

General Requirements		
Page & Line #s	Question	Comments
Page 12, Lines 276-288	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 the following subjects consistent with the LGMA: GR 02a - Water GR 02b - Soil Amendments GR 02c - Environmental Factors GR 02d - Work Practices GR 02e - Field Sanitation	
Page 12, Line 280	GR 03 - Is an up to date producers list with contact and location information available for review?	
Page 12, Lines 282-285	GR 04 - Is the shipper in compliance with the registration requirement of The Public Health Security and Bioterrorism Preparedness and Response Act of 2002?	
	GR 05 - Does the Shipper have a traceability process? GR 05a - Does it enable identification of immediate non-transporter source? GR 05b - Does it enable identification of immediate non-transporter subsequent recipient?	
Page 12, Lines 286-288	GR 06 - Has the Shipper (or if applicable the producer) designated someone to implement and oversee the food safety program? GR 06a - Is the name of the individual available? GR 06b - Is 24/7 contact information for the individual available?	

Environmental Assessments		
Page & Line #s	Question	Comments
Pages 12-13, Lines 291-327	Pre-Season Assessment	
Page 13, Lines 306-309	Animal Activity	
Page 48, Table 5	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.	
	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?	
Page 48, Table 5	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 - If "YES" were corrective actions carried out per the LGMA requirements? 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?	

Environmental Assessments (continued)		
Page & Line #s	Question	Comments
Page 13, Lines 309-317	Adjacent Land Use	
Page 50, 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 50, 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 50-51, 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 51, 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 51, 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 51, 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 51-52, 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 45, Lines 905-903	EA 09 - Is the adjacent land free from uses or conditions that pose a food safety risk to crops? EA 09a - If "No" has a risk assessment been conducted to evaluate the risk? EA 09b - If "No" have corrective measures been put in place and documented?	

Environmental Assessments (continued)		
Page & Line #s	Question	Comments
Recent Field History		
Page 13, Line 325	EA 10 - Are production blocks free from all of the following: EA 10a - History of flooding within the last 60 days	
Page 13, Line 314	EA 10b - History of grazing on the crop land within the last 1 year	
Page 13, Lines 320-323	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	
	EA 10d - If no, were specific actions implemented and documented to mitigate the issue(s)?	
Pre-Harvest Assessment		
Page 12-13, Lines 298-304; Page 48, Table 5	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		
Page 48, 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?	

Environmental Assessments (continued)		
Page & Line #s	Question	Comments
Unusual Events		
Page 43, Lines 798-803	<p>EA 13 - If pre-harvest ranch assessment indicates that flooding has occurred are the following addressed:</p> <p>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?</p>	
Page 12-13, Lines 298-327	<p>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?</p> <p>If EA 14 is answered "NO" then EA 14a - EA 14h will drop down</p> <p>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?</p>	
Page 45, Lines 876-879		
Page 49, Table 5		

Water Use		
Page & Line #s	Question	Comments
Page 14, Lines 350-356	<p>WU 01 - Is a ranch map (or other documentation) indicating the sources of water and distribution systems available for review?</p> <p>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?</p>	
Page 14, Lines 355-356		
Page 14, Lines 363-365		
Page 14, Lines 357-358		

