**Farm Food Safety Plan How-To**

Version 1

**Developed by the Maine Department of Agriculture, Conservation & Forestry through a 5-year Cooperative Agreement Program with the FDA**

* Requesting and preparing for a USDA Good Agricultural Practices Audit
* Identifying which audit checklist items are required to be documented
* Identifying which audit checklist items are not required to be documented
* Food safety plan cover sheet information
* List of documents to attach to the food safety plan
* Generic policies required by Parts 1-4
* Required employee training topic list
* Developing cleaning policies and schedules
* Completing a land use (soil) assessment
* Completing a water assessment

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**USDA Agricultural Marketing Service GAP Help:**

1. The Maine Fed/State Inspection Service offers USDA AMS GAP audits under contract with USDA. Contact Tim Lynds in the Presque Isle office to request: 207-764-2101.
2. Make sure you **know what audit standard and which parts of the audit** your buyer is requesting. GAP audits can be expensive, so you want to make sure you get what you need to sell your produce. The **checklist** is the form the auditor will complete during the audit. The **standard** has the instructions and criteria for each audit question and describes how the audit is scored.
3. Because audits are expensive, it is worth putting the work into being prepared. To do this, you should be familiar with the process, the checklist, and the standard. You’ll need to have a written food safety plan.
   1. Food Safety Plan templates are compiled on the Produce Safety Alliance website: <https://cals.cornell.edu/produce-safety-alliance/resources/farm-food-safety-plan-writing-resources>
   2. Check the USDA AMS GAP website for important updates, resources, and audit materials: <https://www.ams.usda.gov/services/auditing/gap-ghp>
      1. Click the link for the Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables which is the basis for the audits. Read it!
      2. Click the link for the GAP Audit Services you are looking for.
         1. USDA GAP Audit
            1. Find program updates.
            2. Find the most current **checklist** version.
            3. Find the GAP & GHP Audit Verification Program User’s Guide and read it.
            4. There is no direct link to the **standard**, it is buried in Resources-Publications. Here’s the link: <https://www.ams.usda.gov/publications/content/gap-ghp-audit-verification-program-policies-procedures>
         2. USDA Harmonized GAP Audits
            1. **Be familiar with the USDA GAP Audit materials above**. The regular GAP standard has good information that carries over to a Harmonized audit.
            2. Find the most current **checklist** version for **Harmonized** or **Harmonized Plus+** audits. They are different. Harmonized Plus+ questions include all Harmonized questions plus the questions that have a lowercase letter in the question number.
            3. Find the most current **standard**.
         3. If you do not use the internet, you can check for program updates by calling the USDA Specialty Crops Program phone contact: Christopher Purdy, Deputy Administrator (202) 720-3209. Or call Tim in Presque Isle (207) 764-2101.
4. Audit tips:
   1. Be organized. The faster the auditor can find what they need to answer an audit question, the quicker the audit will go and the less the audit will cost. Having a table of contents is helpful.
   2. Organizing your food safety plan by the audit questions prevents your auditor from having to spend time finding the audit question pertaining to what they read in your plan but may make the plan less usable as an employee reference.
   3. Auditors will be verifying that you are adhering to your food safety plan. It may be wise to minimize the amount of information included in the plan used for audits.
   4. Train your supervisors on the regular GAP standard and the Guide to Minimize Microbial Food Safety Hazards.

**USDA GAP General Questions & Parts 1-4 Food Safety Plan Checklist**

**D** –Document required to show conformance to the question.

**P** – Policy or Standard Operating Procedure (SOP) documented to show conformance with the question**.** Whatwill be done.

