

**HARMONIZED**  
**GOOD AGRICULTURAL**  
**PRACTICES (GAP)**  
**NOTEBOOK**

**Based on USDA Harmonized GAP Plus+ Standard  
June 2024**



*Provided by:*  
*Washington State Potato Commission*  
*Growing year 2024*

## Important Resource Links

1. USDA Harmonized Audit Checklists: [HarmonizedGAPCombinedChecklist6.xlsx \(live.com\)](https://www.freshproduce.com/usa/usa-harmonized-gap-combined-checklist-6.xlsx)
2. Digital Downloadable GAP and Harmonized GAP support material from the WSPC: [Washington Potatoes Resources & Education](#)
3. Washington State Department of Agriculture's Bridging the GAPs Outreach and Support site: [GAP GHP | Washington State Department of Agriculture](#)
4. The USDA Harmonized GAP Plus+ Standard is based on the Harmonization Initiative Harmonized Food Safety Standards located at: [Produce GAPs Harmonized Audit Standard \(freshproduce.com\)](#)

## Key to the WSPC USDA Harmonized GAP Notebook

1. For each section red letters indicate the following documents are required.
  - WP** – Written Policies / Procedures / Plans
  - R** – Records
  - A** – Risk Assessment, a is a process to identify potential hazards on a farm and/or packinghouse as well as the likelihood the hazards will impact the safety of fruits and vegetables. Risk assessments should be documented in the manner which best represents the operation and the type of risk assessment required. This may include a combination of WP and/or R documents.
2. The red highlighted letter **M** indicates a mandatory requirement that is assessed as either “compliant” or not applicable.
3. Please note that a careful review of these templates is in order, as food safety plans must be tailored to each individual operation to successfully meet the requirements.
4. All elements **highlighted in yellow** require attention and customized revision for your farm.

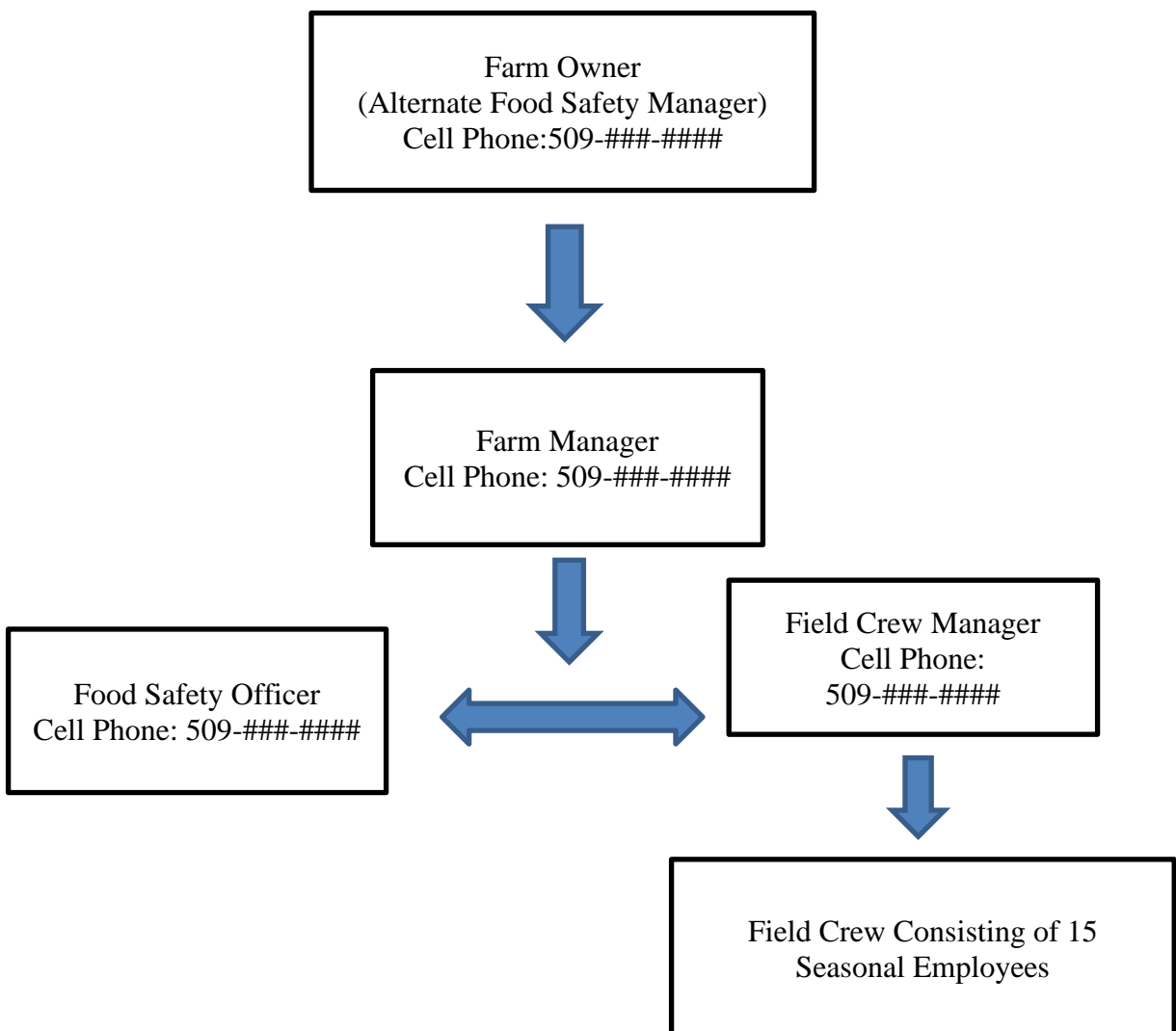


**G-1.2 Management has designated individual(s) on-site and remote, including a list of alternatives authorized to act in absence of designated individuals, with roles, responsibilities, and resources for food safety functions (WP, M)**

Insert a table with the names of employees, their titles, safety roles and responsibilities and emergency phone numbers.

The chart on the next page shows the structure of our company and references the titles of our employees. In case of an emergency, the food safety officer will be contacted and if they are not available the noted alternates will be called to respond.

**G-1.2a The food safety plan outlines an organizational structure for at least those staff whose activities affect food safety (WP)**





During the past three years no domestic sewage, sewage sludge, septic waste, portable toilet waste or other product that might contain human feces has been placed on any part of the land.

During the past three years no flooding from creeks or rivers has occurred on any part of the land, nor have any adjacent domestic septic tanks systems flooded onto the field.

Domestic animals are not allowed in fields during the growing and harvesting season. Measures are taken to ensure that animal waste from nearby fields, feed lots or waste storage facilities does not contaminate production fields. Measures are also taken to limit the presence of wild animals in production fields.

Possible **biological hazards** to land include inadvertent livestock intrusion. In the event of livestock intrusion, the animals will be promptly removed from the area by herding on foot until they have exited the production field. Any manure deposited during an intrusion will be removed using a shovel and placed in a bucket utilized for non-harvested product only. The waste will be deposited far from the production area.

Possible **chemical hazards** to land include an inadvertent chemical spill occurring in the production area. If a chemical spill occurs, the soil and area will be treated according to label recommendations and the Washington State Department of Agriculture will be notified if the scope of the spill is of reportable size and significance to public health.

**Physical hazards** associated with land include the presence of foreign material such as golf balls, scrap metals, or garbage. During preparation of the soil each season, the tractor operators vigilantly scan for the presence of such physical hazards to production and remove any hazards that may damage equipment or harm workers.

#### Irrigation Water / Potable Water

Surface waters and wells are protected from livestock. Controls are in place to minimize contamination of agricultural waters from other farm or animal operations. Well water must be tested for harmful microorganisms once a year, and surface water must be tested three times per growing season. Any available local, state and federal analysis from irrigation districts and major waterways are acceptable for irrigation water. Water applied to harvested product must be potable. Water analyses are available on file.

**Biological hazards** associated with irrigation water include contamination with biological organisms of human health significance. The water is tested by a professional laboratory and the results are carefully analyzed upon receipt.

**Physical hazards** associated with irrigation water include the structural failure of center pivots and location of large canals. Employees check the structural integrity of pivots before irrigation commences and ensure that the systems are properly maintained. Canals are largely maintained by the irrigation bureaus who mitigate risk to their employees working with the systems via education, proper training, and oversight.

## Manure

Raw manure is not used routinely on our farm. In the unlikely event that raw manure was used, it will be applied at least two weeks before planting, and the crop will not be harvested until 120 days after manure applications. If we were to use composted manure and/or biosolids, records are kept on file regarding the composting process and microorganism testing results.

## Pesticides and Fertilizers

Any pesticide, fertilizer or growth regulator applied to the potato crop either pre-harvest or post-harvest will be documented and kept on file. Company personnel applying regulated materials must have name and pesticide license recorded and on file. Company workers handling pesticides and fertilizers are knowledgeable of the purpose and proper use of the product(s).

In the production, transportation and storage of the potato crop, only those pesticides that are lawfully registered under the Federal Insecticide, Fungicide and Rodenticide Act and other applicable laws and regulations and which are labeled for use on potatoes by all applicable laws and regulations are used.

**Biological, chemical and physical hazards** associated with pesticide use and application are mediated by instructing employees to always strictly follow the label specification in accordance to state and federal law. Employees report spills of product to management and are trained to identify the risks of exposure, use of protection equipment, and proper application techniques.

## Equipment

Harvesting and transloading equipment is cleaned and washed before use, and the date of cleaning and washing is documented and kept on file.

During harvest, equipment will be clean and maintained to prevent contamination from leaking oil, grease, loose parts and any other source of foreign material contamination.

Product contaminated from oil, grease and any other source of foreign contamination will be disposed of, buried, or put into garbage containers. Equipment will be cleaned, washed and inspected after a contamination event.

Light bulbs, glass and plastic on harvesting equipment are to be protected so as not to contaminate produce or fields in the case of breakage.