Water Use (continued)		
Page & Line #s	Question	Comments
Pre-Harvest Foliar and non-Foliar Water Applications		
Page 16, Table 1	<p>Table 1 & Figure 1A & 1B</p> <p>WU 02 - Was a source water test conducted for each source of water within 60 days of first use on post germinated fields?</p> <p>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?</p> <p>WU 02b - Records show that the water samples are taken no less than 18 hours apart.</p> <p>WU 02c - Is the geometric mean less than or equal to 126 MPN/100 ml?</p> <p>WU 02d - Are all individual samples less than or equal to 235MPN/100 ml (foliar) or 576 MPN/100m ml (non-Foliar)?</p> <p>WU 02e - The location where the sample was taken is recorded.</p> <p>WU 02f - Show the name of the test laboratory</p> <p>WU 02g - The generic 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>	
Page 17, Table 1		
Page 16, Table 1	<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.</p> <p>WU 02i - A sanitary survey was completed on the water source and distribution system for possible contamination.</p> <p>WU 02j - Records show that corrective actions were taken to eliminate the contamination sources.</p> <p>WU 02k - Samples for the required water retesting were taken at the previous sampling point.</p> <p>WU 02l - One water test was taken daily (not less than 18 hours apart) for 5 days.</p> <p>WU 02m - These 5 test results met the acceptance criteria: average less than 126 MPN/100ml (based on rolling geometric mean=5) and no sample exceeded greater than 235 MPN/100 ml (foliar) or 576 MPN/100 ml (non-foliar).</p> <p>WU 02n - Records show the water system was not used while the water quality was inadequate.</p> <p>WU 02o - Was product sampled for E coli 157:H7 and Salmonella.</p> <p>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		
Page & Line #s	Question	Comments
Page 16, Table 1	<p>WU 03 - Is the source water from a municipal supply or well?</p> <p>WU 03a - Does this source qualify for the 5 consecutive monthly samples below the generic E. coli detection limit on record (2.2 MPN) exemption?</p> <p>WU 03b - Is the last sample recorded within 180 days of the audit date?</p>	

Water Use (continued)		
Page & Line #s	Question	Comments
Hand Wash and Post Harvest Water- Direct Produce Contact, Food Contact Surfaces		
Page 18, Table 1	<p>Table 1 & Figure 1C</p> <p>WU 04 - Is the water from a source that meets the USEPA MCLG for microbial quality (Negative per 100ml (<2.2 MPN/100ml))?</p> <p>WU 04a - If "No" has the water received sufficient disinfection to meet the USEPA MCLG for microbial quality?</p> <p>WU 04b - If the water is reused, is sufficient disinfection added and monitored to prevent possible cross-contamination? (Chlorine-more than 1ppm free chlorine and PH 6.5-7.5 or ORP-more than 650mV or other approved treatment per product EPA label for human pathogen reduction in water)</p>	
Page 18, Table 1	<p>WU 04c - Was a source water test conducted for each source of water within 60 days of first use?</p> <p>WU 04d - Are records available to demonstrate that water samples or monitoring results have been collected from each water distribution system within the last month?</p> <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?</p> <p>WU 04f - Was a sanitary survey completed on the water source and distribution system for possible contamination?</p> <p>WU 04g - Do records show that corrective actions were taken to eliminate the contamination sources?</p> <p>WU 04h - Were samples for the required water retesting taken at the previous sampling point?</p> <p>WU 04i - Was one water test taken daily (not less than 18 hours apart) for 5 days at the point closest to use?</p> <p>WU 04j - Did these 5 test results meet the acceptance criteria: less than 2.2 MPN/100ml?</p> <p>WU 04k - Do records show the water system was not used while the water quality was inadequate?</p> <p>WU 04l - Was product sampled for E coli 157:H7 and Salmonella?</p> <p>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?</p> <p>WU 04n - Do the records show that the product was not harvested?</p>	
Page 18, Table 1	<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:</p> <p>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.</p> <p>WU 05c - The records indicate that the operation monitors disinfectant levels during re-hydration, product coring in the field and product cooling.</p> <p>WU 05d - The records indicate the testing procedure/equipment that was used for monitoring the disinfectant levels (Indicate the procedure/equipment type).</p> <p>WU 05e - Is the location of where the sample was taken recorded?</p> <p>WU 05f - Do the records show the name of the test laboratory if applicable?</p>	