**R** – Records required to be kept showing an action was taken. Show the process has been completed.

|  |  |  |
| --- | --- | --- |
| P-1 | A documented food safety plan program that incorporates GAP has been implemented | D |
| P-2 | The operation has designated someone to implement and oversee an established food safety program. Name: | D |
| G-1 | A documented traceability program has been established. | D |
| G-2 | The operation has performed a “mock recall” that was proven to be effective. | R |
| G-3 | Drinking water is available to all workers. | R |
| G-4 | All employees and all visitors to the location are required to follow proper sanitation and hygiene practices. | P |
| G-5 | Training on proper sanitation and hygiene practices is provided to all staff. | D |
| G-10 | All toilet/restroom/field sanitation facilities are serviced and cleaned on a scheduled basis. | R |
| G-11 | Smoking and eating are confined to designated areas separate from where product is handled. | P |
| G-12 | Workers with diarrheal disease or symptoms of other infectious diseases are prohibited from handling fresh produce. | P |
| G-13 | There is a policy describing procedures which specify handling/disposition of produce or food contact surfaces that have come into contact with blood or other bodily fluids. | P |
| G-14 | Workers are instructed to seek prompt treatment with clean first aid supplies for cuts, abrasions and other injuries. | P |
| G-15 | Company personnel or contracted personnel that apply regulated pre-harvest and/or post-harvest materials are licensed. Company personnel or contracted personnel applying non-regulated materials have been trained on its proper use. | R |
| 1-1 | What is the source of irrigation water? |  |
| 1-2 | How are crops irrigated? |  |
| 1-3 | A water quality assessment has been performed to determine the quality of water used for irrigation purpose on the crop(s) being applied. | D |
| 1-4 | A water quality assessment has been performed to determine the quality of water use for chemical application or fertigation method. | D |
| 1-12 | Crop production areas are monitored for the presence or signs of wild or domestic animals entering the land. | R |
| 1-13 | Measures are taken to reduce the opportunity for wild and/or domestic animals from entering crop production areas. | R |
| 1-14a | When untreated animal-based soil amendments are applied, it is incorporated at least 2 weeks prior to planting and a minimum of 120 days prior to harvest. | R |
| 1-15a | Untreated animal-based soil amendments are not used on commodities that are harvested within 120 days of planting. | R |
| 1-16a | If both untreated and treated animal-based soil amendments are used, the treated animal-based soil amendment is properly treated, composed or exposed to reduce the expected levels of pathogens. | R |
| 1-18b | Only treated or composed animal-based soil amendments and/or treated biosolids are used as a soil amendment. | R |
| 1-19b | Treated or composed animal-based soil amendments and/or treated biosolids are properly treated, composed, or exposed to environmental conditions that would lower the expected level of pathogens. | D |
| 1-21b | Analysis reports are available for treated or composed animal-based soil amendments and/or treated biosolids. | R |
| 1-22c | No animal-based soil amendments or municipal biosolids are used. | P |
| 1-23 | A previous land use risk assessment has been performed. | R |
| 1-24 | When previous land use history indicates a possibility of contamination, preventive measures have been taken to mitigate the known risks and soils have been tested for contaminants and the land use is commensurate with test results. | R |
| 1-25 | Crop production areas that have been subject to flooding are tested for potential microbial hazards. | R |
| 1-26 | Each production area is identified or coded to enable traceability in the event of a recall. | R |
| 2-1 | A documented pre-harvest assessment is made on the crop production areas. Risks and possible sources of crop contamination are noted and assessed. | D |
| 2-5 | A response plan is in place for the event of a major spill or leak of field sanitation units or toilet facilities. | P |
| 2-6 | All harvesting containers and bulk hauling vehicles that come in direct contact with product are cleaned and/or sanitized on a scheduled basis and kept as clean as possible. | D |