Should glass break on harvesting equipment, workers will cease operation immediately. Product contaminated from broken glass or plastic will be disposed of and put into garbage containers which are emptied regularly. Equipment will be cleaned, washed and inspected after a contamination event.

Workers are instructed to inform supervisors of equipment leaks or breaks. Any evidence of leakage or breakage contamination will result in a cessation of work until the issue is resolved.

Vehicles that were previously used to haul domestic sewage, manure or hazardous material are not used for transporting potatoes.

Vehicles used to transport potatoes are cleaned and washed before harvest.

Vehicles transporting potatoes are not used to haul any other products during harvest.

Vehicles leaving the farm and traveling specified distances on roadways will utilize tarps or coverings to protect the product.

**Chemical and physical risks** associated with vehicle use include leaking of fuel lines and oil seepage. These risks are mitigated by properly maintaining and cleaning equipment before use each season. Farm managers and employees are trained to look for leakages on equipment and report it for maintenance. Physical risks associated with vehicles and equipment is mitigated by avoiding glass components on tractors and implements and ensuring that the implement parts are secured and in proper working order before entering a production area.

### Worker Health and Hygiene

On our farm, smoking, chewing, eating, drinking, defecating and spitting are prohibited anywhere in the growing and production areas. Signs will be posted as reminders. Employees caught doing any of the aforementioned violations will be subject to our disciplinary policy.

A pre-harvest assessment of all fields is conducted to ensure that land, equipment, and facilities are in good condition for harvest operations. Items in the assessment include field sanitation facilities, harvest and transportation equipment, possible contamination by animals, chemicals, fuels, etc.

All workers have been trained in good hygiene policy and practices. Dates of training for each worker are documented and kept on file.

All visitors, contractors and employees must adhere to these policies upon entry to site location of the field crop or where the crop may be handled.

All workers and visitors must use restrooms provided. Restrooms have water to wash with, single-use hand towels, toilet paper and hand soap. One toilet facility and one hand washing facility are provided for each 20 employees or fraction thereof. Signs are posted in all bathrooms instructing employees to wash their hands before beginning or returning to work.

All employees must wash hands before starting work, after using restrooms, after eating and before returning to work after any break. After eating or using the toilet, employees must use anti-bacterial soap, water and a single-use hand towel. At other times they may use soap and water or an anti-bacterial hand sanitizer. Whenever possible, soap and water hand-wash stations are preferred over hand sanitizers. **Water used for hand washing and cleaning must meet the safe drinking water standard, and water tests are kept on record.**

All sanitation units are cleaned and resupplied at least weekly, the date of service is located in the unit, and cleaning records are kept on file. All sanitation units will be easily accessible for servicing and for emergency cleanup. Care will be taken to place sanitation units where any spills will not result in contaminated food product.



If a portable toilet is tipped over, damaged or leaking, it will be repaired or replaced. Contaminated soil around it will be removed. Workers are instructed to inform supervisors of leaks or evidence of leakage contamination near toilets.

Smoking, chewing gum or tobacco, eating, drinking, spitting, urinating, and defecating are prohibited in fields, raw product storage buildings, on transload machinery or anywhere around the product.

Consumption of food, drinks, and smoking will be restricted to the designated location 50 feet away from harvested or unharvested product. Enclosed vehicles may be used as a designated location.

Bottled water is provided to all workers, and receipts of purchase are available on file. Only bottled and/or potable water is acceptable in work areas. It must be stored in clear plastic bottles with a closure and stored below the product flow zone. While bottled water is preferred for field workers, potable water from a source with a water test within the last 12 months may be permitted.

Glass containers are not permitted in fields, storages, packing facilities or near the harvest operation.

Garbage containers will be provided and maintained in the eating area.

The food safety officer and/or farm manager is responsible for educating employees and visitors of the farm organization policy with regard to hand sanitation and location of acceptable areas for consumption of food and use of tobacco products. He/She will maintain the responsibility of placing appropriate placards to indicate where designated hand washing, eating and tobacco use areas are to be located on the premises.

Workers who show up sick will be sent home. All workers know the location of clean first aid supplies. Records of worker illness and injury are kept on file.

Product that has come in contact with blood or other body fluids will be disposed of, buried, burned or put into safe garbage container. Machinery that has come into contact with blood or other body fluids will be disinfected with bleach or other safe disinfectant.

Workers are instructed to inform supervisors of product or equipment contact with blood or other body fluids, or any evidence of contamination.

### Security

All irrigation, planting, harvesting and transportation equipment is routinely inspected for unauthorized use or potential incorporation of unauthorized chemicals or substances into the water, chemical application system, or equipment.

All fields are routinely monitored for unauthorized entry. Workers are instructed to conduct visual inspection in the field, on harvesters, at transload, and other product sites to remove foreign material.

## Storage and Transportation

Storages are sufficiently sealed to be protected from external contamination by birds, rodents and other pests. Door seals are checked each year. Rodent traps are regularly emptied and serviced.

Nonfood-grade substances such as pesticides, fertilizers, lubricants and paints are not stored in the product storage facility. Storage facilities and surrounding areas are inspected for cleanliness, condition and foreign material prior to loading with product. Documentation is on file showing date of inspection and inspector's name.

Storage buildings are thoroughly sanitized, and climate control equipment cleaned prior to loading each year. Records are kept of sanitizing schedule, personnel responsible, and methods used.

Measures are taken to exclude animals and pests from the storage facility. There is an established pest control program for the storage facility. Service reports for the pest control program are documented and on file.

Potable water is used for cooling and humidification. Water tests are available on file.

Prior to loading, conveyances are clean, in good physical condition and free from disagreeable odors. Produce items are not loaded with potentially contaminating products and are loaded so that minimal damage to the product is caused. Records are kept on the previous loads hauled by each company-operated truck. All product is transported to storage or packing/processing facility in a way to avoid extremes in temperature that might damage product.

Temperatures in the stored potatoes are regularly checked and recorded in a log. If temperature monitoring is not done by a computer monitoring system automatically, a log will be kept.

## Traceability

A traceability program is established for the operation. Each seed lot, production field, harvested load, storage facility, and delivered load has a unique identifier and records are kept for all of the operation's product. Each storage building is accompanied by records of the production field(s) held in building.

Records must exist for water tests, any soil amendments applied, field sanitation efforts (porta potty rental receipts), production environment (training of workers, cleaning of tractors), wildlife, and worker practices (food safety worker training logs).

## **G-2.2 The food safety plan shall be reviewed at least annually and when changes that affect the operation occur (R)**

I hereby attest that I have reviewed the above food safety plan on (DATE) \_\_\_\_\_ and made corrections necessary to ensure continued excellence in food safety on our farm.

(NAME) \_\_\_\_\_ (SIGNATURE) \_\_\_\_\_

## **G-2.3 Operation has an approved supplier program for all incoming materials, including packaging, soil amendments, and alternative growing media, soil-less media, and substrates (R, M)**

Instructions to growers: All products, and materials impacting food safety should be identified, documented, and controlled. A procedure for the evaluation, approval, and continued monitoring of suppliers which have an effect on food safety shall be established, with a procedure for securing product and services in an emergency. The results of evaluations, rejections, and follow-up actions shall be recorded.

### **Farm Inputs**

The primary inputs into potato production include fertilizer, ag chemicals, and equipment. Packing material and onward process steps are out of scope of this audit and managed by the next step in the supply chain.

#### Fertilizer:

- The primary supplier of fertilizer for our farm is \_\_\_\_\_(insert name)\_\_\_\_\_.
- Alternate suppliers of fertilizer on our farm include \_\_\_\_\_(insert names of alternate)\_\_\_\_\_.

All fertilizer suppliers are evaluated for lawful operation (official business) and use of fertilizer products conforming with prevailing regulations. Commercial fertilizer conforms to requirements for accuracy of formulation, and custom mixes are accompanied by supporting records. If circumstance warrant procurement of fertilizers from another source, these same parameters will be used for evaluation and approval of the new supplier.

#### Ag chemicals:

- The primary supplier of ag chemicals for our farm is \_\_\_\_\_(insert name)\_\_\_\_\_.
- Alternate suppliers of ag chemicals on our farm include \_\_\_\_\_(insert names of alternate)\_\_\_\_\_.

The only permissible ag chemicals applied to the potato crop are those authorized by the EPA and prevailing regulations. Specifications of these ag chemicals are clearly outlined on their labels. Ag chemicals are only procured from reputable sources.

#### Equipment:

- The primary supplier of equipment for our farm is \_\_\_\_\_(insert name)\_\_\_\_\_.
- Alternate suppliers of equipment on our farm include \_\_\_\_\_(insert names of alternate)\_\_\_\_\_.

Equipment is only procured from authorized sources and is always fit for purpose. Equipment is designed and maintained according to recommended service guidelines.

#### Seed:

- The primary supplier of seed for our farm is \_\_\_\_\_(insert name)\_\_\_\_\_.
- Alternate suppliers of seed on our farm include \_\_\_\_\_(insert names of alternate)\_\_\_\_\_.

Our farm uses only certified seed, as regulated by the USDA. Seed records are maintained on file, for traceback purposes. When seed cutting and treatment are conducted by a contracted agency, the records of these activities are kept on file. For proprietary cultivars, records on file with the seed grower indicate authorization to plant the propagate and sell the seed to producers.

## **G-2.4 Operation has an approved services program for all services which may impact the safety of the product. (R, M)**

Instructions to growers: All service providers you use that could impact food safety should be identified, documented, and controlled. A procedure for the evaluation, approval, and continued monitoring of service providers which have an effect on food safety shall be established, with a procedure for securing services in an emergency. The results of evaluations, rejections, and follow-up actions shall be recorded.

### **Farm Service Providers**

The primary service providers potato production include crop consultant rodent control services. Onward process steps are out of scope of this audit and managed by the next step in the supply chain.

#### Crop consultant services:

- The primary supplier of consultation services for our farm is \_\_\_\_\_(insert name)\_\_\_\_\_.
- Alternate suppliers of consultation services on our farm include \_\_\_\_\_(insert names of alternate)\_\_\_\_\_.

