

General Requirements		Comments
Page & Line #s	Question	
Page 15, Lines 294-297	<p>GR 01 - Is a written Leafy Greens Compliance Plan which specifically addresses the Best Practices of the LGMA available for review?</p> <p>GR 02 - Does it specifically address the following subjects consistent with the LGMA:</p> <ul style="list-style-type: none"> GR 02a - Water GR 02b - Soil Amendments GR 02c - Environmental Factors GR 02d - Work Practices GR 02e - Field Sanitation 	
Page 15, Lines 298-299	GR 03 - Is an up to date producers list with contact and location information available for review?	
Page 15, Lines 300-303	<p>GR 04 - Is the shipper in compliance with the registration requirement of The Public Health Security and Bioterrorism Preparedness and Response Act of 2002?</p> <p>GR 05 - Does the Shipper have a traceability process?</p> <ul style="list-style-type: none"> GR 05a - Does it enable identification of immediate non-transporter source? GR 05b - Does it enable identification of immediate non-transporter subsequent recipient? 	
Page 15, Lines 304-306	<p>GR 06 - Has the Shipper (or if applicable the producer) designated someone to implement and oversee the food safety program?</p> <ul style="list-style-type: none"> GR 06a - Is the name of the individual available? GR 06b - Is 24/7 contact information for the individual available? 	
Records		
Pages 15-16, Lines 312-321	<p>RE 01 – Did the shipper have records required in the Leafy Greens Compliance Plan?</p> <p>RE 02 – Do records include (as applicable):</p> <ul style="list-style-type: none"> RE 02a – farm name and location RE 02b – actual values and observations obtained during monitoring RE 02c – an adequate description of the leafy green product RE 02d – growing area location RE 02e – date and time of the activity being documented 	
Page 16, Line 323	RE03 – Do records indicate they were created at the time the activity was performed?	
Page 16, Lines 325-327	RE04 – Were the records signed and dated by the person performing the documented activity?	
Page 16, Lines 328-331	RE05 – Were all records readily available and accessible for inspection during the audit? (e.g. Logs, Checklist, Spreadsheets, etc.)	
Page 16, Lines 348-352	RE06 – Do SOPs require documentation and records to be kept for 2 years?	
Personnel Qualifications and Training		
Page 17, Lines 364-365	PE 01 – Do training records indicate all personnel receive training at hire and at least annually thereafter?	
Page 17, Lines 377-384	<p>PE 02 – Does the training provided to all personnel who work with leafy greens or supervise those who do include:</p> <ul style="list-style-type: none"> PE 02a – the principles of food hygiene and safety? PE 02b – the importance of health and personal hygiene? PE 02c – the standards established in these best practices that are applicable to the employee's job responsibilities? 	
Page 17, Lines 385-397	<p>PE 03 – Do all harvest personnel receive additional training in:</p> <ul style="list-style-type: none"> PE 03a – recognizing leafy greens that may be contaminated and therefore not be harvested? PE 03b – inspecting product containers, harvest equipment, and packaging materials to ensure they are working properly and do not pose a product contamination risk? PE 03c – how to correct problems with product containers, harvest equipment, and packaging materials or report problems to supervisors? 	
Produce Safety Rule - 112.22 (c)	<p>PE 04 – Has a food safety professional / representative for each farm completed the Produce Safety Alliance, "Grower Training" or a standard curriculum recognized by the FDA?</p> <ul style="list-style-type: none"> PE 04a – Grower PE 04b – Harvester PE 04c – Cooler/Holder 	
Page 18, Lines 402-405	<p>PE 05 – Are there records of training events? Do they include:</p> <ul style="list-style-type: none"> PE 05a – training date PE 05b – topics covered PE 05c – trainee name PE 05d – supervisor's signature indicating a record review was performed within a week 	

Environmental Assessments		Comments
Page & Line #s	Question	
Pre-Season Assessment		
Animal Activity		
Page 18, Lines 421-425	EA 01 - Did the assessment indicate that the production area was free from evidence of animal intrusion? If EA 01 is answered "NO" then EA 001 - EA 003d will drop down.	
Page 55, Table 5	EA 001 - Was the animal hazard or potential risk of intrusion assessed by Food Safety professional?	
	EA 002 - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"? EA 002a - If "YES" were corrective actions carried out according to company SOP?	