| 2-7 | All hand harvesting equipment and implements (knives, pruners, machetes, etc.) are kept as clean as practical and are disinfected on a scheduled basis. | D |
| 2-11 | There is a standard operating procedure or instructions on what measures should be taken in the case of glass/plastic breakage and possible contamination during harvesting operations. | P |
| 2-12 | There is a standard operating procedure or instructions on what measures should be taken in the case of product contamination by chemicals, petroleum, pesticides or other contaminating factors. | P |
| 2-14 | Harvesting containers, totes, etc. are not used for carrying or storing non-produce items during the harvest season, and farm workers are instructed in this policy. | P |
| 2-15 | Water applied to harvested product meets the microbial standards for drinking water. | R |
| 2-18 | There is a policy in place and has been implemented that harvested product being moved from field to storage areas or processing plants are covered during transportation. | P |
| 2-19 | In ranch or field pack operations, only new or sanitized containers are used for packing the product. | D |
| 2-21 | Product moving out of the field is uniquely identified to enable traceability in the event of a recall. | D |
| 3-3 | Source water used in the packing operation is potable | R |
| 3-4 | If applicable, the temperature of processing water used in dump tanks, flumes, etc., is monitored and is kept at temperatures appropriate for the commodity. | D |
| 3-5 | Processing water is sufficiently treated to reduce microbial contamination. | D |
| 3-6 | Water-contact surfaces, such as dump tanks, flumes, wash tanks and hydro coolers, are cleaned and/or sanitized on a scheduled basis. | D |
| 3-7 | Water treatment (strength levels and pH) and exposure time is monitored and the facility has demonstrated it is appropriate for product. | D |
| 3-8 | Food contact surfaces are in good condition; cleaned and/or sanitized prior to use and cleaning logs are maintained | D |
| 3-10  **4-17** | The water used for cooling and/or making ice is potable. | R |
| 3-11  **4-18** | Any ice used for cooling produce is manufactured, transported and stored under sanitary conditions. \***4-18 includes sanitized.** | R |
| 3-13  **4-29** | When there is a written policy regarding the use of hair nets/beard nets in the production area, it is being followed by all employees and visitors. \***4-29 includes storage and transportation** **areas.** | P |
| 3-14  **4-30** | When there is a written policy regarding the wearing of jewelry in the production area, it is being followed by all employees and visitors. \***4-30 includes storage and transportation** **areas.** | P |
| 3-15 | Only food grade approved and labeled lubricants are used in the packing equipment/machinery. | R |
| 3-26  **4-7** | There is a policy describing procedures which specify handling/disposition of finished product which is opened, spilled or comes into contact with the floor. | P |
| 3-27 | Only new or sanitized containers are used for packing the product. | D |
| 3-30  **4-13** | Measures are taken to exclude animals or pests from packing and storage facilities. | D |
| 3-31  **4-14** | There is an established pest control program for the facility. | D |
| 3-32  **4-15** | Service reports for the pest control program are available for review. | R |
| 3-34  **4-31** | Records are kept recording the source of incoming product and the destination of outgoing product which is uniquely identified to enable traceability. | D |
| 4-2 | Bulk storage facilities are inspected for foreign material prior to use and records are maintained. | R |
| 4-12 | Mechanical equipment used during the storage process is clean and maintained to prevent contamination of the product. | D |
| 4-20 | Thermometer(s) are checked for accuracy and records are available for review. | D |
| 4-22 | Refrigeration equipment (condensers, fans, etc.) is cleaned on a scheduled basis. | D |
| 4-24 | Prior to the loading process, conveyances are required to be clean, in good physical condition, free from disagreeable odors, and from obvious dirt/debris. | P  **R** |
| 4-25 | Produce items are not loaded with potentially contaminating products. | P |
| 4-26 | Company has a written policy for transporters and conveyances to maintain specified temperature(s) during transit. | P  **R** |
| 4-27 | Conveyances are loaded to minimize damage to product. | P |