#### Rodent control services:

- The primary supplier of consultation services for our farm is \_\_\_\_\_(insert name)\_\_\_\_\_.
- Alternate suppliers of consultation services on our farm include \_\_\_\_\_(insert names of alternate)\_\_\_\_\_.

## **G-2.4a Approved supplier program contains written procedures for the evaluation, approval, and continued monitoring of suppliers and service providers. (WP, R)**

Crop consultants are either employed by reputable agencies or have demonstrated proof of credentials. Acceptable credentials may include university degrees, consultancy licenses, employment with a licensed consultancy firm, employment by an extension or producer-support agency, and employment by an ag chemical provider.

## **G-3: DOCUMENTATION & RECORDKEEPING**

### **G-3.1 Documentation shall be kept that demonstrates the food safety plan is being followed (R, M)**

Show auditor your farm's employee training logs, employee handbooks, past GAP notebook certifications and documents, water test records, and pesticide application records.

### **G-3.2 DOCUMENTATION SHALL BE READILY AVAILABLE FOR INSPECTION (M)**

Have all of the following available for auditor review:

1. Pesticide application records
2. Safety Data Sheets for applied products (can be electronically sourced: <http://www.msds.com/>)
3. Rodent control records (if applicable)
4. Porta-potty rental records
5. Porta-potty cleaning records (should be current and on door of units)
6. Records of employee trainings
7. Records of employee food safety violation
8. Wildlife Logs

### **G-3.3 Documentation shall be retained for a minimum period of two years, or as required by prevailing regulation (R, M)**

Show the auditor GAP notebooks and supporting materials from prior years.

### **G-3.3a Food safety plan documentation and records shall be securely stored and effectively controlled.**

Records shall be protected to prevent unauthorized access or potential falsification. Use a computer and/or file that is password protected.

## **G-4: Worker Education and Training**

### **G-4.1 All personnel shall receive food safety training appropriate to their job responsibilities (R, M)**

All personnel shall receive training in the food safety policy and plan, food safety procedures, sanitation, and personal hygiene appropriate to their job responsibilities. Personnel shall receive training at hire and refresher training at prescribed frequencies, and as needed.

Show the auditor your logs of worker food safety training, employee handbooks, and similar support materials. Training should occur each year.

## Worker Hygiene & Workplace Safety Training Log

Name of Operation: \_\_\_\_\_ Date: \_\_\_\_\_

Policy Manager: \_\_\_\_\_ Training Time: \_\_\_\_\_

Location: \_\_\_\_\_

**Training material** (Please attach any written materials to this log with a staple or note the name of the training video used):

**Please see the food safety plan for overall Worker Training procedures.**

Employee Name (please print)	Employee Signature
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____

### FOOD SAFETY WORKER HEALTH AND HYGIENE POLICIES

- Employees must wash their hands before beginning or returning to work. Signs will be posted in designated areas.
- All visitors to the location are required to follow proper hygiene procedures.
- Rest areas and restrooms will be equipped with soap and water for washing hands.
- On our farm, smoking, chewing, eating, drinking, defecating or spitting are prohibited anywhere in the growing and production areas. Signs will be posted as reminders. Employees caught doing any of the following will be subject to our above-stated disciplinary policy.
- Smoking or eating is prohibited on the transload machinery or around the product. Consumption of food and drinks, as well as smoking, will be conducted in a designated location 50 feet away from harvested or unharvested product. Enclosed vehicles may be used as a designated location. Bottled water is acceptable in the work area provided it is in clear plastic containers and stored below the product flow zone. Glass containers are not allowed in the fields, storages or near the harvest operation. Garbage containers will be provided and maintained in the eating area.

- Workers who are ill or exhibit symptoms of infectious conditions are prohibited from handling produce or entering the production area.
- Produce that has come in contact with blood or other body fluids will be reported to supervisors so that contaminated produce can be discarded. Product that has come into contact with blood or other body fluids will be disposed of, buried, burned or put into safe garbage container. Machinery that has come into contact with blood or other body fluids will be disinfected with bleach or other safe disinfectant.
- First aid kits are available for all employees. Any cuts or abrasions must be immediately reported to supervisor and properly bandaged.
- Employees must always be on the lookout for foreign material such as glass, metal, packaging materials, rocks, bones, personal effects, insects, rodents, or feces.
- Any type of foreign material needs to be removed from the product and taken out of the field.
- Employees must watch for potential chemical hazards such as pesticides, oils, and fuels. Any type of leak or spill needs to be reported to the supervisor for immediate attention.
- Keep any type of chemical containers away from product and raw product storage areas.

**I have received orientation on the above information and fully understand my responsibilities to ensure all food safety measures are taken.**

**Employee Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

**Supervisor Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

## **SALUD de TRABAJADOR de SEGURIDAD de ALIMENTO Y POLITICAS de HIGIENE**

- Empleados deben lavar las manos antes empezar o volver a trabajar. Los signos serán anunciados en áreas designadas.
- Todos visitantes a la ubicación son requeridos a seguir los procedimientos apropiados de la higiene.
- Áreas de Descanso y baños serán equipados con el jabón y el agua antibacterianos para lavar manos.
- Fumando, comiendo y para beber es prohibido en edificios crudos de almacenamiento de producto. Los signos serán anunciados como recordatorios.

El fumar o comer son prohibidos en la maquinaria de transload o alrededor del producto. El alimento, las bebidas y el fumar serán consumidos en una ubicación designada 50 pies lejos de cosechado o unharvested producto. Los vehículos encerrados pueden ser utilizados como una ubicación designada. Sólo agua embotellada es aceptable en el área del trabajo proporcionó lo está en contenedores plásticos claros y almacenado debajo de la zona del flujo del producto. Los contenedores del vidrio no son permitidos en los campos, los almacenamientos ni cerca de la operación de cosecha. Los contenedores de la basura serán proporcionados y serán mantenidos en el área que comer.

- Trabajadores con gripe quieren los síntomas o las condiciones contagiosas son prohibidas del manejo el producto.
- El Producto que tiene entra el contacto con sangre u otros líquidos del cuerpo serán informados a supervisores para que contaminara el producto puede ser desechado. El producto que ha tocado sangre u otros líquidos del cuerpo serán deshechos de, enterrados, quemado o pusieron en el contenedor seguro de basura. La maquinaria que ha tocado sangre u otros líquidos del cuerpo serán desinfectados con decolorante u otro desinfectante seguro.
- Juegos de primeros auxilios están disponibles para todos empleados. Cualquier corte o las abrasiones deben ser informados inmediatamente al supervisor y apropiadamente vendados.
- Empleados siempre deben estar en la mirada fuera para extranjero material tal como; vidrio, el metal, los materiales de envasado, las piedras, los huesos, los efectos personales, los insectos, los roedores, las partes o los excrementos.
- Cualquier tipo de necesidades materiales extranjeras ser quitado del producto o evitado en el campo.
- Está También en la mirada para peligros químicos potenciales tales como; pesticidas, los petróleos, y los combustibles. Cualquier tipo de escape o rocia las necesidades de ser informadas al supervisor para la atención inmediata.
- Mantiene cualquier tipo de contenedores químicos lejos de producto y áreas crudas de almacenamiento de producto.

**He recibido la orientación en el encima de información y entiendo completamente lo mismo.**

La Firma del empleado \_\_\_\_\_ la Fecha \_\_\_\_\_

La Firma del supervisor \_\_\_\_\_ la Fecha \_\_\_\_\_

## **G-4.2 Personnel with supervisory food safety responsibilities shall receive training sufficient to their responsibilities (M)**

Demonstrate that the designated food safety officer has completed an adequate training course to occupy this role for your farm. If you have sent your food safety officer to food safety courses show certificates. The auditor may interview the food safety officer.

## **G-4.3 Contracted personnel are held to the relevant food safety standards as they would be as employees (R, M)**

Subcontractors include, but are not limited to, companies hired to apply agriculture chemicals throughout the season. These contractors must have current pesticide applicator licenses and submit records of their applications to the farm, including name of applicator and rates used. Similarly, in cases where rodent control is contracted, the maintenance of traps must be overseen by current license-holders and in keeping with the corporate policy.



## **G-5: SAMPLING AND TESTING**

**G-5.1. Where laboratory analysis is required in the food safety plan, testing shall be performed by a GLP laboratory or laboratory participating in a proficiency testing program using scientifically valid methods. (R)**

Photocopy the back of the test submission form, which shows how the sample was collected and submitted. You need to demonstrate how the sample was collected and which lab it went to. If your field representative took samples for you, they will have this information. Have lab results to show the auditor. The laboratory should have passed a Good Laboratory Practices (GLP) audit or participates in a Proficiency Testing program, and utilizes BAM, AOAC International or testing methods that have been validated for detecting or quantifying the target organism(s) or chemical(s).

**G-5.2 Where microbiological analysis is required in the food safety plan, samples shall be collected in accordance with an established sampling procedure and prevailing regulations and records kept. (WP, R)**

Photocopy the back of the test submission form, which shows how the sample was collected and submitted. You need to demonstrate how the sample was collected and which lab it went to. Have lab results to show the auditor for at least 2 years of testing. Additionally, if you are doing any additional testing in your field for the presence of microorganisms of human health concern, have the sampling instructions and results available for the auditor to review.

**G-5.3 All microbiological testing as directed by the food safety plan shall include procedures and actions to be taken based on the results. (WP, R)**

Our food safety plan requires microbiological testing of water. We maintain written sample collecting frequency (G-2.1), and testing procedures (G-5.2), and actions to be taken on the basis of results (G-8.1).

As part of our farm's operational plan and best management practices, we do not test our potatoes. Potatoes are not a ready to eat product, and thus deemed not at high risk for microbial outbreaks of human health significance. The National Potato Council conducted a comprehensive Risk Assessment for Potatoes in 2011 through Intertox, Inc. The findings demonstrated that potatoes are low risk and are rarely consumed raw by the end user.

