
Page & Line #s	Question	Comments	
Page 17, Lines 97-99	GR 01 - Is a written Leafy Greens Compliance Plan which specifically addresses the Best Practices of the LGMA available for review?		
	GR 02 - Does it specifically address best practices for water, soil amendments, environmental factors, work practices, and field sanitation?		
Page 17, Line 100	GR 03 - Is an up to date producers list with contact and location information available for review?		
Page 17, Lines 104-106	GR 04 - Does the Shipper have a traceability process? GR 04a - Does it enable identification of immediate non-transporter source? GR 04b - Does it enable identification of immediate non-transporter subsequent recipient?		
	GR 05 - Has the Shipper designated someone to implement and oversee the food safety program? GR 05a - Is the name of the individual available? GR 05b - Is 24/7 contact information for the individual available?		
	Records		
Page 17, Lines 110-117	RE 01 – Were all records required by the Leafy Greens Compliance Plan readily available and accessible for inspection during the audit? (e.g. Logs, Checklist, Spreadsheets, etc.) Do they include (as applicable): RE 01a – farm name and location RE 01b – actual values and observations obtained during monitoring RE 01c – an adequate description of the leafy green product RE 01d – growing area location (i.e. production location including block and/or lot) RE 01e – date and time of the activity being documented		
	Page 17, Line 119		RE02 – Do records indicate they were created at the time the activity was performed?
	Page 18, Lines 121-122		RE03 – Were the records signed and dated by the person performing the documented activity?
	Page 18, Line 139		RE04 – Do SOPs require documentation and records to be kept for 2 years?
	Personnel Qualifications and Training		
Page 18, Lines 153-154	PE 01 – Do training records indicate all personnel receive training at hire and at least annually thereafter?		
Page 19, Lines 161-170	Does the training provided to all personnel who work with leafy greens or supervise those who do include: PE 01a – the principles of food hygiene and safety, including recognition of employee health conditions for illness? PE 01b – the importance of health and personal hygiene? PE 01c – the standards established in these best practices that are applicable to the employee’s job responsibilities?		
	Page 19, Lines 171-180		Do all harvest personnel receive additional training in: PE 01d – recognizing leafy greens that may be contaminated and therefore not be harvested? PE 01e – inspecting product containers, harvest equipment, and packaging materials to ensure they are working properly and do not pose a product contamination risk? PE 01f– how to correct problems with product containers, harvest equipment, and packaging materials or report problems to supervisors?
	Page 19, Lines 181-183		PE 02 – 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 02a – Grower PE 02b – Harvester PE 02c – Cooler/Holder
Page 19, Lines 184-186	PE 03 – Are there records of training events? Do the records include: PE 03a - Training date, topics covered, and trainee’s name? PE 03b – Supervisor’s signature indicating a record review was performed within a week?		

Environmental Assessments		
Pre-Season Assessment		
Animal Activity		
Page 20, Lines 199-201	EA 01 - Did the assessment indicate that the production area was free from evidence of animal intrusion or the potential risk of intrusion? If EA 01 is answered "NO" then EA 02 - EA 04 will drop down.	
Pages 75-76, Table 6	EA 02 - Was the animal hazard or potential risk of intrusion assessed by Food Safety professional?	
	EA 03 - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"? EA 03a - If "YES" were corrective actions carried out according to company SOP?	
	EA 04 - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"? EA 04a - If "YES" were corrective actions formulated? EA 04b - N/A EA 04c - If "YES" is documentation available to show that actions were implemented? EA 04d - If "YES" are you periodically monitoring the effectiveness of any corrective actions?	
Adjacent Land Use		
Pages 75-76, Table 6	EA 05 - Was the adjacent land area free from compost operations within 400' of the crop edge? EA 05a - If "NO" are there mitigation measures, topographical or climate features that indicate that the 400' recommendation should be modified? EA 05b - If "NO" are mitigation measures in place and documented?	
	EA 06 - Was the adjacent land area free from confined animal feeding operations (CAFO) within 1200' of the crop edge? EA 06a - If "NO" are there mitigation measures, topographical or climate features that indicate that the 1200' recommendation should be modified? EA 06b - If "NO" are mitigation measures in place and documented? EA 06c - Did the pre-season assessment indicate that there is no CAFO that will impact the production location? If EA 06c is answered "NO" then EA 06c (1) to EA 06c (3) will drop down.	
	EA 06c (1) - Information on the CAFO's Best Management Practices? EA 06c (2) - Number of animals within the CAFO? EA 06c (3) - Water source and distribution system for the production location proximate to the CAFO? (e.g. Appendix A)	
	EA 07 - Is the adjacent land area free from non-synthetic soil amendments stored within 400' of the edge of the crop? EA 07a - 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 07b - If "NO" are there mitigation measures or topographical features that indicate that the 400' recommendation should be modified? EA 07c - If "NO" are mitigation measures in place and documented?	
	EA 08 - Is the adjacent land area free from grazing lands/domestic animals within 30' from the edge of the crop? EA 08a - If "NO" are there topographical or climate features that indicate that 30' recommendation should be modified? EA 08b - If "NO" are mitigation measures in place and documented?	
	EA 09 - Is the adjacent land area free from any septic leach fields (home or other building) within 30' of the edge of the crop? EA 09a - If "NO" are there mitigation measures, topographical or climate features that indicate that 30' should be modified is too short a distance? EA 09b - If "NO" are mitigation measures in place and documented?	
	EA 10 - Are all well heads at least 200' from untreated manure? EA 10a - If "NO" are there topographical or climate features that indicate that 200' is too short a distance? EA 10b - If "NO" are mitigation measures in place and documented?	
Adjacent Land Use		
Pages 75-76, Table 6	EA 11 - 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 11a - 100' for sandy soil with a slope <6% EA 11b - 200' for loamy or clay soil with a slope <6% EA 11c - 300' for all slopes >6%	
Page 20, Lines 206-211	EA 12 - Is the adjacent land free from uses or conditions that pose a food safety risk to crops? EA 12a - If "NO" has a risk assessment been conducted to evaluate the risk? EA 12b - If "NO" have corrective measures been put in place and documented?	

Environmental Assessments (continued)

Recent Field History		
Page 20, Lines 231-233 Pages 75-76, Table 6	EA 13 - Are production blocks free from all of the following: EA 13a - History of flooding within the last 60 days EA 13b - History of grazing on the crop land within the last 1 year EA 13c - History of hazardous activity including but not limited to CAFO, municipal waste, toxic waste, landfill, etc.?	