\* In Maine a pesticide applicator license is required if you sell more than $1000 of produce annually and apply EPA registered or unregistered minimum risk pesticides, fumigants, fungicides to produce when growing, washing, storing, even if OMRI listed. These chemicals must be registered for use in Maine by the Board of Pesticides Control. Note: Not enforced if only application is to food contact surfaces for sanitizing or disinfecting but is enforced for produce wash water use. G-15

\* Parts 3 & 4 have a lot of overlap. Make sure to check Part 3 questions in these food safety plan and pre-audit checklists if preparing for an audit on Part 4 but not Part 3.

**Pre-audit Checklist of Criteria the Auditor Will Observe**

|  |  |  |
| --- | --- | --- |
| G-6 | Employees and visitors are following good hygiene/sanitation practices. |  |
| G-7 | Employees who handle or package produce are washing their hands before beginning or returning to work. |  |
| G-8 | Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work. |  |
| G-9 | All toilet/restroom/field sanitation facilities are clean. They are properly supplied with single use towels, toilet paper, hand soap, or anti-bacterial soap, and water for hand washing meets the microbial standards for drinking water. |  |
| 1-5 | If necessary, steps are taken to protect irrigation water from potential direct and non-point source contamination. |  |
| 1-6 | The farm sewage treatment system/septic system is functioning properly and there is no evidence of leaking or runoff. |  |
| 1-7 | There is no municipal/commercial sewage treatment facility or waste material landfill adjacent to the farm. |  |
| 1-8 | Crop production areas are not located near or adjacent to dairy, livestock, or fowl production facilities unless adequate barriers exist. |  |
| 1-9 | Manure lagoons located near or adjacent to crop production areas are maintained to prevent leaking/overflowing, or measures have been taken to stop runoff from contaminating the crop production areas. |  |
| 1-10 | Manure stored near or adjacent to crop production areas is contained to prevent contamination of crops. |  |
| 1-11 | Measures are taken to restrict access of livestock to the source or delivery system of crop irrigation water. |  |
| 1-17a | Animal-based soil amendments are properly stored prior to use. |  |
| 1-20b | Treated or composted animal-based soil amendments and/or treated biosolids are properly stored and are protected to minimize recontamination. |  |
| 2-2 | The number, condition, and placement of field sanitation units comply with applicable state and/or federal regulations. |  |
| 2-3 | When question 2-2 is answered “N/A” (sanitation units are not required), a toilet facility is readily available for all workers. |  |
| 2-4 | Field sanitation units are located in a location that minimizes the potential risk for product contamination and are directly accessible for servicing. |  |
| 2-8 | Damaged containers are properly repaired or disposed of. |  |
| 2-9 | Harvesting equipment and/or machinery which comes in contact with product is in good repair. |  |
| 2-10 | Light bulbs and glass on harvesting equipment are protected so as not to contaminate produce or fields in the case of breakage. |  |
| 2-13 | For mechanically harvested product, measures are taken during harvest to inspect for and remove foreign objects such as glass, metal, rocks, or other dangerous/toxic items. |  |
| 2-16 | Efforts have been made to remove excessive dirt and mud from product and/or containers during harvest. |  |
| 2-17 | Transportation equipment used to move product from field to storage areas or storage areas to processing plant which comes into contact with product is clean and in good repair. |  |
| 2-10 | Packing materials used in ranch or field pack operations are properly stored and protected from contamination. |  |
| 3-1 | Product delivered from the field which is held in a staging area prior to packing or processing is protected from possible contamination. |  |
| 3-1 | Prior to packing, product is properly stored and/or handled in order to reduce possible contamination. |  |
| 3-9 | Product flow zones are protected from sources of contamination. |  |
| 3-12  **4-28** | Employee facilities (locker rooms, lunch and break areas, etc.) are clean and located away from packing areas. \***4-28 includes storage, shipping and receiving areas.** |  |
| 3-16 | Chemicals not approved for use on product are stored and segregated away from packing area. |  |
| 3-17  **4-4** | The plant grounds are reasonably free of litter and debris. |  |
| 3-18 | The plant grounds are reasonably free of standing water. |  |
| 3-19 | Outside garbage receptacles/dumpsters are closed or are located away from packing facility entrances and the area around such sites is reasonably clean. |  |
| 3-20 | Packing facilities are enclosed. |  |
| 3-21 | The packing facility interior is clean and maintained in an orderly manner. |  |
| 3-22 | Floor drains appear to be free of obstructions. |  |
| 3-23 | Pipes, ducts, fans and ceilings which are over food handling operations are clean. |  |
| 3-24 | Glass materials above product flow zones are contained in case of breakage. |  |
| 3-25  **4-6** | Possible wastewater spillage is prevented from contaminating any food handling area by barriers, drains or a sufficient distance. |  |
| 3-28 | Pallets and containers are clean and in good condition. |  |
| 3-29  **4-8** | Packing containers are properly stored and protected from contamination (birds, rodents, and other pests). **\*4-8 and sufficiently sealed.** |  |
| 3-33  4-16 | Interior walls, floors and ceilings are well maintained and are free of major cracks and crevices. |  |
| 4-1 | The storage facility is cleaned and maintained in an orderly manner. |  |
| 4-3 | Storage rooms, buildings, and/or facilities are maintained and sufficiently sealed or isolated to be protected from external contamination. |  |
| 4-5 | Floors in storage areas are reasonably free of standing water. |  |
| 4-9 | Pallets, pallet boxes, tote bags and portable bins, etc. are clean, in good condition and do not contribute foreign material to the product. |  |
| 4-10 | Product stored outside in totes, trucks, bins, other containers or on the ground in bulk is covered and protected from contamination. |  |
| 4-11 | Non-food grade substances such as paints, lubricants, pesticides, etc., are not stored in close proximity to the product. |  |
| 4-19 | Climate controlled rooms are monitored for temperature and logs are maintained. |  |
| 4-21 | Refrigeration system condensation does not come in contact with produce. |  |
| 4-23 | Iced product does not drip on pallets of produce stored below. |  |