## G-6 TRACEABILITY

### **G-6.1 A documented traceability program shall be established (WP, R, M)**

A traceability program is established for the operation. Each seed lot, production field, harvested load, storage facility, and delivered load has a unique identifier and records are kept for all of the operation's product. Each storage building is accompanied by records of the production field(s) held in building.

Have truck tickets available to show the auditor, in addition to maps of your fields demonstrating how you track where product from each harvested field is ending up. If you are storing, demonstrate that you can track each field into storage. The auditor will check in the field for truck tickets. Expect your auditor to stop a truck driver and ask to see his truck ticket.

Operation must include product identification on all packaging. The product identification must include: 1) the origin of the producer; 2) the name and address of the producer; 3) the country of origin; and 4) the date of production on packaging. If using reusable containers, procedures ensure that labels are accurate prior to packing.

#### **G-6.1a Packaging must include product identification.**

Instruction to grower: the product identification at a minimum must include the name and address of the farm, packer, or distributor of the produce and meet the requirements of the prevailing regulation. This may be beyond the scope of your operation.

#### **G-6.1b If product is intended for export, product meets labeling regulations of the country(ies) the product is being exported to.**

Instruction to grower: Make sure product is labeled according to the regulations in the country(ies) in which the product is intended to be sold.

#### **G-6.1c If a post-harvest operation supplies product to a farm stand or Community Supported Agriculture (CSA), records tracing the product from the post-harvest operation to the farm stand or CSA are required (R)**

Instruction to grower: This requirement likely does not apply to your operation. However, if it does, be able to show your process for tracing and recalling product from a CSA or farm stand.

**G-6.2 A traceback and trace forward exercise shall be performed at least annually (R)**

Show the start and stop times for the trace-back and trace-forward exercise performed within a year. It must be completed in 4 hours. It must achieve 100% reconciliation of product. If no trace exercise was performed in the past year, the operation will perform the exercise during the audit.

**TRACEABILITY EXERCISE**

Name of Operation: \_\_\_\_\_  
Exercise Start Time: \_\_\_\_\_  
Exercise Completed Time: \_\_\_\_\_

Trace Forward:

Receiver Name and Contact Information: \_\_\_\_\_  
Date and Time Contacted: \_\_\_\_\_  
Description of Product (LOT #s, shipping receipts, etc.): \_\_\_\_\_  
Markings on Containers and Descriptions (50lb sacks, bulk shipment, etc.): \_\_\_\_\_  
Documentation of Trace-Forward from Customer: \_\_\_\_\_

Trace Back:

Field Harvested: \_\_\_\_\_  
Days Harvested: \_\_\_\_\_  
Storage Number and Time Product was Put into Storage: \_\_\_\_\_  
Applicable Truck Tickets: \_\_\_\_\_  
Date(s) of Planting: \_\_\_\_\_  
Seed Source(s): \_\_\_\_\_  
Name of Seed Cutter: \_\_\_\_\_  
Seed Treatments Applied: \_\_\_\_\_  
Amount of Product Accounted for in Exercise: 100%  
Completed By: \_\_\_\_\_ Date: \_\_\_\_\_

## G-7: RECALL PROGRAM

### G-7.1 A documented recall program, including written procedures, shall be established (WP, R, M)

Instructions to growers: Provide documentation that includes the types of events that may result in a recall, the persons responsible for making decision on the possible recall, and the mechanism for notifying the next step in the supply chain, the notification of relevant authorities when required, steps taken to contact the certification body, and the methods for reconciling stock.

### G-7.2 The recall program shall have a designated recall team (R)

Instruction to grower: Prepare a document that shows the names of people, internal and external, involved in a recall that may include the following:

Our farm's recall team includes the following individuals including key company employees (INSERT NAMES), legal counsel (INSERT NAME), regulatory agencies (INSERT NAMES), insurance agent (INSERT NAMES), and media spokesperson (INSERT NAME).

### G-7.3 A mock recall exercise shall be performed at least annually at the operation being audited (R)

Each year you must do a complete mock recall on the farm. Ensure that you can demonstrate not only the ability to recall products but can trace one step back and identify where your seed came from for each field. Include truck tickets, packing information from shed, and/or any other information associated with the recall exercise.

## Mock Recall Scenario Narrative

(FARM NAME) provides potatoes directly to (PROCESSOR OR PACKER NAME) from (STORAGE OR FIELD). Below we have conducted two recalls for both possible packing scenarios in our operation.

### Mock Recall Scenario One – Packing Direct from Field:

Glass is found in the packing line while running potatoes from our farm.

**October 3, 2023:**

8:00 a.m. Packer notifies our farm there is glass in the boxes they are packing from his farm.

8:10 a.m. Food safety officer retrieves the truck ticket for the load being run from packing house (INSERT A REAL TRUCK TICKET).

8:12 a.m.: The Food Safety Officer is able to use their trace-back and trace-forward maps of where each truck was being loaded to identify the location in the field. The farm manager calls their crew and stops the digger associated with the glass contamination.

8:30 a.m.: The field crew identifies where in the field the broken glass was and inspects the area for any remnants of glass. Any remaining glass in the field is shoveled into a secure container and discarded. Additionally, the digger that encountered the glass is thoroughly inspected, along with all trucks associated with the contaminated load.

8:45 a.m.: Using the packing house trace-back digital lot tracking system, all boxes contaminated with glass are identified and destroyed. The entire lot is taken to a landfill and disposed.

**Mock Recall Scenario #2: Packing from Shed**

Glass is found in the packing line while running potatoes from our farm out of our storage shed.

**October 3, 2017:**

8:00 a.m. The packing shed notifies us there is glass in the boxes they are packing from his shed.

8:10 a.m. The Food Safety Officer retrieves truck ticket for the load being run from the packing house (INSERT A REAL TRUCK TICKET)

8:12 a.m.: The Food Safety Officer is able to use his trace-back and trace-forward policy to identify which shed the contaminated product came from. The grower halts all loading from that shed and instructs his crew to carefully examine the storage pile.

8:30 a.m.: The storage shed crew identifies where in the pile the broken glass was and inspects the surrounding area in the pile for any remnants of glass. Any remaining glass in the pile is removed by tractor and placed in a landfill.

8:45 a.m.: Using the packing house trace-back digital lot tracking system, all boxes contaminated with glass are identified and destroyed. The entire lot is taken to a landfill and disposed.

**SIGNATURE:** \_\_\_\_\_

**Date:** \_\_\_\_\_

## Mock Recall Log

Name of operation:

The mock recall begins with a notification from a receiver that product received on a particular date is being recalled.

Receiver		Date Contacted		Reason for Recall	
Description of Product			Markings on Containers		
Delivery Date(s) of Recalled Product	Storage Name(s)	Field Designation(s)	Harvest Date(s)	Planting Date(s)	Seed Source(s)
<u>Disposition of All Product from Recalled Lot(s)</u>					
Amount and Action Taken on Remaining Product			Amount and Action Taken on Product Already Delivered		

Completed By: \_\_\_\_\_

Date: \_\_\_\_\_

## G-8: CORRECTIVE ACTIONS AND FOOD SAFETY INCIDENTS

### G-8.1 The operation shall have documented corrective action procedures **(WP, R, M)**

Food safety violations are taken very seriously on our farm. The employees are given a verbal warning for their first violation. Their second violation is documented in the below table. They will be placed on probation or terminated on their third violation, under the discretion of the farm manager.

Corrective actions not associated with employee performance are handled by the farm manager. These actions, such as leaking equipment, are documented and rectified.

Name of Employee	Date of Infraction	Infraction	Action
John Doe	April 30, 2018	Dog in Truck	Verbal Warning
John Doe	May 5 <sup>th</sup> , 2018	Didn't wash hands	Written Warning
John Doe	May 15 <sup>th</sup> , 2018	Brought dog to field again	Fired

### G-8.1a Corrective action procedures shall include a procedure to evaluate complaints **(WP)**

#### Complaint Evaluation Policy

Complaints or comments from customers are handled as follows:

Buyer complaints:

Quality issues: We modify chain speeds, time of digging (earlier/later in day), and handling practices to address any noted undesirable occurrence observed by buyer or noted by our staff while piling into storage or fresh packing. During the grading process for potatoes, our payment from the processor is based on quality grade ratings. We will work to address client concerns by fluctuating harvest times and negotiate a modified payment schedule with the buyer based on quality evaluations as needed.

Food safety issues: If food safety issues, such as broken glass occur, we follow procedures listed in our policy handbook for handling recalls. Problems and their solutions are noted in our book.

General queries from the public:

Quality issues: We take general queries from the public on a case by case basis. Members of the public may call and ask if we grow certain types of potatoes or have other questions. We address all queries respectfully and in accordance with the spirit of their request.

Food safety issues: General questions about food safety and the audits our farm undergoes are answered for the general public in respect to the spirit of their inquiry. Members of the public may ask about how food safety is handled on our farm, and we can offer insight into our food safety policy in the context of industry best practices.

All complaints are taken seriously, as they result in lost income and productivity for our farm. Any food safety related complaint will trigger immediate action, such as product destruction and recall, as noted in our supporting documents.

### **Complaint Log**

Date of Complaint	Name of Concerned Party	Problem reported	Resolution

Growers can also use grading reports from the processors as documentation of customer input on quality of potatoes sold.

### **G-8.1b Food safety incidents are recorded and assessed to determine severity and risk and are addressed according to a documented food safety incident management procedure (R)**

For the purpose of preventing recurrence, document corrective action procedure to evaluate food safety related complaints, and to investigate non-conformities. Include a plan to address the issue; a plan to prevent recurrence; and demonstration of the evidence of effectiveness. The time frame necessary for corrective action shall be documented. Objective evidence shall demonstrate that the procedure is effective.