	EA 003 - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"? EA 003a - If "YES" were corrective actions formulated? EA 003b - N/A EA 003c - If "YES" is documentation available to show that actions were implemented? EA 003d - If "YES" are you periodically monitoring the effectiveness of any corrective actions?	
	Adjacent Land Use	
Page 57, Table 6	EA 02 - Was the adjacent land area free from compost operations within 400' of the crop edge? EA 02a - If "No" are there mitigation measures, topographical or climate features that indicate that the 400' recommendation should be modified? EA 02b - If "No" are mitigation measures in place and documented?	
Page 57, Table 6	EA 03 - Was the adjacent land area free from confined animal feeding operations (CAFO) within 400' of the crop edge? EA 03a - If "No" are there mitigation measures, topographical or climate features that indicate that the 400' recommendation should be modified? EA 03b - If "No" are mitigation measures in place and documented?	
Page 57, Table 6	EA 04 - Is the adjacent land area free from non-synthetic soil amendments stored within 400' of the edge of the crop? EA 04a - If "No" has the non-synthetic crop treatment been treated using a validated process and no closer than 30' from the edge of the crop? EA 04b - If "No" are there mitigation measures or topographical features that indicate that the 400' recommendation should be modified? EA 04c - If "No" are mitigation measures in place and documented?	
Page 58, Table 6	EA 05 - Is the adjacent land area free from grazing lands/domestic animals within 30' from the edge of the crop? EA 05a - If "No" are there topographical or climate features that indicate that 30' recommendation should be modified? EA 05b - If "No" are mitigation measures in place and documented?	
Page 58, Table 6	EA 06 - Is the adjacent land area free from any septic leach fields (home or other building) within 30' of the edge of the crop? EA 06a - If "No" are there mitigation measures, topographical or climate features that indicate that 30' should be modified is too short a distance? EA 06b - If "No" are mitigation measures in place and documented?	
Page 58, Table 6	EA 07 - Are all well heads at least 200' from untreated manure? EA 07a - If "No" are there topographical or climate features that indicate that 200' is too short a distance? EA 07b - If "No" are mitigation measures in place and documented?	
Page 58, Table 6	EA 08 - Does documentation justify the buffer zone distance for all surface water sources on the ranch and their separation from untreated manure (raw manure and partially composted manure) as follows? EA 08a - 100' for sandy soil with a slope <6% EA 08b - 200' for loamy or clay soil with a slope <6% EA 08c - 300' for all slopes >6%	
Page 59, Table 6	EA 09 - Is the adjacent land free from uses or conditions that pose a food safety risk to crops? EA 09a - If "No" has a risk assessment been conducted to evaluate the risk? EA 09b - If "No" have corrective measures been put in place and documented?	
Recent Field History		
Page 50, Table 4	EA 10 - Are production blocks free from all of the following:	
Page 19, Lines 452-455	EA 10a - History of flooding within the last 60 days	
Page 18, Lines 421-425	EA 10b - History of grazing on the crop land within the last 1 year	
Page 18, Lines 435-439	EA 10c - History of hazardous activity including but not limited to CAFO, municipal waste, toxic waste, landfill, etc.?	
EA 10a - EA 10c if any of these are answered "NO" then EA 10d will drop down		
Page 49, Table 4	EA 10d - If no, were specific actions implemented and documented to mitigate the issue(s)?	

		Environmental Assessments (continued)	Comments
Page & Line #s	Question		
Pre-Harvest Assessment			
Pages 55-56, Table 5 Page 54, Decision Tree Page 18, Lines 407-420	EA 11 - Was a Pre-Harvest Assessment conducted within 7 days for each harvested lot? EA 11a - Did it address the following areas? EA 11b - Intrusion by animals EA 11c - Flooding EA 11d - Potential contamination materials EA 11e - Condition of water source and distribution system EA 11f - Unexpected adjacent land activity that will pose a risk to food safety EA 11g - Worker hygiene and sanitary facilities		
Animal Intrusion			
Pages 55-56, Table 5	EA 12 - Did the assessment indicate that the production area was free from evidence of animal intrusion? If EA 12 is answered "NO" then EA 12a - EA 12f will drop down. EA 12a - Was the animal hazard or potential risk of intrusion assessed by food safety professional or food safety personnel? EA 12b - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"? EA 12c - If "YES" were corrective actions carried out according to company SOP? EA 12d - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"? EA 12e - If "YES" were corrective actions carried out per the LGMA requirements? EA 12f - If "YES" is documentation available to show that actions were implemented?		