**Farm Food Safety Plan Cover Sheet**

Farm Name:

Mailing Address:

Farm Contact Name/Title (Owner):

Farm Contact Phone/Email/Fax:

Name of Person Responsible for Food Safety (P-2):

Participation in GAP training (extension, seminars, PSA Grower Training, etc.)? Y / N

Farm Description:

Subject to FSMA Produce Safety Rule? Y / N

\*No, if only crops Rarely Consumed Raw are grown or gross annual produce sales are less than $25,000 adjusted for inflation. Yes, if growing crops other than those Rarely Consumed Raw and gross annual produce sales are more than $25,000 adjusted for inflation (may be Qualified Exempt).

Is product commingled? Y / N

Total Acres and/or Square Feet Covered by Audit:

Contractors (including harvest companies):

Audit Location Address (legal description/GPS/Lat. Long):

Location of Other Sites Covered by the Audit (fields/buildings/packing facilities) (legal description/GPS/Lat. Long):

**Farm Food Safety Plan Attachments \*if applicable**

* GAP & GHP Training Certificates (Produce Safety Alliance Grower Training)
* Farm/Facility Map – include name/number assigned to fields, roads, septic systems, manure storage sites, areas that flood, surface water sources, wells, staging areas, toilets
* Floor plan for packing house indicating flow of product, storage areas, cull areas, employee break rooms, restrooms, offices.
* Potable Water Test Results (G-3, 2-15, 3-3, 3-10, 4-17) \*FSMA requires 0 E. coli only
* List of Irrigation Water Sources (1-1, FSMA PSR)
* List of How Crops are Irrigated (1-2, FSMA PSR)
* Irrigation Water Assessment (1-3)
* Chemical Application/Fertigation Water Assessment (1-4)
* Irrigation/Chemical Application Water Test Results (1-3, 1-4)
* Mock Recall Record (G-2)
* Production Areas Identified for Traceability (1-26) \*on farm map?
* Traceability Records (G-1, 3-34, 4-31)
* Employee Training Record (G-5, FSMA PSR)
* Toilet Cleaning Record (G-10) \*contract if serviced by a contractor
* Pesticide Applicator Licenses (G-15)
* Animal Monitoring Record, includes measures taken (1-12, 1-13) \*can be in field notes
* Raw Manure Application Record (1-14, 1-15)
* Animal-Based Soil Amendment Treatment/Compost Record (treatment for Biosolids which are human-based) (1-16, 1-18, 1-21, FSMA PSR)
* Previous Land Use Risk Assessment Record and Mitigation Records for Possible Risks (1-23, 1-24)
* Flood Microbial Testing Records (1-25)
* Preharvest Assessment Record (2-1) \*date, initials, projected harvest date required
* Food Contact Surface Cleaning Records (2-6, 3-6, 3-8, 3-11, 4-12, 4-18, FSMA PSR)
* Letter of guarantee from supplier for sanitation of RPCs not cleaned/sanitized by farm (2-19, 3-27)
* Wash Water Temperature Records (3-4)\*If infiltration susceptible (tomatoes, cantaloupe, peppers, apples, potatoes, pears, etc.) water no more than 10F colder than produce.
* Wash Water Treatment Record (3-5) (3-7)\*Water change schedule, testing, antimicrobial addition. \*Monitor & maintain. \*Can’t be N/A if water is re-used. \*Conflict between manual recommendations for bleach and product labeling, monitor pH if using bleach, easier to use different chemical.
* Food Grade Lubricant \*Labels or receipts specify “food grade” (3-15)
* Pest control program/reports (3-30, 3-32, 4-14, 4-15)
* Bulk Storage Facility Foreign Material Inspection Record (4-2) \*Produce in piles, not containers.
* Thermometer Accuracy Check Records (4-20)
* Refrigeration Equipment Cleaning Records (4-22)
* Storage Mechanical Equipment Cleaning/Maintenance Documentation (4-12)
* Cold Storage Temperature Monitoring Record \*If below 41F (4-19)
* Shipping Conveyance Inspection Record (4-24)
* Shipping Manifest Specifies Required Temperature (4-26)