### **G-8.2 NON-CONFORMING PRODUCT ON HOLD FOR FOOD SAFETY IS CLEARLY IDENTIFIED AND SEGREGATED FROM OTHER PRODUCTS AND PACKAGING MATERIALS (WP, R, M)**

Have a written procedure to clearly identify and segregate on-hold, quarantined, and rejected product and materials when held for food safety reasons, to prevent commingling with other



products or adulteration of products, production area, or packaging material, and logs of such materials held.

Non-conforming products may be identified directly in the field prior to harvest or may be identified in storage conditions. Non-conforming product identified as such in the processing line or packinghouse are outside of the scope of this audit and are covered by the next step in the supply chain. When a product is not conforming, the nature of the problem is identified and directly determines the handling of the product.

If the product is not harvestable due to contamination, quality issues, severe degradation, or lack of viable market, it will be tilled back into the ground or harvested and disposed of by burying or placing in a landfill.

If the product is harvestable and of sufficient quality to be used in dehydrated product, the producer will search for a processor who will accept the potatoes to be used for dehydration. These potatoes may also be used for livestock feed.

If the product is harvestable and of sufficient quality for other uses (e.g., processing potatoes diverted to table stock), the producer will evaluate these on a case-by-case basis, with consideration given to market options and food safety.

Potatoes may be placed on hold in the field prior to harvest, within a truck in transport, or in storage. Potatoes placed on a hold in the packinghouse or processing facility are managed by the next step in the supply chain and outside of the scope of this audit. Potatoes placed on hold in the field for suspected quality or food safety problems will not be harvested. The farm manager who is staging the harvesting crews will keep records for fields on hold for harvest. The fields will be released for harvest when the risk has been mitigated (e.g. resolved through diversion into a processing stream with a kill step, tilled down, etc.).

Potatoes placed on hold in a truck as part of the transport will be directed to not unload. Truck drivers have truck tickets and numbered vehicles and loads. A truck that is placed on hold in route to a processor or packinghouse will be instructed on what to do with the load based on the assessed risk. The product will not be released from the holding in the truck to the supply chain until the risk posed has been thoroughly identified and evaluated. The truck may be released from the hold to deliver to a livestock yard or processor/dehydrator or may be released to deliver the product per plan to the packinghouse or processor.

Potatoes in storage that incur contamination will be placed on hold and only released according to the associated risk into the onward supply chain or disposal. The farm manager and potato storage supervisor will collaborate to evaluate how potatoes placed on storage will be released to market or disposal.

The hold and release are dictated by the farm manager in the field, in collaboration with the recipient packinghouse or processor. When potatoes are released to market, records of transfer are kept. When potatoes are released for disposal, records of the culls or alternate market sales are kept.

Contaminated produce is disposed of and destroyed. Contaminated product does not enter the food chain. Mechanically damaged (cut, bruised) potatoes or product rejected for defects may be

sold to a dehydration facility where it is made into potato flakes and powder. If a market cannot be found for rejected product, it too will be destroyed.

## **G-9: SELF-AUDITS**

### **G-9.1 THE OPERATION SHALL HAVE DOCUMENTED SELF-AUDIT PROCEDURES (R)**

Once a year our farm undergoes a self-audit. During the self-audit, we use the USDA GAP checklist to analyze the efficacy of our current procedures. Our procedure for the annual self-audit designates one employee, usually the foods safety officer, to carefully read through the complete USDA Harmonized GAP checklist and then review all office records, food safety plans, and supporting materials to ensure compliance. This employee must visit all areas of the farm, including pesticide storage, sorting lines, break rooms, fields, and water sources during the walk-through. If the employee sees items in need of corrective action, they must report these items and follow through with ensuring future compliance.

DATE of SELF-AUDIT: \_\_\_\_\_

NAME of EMPLOYEE CONDUCTING SELF-AUDIT: \_\_\_\_\_

Items found in need of correction during self-audit:

1. Trash can missing a lid
2. One employee found eating lunch outside designated area
- 3.
- 4.
- 5.
- 6.

Print out the checklist and show handwritten checks, demonstrating that you have read through the entire document and compared it to what you are doing on the farm at this time.

## **G-10: WORKER HEALTH/HYGIENE AND TOILET/HANDWASHING FACILITIES**

### **G-10.1 Operation shall have a policy for toilet, handwashing, hygiene, and health (WP, M)**

Water used for drinking, cleaning and hand washing must meet the safe drinking water standards. Evidence of water tests are included in records.

All workers have been trained in good hygiene policy and practices. Dates of training for each worker are documented and kept on file.

All visitors, contractors and employees must adhere to these policies upon entry to field sites or areas where the crop may be handled.

All workers and visitors must use restrooms provided. Restrooms have water to wash with, single-use hand towels, toilet paper and hand soap. One toilet facility and one hand washing facility are provided for each 20 employees or fraction thereof. Signs are posted in all bathrooms instructing employees to wash their hands before beginning or returning to work.

All employees must wash hands before starting work, after using restrooms, after eating and before returning to work after any break. After eating or using the toilet, employees must use soap, water and a single-use hand towel. Field rest areas and restrooms will be equipped with soap and water for washing hands.

All sanitation units are cleaned and resupplied at least weekly. The date of service is located in the unit and cleaning records are kept on file. All sanitation units will be easily accessible for servicing and for emergency cleanup. Care will be taken to place sanitation units where any spills would not result in contaminated food product.

Employees must wash their hands before beginning or returning to work. Signs will be posted in designated areas.

Smoking, chewing, eating, drinking, defecating or spitting are prohibited anywhere in the growing and production areas. Signs will be posted as reminders.

Smoking or eating is prohibited on the transload machinery or around the product. Food, drinks and tobacco use will be restricted to a designated location 50 feet away from harvested or unharvested product. Enclosed vehicles may be used as a designated location. Only bottled water is acceptable in the work area provided it is in clear plastic containers and stored below the product flow zone. Bottled water is provided to all employees and purchase receipts are kept on record. Glass containers are not allowed in the fields, storages or near the harvest operation. Garbage containers will be provided and maintained in the eating area.

Workers who are ill or have infectious symptoms are prohibited from working in the production area and are sent home.

Produce that has come in contact with blood or other body fluids will be reported to supervisors so that contaminated produce can be discarded. Product that has come into contact with blood or other body fluids will be disposed of, buried, burned or put into safe garbage containers. Machinery that has come into contact with blood or other body fluids will be disinfected with bleach or other safe disinfectant.

First aid kits are available for all employees. Any cuts or abrasions must be immediately reported to supervisor and properly bandaged.

Employees must always be on the lookout for foreign material such as personal effects, glass, tools, metal, packaging materials, rocks, bones, insects, rodents, or feces.

Any type of foreign material needs to be removed from the product and avoided in the field.

Employees will also watch for potential chemical hazards such as pesticides, oils, and fuels. Any type of leak or spill needs to be reported to the supervisor for immediate attention.

Employees will keep all chemical containers away from product and raw product storage areas.

**G-10.2 Employees, workers, and visitors shall be made aware of and follow all personal hygiene practices as designated by the operation**  
**(M)**

Next to the visitor sign-in sheet, ensure that you have a list of the food safety rules that the visitor must comply with. Additionally, the auditor will observe this carried out in the field. The auditor must be asked to sign in!!! If you have visitor badges, have the auditor wear one. Check the auditor in, just as you would any other visitor to your farm or facility.

## Visitor Log

Name of operation:

**Please see the food safety plan for information on food safety procedures for visitors. All visitors must comply with the farm's food safety policies.**

Date	Enter time	Visitor	Badge number	Host	Exit time

Reviewed by:

Title:

Date:

**G-10.3 Toilet facilities and restrooms shall be designed, constructed, and located in a manner that minimizes the potential risk for product contamination and are directly accessible for servicing (M)**

Toilet and handwashing facilities are situated during operation and servicing, and maintained so as not to pose a hazard to the produce or other opportunity for contamination. Restrooms are located away from produce handling areas whenever possible. If in a building, restrooms should not open directly into product handling areas. Those that do open directly into produce handling areas should have additional measures in place to mitigate risk, such as a self-closing mechanism, a maze-type entrance/exit, or distance.

The auditor will check toilet facilities, including portable field toilets and review their cleaning log. Make sure that all cleaning logs are present in the toilets. The auditor will also check the water, soap and towels to be sure all are functioning. Ensure that the portable toilets are not too close to the edge of the field where you have not yet harvested.

**G-10.4 Toilet facilities shall be of adequate number, easily accessible to employees, workers, and visitors and in compliance with applicable regulations (M)**

Ensure that you have an accurate count of how many workers you have in the field, and have an adequate number of toilets for the workers present.

**G-10.5 The practice of disposing of used toilet tissue on the floor, in trash receptacles, or in boxes is prohibited except in situations where waste systems are not capable of handling toilet paper (M)**

If toilet paper cannot be disposed of in the toilet, the use of toilet paper disposal containers is acceptable. Containers must be used only for toilet paper or other hygiene products and must be distinguishable from towel waste containers. Operation shall develop SOPs for the sanitary disposal of waste, ensuring adequate monitoring and cleaning frequencies to prevent unsanitary conditions

Display pertinent signage in the appropriate location.

**G-10.6 Toilet and wash stations shall be maintained in a clean and sanitary condition (R, M)**

Ensure that all toilets have current cleaning logs. Paper towels should be put in the trash can. The toilet should show signs of use, with towels in the trash and wet sinks, but be clean. If the toilet was cleaned a week ago, and there are no towels in the trash or the sinks show no signs of use, the auditor may assume your workers are not washing their hands. Be sure that your workers are washing and drying hands as per policy.

## **G-10.7 A RESPONSE PLAN IS IN PLACE FOR MAJOR SPILLS OR LEAKS OF FIELD SANITATION UNITS (WP)**

Provide a written response plan that you develop, or is a plan from the contractor of the field sanitation unit.