Unusual Events			
Page 49, Table 4 Pages 47-48, Lines 979-986	EA 13 - If pre-harvest ranch assessment indicates that flooding has occurred are the following addressed: EA 13a - Do the records indicate that no fields were flooded at any time during the crop cycle? EA 13b - If production blocks were flooded is there documentation to indicate the extent of flooding and the area of crop impacted? EA 13c - Was the product left un-harvested? EA 13d - If product was harvested, was a 30' (min) "no harvest" buffer from the high water mark established? EA 13e - Are these remedial activities documented?		
Pages 18-19, Lines 406-443	EA 14 - Is the pre-harvest lot free from all evidence of any other type of potential source of human pathogen contamination AND the food safety status of the adjacent land remains unchanged since the pre-season assessment was conducted? If EA 14 is answered "NO" then EA 14a - EA 14h will drop down EA 14a - If "No", was a food safety assessment completed? EA 14b - Is the individual who conducted the assessment identified? EA 14c - Is the date of the assessment documented? EA 14d - Were remedial actions formulated? EA 14e - If "No", was the field harvested? EA 14f - If "No", is there documentation to show the remedial actions were followed? EA 14g - Did the remedial action include creation of "no harvest" buffer or separation zones around the potentially contaminated area(s)? EA 14h - Is documentation which fully delineates the potential contamination available for review?		
Water Use			
Page 19, Lines 465-480	WU 01 - Is a ranch map (or other documentation) indicating the sources of water and distribution systems available for review? WU 01a - Does the map (or other documentation) identify permanent above ground fixtures such that they can be located in the field? WU 01b - Does the map or other documentation identify the production blocks that may be served by each water source? WU 01c - Was a sanitary survey completed prior to use for each water source? WU 01d - Are effluent systems (that convey untreated human or animal wastes) separated from irrigation water systems?		

Water Use (continued)		
Page & Line #s	Question	Comments
Pre-Harvest Foliar and non-Foliar Water Applications		
Pages 21-22, Table 1 Pages 25-26, Figure 1A and 1B	<p>WU 02 - Was a source water test conducted for each source of water within 60 days of first use on post germinated fields? Note: Reclaimed water sample results and analysis provided by the water district or provider may be utilized as records of water source testing for verification and validation audits.</p> <p>WU 02a - Are records available to demonstrate that water samples have been collected from each water distribution system on a monthly basis? WU 02b - Records show that the water samples are taken no less than 18 hours apart. WU 02c - Is the geometric mean less than or equal to 126 MPN/100 ml? WU 02d - Are all individual samples less than or equal to 235MPN/100 ml (foliar) or 576 MPN/100m ml (non-Foliar)? WU 02e - The location where the sample was taken is recorded. WU 02f - Show the name of the test laboratory WU 02g - The generic E.coli testing methodology is specified on the test report and meets the FDA BAM method or any U.S. EPA approved or AOAC accredited for quantitative monitoring of water for generic E. coli.</p> <p>WU 02c or WU 02d answered "no" then WU 02h-WU 02p will drop down</p> <p>WU 02h - The water system was discontinued after the tests indicated the water source failed to meet the minimum water quality requirements. WU 02i - A sanitary survey was completed on the water source and distribution system for possible contamination. WU 02j - Records show that corrective actions were taken to eliminate the contamination sources. WU 02k - Samples for the required water retesting were taken at the previous sampling point. WU 02l - One water test was taken daily (not less than 18 hours apart) for 5 days. WU 02m - These 5 test results met the acceptance criteria: average less than 126 MPN/100ml (based on rolling geometric mean=5) and no sample exceeded greater than 235 MPN/100 ml (foliar) or 576 MPN/100 ml (non-foliar). WU 02n - Records show the water system was not used while the water quality was inadequate. WU 02o - Was product sampled for E coli 157:H7 and Salmonella. WU 02p - Or records show that the crop was not harvested for human consumption when the tests were positive for E coli O157:H7 or Salmonella.</p>	