Visitor and Contractor Policy

Visitors and contractors who enter growing or handling areas must check in with farm management and adhere to posted hygiene and sanitation practices, including hand washing. G-4

Health & Hygiene Policy

All visitors and employees are required to follow good practices. Adherence to food safety policies are under continuous review. G-4 Supervisors are trained to identify failures of this food safety plan. G-5 Designated smoking and eating areas are separate from growing, packing, equipment washing, and storage areas. Designated areas in packing/storage areas will be clearly marked. Plastic bottled water is allowed outside of designated areas provided it is stored away from the product flow zone and is kept closed. G-11 Handwashing facilities are required whenever workers are handling food products, even when a toilet facility is not mandated. Handwashing does not need to be provided if there will be no hand contact with produce, food contact surfaces, or packaging materials. G-7 Readily accessible bathrooms are provided. Readily accessible is considered a ¼ mile walk or 5-minute drive if transportation is provided. Toilet facilities are not required in the field if it will take less than 3 hours to complete field work including travel time. 2-2 Bathrooms are maintained clean and stocked with supplies (sanitary towel service/drying device, toilet paper, lined/closed bin for feminine products, soap, trash bin), faucets do not recontaminate hands. G-9

Toilet Facility Cleaning Policy

Toilet facilities are cleaned at the specified frequency (G-10):

Illness Policy

Workers with symptoms of diarrhea or other infectious disease (boils, sores, infected wounds, sore throat with fever, vomiting, jaundice (yellow eyes/throat)) are not allowed to work directly with produce, food contact surfaces, or packaging materials, but may be provided with other job tasks away from the product flow zone if appropriate. Supervisors are trained to recognize potential worker illnesses. G-12

Injury Policy

Workers are instructed to seek prompt treatment with clean first aid supplies for cuts, abrasions and other injuries. Injuries that could contaminate produce, food contact surfaces, or packaging materials must be reported to a supervisor. Injuries must be adequately covered before returning to work. First aid kits are readily accessible. G-14

Bodily Fluid Policy

When blood or bodily fluid (feces, blood, saliva, or other human or animal bodily fluids) contacts produce, the product is immediately removed from the area in sealed plastic bags and destroyed. All surfaces that contact blood or bodily fluid are cleaned and sanitized. G-13

Toilet Leak/Sewage Spill Policy

If a major spill or leak of a portable toilet or toilet facility occurs, the spill will be contained, and access blocked. Affected product will be contained and disposed of. The affected area will be cleaned up. Contaminated debris and product will be disposed of appropriately to prevent contact with pests such as flies. The facility will be cleaned, sanitized and inspected for cleanliness before being put back in use. 2-5

Soil Amendment Policy

Raw or aged manure is incorporated at least 2 weeks prior to planting and a minimum of 120 days prior to harvest. Treated animal-based amendments have been treated in a manner to kill pathogens and may be applied any time prior to harvest. Records will be maintained showing adequate treatment for animal-based amendments treated on-farm. A letter of guarantee of adequate treatment will be obtained from treated amendment suppliers. Raw or aged manure is stored to prevent contamination of irrigation water, growing, traffic, and packing areas. Treated animal-based amendments are stored to prevent their contamination. G-14 through 22

Glass and Plastic Breakage Policy

Light bulbs and glass on harvesting equipment are not a hazard if not directly over un-harvested product. 2-10 If there is a glass or plastic breakage during harvesting that could result in physical contamination of the crop, harvesting operations will cease until the contaminated product can be disposed of, a supervisor notified, and all broken pieces of glass or plastic removed from the growing area. 2-10 and 11

Chemical, Petroleum, Pesticide Contamination Policy

If product becomes contaminated from chemicals, petroleum, or pesticides, operations will cease until the contaminated product can be disposed of, a supervisor notified, and the chemical, petroleum, or pesticide residues are contained and disposed of per container labeling or Safety Data Sheet. 2-12