## **G-10.8 Employees and workers shall wash their hands at any time when their hands may be a source of contamination (M)**

Personnel shall wash their hands prior to start of work, after each visit to a toilet, after using a handkerchief/tissue, after handling contaminated material, after smoking, eating or drinking, after breaks and prior to returning to work, after touching animals or waste and at any other time when their hands may have become a source of contamination. Antiseptic hand rubs may not be used as a substitute for soap (or other effective surfactant) and water. Operation management reinforces importance of and compliance with handwashing policy.

The auditor will observe your employees taking lunch breaks and ensure that they have washed their hands according to your policy. The auditor may be bilingual and ask your workers what task they must do before returning to work. Make sure your employees know the hand washing policy and other food safety rules.

## **G-10.9 Signage requiring handwashing is posted**

Signs must be posted in Spanish AND English. Ensure that your hand wash signs are in both languages. Laminated hand washing signs are available from the WSPC office. Please call to have signs mailed to you free of charge – Washington State Potato Commission 509-765-8845.

## **G-10.10 Clothing, including footwear, shall be effectively maintained and worn so as to protect product from risk of contamination (M)**

Our farm's policy permits employees to bring their own clothing, if it is clean and free of contaminants. We do not provide boots, pants, or shirts. At times, we may provide gloves, protective equipment for spraying, or aprons as needed. However, our farm does not express an obligation to provide employees with clean clothing and is an expectation of employment that they will arrive to work in clean apparel. If gloves, boots, hats, or other protective equipment is soiled, the farm manager will approach the employee and ask them to clean the item or replace it. Employee wardrobes should not have excessive holes or tears which could be caught in the equipment and pose a hazard.

Date of Apparel Check	Manager Name	Noted Non-compliance

**G-10.11 If gloves are used, the operation shall have a glove use policy (M)**

Our farm’s policy is not to provide gloves for our field workers. The workers provide their own gloves and purchase them on their own accord. The gloves are not permitted to be stored in a dirty place or used for other activities that could potentially contaminate produce. We do permit the gloves to be stored in personal vehicles or work vehicles. A supervisor checks the gloves to ensure that they are clean and fit for working. As potatoes are a low-risk product, we have assessed the risk of having employees provide and store their own gloves and have determined this practice is within the appropriate bounds of good food safety stewardship.

Date of Glove Check	Manager Name	Noted Non-compliance

**G-10.12 If protective outer garments are worn in product handling areas, they shall be handled in a manner to protect against contamination**

In our potato fields, the protective equipment employed includes spray suits, gloves, and boots for pesticide applications, and gloves and hats for the sun. The employees are permitted to purchase their own hats and gloves for use in the field. While the supervisor ensures they are clean and well maintained, the company does not pay to launder these items. Personal Protective Equipment (PPE) for pesticide application is used and disposed of after the application is complete. Rubber boots and mixing gloves are stored and cleaned according to proper pesticide application and use. Employees may store non-chemical apparel in their vehicles.

Our farm has designated the employee’s vehicle as an approved storage space for protective clothing and apparel. Employees operating tractors and company vehicles may use these as their storage areas. The supervisor ensures that these items are clean and in good repair.

**G-10.13 The wearing of jewelry, body piercings, and other loose objects shall be in compliance to company policy and applicable regulation**

Our farm does not permit any necklaces, bracelets or earrings that dangle down into the product or are at risk of catching on equipment or contaminating product. Simple wedding bands without stones may be worn, but we recommend they be covered with a glove. At no time are facial piercings, such as nose or eyebrow piercings permitted.

## **G-10.14 The use of hair coverings shall be in compliance to company policy and applicable regulation**

### Hair Net Risk Assessment

As potatoes are the only commodity handled by our farm destined for human consumption, our detailed risk assessment for the use of hair nets will address pertinent food safety concerns proportional to our end-use product. Potatoes are a low-risk product, as defined by the federal Food and Drug Administration in the current Food Safety Modernization Act Preventative Produce Controls (proposed draft version 2013). Science supports that the temperatures necessary to cook a fresh potato by the consumer eliminate relevant pathogens of human concern. Furthermore, our product is not eaten raw by the end consumer, and any raw consumption of the product would be rare and out of keeping with the recommended use. The National Potato Council has completed a comprehensive risk assessment entitled “Potato Food Safety Guidelines Version 1.0” and this document is included in our supporting materials for auditor review. The food safety policies and practices at our farm are in keeping with those listed on page 53 of the document, outlining best management practices for farm and packinghouse sanitation. Additionally, a detailed risk assessment was conducted for the entire potato industry in 2011, and this comprehensive document is also available for review. Page 48-51 of the risk assessment provides a detailed table of the potential human consumption risk in relation to mammalian pathogens. Other risks not associated with microbial pathogens are referenced on page 94 of the comprehensive industry wide assessment, in which hazard quotients for baked and boiled potatoes do not exceed .007, well below the 1.0 EPA action thresholds. Our policy on hairnets is therefore reflective of the science based assessments and best management practices of the potato industry.

At our farm, workers coming in direct contact with open product may include the employees standing beside the moving sorting line and those monitoring the automated bagging or boxing system. Employees engaged in driving forklifts, moving enclosed boxes for shipment, stacking enclosed and sealed bulk bags, and office personal entering or transiting the open-space sectors of the packing shed are not required to wear hairnets. The risk of detached hair falling from the head of an employee into our product is relevant only where employees are leaning over exposed potatoes. This occurs at the previously mentioned locations of the sorting line and bagging tenders. Elsewhere, product is protected by bags, boxes, and/or is in a field bulk state undergoing flume treatments or similar steps aimed at cleaning and elimination of foreign material. Furthermore, the risk of hair-born contaminants is additionally reduced by nightly sweeps of the packinghouse floor, as are documented in our cleaning logs. This best practice removes loose dirt and hair from the shed floor. Therefore, the hairnet policy is in direct proportion to the potential product risk and is in keeping with industry best management practices.

## **G-10.15 Employees’ personal belongings shall be stored in designated areas**

The policy on our farm is to have employees store their personal belongings in their vehicles, and in designated break areas. The employees may leave lunches and food items in the break area, at their own risk. Employees may not take their personal purses, backpacks, or other luggage items into the harvesting or sorting areas. Our farm strongly encourages employees to



leave any item of value in their personal vehicles. Employees in tractors or who have been assigned company vehicles may use these cabs as a storage location for their personal items.

**G-10.16 Smoking, chewing, eating, drinking (other than water), urinating, defecating, and using tobacco shall be prohibited except in clearly designated areas (M)**

On our farm, smoking, chewing, eating, drinking (other than water), chewing gum, spitting, urinating, defecating, and using tobacco shall be prohibited except in clearly designated areas. Signs will be posted as reminders. Employees caught doing any of the following will be subject to our above-stated disciplinary policy.

**G-10.17 Operation shall have a written policy that break areas are located so not to be a source of product contamination**

Our farm's policy is to permit the cab of tractors and company vehicles to be used as designated break spaces. Additionally, the employees may take breaks in their own personal vehicles. When appropriate and possible, we offer designated break areas to employees, and denote these areas with signage. All break areas are located away from the harvest area and raw product.

**G-10.18 Drinking water shall be available to all field employees and workers (R)**

Drinking water that you are providing to employees must either be bottled or from a source that you have a water test from. If you are offering tap water, you must show the auditor your water test results. Even if the water is from a municipal source, you must have proof of a water test from the city. If you are providing bottled water, you must SAVE YOUR RECIEPTS to prove that water has been purchased for the field crew. We recommend purchasing some bottled water and having a receipt to show the auditor. You should have a small pallet of bottled water available, even if your workers prefer the tap water.

**G-10.19 Workers and visitors who show signs of illness shall be excluded from direct contact with produce or food-contact surfaces and from entering produce handling areas (WP, R)**

Our food safety plan states that workers who show up sick will be sent home or given work away from fields and away from food handling equipment. All workers know the location of clean first aid supplies. Records of worker illness and injury are kept on file.

Product that has come into contact with blood or other body fluids will be disposed of, buried, burned or put into safe garbage container. Machinery that has come into contact with blood or other body fluids will be disinfected with bleach or other safe disinfectant.

Workers are instructed to inform supervisors of product or equipment contact with blood or other body fluids or any evidence of contamination.

### **G-10.20 Personnel with exposed cuts, sores, or lesions shall not be engaged in handling product (M)**

Employees sign a statement with the below three bullet points denoting their understanding of our policy regarding illness and injury.

- Workers who are ill or exhibit infectious symptoms are prohibited from handling produce.
- Produce that has come in contact with blood or other body fluids will be reported to supervisors so that contaminated produce can be discarded. Product that has come into contact with blood or other body fluids will be disposed of, buried, burned or put into safe garbage container. Machinery that has come into contact with blood or other body fluids will be disinfected with bleach or other safe disinfectant.
- First aid kits are available for all employees. Any cuts or abrasions must be immediately reported to supervisor and properly bandaged.

### **G-10.21 Operation shall have a blood and bodily fluid policy (WP, M)**

As noted above, our policy states that produce that has come in contact with blood or other body fluids will be reported to supervisors so that contaminated produce can be discarded. Product that has come into contact with blood or other body fluids will be disposed of, buried, burned or put into safe garbage container. Machinery that has come into contact with blood or other body fluids will be disinfected with bleach or other safe disinfectant.

### **G-10.22 First aid kits shall be accessible to all employees and workers**

Ensure that field crews have access to first aid kits, as well as workers on sorting lines. Check the first aid kits each year to ensure there are no expired medications in the kits. Additionally, the kits need to be restocked and checked. Tractors and corporate vehicles should also have first aid kits available.

Location of Kit	Date Checked/Restocked	Initials of Employee

## **G-11: AGRICULTURAL AND CLEANING CHEMICALS**

### **G-11.1 Use of pesticides and other agricultural chemicals shall comply with label directions and prevailing regulation (R, M)**

Have all of your chemical application records available for review. Include all applications made by commercial companies and contract applicators. These must be current and show rates consistent with the label specifications. The auditor may ask to see a label for a product to ensure that it is registered for use on potatoes. Ensure that you have access to product labels during the audit. Electronic access is sufficient.