Municipal Supply or Well Exemption		
Pages 21-22, Table 1 Pages 25-26, Figure 1A and 1B	<p>WU 03 - Is the source water from a municipal supply or well?</p> <p>WU 03a - Does this source qualify for the 5 consecutive monthly samples below the generic E. coli detection limit on record (2.2 MPN) exemption? WU 03b - Is the last sample recorded within 180 days of the audit date?</p>	
Hand Wash and Post Harvest Water- Direct Produce Contact, Food Contact Surfaces		
Pages 23-24, Table 1 Page 27, Figure 1C	<p>WU 04 - Is the water from a source that meets the USEPA MCLG for microbial quality (Negative per 100ml (<2.2 MPN/100ml))?</p> <p>WU 04a - If "No" has the water received sufficient disinfection to meet the USEPA MCLG for microbial quality? WU 04b - If the water is reused, is sufficient disinfection added and monitored to prevent possible cross-contamination? (Chlorine-more than 1ppm free chlorine and PH 6.5-7.5 or ORP-more than 650mV or other approved treatment per product EPA label for human pathogen reduction in water)</p> <p>WU 04c - Was a source water test conducted for each source of water within 60 days of first use? WU 04d - Are records available to demonstrate that water samples or monitoring results have been collected from each water distribution system within the last month?</p> <p>If WU 04 and WU 04a are answered "NO" then WU 04e - WU 04n will drop down</p> <p>WU 04e - Was use of the water system discontinued after the tests indicated the water source failed to meet the minimum water quality requirements? WU 04f - Was a sanitary survey completed on the water source and distribution system for possible contamination? WU 04g - Do records show that corrective actions were taken to eliminate the contamination sources? WU 04h - Were samples for the required water retesting taken at the previous sampling point? WU 04i - Was one water test taken daily (not less than 18 hours apart) for 5 days at the point closest to use? WU 04j - Did these 5 test results meet the acceptance criteria: less than 2.2 MPN/100ml? WU 04k - Do records show the water system was not used while the water quality was inadequate? WU 04l - Was product sampled for E coli 157:H7 and Salmonella? WU 04m - Do records show that the crop was not harvested for human consumption when the tests were positive for E coli O157:H7 or Salmonella? WU 04n - Do the records show that the product was not harvested?</p>	

Page & Line #s	Question	Comments
Hand Wash and Post Harvest Water- Direct Produce Contact, Food Contact Surfaces		
Pages 23-24, Table 1 Page 27, Figure 1C	<p>WU 05 - Do records show that all water used in equipment cleaning processes (Tables, belts, bins, etc.) is tested for generic E. coli or that sufficient disinfectant was used?</p> <p>WU 05a - Do the records document all of the following: WU 05b - The generic E.coli testing methodology is specified on the test report and meets the FDA BAM method or any U.S. EPA approved or AOAC accredited for quantitative monitoring of water for generic E. coli. WU 05c - The records indicate that the operation monitors disinfectant levels during re-hydration, product coring in the field and product cooling. WU 05d - The records indicate the testing procedure/equipment that was used for monitoring the disinfectant levels (Indicate the procedure/equipment type). WU 05e - Is the location of where the sample was taken recorded? WU 05f - Do the records show the name of the test laboratory if applicable?</p>	
Soil Amendments		
All soil amendments are free from raw or partially composted animal manure and biosolids.		