Page 20, Lines 227-230	EA 13a - EA 13c if any of these are answered "NO" then EA 13c (1) will drop down	
	EA 13c (1) - Were specific actions implemented and documented to mitigate the issue(s)?	
Pre-Harvest Assessment		
Page 19, Lines 193-197; Page 20, Lines 198-233	EA 14 - Was a Pre-Harvest Assessment conducted within 7 days for each harvested lot? Did the assessment address the following: EA 14a - Intrusion by animals EA 14b - Flooding EA 14c - Potential contamination materials EA 14d - Condition of water source and distribution system EA 14e - Unexpected adjacent land activity that will pose a risk to food safety EA 14f - Worker hygiene and sanitary facilities	
	EA 15 - Did the assessment indicate that the production area was free from evidence of animal intrusion or the potential risk of intrusion?	
	If EA 15 is answered "NO" then EA 15a - EA 15f will drop down.	
Page 74, Decision Tree Pages 75-76, Table 6	EA 15a - Was the animal hazard or potential risk of intrusion assessed by food safety professional or food safety personnel? EA 15b - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"? EA 15c - If "YES" were corrective actions carried out according to company SOP? EA 15d - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"? EA 15e - If "YES" were corrective actions carried out per the LGMA requirements? EA 15f - If "YES" is documentation available to show that actions were implemented?	
Unusual Events		
Pages 68-70, Lines 863-936 Page 69, Table 5	EA 16 - If pre-harvest ranch assessment indicates that flooding has occurred are the following addressed: EA 16a - Do the records indicate that no fields were flooded at any time during the crop cycle? EA 16b - If production blocks were flooded is there documentation to indicate the extent of flooding and the area of crop impacted? EA 16c - Was the product left un-harvested? EA 16d - If product was harvested, was a 30' (min) "no harvest" buffer from the high water mark established? EA 16e - Are these remedial activities documented?	
Animal Intrusion		
Page 72, Lines 993-999 Pages 77-80, Table 7	EA 17 - 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 17 is answered "NO" then EA 17a - EA 17h will drop down EA 17a - Was a food safety assessment completed? EA 17b - Is the individual who conducted the assessment identified? EA 17c - Is the date of the assessment documented? EA 17d - Were remedial actions formulated? EA 17e - Was the field harvested? EA 17f - Is there documentation to show the remedial actions were followed? EA 17g - Did the remedial action include creation of "no harvest" buffer or separation zones around the potentially contaminated area(s)? EA 17h - Is documentation which fully delineates the potential contamination available for review?	
Page 20, Lines 222-226 Page 20, Lines 202-205	EA 18 - Did the assessment indicate there were no changes in weather condition or weather events (e.g. severe wind, hail, freeze, excessive rain, or consecutive weather events) during the production period? EA 18a - If "NO", did the assessment indicate a possible impact on the crop or operations including environmental sources of contaminants near production locations (i.e. CAFO, dairy, hobby farm and manure or livestock compost facility)?	
Page 20, Lines 222-226	EA 19 - Did the assessment indicate there were no discharge events from environmental sources of contamination (i.e. CAFO, dairy, hobby farm and manure or livestock compost facility) proximate the production location? EA 19a - If "NO" to EA 18 or EA 19, were corrective actions carried out according to company SOP?	

Water Use		
General Agricultural Water Management		
Page 21, Lines 250-264	WU 01 - Is an agricultural water system description (or other documentation) indicating the source(s) of water and distribution system(s) available for review? WU 01a - Does the description (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 the flow of the water system(s) and production blocks that may be served by the water source(s)?	
Pages 21-23, Lines 270-334 (Hazard Analysis-Step 1)	WU 02 - Was an Agricultural Water Assessment completed prior to use for each water system? WU 02a - Was the system, including water source, water storage and water conveyance, evaluated to determine the system type(s) (Type A or Type B) ?	
Page 23-24, Lines 335-361 (Hazard Analysis-Step 2 and Step 3)	WU 02b - Has the operation established how and when water will be suitably applied for specific uses?	
Page 21, Lines 265-266	WU 03 - Are effluent systems that convey untreated human or animal wastes separated from irrigation water systems?	
Managing Storage and Conveyance Systems		
Page 26, Lines 408-409	WU 04 - Has an SOP been created for maintenance of ancillary equipment, water storage and conveyance?	
Page 26, Lines 410-423	Does the SOP include the following: WU 04a - Regularly scheduled visual inspections to ensure that it is in good working order and does not pose a contamination risk to the water system? WU 04b - Does the SOP include maintaining water quality by removal of debris, weeds, algae, tule, trash, and sediment within the producer's control? WU 04c - Controls for pest access in place and corrective actions outlined if pest infestation occurs? WU 04d - Controls identified for the prevention of run-off into water storage and conveyance systems? WU 04e - Procedures to ensure standing water does not pose a contamination in place? WU 04f - Management of agricultural water system components used to prepare crop amendments to ensure these activities and equipment used are not a source of contamination?	
Page 26, Lines 424-428	WU 04g - Practices to ensure water used in aerial applications within the 21 days-to-scheduled harvest are Type A or B->A water systems? WU 04g (1) - Holding tanks, equipment mounted application tanks, manifolds, boom lines and nozzles are properly maintained and cleaned? WU 04g (2) - Water treatment chemistry is compatible with the agricultural chemicals being applied?	
Page 26, Lines 429-433	WU 04h - Establish corrective action procedures for non-compliance scenarios (e.g. contaminated source water, animal intrusion, contaminated run-off, flooding)? WU 04i - Does the SOP require corrective measures be documented (e.g. cleaning and maintenance activities)?	
Irrigation Water from TYPE B Agricultural Water (before and after 21 Days to scheduled harvest)		
Pages 28-29, Table 2A/Figure 1 (Irrigation Water from TYPE B Agricultural Water) Pages 44-46, Table 2E/Figure 5 (Irrigation Water from TYPE B Agricultural Water Systems intended for overhead irrigation prior to 21 days) (D1. Routine Verification of Microbial Water Quality)	WU 05 - Was a source water test conducted, for each source of water, within 60 days of first use? 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. WU 05a - Are records available to demonstrate that water samples have been collected from each water distribution system on a monthly basis? WU 05b - Do records show that the water samples are taken no less than 18 hours apart? WU 05c - Is the geometric mean less than or equal to 126 MPN/100 mL? WU 05d - Are all individual samples less than or equal to 235MPN/100 ml for overhead application/irrigation 21 days prior to scheduled harvest or 576 MPN/100m ml for any type of water application, except overhead? WU 05c or WU 05d answered "NO" then WU 05d (1) - WU 05d (8) will drop down WU 05d (1) - Was the water distribution system use discontinued after the tests indicated the water source failed to meet the minimum water quality requirements? WU 05d (2) - Was an agricultural water assessment completed on the water source and distribution system for possible contamination? WU 05d (3) - Do records show that corrective actions were taken to eliminate the contamination sources?	