### **G-11.2 Pre- and postharvest agricultural chemical use, shall consider the maximum residue limit (MRL) requirements in the country of origin or intended country of destination**

Instructions to growers: The way this question is answered will depend on the operation. If you are selling only processed potatoes, the processor may already be taking samples from your fields for MRL testing. Ask your fieldman for MRL test records if this is the case. If the processor will most likely be using your potatoes to fulfill domestic orders, you can state that MRL testing is not conducted because product is not destined for foreign markets. By carefully complying by labeled rates, you should be meeting MRL expectations and requirements.

The country of destination for our potatoes is not always known at the time of harvest and/or the time of sale to a processor or packinghouse. However, we always apply registered products at the labeled rates, therefore complying with MRLs for most markets. If we knew which country we were going to export to, we would comply with MRLs by utilizing the MRL database at: <https://bcglobal.bryantchristie.com/>. Our policy on MRL is to strictly adhere to the label requirements, and thus fulfill the majority of MRL requirements for domestic consumption and export.

When used at the labeled rate and when label instructions are carefully followed, residue of sprout inhibitor used post-harvest is not considered a food safety concern or subject to MRL testing under our current marketing strategy.

In case that an unauthorized plant protection product is detected, the hold and recall policy will immediately go into effect. All product will be recalled, and product in transit or in the field will be placed on hold. Using sales records from packinghouses and processors, buyers will be informed to remove product from shelves and destroy it. Means of destruction include burial and tilling (unharvested product), depositing in a landfill, and disposing of it in garbage receptacle that is not accessible to pilfering.

### **G-11.3 Agricultural chemicals shall be applied by trained, licensed, or certified application personnel, as required by prevailing regulation (R)**

Our farm does not permit the application of pesticides without oversight by an employee or contracted applicator with a current Washington State Department of Agriculture Pesticide Applicator's License. We can verify the validity of a license by using the WSDA website: <http://agr.wa.gov/PestFert/LicensingEd/Search/>

Insert copies of the pesticide licenses held by your employees. Also ensure that your spray records include the name of the applicator, and the applicator license number he is working under.

### **G-11.4 Water used with agricultural chemicals shall not be a source of product or field contamination (R)**

Water used to dilute or deliver agricultural chemicals shall be from a source in compliance with the Water System Risk Assessment and Water Management Plan, consistent with current industry practices or regulatory requirements for that commodity.

### **G-11.5 Use of water treatment agricultural chemicals shall comply with label directions and prevailing regulation (R, M)**

Instruction to grower: maintain records of water treatment, and include crop, date and location of application, chemical used, application rate and method.

Chemicals we use to manage water quality, including sanitizers and disinfectants, are registered for such use as required by prevailing regulation, and used in accordance with label directions including application rates, worker protection standards, personal protection equipment, container disposal, storage, and all requirements specified for the chemical or compound.

### **G-11.6 Agricultural chemical disposal shall not be a potential source of product or field contamination (R)**

Instruction to grower: be able to describe procedures for disposal of waste agricultural chemicals and for cleaning of application equipment that protects against contamination of product and growing areas.

### **G-11.6a Agricultural chemicals approved for use on the crops being grown are stored separately from agricultural chemicals used for other purposes (R)**

Instructions to growers: Only the agricultural chemicals currently in the approved agricultural chemicals list are kept in the storage area. Agricultural chemicals used for purposes other than application on crops within the rotation for the last 12 months are clearly identified and stored separately within the chemical storage area.

### **G-11.7 All cleaning agents shall be appropriate for use on food contact surfaces**

All chemicals used for cleaning or sanitizing of food contact equipment, tools, utensils, containers and other food contact surfaces shall be approved for that use, according to the chemical manufacturer or supplier and all federal, state and local requirements, and shall be used in a manner consistent with the approved use.

### **G-11.8 Compressed air or other gases that contact food or food contact surfaces must be maintained in a manner that does not serve as a potential source of product contamination (R)**

Air and compressed gases are not used in commercial potato production at the field level. Compressed air is used only in machine maintenance applications (air tires, etc.) and is not related to food safety. Fans may be present on the harvesters to support the removal of vine material during harvest, but this is not compressed air. All equipment is washed with water and/or a formulation of water with sanitizer prior to use and does not rely on compressed air or gases. Packing and processing applications of compressed air occur in the next step of the supply chain and are out of scope of this audit.

## **G-12: WASTE MANAGEMENT**

### **G-12.1 Operation has implemented a waste management plan**

State the nature of trash receptacles, where they are located, and how they are protected from infestation.

Our procedure for control, storage, and disposal of trash, litter, and waste in produce handling areas involves trash receptacles strategically located in break areas, near restrooms where hand washing takes place, and near parking areas where employees might use their vehicles during breaks. Trash receptacles are placed so they cannot be tipped over and have plastic-bag liners lids that prevent access by vermin, insects, and birds. There is no wastewater in our operation.

### **G-12.2 Trash shall not come in contact with produce (M)**

State how you handle the trash on your farm, how often it is removed, and where it goes (landfill, incinerator, etc.). Provide the name of the sanitary service.

Trash receptacles are dumped into the large dumpster at least once a week. The commercial sanitary service empties our dumpster once a week. Whenever possible, we try to recycle plastics, papers, and some metals/glass. If we have a large volume of any of the aforementioned items that are of recyclable quality, they are taken to the local community recycling drop-off location. All garbage cans are maintained to prevent contamination of product.

## **G-13: FOOD DEFENCE**

### **G-13.1 Operation shall assess the potential for unauthorized access to growing and/or packing areas and its impact on food safety (A, M)**

Operation shall demonstrate an awareness of site security and, if deemed necessary for food safety, take reasonable measures to minimize the potential for unauthorized access to growing and/or packing areas.

The individual in charge of site security should be able to discuss food safety risks associated with unauthorized access and measures taken to minimize this risk.

### **G-13.2 Operation shall develop and emergency response plan (WP, R)**

Prepare a response plan should a security event potentially impact food safety. Action taken to reduce risk to product shall be documented by means of an incident report or other record of response.

### **G-13.2a Initially and at least annually thereafter, the operation shall evaluate and document the risks associated with security (food defense), including unintentional security risks (A, M)**

At the beginning of each season, we conduct a risk assessment to identify potential food security issues given our new situation every year that includes new fields under cultivation and new water sources. We survey areas surrounding our fields, including roads, crops, residences and livestock, and consider their impact on our potatoes.

### **G-13.2b There shall be a written food defense plan to mitigate risks identified in the food defense risk assessment (WP, R)**

All irrigation, planting, harvesting and transportation equipment is routinely inspected for unauthorized use or potential incorporation of unauthorized chemicals or substances into water or chemical application systems.

All fields are routinely monitored for unauthorized entry. Workers are instructed to conduct visual inspection in the field, on harvesters, at transload, and other production sites to remove foreign material. The presence of suspicious activity or unauthorized personnel on the farm is reported to management. Management routinely observes production area and crews for evidence of sabotage, destructive mischief, or other malicious acts.

Many access roads require a high-clearance vehicle, motorcycle, or quad to enter the production area. The rugged road conditions preclude many potential trespassers. Production areas near the time of harvest have signage stating that entry is restricted near key access points. Additionally, our employees will note any unauthorized vehicle activity near the production area and report them to management.

In accordance with state and federal law, wells are sealed to prevent both advertent and inadvertent contamination. Backflow prevention devices further prohibit contamination by acts of sabotage. Columbia Basin Irrigation District water main canals are protected by high fences and deep cemented canals, making intrusion challenging and acts of sabotage difficult. The district managed system is carefully monitored for signs of tampering by staff.

The grounds and facilities are routinely monitored by staff members, who live on and near the farm. Our employees are our security personnel, and quickly identify unauthorized activity on the farm. Additionally, other security strategies have been employed on the property.

Each member of the farm crew has been trained to report any unauthorized personnel or suspicious activity to management. If they believe the situation calls for police presence, they are instructed to call 911.

High risk areas, such as machine shops, fertilizer sheds, and areas where other expensive equipment and tools are stored are kept locked after dark and when not in use. In addition to locks on the doors, the areas are kept well-lit wherever electrical access permits.

If cameras are at use on your farm: In key locations on the farm, cameras record movement and record unauthorized entry into structures.

Proximity to residential structures or farm worker housing: Some key structures and equipment storage areas are in close proximity to dwellings of farm workers, where the property can be monitored regularly for suspicious activity.

Prior to use, equipment is washed and carefully inspected for both mechanical problems and issues associated with tampering. Employees carefully inspect wiring, locations of fuel input, and other target elements of each piece of equipment prior to use.

Whenever possible, equipment is stored in an area that prevents tampering, such as a building or gate enclosure. Where gated areas and enclosures are not accessible, careful monitoring of the equipment is undertaken by staff and farm owners.

Managers in charge of security are offered training on safety and security practices on farms and rural properties. Managers and supervisors sign a form verifying that they have completed the said training and understand their responsibility in preventing crime and other malicious acts against the farm.

## G-14: FOOD FRAUD

### **G-14.1.a The operation shall initially and at least annually thereafter, evaluate and document the risks associated with food fraud (A, M)**

#### Food Fraud Risk Assessment

1. Risk of non-food grade packaging
  - a. Risk is mitigated by packinghouse having longstanding contracts with established suppliers of poly bags and boxes. Certifications of quality sourcing are on file for packing suppliers. This information is held and maintained by the packinghouse.
  - b. Food fraud plan to reduce risk associated from packing materials: The packinghouse will only purchase packing materials from approved suppliers with proper certificates of authenticity on file.
2. Risk of counterfeit propagation material
  - a. All potato seed used on our farm is certified by the USDA and subject to inspection. Furthermore, we have long-standing established relationships with our potato seed suppliers.
  - b. Food fraud plan to address counterfeit propagation material: The farm shall only purchase USDA certified seed from approved seed growers.
3. Risk of counterfeit pesticides, herbicides, or fertilizers
  - a. All products purchased and used on our farm come from established providers and have federal labels. We purchase chemicals and fertilizers from approved suppliers with which we have long-standing relationship.
  - b. Food fraud plan to address counterfeit pesticide, herbicide, and fertilizers: All pesticides and herbicides must be delivered with an approved federal label. Fertilizers will only be purchased from reputable approved suppliers and must have composition test results available for the product.