Page 28, Lines 565-570; Page 30, Table 2	<p>SA 01 - Raw or partially composted animal manure, animal by-products or biosolids have not been applied in the last 1 year?</p> <p>SA 01a - If "No" to the above were any of these fields used in the production of leafy greens?</p>	
Soil amendments contain composted manure		
Pages 30-31, Table 2 Page 35, Figure 2A	<p>SA 02 - No soil amendment containing fully composted animal manure has been applied to the field within the last year?</p> <p>If SA 02 is answered "NO" then SA 02a-SA 02u will drop down</p> <p>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 131°F 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: SA 02h - ...the active compost was covered with 6 to 12 inches of insulating materials? SA 02i - ...maintain a minimum of 131°F 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? SA 02k(1) - For on-farm compost, are process control monitoring records reviewed, dated and signed by supervisor or responsible party within a week after records were made?</p> <p>Records must be available to document the following criteria have been met for each lot of compost containing animal material used.</p> <p>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</p> <p>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.</p> <p>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.</p>	

Page & Line #s		Question	Comments
Soil amendments that do not contain animal manure			
Pages 28-29, Lines 575-587 Page 34, Table 2		<p>SA 03 - Is a Letter of Guaranty or other comparable documentation (ingredient statement, bag label, etc.) available that shows the soil amendment does not contain animal manure or is composed of a single ingredient?</p> <p>SA 03a - Is the name of the authority issuing the Letter of Guaranty or other comparable document shown?</p>	
Soil amendments that contain animal manure that are heat treated or processed by other equivalent methods			
Pages 32-33, Table 2 Page 36, Decision Tree		<p>SA 04 - No soil amendment containing animal manure that has been heat treated or processed by other equivalent methods have been applied in the field within the last year</p> <p>If SA 04 is answered "NO" then SA 04a-SA 04m will drop down</p> <p>SA 04a - Are process records or other comparable documentation available that show the lethality of the process?</p> <p>SA 04b - Is the name of the process authority issuing the Letter of Guaranty or other comparable document shown?</p> <p>Records must be available to document the following criteria have been meet for each lot of heat treated or processed by other equivalent method</p> <p>a. Acceptance criteria</p> <p>SA 04c - Fecal coliforms: Negative MPN/gram</p> <p>SA 04d - <i>Salmonella</i>: Negative per sample size of the prescribed test</p> <p>SA 04e - <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test</p> <p>SA 04e(1) – <i>Listeria monocytogenes</i>: Negative per sample size of the prescribed test</p> <p>b. Recommended test methods</p> <p>SA 04f - Fecal coliforms: 9 tube MPN</p> <p>SA 04g - <i>Salmonella</i> spp: U.S. EPA Method 1682</p> <p>SA 04h - <i>E. coli</i> O157:H7: Any laboratory validated method for compost</p> <p>SA 04i - Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate.</p> <p>SA 04i(1) – <i>Listeria monocytogenes</i>: Any laboratory validated method for testing soil amendments</p> <p>c. Sampling plan</p> <p>SA 04j - Take at least 12 equivalent samples from 12 or more separate locations or 12 samples from 12 individual bags, if bagged individually.</p> <p>SA 04k - Sample may be taken by the supplier if trained by a testing laboratory or state authority.</p> <p>SA 04l - Laboratory must be certified/accredited by a certification or accreditation body.</p> <p>SA 04m - If testing records are NOT available is a Certificate of Process Validity as defined by the "Guidelines" available for review?</p>	
Soil amendments that are Non-Synthetic Crop Treatments (compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc.) Table 3 & Figure 3.			
Pages 38-39, Table 3 Page 40, Figure 3		<p>SA 05 - No non-synthetic crop treatment has been applied to the crop?</p> <p>If SA 05 if answered "NO" then SA 05a - SA 05v will drop down</p> <p>SA 05a - If "No" to the above, the product (non-synthetic soil amendment) was not applied to the edible portion of the crop?</p> <p>SA 05b - Is a letter of compliance or comparable document outlining the actual conditions of use and conformance to standards available for review (including presence of animal products or manure)?</p> <p>SA 05b(1) – If compost / treated ag tea containing nutrients intended to increase microbial biomass (e.g. molasses, yeast extract, algal powder) is applied to edible portion of the crop, do records indicate that the nutrients were added prior to treatment?</p> <p>Records must be available to document the following criteria have been meet for each lot of non-synthetic crop treatment used.</p> <p>SA 05c - Did each lot/batch used meet the microbial criteria identified below?</p> <p>SA 05c (1) - Fecal coliforms: Negative MPN/gram</p> <p>SA 05d - <i>Salmonella</i>: Negative per sample size of the prescribed test</p> <p>SA 05e- <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test</p> <p>SA 05e(1) – <i>Listeria monocytogenes</i>: Negative per sample size of the prescribed test</p> <p>SA 05f - If this treatment is applied as a liquid was the solution made with water that meets the quality standards for post-harvest water used in Table 1?</p> <p>Application intervals were met:</p> <p>SA 05g- Was this non-synthetic crop treatment produced using a validated process for pathogen control?</p> <p>SA 05h - If "No" to above, was the treatment applied at least 45 days before harvest?</p> <p>SA 05i - If "Yes", are process validation records and documentation available to show that the process is capable of reducing pathogens of human health significance to acceptable levels.</p>	

Soil Amendments (continued)		Comments
Page & Line #s	Question	
Soil amendments that are Non-Synthetic Crop Treatments (compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc.) Table 3 & Figure 3.		