Soil Amendments		
Page & Line #s	Question	Comments
All soil amendments are free from raw or partially composted animal manure and biosolids.		
Page 23, Lines 450-453	<p>SA 01 - Raw or partially composted animal manure 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		
Page 24, Lines 494-498 & 503-505	<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?</p> <p>SA 02b - If the Enclosed or Within-Vessel Composting method is used, do the records show:</p> <p>SA 02c - ...that the active compost maintained a minimum of 131°F for 3 days?</p> <p>SA 02d - If the Windrow Composting method is used do the records show:</p> <p>SA 02e - ...that the active compost maintained aerobic conditions for a minimum of 131 °F or higher for 15 days or longer?</p> <p>SA 02f - ...a minimum of five turnings during this period?</p> <p>SA 02g - If the Aerated Static Pile Composting method is used do the records show that:</p> <p>SA 02h - ...the active compost was covered with 6 to 12 inches of insulating materials?</p> <p>SA 02i - ...maintain a minimum of 131°F for 3 days?</p> <p>SA 02j - Has each lot of composted material that is equal to or less than 5000 cubic yards been tested as required?</p> <p>SA 02k - Has each lot of composted material been applied to the production location more than 45 days before harvest?</p>	
Page 25, Table 2	Records must be available to document the following criteria have been meet for each lot of compost containing animal material used.	
Page 25, Table 2	<p>a. Acceptance criteria</p> <p>SA 02l - Fecal coliforms: <1000 MPN/gram</p> <p>SA 02m - Salmonella: Negative per sample size of the prescribed test</p> <p>SA 02n - E. coli O157:H7: Negative per sample size of the prescribed test</p> <p>b. Recommended test methods</p> <p>SA 02o - Fecal coliforms: 9 tube MPN</p> <p>SA 02p - Salmonella spp: U.S. EPA Method 1682</p> <p>SA 02q - E. coli O157:H7: Any laboratory validated method for compost</p> <p>SA 02r - Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate.</p> <p>c. Sampling plan</p> <p>SA 02s - A composite sample shall be representative and random and obtained as described in the California state regulations. ¹</p> <p>SA 02t - Sample may be taken by the supplier if trained by a testing laboratory or state authority.</p> <p>SA 02u - Laboratory must be certified/accredited</p>	
Page 26, Table 2		

Soil Amendments (continued)		
Page & Line #s	Question	Comments
Soil amendments that do not contain animal manure		
Page 23, Lines 458-460; Page 28, Table 2	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?	
Page 29, Table 2	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 physically heat treated or processed by other equivalent methods		
	SA 04 - No soil amendment containing animal manure that has been physically heat treated or processed by other equivalent methods have been applied in the field within the last year If SA 04 is answered "NO" then SA 04a-SA 04m will drop down	
Page 27, Table 2	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 meet for each lot of physically heat treated or processed by other equivalent method compost containing animal material used.	
Page 27, Table 2	a. Acceptance criteria SA 04c - Fecal coliforms: Negative MPN/gram SA 04d - Salmonella: Negative per sample size of the prescribed test SA 04e - E. coli O157:H7: Negative per sample size of the prescribed test	
Page 27, Table 2	b. Recommended test methods SA 04f - Fecal coliforms: 9 tube MPN SA 04g - Salmonella spp: U.S. EPA Method 1682 SA 04h - E. coli O157:H7: Any laboratory validated method for compost SA 04i - Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate.	
Page 27, Table 2	c. Sampling plan SA 04j - Take at least 12 equivolume samples from 12 or more separate locations or 12 samples from 12 individual bags, if bagged individually. SA 04k - Sample may be taken by the supplier if trained by a testing laboratory or state authority. SA 04l - Laboratory must be certified/accredited	
Page 27, Table 2	SA 04m - If testing records are NOT available is a Certificate of Process Validity as defined by the "Guidelines" available for review?	