Water Use (continued)		
Irrigation Water from TYPE B Agricultural Water (before and after 21 Days to scheduled harvest)		
Pages 44-46, Table 2E/Figure 5	WU 05d (4) - Was the system retested - five samples (taken no less than 18 hours apart) at the previous sampling point?	
	WU 05d (5) - Did the five samples meet the acceptance criteria - average less than 126 MPN/100 mL (based on rolling geometric mean=5) and all individual samples less than or equal to 235MPN/100 mL for overhead application/irrigation 21 days prior to scheduled harvest or 576 MPN/100 mL for any type of water application, except overhead	
	WU 05d (6) - Do records show the water system was not used while the water quality was inadequate?	
Pages 28-29, Table 2A	WU 05d (7) - If water exceeding the acceptance criteria has been used for crop production was product sampled from all affected lots for STEC, including E coli O157:H7, and Salmonella, after the last irrigation and prior to harvest?	
	WU 05d (8) - If "NO" or the tests were positive for STEC, including E coli O157:H7, or Salmonella, do records show that the crop was not harvested for human consumption?	
	WU 06 - Records show the name of the test laboratory, water source, date, time, location of the sample and method of analysis, and if quantitative, the detection limit?	
	WU 07 - And have they been reviewed within a week by a supervisor or responsible party?	
	WU 08 - The generic E.coli testing methodology is specified on the test report and meets any FDA method for quantitative monitoring of water for generic E. coli?	
Irrigation Water from TYPE A Agriculture Water Systems Sourced from Public or Private Providers		
Page 30, Table 2B (A1. Baseline Microbial Assessment)	WU 09 - Is the TYPE A Irrigation water sourced from a public or private providers?	
	WU 10 - Was the public or private provider's most current COA available for review?	
Pages 30-31, Table 2B/Figure 2A (A2. Initial Microbial Water Quality Assessment and Follow-up Testing)	WU 11- Was the an <u>initial microbial water quality assessment</u> performed at least one-time seasonally for each system (before the 21 day to-scheduled-harvest-period begins)?	
	WU 11a - Were three 100 mL samples taken during one irrigation event for the initial microbial water quality assessment, and taken from the end of the delivery system?	
	WU 011b- Did sampling meet the acceptance criteria - three 100 mL samples from end of delivery system with non-detectable generic E. coli in two of the three 100 mL samples, and the remaining sample no greater than 10 MPN per 100 mL?	
	If WU 11b answered "NO" then WU 11b (1) - WU 11b (4) will drop down	
	WU 11b (1) - Was an agricultural water assessment and root cause analysis performed prior to the next irrigation event?	
	WU 11b (2) - Was follow-up testing conducted (five 100 mL samples during the next irrigation event)?	
Pages 30-31, Table 2B/Figure 2A (A2. Initial Microbial Water Quality Assessment and Follow-up Testing)	WU 11b (3) - Did the five samples meet follow-up testing acceptance criterion - four must have no detectable generic E. coli and the one remaining sample must have levels not greater than 10 MPN/100 mL?	
	WU 11b (4) - If "NO" was the agricultural water system disqualified for Type A usage?	
	WU 12- If a <u>material change</u> was made to a system was another initial microbial water quality assessment conducted?	
	WU 12a- Were three 100 mL samples from the end of the delivery system taken during one irrigation event for the initial microbial water quality assessment?	
	WU 12b- Did sampling meet the acceptance criteria - three 100 mL samples from end of delivery system with non-detectable generic E. coli in two of the three 100 mL samples, and the remaining sample no greater than 10 MPN per 100 mL?	
	If WU 12b answered "NO" then WU 12b (1) - WU 12b (4) will drop down	
Pages 30-31, Table 2B/Figure 2A (A2. Initial Microbial Water Quality Assessment and Follow-up Testing)	WU 12b (1) - Was an agricultural water assessment and root cause analysis performed prior to the next irrigation event?	
	WU 12b (2) - Was follow-up testing conducted (five 100 mL samples during the next irrigation event)?	
	WU 12b (3) - Did the five samples meet follow-up testing acceptance criterion - four must have no detectable generic E. coli and the one remaining sample must have levels not greater than 10 MPN/100 mL ?	
	WU 12b (4) - If "NO" was the agricultural water system disqualified for Type A usage?	
Page 32, Table 2B/Figure 2B (A3. routine verification of microbial water quality)	WU 13 - Was a <u>routine verification</u> of microbial water quality performed on each distinct irrigation system at least once during the season?	
	WU 13a - AZ LGMA Metrics- Were five samples (Three 100 mL samples taken during the routine verification from the end of the delivery system plus two consecutive samples from the prior testing) used to evaluate acceptance criterion?	

Water Use (continued)		
Irrigation Water from TYPE A Agriculture Water Systems Sourced from Public or Private Providers		
Page 32, Table 2B/Figure 2B (A3. routine verification of microbial water quality)	AZ LGMA WILL ACCEPT THE CA LGMA SAMPLE PROTOCOL Were three 100 mL samples taken during the routine verification used to evaluate acceptance criterion?	
	WU 13b - Did the five samples meet acceptance criterion - four must have no detectable generic E. coli and the one remaining sample must have levels not greater than 10 MPN/100 mL? AZ LGMA WILL ACCEPT THE CA LGMA ACCEPTANCE CRITERIA CA LGMA: Did the three samples meet the acceptance criteria - non-detectable generic E. coli in two of the three 100 mL samples, and the one remaining sample must have levels not greater than 10 MPN per 100 mL?	
	If WU 13b answered "NO" then WU 13b (1) - WU 13b (3) will drop down	
	WU 13b (1) - Was a Level 1 Assessment performed prior to the next irrigation event? WU 13b (2) - Was follow-up testing conducted (five 100 mL samples during the next irrigation event)? WU 13b (3) - Did the five samples for the level one assessment meet acceptance criterion - four must have no detectable generic E. coli and the one remaining sample must have levels not greater than 10 MPN/100 mL?	