Pages 38-39, Table 3 Page 40, Figure 3	<p>Acceptable testing methods were followed:</p> <p>SA 05i(1) - Fecal coliforms: Negative MPN/gram SA 05j - <i>Salmonella</i> spp: U.S. E.P.A. Method 1682 SA 05k - <i>E. coli</i> O157:H7: Any laboratory validated method for compost sampling SA 05l(1) – <i>Listeria monocytogenes</i>: Negative per sample size of the prescribed test SA 05l - Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate.</p> <p>The proper sampling plan was followed:</p> <p>SA 05m - Solid: 12 point sampling plan composite sample SA 05n - Liquid: Single well-mixed sample per lot SA 05o - Sample may be taken by the supplier if trained by the testing laboratory SA 05p - Laboratory must be certified/accredited by annual review of laboratory protocols based on GLPs by a certification or accreditation body.</p> <p>Testing Frequency:</p> <p>SA 05q - Each lot before application to production fields. SA 05r - Identify the crop treatment. SA 05s - Show the name of the laboratory completing the testing. SA 05t - Show date of application ? SA 05u - Does it show the date of harvest? SA 05v - Show the supplier name.</p>	
Soil Amendments (continued)		
Page 29, Lines 588-590; Page 37, Lines 660-663	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		
Page 44, Lines 845-916	<p>WP 01 - Is there a written policy for all employees and all visitors to the field location which describes the required hygiene rules?</p> <p>WP 01a - Does the Policy address the following: WP 01b - Sanitary Facilities WP 01c - Field Worker Practices (GMP's, GHP's, etc.) WP 01d - Worker Health Practices</p>	
Sanitary Facilities		
Pages 45-46, Lines 894-916	<p>WP 02 - Is there a documented field sanitary facility program that addresses the following:</p> <p>WP 02a - N/A WP 02b - The number, condition, and placement of field sanitation units complies with applicable state and/or federal regulations. WP 02c - Sanitary facilities are readily accessible (proximate) to the work area. WP 02d - Sanitary facilities are regularly maintained according to schedule. WP 02e - Sanitary facilities have sufficient consumable supplies (i.e.: hand soap, water that meets the post harvest acceptance criteria, paper towels, toilet paper, etc.). WP 02f - Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work. WP 02g - Field sanitation facilities are cleaned and serviced with waste disposed of on a scheduled basis and at a location that minimizes the potential risk for product contamination. WP 02h - Address the placement of the sanitary facility in order to minimize any impact on the crop in the field including: WP 02i - Minimize the impact on the crop from leaks and/or spills WP 02j - Ability to access the unit for service WP 02k - Documented response plan in the event of a major leak and/or spill.</p>	
Field Worker Practices (GMPs, GHPs, etc.)		
Pages 44-45, Lines 853-868	WP 03 - Is there a written worker practices program that establishes employee work rules that address the following:	
	WP 03a - N/A WP 03b - Training on proper sanitation and hygiene practices WP 03c - Requirement for workers to wash their hands with soap and water before beginning or returning to work, and any other time when hands may have become contaminated.	

Page & Line #s		Question	Worker Practices (continued)	Comments
Field Worker Practices (GMPs, GHPs, etc.)		<p>WP 03d - Confine smoking, eating and drinking (except water) to designated areas.</p> <p>WP 03e - Storage requirements for personal items in/or adjacent to the field?</p> <p>WP 03f - The appropriate use and sanitation of gloves.</p> <p>WP 03g - Avoid contact with animals</p> <p>WP 03h - For materials targeted for further processing, is there a written physical hazard prevention program which includes the following?</p> <p>WP 03i - The proper wearing of head and facial hair restraints.</p> <p>WP 03j - The proper wearing of apron and other food safety apparel.</p> <p>WP 03k - Removal of visible jewelry (rings, bracelets, necklaces, body piercings, etc.) or covering of hand jewelry prior to the start of work.</p> <p>WP 03l - Removal of all objects from upper pockets.</p> <p>WP 03m - Prohibitions on spitting, urinating or defecating in the field.</p>		
Pages 44-45, Lines 853-868				