Harvest Container Policy

Harvest containers are used only for holding product. Containers used for activities other than holding product are clearly marked. 2-6 and 14

Product Transportation Policy

We do NOT have a policy requiring harvested product to be covered when transported a short distance from field to storage. When products transported in bulk are hauled long distances, they will be covered to protect from contamination from other vehicles, and overhead contamination from overpasses and birds. Enclosed containers are not considered covered. 2-18

Traceability Policy

A traceability program is in place allowing product to be traced one step back and one step forward in the distribution chain. To accomplish this, records are maintained for the growing location and harvest date for each crop as well as the date of sale, customer, and quantity of each crop/product. Crops held in storage before packing will be labeled to indicate origination and pack date will be documented. A mock recall is performed annually. The record will show the customer contacted, how much of the product is remaining, and the disposition of what can’t be recalled (sold, disposed of). Comingling will be limited to 5-8 tree fruit growers and 3 to 5 vegetable growers for product harvested within 7 days. G-1 and 2

Work/Domestic Animal Policy

When work animals are utilized for plowing, harrowing, discing, cultivating, transportation, etc., their manure will be collected with a manure bag or removed with a dedicated shovel as soon as practicable from fields and from roads where manure could run-off into growing areas during rain. Product contaminated with urine or manure will be disposed of. 1-13 Domestic animals are not permitted in packing and storage facilities. 3-30 and 4-13

Hair Restraint Policy

Hair restraints are not required when handling produce but are encouraged when helpful to keep stray hair from getting into produce or packaging. 3-13, 4-29

Jewelry Policy

Unsecured jewelry that could fall into food, equipment, or containers is removed. Hand jewelry that can’t be sanitized is removed before handling produce/food is covered. Plain wedding bands (no stones) are permitted. 3-14, 4-30

Opened/Spilled Product Policy

Packaged product that becomes opened when intended to remain intact to protect from contamination, product that is spilled onto surfaces that may contaminate the product, and product that has been dropped to the ground or contacted the floor in a building will be disposed of or reconditioned, or otherwise not distributed for use as human food. 3-26, 4-7

Conveyance Temperature Policy

If refrigeration is required for food safety, transportation equipment will be maintained below 40F as indicated on the manifest. Other temperature ranges may be specified for food quality and will be indicated on the manifest if applicable. Temperature will be verified before loading. 4-26

Conveyance Inspection and Loading Policy

Prior to loading, transportation equipment is inspected to ensure it is adequately clean, in good physical condition, and free from unacceptable odors. The equipment’s previous use is considered. If used to transport animals or animal products the equipment will not be used to transport fresh produce before cleaning and sanitizing. Produce should not be shipped with fertilizers, meats, poultry, or fish products unless protected from contamination by segregation by physical barrier. Produce is packed and loaded to minimize damage and to reduce the potential for contamination during transport through spillage, shifting, etc. 4-24, 4-25, 4-27. Safe loading practices described below or attached:

**Requirements for workers that handle produce, food contact surfaces, or packaging materials:**

* Understand your impact on food safety and adhere to the following policies:
* Unsecured jewelry that could fall into food, equipment, or containers is removed. Hand jewelry that can’t be sanitized is removed before handling food or is covered. Plain wedding bands (no stones) are permitted. G-5, 3-14, 4-30
* Gloves are maintained in intact, clean, and sanitary condition. Gloves should be of an impermeable material. Hands must be washed before putting on gloves. G-5
* Hair restraints are not required but encouraged when packing produce. G-5, 3-13, 4-29
* Personal items are stored away from exposed food, food-contact surfaces, and packaging. G-5
* Smoking, eating, chewing gum, drinking, tobacco use restricted to designated areas away from food handling. Plastic bottled water is permitted if stored away from product flow zone. G-11, G-5
* Clothing and personal cleanliness must be reasonably clean. G-5
* Thorough handwashing is required before beginning or returning to work, or any time hands may have become soiled or contaminated such as handling cell phones, garbage, or animals. G-5
* Handwashing procedure: Wet hands, apply soap, work up a lather. Rub hands together for at least 20 seconds while cleaning under the nails and between the fingers. Rub fingertips each hand in the lather on palm of opposite hand. Rinse hands and turn off the faucet with the paper towel used to dry hands to prevent recontamination of hands. G-7
* Bathroom facilities must be used. G-13 Toilet paper must be disposed of in the toilet bowl. G-9
* Workers with signs of infectious disease (fever, vomiting, diarrhea, jaundice) are prohibited. G-12
* Workers with open lesions including boils, sores, infected wounds, are prohibited unless the lesion can be covered to prevent potential contamination. G-12
* No spitting or nose-blowing on the ground. G-13
* Cough or sneeze away from product.
* Sick or injured workers must report the condition to their supervisor and seek prompt treatment. Injuries must be covered before returning to work. G-14
* Harvest containers may not be used for carrying or storing non-produce items. 2-14
* Harvest containers and equipment are inspected before use to ensure they are functioning properly, clean, and maintained. Problems with equipment or harvest containers are reported to a supervisor. 21 CFR 112.22
* Produce must not be harvested if it is contaminated with feces (human or animal), chemicals, petroleum, glass, sharp plastic, etc. 21 CFR 112.22
* Workers must report incidences of product contamination by chemicals, petroleum, glass or sharp plastic, bodily fluids (feces, blood, saliva, urine, or other), etc. G-13, 2-11 and 2-12
* Workers must report sewage waste leaks. 2-5
* Adequate training has been provided to workers who use regulated or non-regulated (wax, growth regulators, fertilizers) pre-harvest and post-harvest application materials. Training shall include following label instructions for proper use and concentration, how to handle spills, proper disposal, dilutions. G-15
* Produce that is dropped to the ground or otherwise becomes contaminated is disposed of. 3-26, 4-7

Food Contact Surface Cleaning Policies and Schedules

We have assigned a responsible person on the harvest crew who will ensure the following practices are adhered to. Food contact surfaces are maintained as clean (free of debris) as practicable, cleaned prior to use and/or sanitized regularly. If stored outside, cleaned and sanitized prior to use. Bulk vehicles are swept regularly (2-6, 3-8, 3-11). Hand harvesting equipment and implements (knives) are maintained as clean as practicable and disinfected regularly (2-7). Transportation equipment that contacts produce is maintained clean and in good repair (2-17). Bulk vehicles are swept regularly (2-6). Packing materials are either new or sanitized if re-used (2-19, 3-17). We have developed a cleaning and/or sanitizing schedule including method of cleaning for food contact surfaces (3-8), ice manufacturing equipment and contact surfaces (3-11, 4-18), general facility (3-21, 4-1), refrigeration equipment (4-22). Attached.

Previous Land Use – Soils Assessment 1-23 and 1-24

We have conducted a previous land use assessment for each field location and documented our findings. Attached. There is no recent dumping, dairy operations, livestock operations, poultry feedlot operations, or improper use of animal wastes on any field locations. If a field location has been in produce production for more than 5 years it is assumed that microbial contamination from previous use is no longer a concern. If a field location has been in produce production for less than 5 years, the previous use is described and assessed for potential physical, chemical, and biological contamination. If previous land use indicates a possibility of contamination, preventative measures have been taken to mitigate the known risks and soils have been tested for microbial contaminants.

Water Assessments

Potable water available to all workers and used for harvest/post-harvest uses. Antimicrobials may be added to handwashing water. G-3, 2-15, 3-3, 3-10, 4-17 Attach:

* Municipal testing results obtained from supplier annually.
* Ground water wells tested annually (coliform, E. coli, nitrates, nitrites).
* Testing results for water supplied by a contractor (portable toilet handwashing).
* List water sources for drinking water, equipment cleaning, ice, produce washing.

Pre-harvest water

* List irrigation water sources. 1-1
* List method of irrigation. 1-2
* List chemical application or fertigation water sources. 1-4
* Water assessment conducted for non-potable sources. 1-3, 1-4
  + Surface water tested for E. coli (quantified) 3 times annually at planting, peak use, and near harvest.
  + Ground water tested for E. coli (quantified) once annually.

Harvest/post-harvest wash water

* How monitor temperature if produce susceptible to infiltration? 3-4
* How monitor treatment (water change schedule, testing, etc.)? 3-5, 3-7