Soil Amendments (continued)		
Page & Line #s	Question	Comments
Soil amendments that are Non-Synthetic Crop Treatments (compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc) Table 3 & Figure 3.		
Page 32, Lines 526-528	SA 05 - No non-synthetic crop treatment has been applied to the crop? If SA 05 if answered "NO" then SA 05a - SA 05v will drop down	
Page 33, Table 3	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)?	
Page 33, Table 3	Records must be available to document the following criteria have been meet for each lot of non-synthetic crop treatment used. SA 05c - Did each lot/batch used meet the microbial criteria identified below? SA 05d - <i>Salmonella: Negative per sample size of the prescribed test</i> SA 05e - <i>E. coli O157:H7: Negative per sample size of the prescribed test</i> SA 05f - If this treatment is applied as a liquid does the solution meet the microbial criteria set forth for pre-harvest water application? (5-sample geometric mean of 126 MPN/100 ml and no sample >235 MPN/100ml (Foliar) or 576 MPN/100 ml (non-foliar))	
Page 34, Table 3	Application intervals were met: SA 05g - Was this non-synthetic crop treatment produced using a validated process for pathogen control? SA 05h - If "No" to above, was the treatment applied at least 45 days before harvest? SA 05i - If "Yes", are process validation records and documentation available to show that the process is capable of reducing pathogens of human health significance to acceptable levels.	
Page 33, Table 3	Acceptable testing methods were followed: SA 05j - <i>Salmonella spp: U.S. E.P.A. Method 1682</i> SA 05k - <i>E. coli O157:H7: Any laboratory validated method for compost sampling</i> SA 05l - Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate.	
Page 33, Table 3	The proper sampling plan was followed: SA 05m - Solid: 12 point sampling plan composite sample SA 05n - Liquid: Single well-mixed sample per lot SA 05o - Sample may be taken by the supplier if trained by the testing laboratory SA 05p - Laboratory must be certified/accredited by annual review of laboratory protocols based on GLPs by recognized NGO.	
Pages 33-34, Table 3	Testing Frequency: SA 05q - Each lot before application to production fields. SA 05r - Identify the crop treatment. SA 05s - Show the name of the laboratory completing the testing. SA 05t - Show date of application ? SA 05u - Does it show the date of harvest? SA 05v - Show the supplier name.	
Page 24, Lines 470-472; Page 32, Lines 535-538	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		
Page & Line #s	Question	Comments
General Requirements		
Page 38, Lines 669-671	WP 01 - Is there a written policy for all employees and all visitors to the field location which describes the required hygiene rules? WP 01a - Does the Policy address the following: WP 01b - Sanitary Facilities WP 01c - Field Worker Practices (GMP's, GHP's, etc.) WP 01d - Worker Health Practices	
Page 39, Lines 698-702		
Pages 38-39, Lines 666-688		
Page 39, Lines 689-697		
Sanitary Facilities		
Page 39, Lines 698-716	WP 02 - Is there a documented field sanitary facility program? WP 02a - Does the Field Sanitary Facility Program address the following: 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, 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 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.	
Field Worker Practices (GMPs, GHPs, etc.)		
Page 38, Lines 666-681	WP 03 - Is there a written worker practices program? WP 03a - Does the program establish employee work rules which address the following: WP 03b - Training on proper sanitation and hygiene practices WP 03c - Requirement for workers to wash their hands before beginning or returning to work. WP 03d - Confine smoking, eating and drinking (except water) to designated areas. WP 03e - Storage requirements for personal items in/or adjacent to the field? WP 03f - The appropriate use and sanitation of gloves. WP 03g - Proper cleaning, sanitation and storage of hand harvest equipment (knives, scythes, etc). WP 03h - For materials targeted for further processing, is there a written physical hazard prevention program which includes the following? WP 03i - The proper wearing of head and facial hair restraints. WP 03j - The proper wearing of apron and other food safety apparel. WP 03k - Removal of visible jewelry (rings, bracelets, necklaces, body piercings, etc.) prior to the start of work. WP 03l - Removal of all objects from upper pockets. WP 03m - Prohibitions on spitting, urinating or defecating in the field.	
Page 38, Lines 666-668		
Page 36, Lines 590-594		
Pages 38-39, Lines 682-688		
Page 38, Lines 680		