Worker Health Practices		<p>WP 04 - Is there a written worker health practices program that establishes employee work rules that address the following:</p> <p>WP 04a- N/A</p> <p>WP 04b - Workers with diarrheal disease or symptoms of other infectious disease are prohibited from being in the field or handling fresh produce or food-contact surfaces?</p> <p>WP 04c - Workers with open cuts or lesions are prohibited from handling fresh produce.</p> <p>WP 04d - Actions for employee to take in the event of injury or illness (e.g. notifying supervisor).</p> <p>WP 04e - A policy describing procedures for handling/disposition of produce or food contact surfaces that have come into contact with blood or other body fluids.</p>		
Page 45, Lines 882-893				
Field Sanitation				
General Requirements		<p>Pages 44-45, lines 845-872 FS 01 - Is there a written policy for all employees and all visitors in the field location which describes the required field sanitation SOPs?</p>		
Field Activities		<p>FS 02 - Does the written field activity SOP address the following:</p> <p>FS 02a(a) – is a specific individual assigned the food safety responsibility for growing operations?</p> <p>FS 02a - Cross contamination by farming equipment and tools that comes into contact with raw manure, untreated compost, waters of unknown quality, animal hazards or other potential sources.</p> <p>FS 02b - If "yes", does it appropriately restrict the use or require a documented cleaning and sanitation program of the equipment?</p> <p>FS 02c - If cleaning and sanitation is required, are records of the cleaning/sanitation available for review.</p>		
Page 46, Lines 919-938				
Harvest Activities		<p>FS 03 - Does the written harvest activity SOP address the following:</p> <p>FS 03a - Is a specific individual assigned the food safety responsibility for harvesting?</p> <p>FS 03b - Is a documented daily food safety harvest assessment available for review?</p> <p>FS 03c - Is the assessment dated?</p> <p>FS 03d - Is the individual who conducted the assessment identified?</p> <p>FS 03e - Are the specific growing blocks associated with the assessment clearly identified?</p> <p>FS 03f - Is the Harvester name and contact information documented?</p> <p>FS 03g - Did the assessment indicate that the production area was free from evidence of animal intrusion?</p>		
Page 44, Lines 849-851		<p>If FS 03g is answered "NO" then FS 03gg - FS 03i2 will drop down.</p>		
Pages 15-16, Lines 312-327 Pages 18-19, Lines 407-443 Pages 51-53, Lines 1065-1136		<p>FS 03gg - Was the animal hazard or potential risk of intrusion assessed by food safety professional or food safety personnel?</p> <p>FS 03h- Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"?</p> <p>FS 03h1 - If "YES" were corrective actions carried out according to company SOP?</p> <p>FS 03i - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"?</p> <p>FS 03i1 - If "YES" were corrective actions carried out per the LGMA requirements?</p> <p>FS 03i2 - If "YES" is documentation available to show that actions were implemented?</p>		
Page 54, Figure 5 Pages 55-56, Table 5		<p>FS 03j - Is there an SSOP for food-contact surfaces of harvest equipment, tools and containers addressing the following:</p> <p>FS 03k - Method and frequency of cleaning and sanitation</p> <p>FS 03l - Chemical usage and record keeping (e.g. soap, detergent, sanitizer, etc.)</p>		
Pages 42-43, Lines 768-776				
Page 42, Lines 761-767		<p>FS 03m - Equipment specific cleaning instructions</p>		
Page 44, Line 852		<p>FS 03n - Chemical storage</p>		

Page & Line #s		Field Sanitation (continued)	Comments
Harvest Activities			
Page 44, Line 852		FS 03o - All chemical storage containers are labeled appropriately	
Page 42, Lines 772-773		FS 03p - Sanitation Procedures Verification	
Page 41, Line 718		FS 03q - Daily inspection	
Page 42,761-771		FS 03q (1) - Is there an SOP for non-food-contact surfaces of harvest equipment, tools, and containers addressing the following: FS 03q(2) – Method and frequency of cleaning? FS 03q(3) - Chemical usage and record keeping? (e.g. soap, detergent, sanitizer, etc.) FS 03q(4) - Equipment-specific cleaning instructions? FS 03q(5) - Cleaning verification? FS 03q(6) - Daily inspection?	
Page 42, Lines 738-739; Page 18, Line 402-405		FS 03r (1) - Has a supervisor or responsible party signed and dated equipment cleaning and sanitation records within a week of the activities being performed?	