	If WU 13b (3) answered "NO" then WU 13b (4) - WU 13b (6) will drop down	
	WU 13b (4) - Was the agricultural water discontinued for Type A use? WU 13b (5) - If water exceeding the acceptance criteria has been used for crop production was product sampled from all affected lots for STEC, including E coli O157:H7, and Salmonella, after the last irrigation and prior to harvest? WU 13b (6) - If "NO" or the tests were positive for STEC, including E coli O157:H7, or Salmonella do records show that the crop was not harvested for human consumption?	
	WU 14 - Are records of the analysis of source water available? (e.g. may be provided by municipalities, irrigation districts, or other water providers)?	
	WU 15 - Records show the name of the test laboratory, water source, date, time, location of the sample and method of analysis, and if quantitative, the detection limit?	
	WU 16 - And have they been reviewed within a week by a supervisor or responsible party?	
	WU 17 - The generic E.coli testing methodology is specified on the test report and meets any FDA method for quantitative monitoring of water for generic E. coli?	
Irrigation Water from TYPE A Agricultural Water Systems Sourced from Private Wells or Regulated Tertiary Treated Recycled Water Supplies		
Page 35 Table 2C/Figure 3A (B1. Baseline Microbial Assessment)	WU 18 - For the purpose of <u>baseline microbial assessment</u> are records of analysis of source water available - historical water test data? WU 18a - Is a self-certification with historical water test data available that states the acceptance criteria has been met with at least one test taken within the last 6 months? WU 18b - If "NO" was the system tested two times, three 100 mL samples at the source, no less than seven days apart prior to using the water in the 21 days-to-scheduled harvest window? WU 18c - Did the sampling meet the acceptance criteria - five of the six total samples have no detectable generic E. coli and the remaining sample has no greater than 10 MPN in 100 mL?	
	If WU 18c answered "NO" then WU 18c (1) - WU 18c (2) will drop down	
	WU 18c (1) - Was an agricultural water assessment and root cause analysis performed? WU 18c (2) - Was the agricultural water system disqualified for Type A usage?	
Pages 36-37 Table 2C/Figure 3B (B2. Initial Microbial Water Quality Assessment)	WU 19 - Was an <u>initial microbial water quality assessment</u> performed at least one-time seasonally for each system (before the 21 day to-scheduled-harvest-period begins)? WU 19a - Were three 100 mL samples from the end of the delivery system taken during one irrigation event for the initial microbial water quality assessment? WU 19b - Did sampling meet the acceptance criteria - three 100 mL samples from end of delivery system with non-detectable generic E. coli in two of three 100 mL samples and the remaining sample no greater than 10 MPN per 100 mL?	
	If WU 19b answered "NO" then WU 19b (1) - WU 19b (4) will drop down	
	WU 19b (1) - Was an agricultural water assessment and root cause analysis performed prior to the next irrigation event? WU 19b (2) - Was follow-up testing conducted (five 100 mL samples during the next irrigation event)? WU 19b (3) - Did the five samples meet follow-up testing acceptance criterion - four must have no detectable generic E. coli and the one remaining sample must have levels not greater than 10 MPN/100 mL?	

Water Use (continued)		
Irrigation Water from TYPE A Agricultural Water Systems Sourced from Private Wells or Regulated Tertiary Treated Recycled Water Supplies		
Pages 36-37 Table 2C/Figure 3B (B2. Initial Microbial Water Quality Assessment)	WU 19b (4) - If "NO" was the agricultural water system disqualified for Type A usage? WU 20 - If a <u>material change</u> was made to a system was another initial microbial water quality assessment conducted? WU 20a- Were three 100 mL samples from the end of the delivery system taken during one irrigation event for the initial microbial water quality assessment? WU 20b - Did sampling meet the acceptance criteria - three 100 mL samples from end of delivery system with non-detectable generic E. coli in two of the three 100 mL samples, and the remaining sample no greater than 10 MPN per 100 mL? If WU 20b answered "NO" then WU 20b (1) - WU 20b (4) will drop down WU 20b (1) - Was an agricultural water assessment and root cause analysis performed prior to the next irrigation event? WU 20b (2) - Was follow-up testing conducted (five 100 mL samples during the next irrigation event)? WU 20b (3) - Did sampling meet follow-up testing acceptance criterion - four of the five total samples must have no detectable generic E. coli and the one remaining sample must have levels not greater than 10 MPN/100 mL? WU 20b (4) - If "NO" was the agricultural water system disqualified for Type A usage?	
	WU 21 - Was <u>routine verification</u> performed on each distinct irrigation system sampled and tested for generic E. coli at least once during the season with three 100 mL samples at the end of the delivery system? WU 21a - AZ LGMA Metrics- Were five samples (Three 100 mL samples taken during the routine verification from the end of the delivery system plus two consecutive samples from the prior testing) used to evaluate acceptance criterion? AZ LGMA WILL ACCEPT THE CA LGMA SAMPLE PROTOCOL CA- LGMA: <i>Were three 100 mL samples taken during the routine verification used to evaluate acceptance criterion?</i> WU 21b - Did the five samples meet acceptance criterion - four must have no detectable generic E. coli and the one remaining sample must have levels not greater than 10 MPN/100 mL? AZ LGMA WILL ACCEPT THE CA LGMA ACCEPTANCE CRITERIA CA- LGMA: <i>Did the three samples meet the acceptance criteria - non-detectable generic E. coli in two of the three 100 mL samples, and the one remaining sample must have levels not greater than 10 MPN per 100 mL?</i> If WU 21b answered "NO" then WU 21b (1) - WU 21b (3) will drop down WU 21b (1) - Was a Level 1 Assessment performed prior to the next irrigation event? WU 21b (2) - Was follow-up testing conducted (five 100 mL samples during the next irrigation event)? WU 21b (3) - Did the five samples for the level one assessment meet acceptance criterion - four must have no detectable generic E. coli and the one remaining sample must have levels not greater than 10 MPN/100 mL? If WU 21b (3) answered "NO" then WU 21b (4) - WU 21b (3) will drop down WU 21b (4) - Was the agricultural water discontinued for Type A use? WU 21b (5) - If water exceeding the acceptance criteria has been used for crop production was product sampled from all affected lots for STEC, including E coli O157:H7, and Salmonella, after the last irrigation and prior to harvest? WU 21b (6) - If "NO" or the tests were positive for STEC, including E coli O157:H7, or Salmonella do records show that the crop was not harvested for human consumption? WU 22- Records show the name of the test laboratory, water source, date, time, location of the sample and method of analysis, and if quantitative, the detection limit? WU 22a - And have they been reviewed within a week by a supervisor or responsible party? WU 22b - The generic E.coli testing methodology is specified on the test report and meets any FDA method for quantitative monitoring of water for generic E. coli and total coliforms?	