Worker Practices (continued)		
Page & Line #s	Question	Comments
Worker Health Practices		
Page 39, Line 689	WP 04 - Is there a written worker health practices program? WP 04a - Are employee work rules established which address the following: WP 04b - Workers with diarrheal disease or symptoms of other infectious disease are prohibited from handling fresh produce. WP 04c - Workers with open cuts or lesions are prohibited from handling fresh produce. WP 04d - Actions for employee to take in the event of injury or illness. 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.	
Page 39, Lines 689-697		

Field Sanitation		
Page & Line #s	Question	Comments
General Requirements		
Page 38, Lines 669-671	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 Activities		
Pages 39-40, Lines 726-738	FS 02 - Does the written field activity SOP address the following: FS 02a - Cross contamination by farming equipment 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.	
Harvest Activities		
Page 38, Line 672	FS 03 - Does the written harvest activity SOP address the following: FS 03a - Is a specific individual assigned the food safety responsibility for harvesting? FS 03b - Is a documented daily food safety harvest assessment available for review? FS 03c - Is the assessment dated? FS 03d - Is the individual who conducted the assessment identified? FS 03e - Are the specific growing blocks associated with the assessment clearly identified? FS 03f - Is the Harvester name and contact information documented? FS 03g - Did the assessment indicate that the production area was free from evidence of animal intrusion?	
Page 48, Table 5	If FS 03g is answered "NO" then FS 03gg - FS 03i2 will drop down.	
	FS 03gg - Was the animal hazard or potential risk of intrusion assessed by food safety professional or food safety personnel?	
Page 48, Table 5	FS 03h - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"?	
Page 48, Table 5	FS 03i1 - If "YES" were corrective actions carried out according to company SOP?	
Page 36, Line 588	FS 03i - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"?	
Page 36, Lines 588-595	FS 03i1 - If "YES" were corrective actions carried out per the LGMA requirements?	
Page 38, Line 674	FS 03j - SSOP of harvest equipment addressing the following FS 03k - Frequency of cleaning and sanitation FS 03l - Chemical usage and record keeping	

Field Sanitation (continued)		
Page & Line #s	Question	Comments
Page 37, Lines 627-629	FS 03m - Equipment specific cleaning instructions	
Page 38, Line 674	FS 03n - Chemical storage	
Page 36, Line 589	FS 03o - All chemical storage containers are labeled appropriately	
Page 36, Line 590	FS 03p - Sanitation Procedures Verification	
Page 36, Line 591	FS 03q - Daily inspection	
Page 36, Line 592	FS 03r - N/A	
Page 36, Lines 596-602	FS 03s - SOP for handling and storage of product containers addressing the following	
Page 36, Line 598	FS 03t - Over night storage	
Page 36, Line 599	FS 03u - Contact with the ground	
Page 36, Line 600	FS 03v - Container assembly (RPC, fiber bin, plastic bin, etc)	
Page 36, Line 601	FS 03w - Damaged containers	
Page 36, Line 602	FS 03x - Use of containers only as intended	
Page 36, Line 603	FS 03y - SOP for sanitary operation of equipment	
Page 36, Line 604	FS 03z - Are spills and leaks addressed	
Page 37, Lines 634-636	FS 03aa - Harvest equipment protection	
Pages 36-37, Lines 603-613	FS 03bb - Overnight equipment storage	
Page 36, Line 605; Page 37, Lines 608-609	FS 03cc - As per the SOP for Sanitary Operation of Equipment, were the appropriate remedial actions taken as necessary?	
Page 36, Line 605; Page 37, Lines 608-609	FS 03dd - As per the SOP for Water Tanks, containers and Equipment used for Hydration.	
Page 50, Table 5	FS 04 - Is there a written SOP which addresses corrective actions for "Low Hazard" animal intrusion?	

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? 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)? 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	

Field Observations		
Page & Line #s	Question	Comments
Environmental Factors	<p>FO 03 - No evidence of fecal contamination in the field?</p> <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	<p>FO 04 - No employees eating, drinking (except water), chewing tobacco or smoking in crop production actively harvested areas?</p> <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	<p>FO 05 - No evidence of excessive non-vegetative debris in the field?</p> <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>	