Page 41, Lines 724-730		FS 03s - Is there an SOP for handling and storage of product containers addressing the following FS 03t - Over night storage FS 03u - Contact with the ground FS 03v - Container assembly (RPC, fiber bin, plastic bin, etc.) FS 03w - Damaged containers FS 03x - Use of containers only as intended	
Pages 41-42, Lines 731-741		FS 03y - Is there an SOP for sanitary operation of equipment FS 03z - Are spills and leaks addressed FS 03aa - Harvest equipment protection FS 03bb - Overnight equipment and tool storage FS 03cc - Does the SOP for Sanitary Operation of Equipment, address remedial actions?	
Page 43, Lines 794-795		FS 03dd - Is there an SOP for water tanks, containers and equipment used for hydration.	
Page 43, Lines 796-797		FS 03zd – Are packing materials or containers cleanable or designed for single use? FS 03ze – Are reusable packing materials or containers cleaned and sanitized or fitted with a clean liner?	
Page 42, Lines 753-756		FS 03zf – Are instruments or controls used to measure, regulate, or record temperature, hydrogen ion concentration, pH, sanitizer concentration or other conditions: FS 03zf (1) - Accurate and precise as necessary and appropriate for their intended use? FS 03zf (2) – Adequately maintained? FS 03zf (3) – Adequate in number for their intended use? FS 03zf (4) – Is there an SOP that addresses waste, trash, and other debris that protects product and production area from contamination?	
Page 44, Lines 831-833		FS 03zg – Are there any buildings used to store packing material? FS 03zg (1) – Does the building have proper drainage and protection from condensate or drips to keep food-contact surfaces from getting wet? FS 03zg (2) – Are packaging materials and other food-contact surfaces kept separate from contamination sources by partition, time, location, enclosed system, or other effective means?	
Page 54, Figure 5; Page 55, Table 5		FS 04 - Is there a written SOP which addresses corrective actions for "Low Hazard" animal intrusion?	
Transportation			
Page 60, Lines 166-1174		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		
Page & Line #s	Question	Comments
Water Use	FO 01 - Are all active and/or inactive water sources recorded in the Water Use Audit? <p>FO 01a - From visual inspection, there is no evidence that the water sources and distribution systems may pose a contamination risk (damage, inadequately maintained, evidence of animal activity, connection with effluent systems)?</p> <p>FO 01b - No other observations of improper use of water</p>	
Field Observations (continued)		
Soil Amendments	FO 02 - No evidence of undocumented use of soil amendments? <p>FO 02a - No evidence of improperly applied soil amendments?</p> <p>FO 02b - No evidence of improperly stored soil amendments?</p> <p>FO 02c - No other observations of improper use of soil amendments</p>	
Environmental Factors	FO 03 - No evidence of fecal contamination in the field? <p>FO 03a - No evidence of animal hazards in the field?</p> <p>FO 03b - No evidence of non-compliance with distances as outlined in the Environmental Assessment?</p> <p>FO 03c - No evidence that remedial actions such as animal barriers (fences, gates, grates, etc.) are not in good repair and operational?</p> <p>FO 03d - No evidence that worker hygiene rules have been violated during the crop cycle?</p> <p>FO 03e - No other observations of environmental risk factors.</p>	
Work Practices	FO 04 - No employees eating, drinking (except water), chewing tobacco or smoking in crop production actively harvested areas? <p>FO 04a - All employees observed to have washed their hands after; restroom usage, work breaks or any returning to work occasion?</p> <p>FO 04b - No evidence that sanitary facilities are not routinely clean and operational?</p> <p>FO 04c - No evidence that worker hygiene rules have been violated during the crop cycle?</p> <p>FO 04d - No evidence that sanitary facilities are not adequately stocked with disposable supplies?</p> <p>FO 04e - No improperly stored personal items observed in the field?</p> <p>FO 04f - No evidence or observations that employees are not using the restrooms?</p> <p>FO 04g - No employees with uncovered wounds, boils or cuts?</p> <p>FO 04h - No employees with symptoms of infection or contagious disease?</p> <p>FO 04i - No other observations of improper work practices.</p>	
Field Sanitation	FO 05 - No evidence of excessive non-vegetative debris in the field? <p>FO 05a - No evidence of open and/or unsupervised chemicals in the field?</p> <p>FO 05b - No evidence of leaks and spills on equipment in the field?</p> <p>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?</p> <p>FO 05d - No evidence of other cross-contamination potential of product and/or product contact surfaces?</p> <p>FO 05e - No other evidence of improper field sanitation.</p>	