	Irrigation Water from Treated TYPE B->A Agricultural Water Systems	
	WU 23 - Was an SOP established outlining irrigation treatment and process parameters for irrigation treatment systems based on the Initial Irrigation water Treatment Assessment? WU 24 - Was an <u>Initial Irrigation Water Treatment Assessment</u> performed to establish treatment process parameters prior to 21 days-to-scheduled harvest? WU 24a - Was an initial microbial water quality assessment conducted prior to 21 days-to-scheduled harvest? WU 24b - Was the assessment repeated if material changes occurred?	
Page 27 Lines 437-457; Appendix A Pages 41-42, Table 2D/Figure 4 (D1. Routine Verification of Microbial Water Quality)	WU 25 - Was <u>routine verification of microbial water quality</u> for each distinct system performed? WU 25a - If the system is used prior to the 21 days to harvest window, was the irrigation treatment system tested on at least one occasion?	

Water Use (continued)	
Irrigation Water from Treated TYPE B->A Agricultural Water Systems	
Pages 41-42, Table 2D/Figure 4 (D1. Routine Verification of Microbial Water Quality)	WU 25b - Is sampling (three 100 mL samples) conducted monthly?
Pages 41-42, Table 2D/Figure 4 (D1. Routine Verification of Microbial Water Quality)	WU 25c - If the system is used within the 21 days to harvest window, was the irrigation treatment system tested on at least two occasions separated by at least three days? WU 25d - Did sampling meet the acceptance criteria - three 100 mL samples from end of delivery system with non-detectable generic E. coli in two of the three 100 mL samples, and the remaining sample no greater than 10 MPN per 100 mL?
	If WU 25c or WU 25d answered "NO" then WU 25d (1) - WU 25d (3) will drop down
	WU 25d (1) - Was a Level 1 Assessment performed prior to the next irrigation event? WU 25d (2) - Was follow-up testing conducted (five 100 mL samples during the next irrigation event)? WU 25d (3) - Did the five samples for the level one assessment meet acceptance criterion - four must have no detectable generic E. coli and the one remaining sample must have levels not greater than 10 MPN/100 mL?
	If WU 25d (3) answered "NO" then WU 25d (4) - WU 25d (6) will drop down
	WU 25d (4) - Was the agricultural water discontinued for Type A use? WU 25d (5) - If water exceeding the acceptance criteria has been used for crop production was product sampled from all affected lots for STEC, including E coli O157:H7, and Salmonella, after the last irrigation and prior to harvest? WU 25d (6) - If "NO" or the tests were positive for STEC, including E coli O157:H7, or Salmonella do records show that the crop was not harvested for human consumption?
	WU 26 - Did all samples meet the data monitoring criteria for Total Coliform - maximum level of no greater than 99 MPN per 100 mL?
	WU 27 - Was there an adequate log reduction (as outlined in Appendix A) in Total Coliforms, based on the untreated water's baseline levels?
	<i>Note: If "NO" to WU26or WU27 then continue to monitor for total coliforms and and continue to evaluate your irrigation treatment system to identify and correct any failures.</i>
Page 42, Table 2D (D2. Routine Water Treatment Monitoring)	WU 28 - Is the water treatment system being monitored when in use for flow rates and treatment related parameters per the SOP (routine water treatment monitoring)?
	WU 29 - During every irrigation event, treatment-related parameter values such as residual antimicrobial levels, pH, dose settings, UVT, etc. must be documented to demonstrate the system is working as intended?
	WU 30 - Are USEPA antimicrobial water treatments being used, per the label instructions?
	WU 31 - Is the system tested for microbial water quality if the monitoring parameters fall outside the acceptable criteria?
	WU 32 - If water exceeding the acceptance criteria has been used for crop production within 21 days to scheduled harvest was product sampled from all affected lots for STEC, including E coli O157:H7, and Salmonella, after the last irrigation and prior to harvest? WU 32a - If "NO" or the tests were positive for STEC, including E coli O157:H7, or Salmonella do records show that the crop was not harvested for human consumption?
	WU 33 - Records show the name of the test laboratory, water source, date, time, location of the sample and method of analysis, and if quantitative, the detection limit?
	WU 34 - And have they been reviewed within a week by a supervisor or responsible party?
	WU 35 - The generic E.coli testing methodology is specified on the test report and meets any FDA method for quantitative monitoring of water for generic E. coli and total coliforms?
Post Harvest Water / Hand Wash Water - Direct Produce Contact or Food Contact Surfaces	
Pages 48-50, Table 2G/Figure 6	WU 36 - Is the water that directly contacts edible portions of harvested crop or used on food-contact surfaces (i.e. equipment or utensils) from a source that meets the USEPA MCLG for E. coli? WU 36a - If "NO" has the water received sufficient disinfection to meet the USEPA MCLG for microbial quality?
	WU 37 - If the water is reused, is sufficient disinfection added and monitored to prevent possible cross-contamination? (Chlorine-more than 1ppm free chlorine and PH 5.5-7.5 or ORP-more than 650mV or other approved treatment per product EPA label for human pathogen reduction in water)
	WU 38 - If disinfectant is used during re-hydration, product coring in the field, and product cooling (single-pass) does the operation monitor disinfectant levels?
	WU 39 - Was a source water test conducted for each source of water within 60 days of first use?

Water Use (continued)		
Post Harvest Water / Hand Wash Water - Direct Produce Contact or Food Contact Surfaces		
Pages 48-50, Table 2G/Figure 6	WU 40 - Are records available to demonstrate that water samples or monitoring results have been collected from each water distribution system within the last month? WU 40a - Were the microbial acceptance criteria met?	
	If WU 40a is answered "NO" then WU 40a (1) will drop down	
	WU 40a (1) - Was use of the water discontinued after the tests indicated the water source failed to meet the minimum water quality requirements?	
	WU 40a (2) - Was an agricultural water assessment completed on the water source and distribution system for possible contamination? WU 40a (3) - Do records show that corrective actions were taken to eliminate the contamination sources? WU 40a (4) - Was the water retested at the same sampling point? WU 40a (5) - Was one water test taken daily (not less than 18 hours apart) for 5 days at the point closest to use? WU 40a (6) - Did these 5 test results meet the acceptance criteria - non-detectable (less than 2.2 MPN/100 mL)? WU 40a (7) - Do records show the water was not used while the water quality was inadequate? WU 40a (8) - If water exceeding acceptance criteria has been used for crop production was product sampled from all affected lots for STEC, including E. coli O157:H7, and Salmonella?	
	WU 41 - Records show that the crop was not harvested for human consumption when the tests were positive for STEC, including E. coli O157:H7, or Salmonella?	
	WU 42 - Show the name of the test laboratory, water source, date, time, location of the sample and method of analysis, and if quantitative, the detection limit? WU 43 - And have they been reviewed within a week by a supervisor or responsible party? WU 44 - The generic E. coli testing methodology is specified on the test report and meets any FDA method for quantitative monitoring of water for generic E. coli?	
Post Harvest Water / Municipal & Well Exemptions		
Pages 48-50, Table 2G/Figure 6	WU 45 - Is the source water from a municipal supply or well? WU 45a - Does this source qualify for the 5 consecutive monthly samples below the generic E. coli detection limit on record exemption? WU 45b - Is the last sample recorded within 180 days of the audit date?	
Soil Amendments		
All soil amendments are free from raw or partially composted animal manure and biosolids.		
Page 51-56, Lines 567-570; Table 3	SA 01 - Raw or partially composted animal manure, animal by-products or biosolids have not been applied in the last 1 year? SA 01a - If "NO" to the above were any of these fields used in the production of leafy greens?	
Soil amendments contain composted manure		
Page 53-56, Table 3	SA 02 - No soil amendment containing fully composted animal manure has been applied to the field within the last year? If SA 02 is answered "NO" then SA 02a - SA 02u will drop down	
	SA 02a - Are Process Validation records available for review?	
	SA 02b - If the Enclosed or Within-Vessel Composting method is used, do the records show:	
	SA 02c - ...that the active compost maintained a minimum of 131oF for 3 days? SA 02c (1) - ...Is a Letter of Guaranty or other comparable documentation available that shows the soil amendment has been adequately cured?	
	SA 02d - If the Windrow Composting method is used do the records show:	
	SA 02e - ...that the active compost maintained aerobic conditions for a minimum of 131°F or higher for 15 days or longer? SA 02f - ...a minimum of five turnings during this period? SA 02f (1) - ...Is a Letter of Guaranty or other comparable documentation available that shows the soil amendment has been adequately cured?	
	SA 02g - If the Aerated Static Pile Composting method is used do the records show that: SA 02h - ...the active compost was covered with 6 to 12 inches of insulating materials? SA 02i - ...maintain a minimum of 131oF for 3 days? SA 02i (2) - ...Is a Letter of Guaranty or other comparable documentation available that shows the soil amendment has been adequately cured? SA 02j - Has each lot of composted material that is equal to or less than 5000 cubic yards been tested as required? SA 02k - Has each lot of composted material been applied to the production location more than 45 days before harvest?	

Soil Amendments		
All soil amendments are free from raw or partially composted animal manure and biosolids.		
Page 53-56, Table 3	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?	
	Records must be available to document the following criteria have been met for each lot of compost containing animal material used.	
	a. Acceptance criteria SA 02l - Fecal coliforms: <1000 MPN/gram SA 02m - Salmonella: Negative per sample size of the prescribed test SA 02n - E. coli O157:H7: Negative per sample size of the prescribed test b. Recommended test methods SA 02o - Fecal coliforms: U.S. EPA Method 1680; multiple- tube MPN SA 02p - Salmonella spp: U.S. EPA Method 1682 SA 02q - E. coli O157:H7: Any laboratory validated method for compost SA 02r - Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate. c. Sampling plan SA 02s - A composite sample shall be representative and random and obtained as described in the California state regulations. ¹ SA 02t - Sample may be taken by the supplier if trained by a testing laboratory or state authority. SA 02u - Laboratory must be certified/accredited for microbial testing by a certification or accreditation body.	
	Soil amendments that do not contain animal manure	
Pages 52, Lines 599-608	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? 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 by other equivalent methods		
Pages 55-56, Table 3	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?	
Page 58, Figure 7B Decision Tree	If SA 04 is answered "NO" then SA 04a-SA 04b (16) will drop down	
	SA 04a - Are process records or other comparable documentation available that show the lethality of the process? SA 04b - Is the name of the process authority issuing the Letter of Guaranty or other comparable document shown?	
	Records must be available to document the following criteria have been met for each lot of heat treated or processed by other equivalent method compost containing animal material used.	
	a. Acceptance criteria SA 04b (1) - Fecal coliforms: Negative MPN/gram SA 04b (2) - Salmonella: Negative per sample size of the prescribed test SA 04b (3) - E. coli O157:H7: Negative per sample size of the prescribed test SA 04b (4) – <i>Listeria monocytogenes</i> : Negative per sample size of the prescribed test b. Recommended test methods SA 04b (5) - Fecal coliforms: 9 tube MPN SA 04b (6) - Salmonella spp: U.S. EPA Method 1682 SA 04b (7) - E. coli O157:H7: Any laboratory validated method for compost SA 04b (8) - Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate. SA 04b (9) – <i>Listeria monocytogenes</i> : Any laboratory validated method for testing soil amendments c. Sampling plan SA 04b (10) - Take at least 12 equivolume samples from 12 or more separate locations or 12 samples from 12 individual bags, if bagged SA 04b (11) - Sample may be taken by the supplier if trained by a testing laboratory or state authority. SA 04b (12) - Laboratory must be certified/accredited by a certification or accreditation body. SA 04b (13) - If testing records are NOT available is a Certificate of Process Validity as defined by the "Guidelines" available for review?	
Page 56, Table 3	Application intervals were met: SA 04b (14) - Was this heat treated or processed crop treatment produced using a validated process for pathogen control? SA 04b (15) - If "NO" to above, was the treatment applied at least 45 days before harvest?	

Soil Amendments (continued)		
Soil amendments that contain animal manure that are heat treated or processed by other equivalent methods		
Page 56, Table 3	SA 04b (16) - 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.	
Soil amendments that are Non-Synthetic Crop Treatments (compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc.) Table 4 & Figure 8).		
Page 59, Pages 60-64	SA 05 - No non-synthetic crop treatment has been applied to the crop?	
Pages 60-61, Table 4	If SA 05 if answered "NO" then SA 05a - SA 05c (24) will drop down	
	SA 05a - If "NO" to the above, the product (non-synthetic soil amendment) was not applied to the edible portion of the crop?	
	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)?	
	SA 05c – 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 met for each lot of non-synthetic crop treatment used.	
	SA 05c (1) - Did each lot/batch used meet the microbial criteria identified below?	
	SA 05c (2) - <i>Fecal coliforms</i> : Negative MPN/gram	
	SA 05c (3) - <i>Salmonella</i> : Negative per sample size of the prescribed test	
	SA 05c (4) - <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test	
	SA 05c (5) – <i>Listeria monocytogenes</i> : Negative per sample size of the prescribed test	
	SA 05c (6) - If this treatment is applied as a liquid was the solution made with water that meets the quality standards for post-harvest water (Table 2G)?	
	Application intervals were met:	
	SA 05c (7) - Was this non-synthetic crop treatment produced using a validated process for pathogen control?	
	SA 05c (8) - If "NO" to above, was the treatment applied at least 45 days before harvest?	
	SA 05c (9) - 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 05c (10) - <i>Fecal coliforms</i> : Negative MPN/gram	
	SA 05c (11) - <i>Salmonella</i> spp: U.S. E.P.A. Method 1682	
	SA 05c (12) - <i>E. coli</i> O157:H7: Any laboratory validated method for compost sampling	
	SA 05c (13) – <i>Listeria monocytogenes</i> : Negative per sample size of the prescribed test	
	SA 05c (14) - Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate.	
	The proper sampling plan was followed:	
	SA 05c (15) - Solid: 12 point sampling plan composite sample	
	SA 05c (16) - Liquid: Single well-mixed sample per lot	
	SA 05c (17) - Sample may be taken by the supplier if trained by the testing laboratory	
	SA 05c (18) - Laboratory must be certified/accredited by annual review of laboratory protocols based on GLPs by a certification or accreditation body.	
	Testing Frequency:	
	SA 05c (19) - Each lot before application to production fields.	
	SA 05c (20) - Identify the crop treatment.	
	SA 05c (21) - Show the name of the laboratory completing the testing.	
	SA 05c (22) - Show date of application ?	
	SA 05c (23) - Does it show the date of harvest?	
	SA 05c (24) - Show the supplier name.	
Page 51, Lines 574-575	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 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		
Pages 66-67, Lines 787-825	WP 01 - Is there a written policy for all employees and all visitors to the field location which describes the required hygiene rules? Does the Policy address the following: WP 01a - Sanitary Facilities	
Pages 66-67, Lines 787-825	WP 01b - Field Worker Practices (GMP's, GHP's, etc.) WP 01c - Worker Health Practices	
Sanitary Facilities		
Page 67, Lines 826-844	WP 02 - Is there a documented field sanitary facility program? Does the program address the following: WP 02a - The number, condition, and placement of field sanitation units complies with applicable state and/or federal regulations. WP 02b - Sanitary facilities are readily accessible (proximate) to the work area. WP 02c - Sanitary facilities are regularly maintained according to schedule. WP 02d - Sanitary facilities have sufficient consumable supplies (i.e.: hand soap, water that meets the post harvest acceptance criteria, paper towels, toilet paper, etc.). WP 02e - Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work.	
Sanitary Facilities		
Page 67, Lines 826-844	WP 02f - 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 02g - Address the placement of the sanitary facility in order to minimize any impact on the crop in the field including: WP 02h - Minimize the impact on the crop from leaks and/or spills WP 02i - Ability to access the unit for service WP 02j - Documented response plan in the event of a major leak and/or spill.	
Field Worker Practices (GMPs, GHPs, etc.)		
Pages 66-67, Lines 787-825	WP 03 - Is there a written worker practices program that establishes employee work rules? Does the program address the following: WP 03a - 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 03b - Confine smoking, eating and drinking (except water) to designated areas. WP 03c - Storage requirements for personal items in/or adjacent to the field? WP 03d - The appropriate use and sanitation of gloves. WP 03e - Avoid contact with animals WP 03f - Prohibitions on spitting, urinating or defecating in the field.	
	WP 04 - For materials targeted for further processing, is there a written physical hazard prevention program? Does the program address the following: WP 04a - The proper wearing of head and facial hair restraints. WP 04b - The proper wearing of apron and other food safety apparel. WP 04c - Removal of visible jewelry (rings, bracelets, necklaces, body piercings, etc.) or covering of hand jewelry prior to the start of work. WP 04d - Removal of all objects from upper pockets.	
Worker Health Practices		
Page 67, Lines 817-825	WP 05 - Is there a written worker health practices program that establishes employee work rules? Does the program address the following: WP 05a - 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? WP 05b - Workers with open cuts or lesions are prohibited from handling fresh produce. WP 05c - Actions for employee to take in the event of injury or illness (e.g. notifying supervisor). WP 05d - A policy describing procedures for handling/disposition of produce or food contact surfaces that have come into contact with blood or other body fluids.	

Field Sanitation		
General Requirements		
Pages 66, Lines 789	FS 01 - Is there a written policy for all employees and all visitors in the field location which describes the required field sanitation SOPs?	
Field and Harvest Activities SOP's		
Page 67-68, Lines 846-861	FS 02 - Is there a written field and harvest activity SOP? Does the SOP address the following: 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. FS 02b - If "YES" does it appropriately restrict the use or require a documented cleaning and sanitation program of the equipment? FS 02c - If cleaning and sanitation is required, are records of the cleaning/sanitation available for review.	
Pages 75-76, Table 6	FS 2d - Is there a written SOP for corrective actions for "Low Hazard" animal intrusion?	
Page 71, Lines 954-956	FS 02e - Is there a written SOP for production locations that have environmental source of pathogens (i.e. CAFO, dairy, hobby farm and manure or livestock compost facility) and the potential for contamination during weather conditions and events?	
Page 66, Lines 778-779	FS 02f- Is there an SOP that addresses waste, trash, and other debris that protects product and production area from contamination?	
Page 66, Lines 792-793	FS 02g – is a specific individual assigned the food safety responsibility for growing operations? FS 02h - Is a specific individual assigned the food safety responsibility for harvesting?	
Daily Harvest Assessment		
Pages 17-18, Lines 110-143; Page 19, Lines 188-191; Page 72, Lines 978-981; Pages 75-76, Table 6	FS 03 - Is a documented daily food safety harvest assessment available for review? FS 03a - Is the assessment dated? FS 03b - Is the individual who conducted the assessment identified? FS 03c - Are the specific growing blocks associated with the assessment clearly identified? FS 03d - Is the Harvester name and contact information documented? FS 03e - Did the assessment indicate that the production area was free from evidence of animal intrusion or potential risk of intrusion? If FS 03e is answered "NO" then FS 03e (1) - FS 03e (6) will drop down. FS 03e (1) - Was the animal hazard or potential risk of intrusion assessed by food safety professional or food safety personnel? FS 03e (2)- Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"? FS 03e (3) - If "YES" were corrective actions carried out according to company SOP? FS 03e (4) - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"? FS 03e (5) - If "YES" were corrective actions carried out per the LGMA requirements? FS 03e (6) - If "YES" is documentation available to show that actions were implemented?	
Page 20, Lines 222-226	FS 03f - Did the assessment indicate there were no changes in weather condition or weather events (e.g. severe wind, hail, freeze, excessive rain, or consecutive weather events) during the production period? FS 03f (1) If "No", did the assessment indicate a possible impact on the crop or operations including environmental sources of contaminants near production locations (i.e. CAFO, dairy, hobby farm and manure or livestock compost facility)? FS 03g -Did the assessment indicate there were no discharge events from environmental sources of contamination (i.e. CAFO, dairy, hobby farm and manure or livestock compost facility) proximate the production location? FS 03g (1) - If "No" to FS03hh or FS03ii, were corrective actions carried out according to company SOP?	
Page 63, Line 682-683	FS 04 - Did the daily inspection indicate the food contact surfaces on harvest equipment need to be rinsed and sanitized prior to beginning daily harvest? FS 04a - If "YES" was the food contact surfaces on harvest equipment rinsed and sanitized?	
Harvest Equipment, Packing Materials and Buildings		
Page 64, Lines 731-733	FS 05 - Is there an SSOP for food-contact surfaces of harvest equipment, tools, utensils and containers? Does the SSOP address the following: FS 05a - Equipment specific cleaning instructions FS 05b - Method and frequency of cleaning and sanitation FS 05b (1) - Food contact surfaces on harvest equipment are cleaned and sanitized at the end of each daily harvest	

Field Sanitation		
Harvest Equipment, Packing Materials and Buildings		
Page 64, Lines 731-733	FS 05b (2) - Food contact surfaces on harvest equipment are cleaned and sanitized before moving to the next commodity and/or field FS 05c - Daily inspection of food contact surfaces on equipment FS 05d - Chemical usage and record keeping (e.g. soap, detergent, sanitizer, etc.)	
Page 64, Line 734	FS 05e - Sanitation Procedures Verification	
Page 64, Lines 731-733	FS 06 - Is there an SOP for non-food-contact surfaces of harvest equipment, tools, and containers? Does the SOP address the following: FS 06a- Equipment-specific cleaning instructions FS 06b – Method and frequency of cleaning FS 06c - Chemical usage and record keeping (e.g. soap, detergent, etc.) FS 06d - Cleaning verification FS 06e - Daily inspection of non-food contact surfaces and equipment	
Page 64, Lines 705-706	FS 07 - Is there an SOP for water tanks, containers and equipment used for hydration?	
Page 64, Lines 699-707	FS 08 - Is there an SOP for sanitary operation of equipment? Does the SOP address the following: FS 08a - Are spills and leaks addressed FS 08b - Harvest equipment protection FS 08c - Overnight equipment and tool storage FS 08d - Does the SOP for Sanitary Operation of Equipment, address remedial actions?	
Page 44, Lines 819-821	FS 09 - Has a supervisor or responsible party signed and dated equipment cleaning and sanitation records within a week of the activities being	
Pages 63-64, Lines 693-698	FS 10 - Is there an SOP for handling and storage of product containers? Does the SOP address the following:	
Pages 63-64, Lines 693-698	FS 10a - Over night storage FS 10b - Contact with the ground FS 10c - Container assembly (RPC, fiber bin, plastic bin, etc.) FS 10d - Damaged containers FS 10e - Use of containers only as intended	
Page 65, Lines 744-745	FS 11 – Are packing materials or containers cleanable or designed for single use?	
Page 65, Lines 746-747	FS 12– Are reusable packing materials or containers cleaned and sanitized or fitted with a clean liner?	
Page 65, Line 794	FS 13- Is there an SOP for chemical storage and chemical content labeling	
Page 64, Lines 714-718	FS 14 – Are instruments or controls used to measure, regulate, or record temperature, hydrogen ion concentration, pH, sanitizer concentration or other conditions: FS 14a - Accurate and precise as necessary and appropriate for their intended use? FS 14b – Adequately maintained? FS 14c – Adequate in number for their intended use?	
Page 65, Lines 752-763	FS 15 – Are there any buildings used to store packing material? FS 15a – Does the building have proper drainage and protection from condensate or drips to keep food-contact surfaces from getting wet? FS 15b – Are packaging materials and other food-contact surfaces kept separate from contamination sources by partition, time, location, enclosed system, or other effective means?	
Transportation		
Page 81, Lines 1034-1042	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?	

Field Observations		
Water Use		
	FO 01 - Are all active and/or inactive water sources recorded in the Water Use Audit? 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, environmental sources of contamination, connection with effluent systems)? FO 01b - No other observations of improper use of water	
Soil Amendments		
	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	
Environmental Factors		
	FO 03 - No evidence of fecal contamination in the field? FO 03a - No evidence of animal hazards in the field? 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.	
Work Practices		
	FO 04 - No employees eating, drinking (except water), chewing tobacco or smoking in crop production actively harvested areas? FO 04a - All employees observed to have washed their hands after; restroom usage, work breaks or any returning to work occasion? 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? FO 04e - No improperly stored personal items observed in the field? FO 04f - No evidence or observations that employees are not using the restrooms? FO 04g - No employees with uncovered wounds, boils or cuts? FO 04h - No employees with symptoms of infection or contagious disease? FO 04i - No other observations of improper work practices.	
Field Sanitation		
	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.	