#### SECURITY TRAINING

The lead security officer and responsible party on the farm is (Name). All non-emergency security incidents shall be reported to the lead security officer.

In case of emergency, always call 911. Do not confront a trespasser or criminal on the farm. Call the police immediately. Retreat to a safe area and record the license plate of the individual if possible. Note details of their appearance and report what was seen to the police.

Ensure that security lights remain on after dark and any failed bulbs are promptly replaced. Note any suspicious vehicles or personnel near the farm to the security officer.

Always lock chemical and equipment sheds. Double-check door handles and locks before leaving the farm for the evening.



Learn and remember the locations of water main shut-offs and electrical panels.

Remind members of the field staff to always be watchful for unusual activity.

Theft of four-wheelers from farms is very common in Washington State. Secure the quads in the evening before leaving the farm and be vigilant when parking near access roads or easily accessible areas.

Record serial numbers of farm equipment that is easily stolen, like quads and motorcycles, in an easily accessible place.

Collaborate with neighboring farms to watch for potential criminal activity.

Stay informed of local crime trends on farms and ranches in the area by reading local media reports and requesting information from law enforcement officials when appropriate.

NAME OF EMPLOYEE: \_\_\_\_\_

TITLE: \_\_\_\_\_

DATE: \_\_\_\_\_

**G-14.1.b There shall be a written food fraud plan to mitigate risks identified in the food fraud risk assessment (WP, R)**

**F: FIELD OPERATIONS AND HARVESTING**

**F-1.1 The food safety plan shall, initially and at least annually thereafter, evaluate and document the risks associated with land use history and adjacent land use including equipment and structures (A, M)**

Our farm takes risks associated with land use seriously and conducts an annual evaluation of each field. On leased ground, we track the history of past crops and document rotations. Risks from adjacent land are noted in our pre-plant checklist and mitigated as necessary.

We surveyed the ground before planting to determine that no risks were present.

DATE: \_\_\_\_\_

SUPERVISOR/MANAGEMENT SIGNATURE: \_\_\_\_\_

## Land Use Risk Assessment

Name of Operation: \_\_\_\_\_

Land-related food-safety risk factors include prior use as a dairy, feedlot, homestead, or waste disposal. For each field, presence/absence of these and other risk factors is noted, including location in field. Corrective actions are documented.

Completed by: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Field	Date	Conditions	Corrective Actions Taken
		Previous crop: Former homestead? Livestock production? Waste/chemical spillage or disposal?  Other:	
		Previous crop: Former homestead? Livestock production? Waste spillage or disposal? Other	

**F-1.1.a Operation has performed and documented a risk assessment of each production area prior to the harvest of that location. The risk assessment must include potential cross contamination between production sites (A, M)**

### Risk Assessment

#### Self-Inspection

This farm has undergone food safety audits for several years and has records of previous GAP audits on file for review.

The farm undergoes a self-inspection of the entire farm, review of risk assessments, and evaluation of supporting policies at least once a year.

### Traceability

A traceability program is established for the operation. Each seed lot, production field, harvested load, storage facility, and delivered load has a unique identifier and records are kept for all of the operation's product. Each storage building is accompanied by records of the production field(s) held in building.

Fields are coded either numerically or by field names. Addresses, maps, and (in some cases) GPS coordinates for each field are kept on file. Planting, crop protectant applications, fertilizer applications, and harvest records all utilize the same system of coding.

A mock recall is completed at least once a year, demonstrating trace forward and trace back procedures on the farm.

### Ground History

Fields known to be former feedlots, dairies, dumpsites, old homesteads, barn sites, livestock pens, areas containing excess foreign material, or those that are otherwise contaminated will not be cultivated for potatoes.

All fields are required to be inspected to ensure they are free from foreign material contamination or any hazards caused by the dumping of glass, metal, chemicals or any other undesirable debris. The date of inspection (pre-planting assessment) and documentation is available on file.

During the past three years no domestic sewage, sewage sludge, septic waste, portable toilet waste or other product that might contain human feces has been placed on or near the growing area.

During the past three years no flooding from creeks or rivers has occurred on any part of the land, nor have any adjacent domestic septic tanks systems flooded onto the field.

### Adjacent Land Use

Domestic animals are not allowed in fields during the growing and harvesting season. Measures are taken to ensure that animal waste from any nearby fields, feedlots or waste storage facilities does not contaminate production fields. Measures are taken within the parameters of federal wildlife laws to limit the presence of wild animals in production fields.

### Land Management of Potential Hazards

Possible **biological hazards** to land include inadvertent livestock intrusion. In the event of livestock intrusion, the animals will be promptly removed from the area by herding on foot until they have exited the production field. Any manure deposited during an intrusion will be removed using a shovel and placed in a disposable plastic bag. A 5 ft 'no-harvest' sacrifice zone around the fecal event will be established. Soil and product surrounding the manure event will also be

removed and disposed of. The waste will be placed in a trash receptacle far from the production area.

Possible **chemical hazards** to land include an inadvertent chemical spill occurring in the production area. If a chemical spill occurs, the soil and area will be treated according to label recommendations and the Washington State Department of Agriculture will be notified if the scope of the spill is of reportable size and significance to public health.

**Physical hazards** associated with land include the presence of foreign material such as golf balls, scrap metals, or trash. During preparation of the soil each season, the tractor operators vigilantly scan for the presence of such physical hazards to production and remove any hazards that may damage equipment or harm workers.

A pre-harvest assessment of all fields is conducted to ensure that land, equipment, and facilities are in good condition for harvest operations. Items in the assessment include field sanitation facilities, harvest and transportation equipment, and possible contamination by animals, chemicals, fuels, etc.

#### Irrigation Water / Potable Water

Surface waters and wells are protected from livestock. Controls are in place to minimize contamination of agricultural waters from other farm or animal operations. Well water must be tested for harmful microorganisms once a year, and surface water must be tested three times per growing season. Available local, state and federal analysis from irrigation districts and major waterways are acceptable for irrigation water. Water applied to harvested product must have a water test on file from the current growing season. All water analyses documentation is available on file.

**Biological hazards** associated with irrigation water include contamination with biological organisms of human health significance. The water is tested by a professional laboratory and the results are carefully analyzed upon receipt.

**Physical hazards** associated with irrigation water include the structural failure of center pivots and debris in large canals. Employees check the structural integrity of pivots before irrigation commences, and ensure that the systems are properly maintained. Canals are largely maintained by the irrigation bureaus who mitigate risk to their employees working with the systems via education, proper training, and oversight. The canals are routinely inspected for foreign material and debris.

#### Manure

Composted manure and other organic fertilizers may be applied, depending on the field, season, and crop rotation. Applications of organic fertilizers is always in keeping with assessed risk and application mitigates potential impacts to human health.

#### Pesticides and Fertilizers

Any pesticide, fertilizer or growth regulator applied to the potato crop either pre-harvest or post-harvest is documented and kept on file. These records are often digital and kept within a service

provider's database, accessible easily and quickly by computer or mobile phone. Company personnel applying regulated material have their name and pesticide license on file. Company workers handling pesticides and fertilizers are knowledgeable of the purpose and proper use of the product(s).

In the production, transportation and storage of the potato crop, only those pesticides that are lawfully registered under the Federal Insecticide, Fungicide and Rodenticide Act and other applicable laws and regulations and which are labeled for use on potatoes by all applicable laws and regulations are used.

**Biological, chemical and physical hazards** associated with pesticide use and application are mediated by instructing employees to always strictly follow the label specification in accordance to state and federal law. Employees report spills of product to management and are trained to identify the risks of exposure, use protection equipment, and employ proper application techniques.

### Equipment

Harvesting and transloading equipment is cleaned and washed before use, and the date of cleaning and washing is documented and kept on file.

Food grade lubricant is used on all product contact surfaces and contact areas of equipment.

Before and during harvest, equipment is cleaned and maintained to prevent contamination from leaking oil, industrial lubricants, or faulty parts. Product contaminated with oil, grease and any other source of foreign material is disposed of and put into garbage containers. Equipment is cleaned, washed and inspected after a contamination event.

Light bulbs, glass and plastic on harvesting equipment are protected so as not to contaminate produce or fields in case of breakage.

Should glass break on harvesting equipment, workers will cease operation immediately. Product contaminated with broken glass or plastic will be disposed of and put into garbage containers which are emptied regularly. Equipment will be cleaned, washed and inspected after a contamination event.

Workers are instructed to inform supervisors of equipment leaks or breaks. Any evidence of leakage or breakage contamination will result in a cessation of work until the issue is resolved.

Vehicles that were previously used to haul domestic sewage, manure or hazardous material are not used for transporting potatoes.

Vehicles used to transport potatoes are cleaned and washed before harvest.

Vehicles transporting potatoes are not used to haul any other products during harvest.

Vehicles leaving the farm and traveling specified distances on public roadways will utilize tarps or coverings to protect the product.

Our farm primarily utilizes water trucks and tankers for dust control. The trucks are cleaned each year before use, and the dates of sanitation are noted in the log. The trucks are filled with water that has been water tested; such as well or irrigation source water. We do not fill the water tanks or trucks with anything other than water when not in use.

**Chemical and physical risks** associated with vehicle use include leaking of fuel lines and oil seepage. These risks are mitigated by properly maintaining and cleaning equipment before use each season. Farm managers and employees are trained to look for leakages on equipment and report it for maintenance. Physical risks associated with vehicles and equipment is mitigated by avoiding glass components on tractors and implements, and ensuring that the implement parts are secured and in proper working order before entering a production area.

Equipment repair procedures: At our farm, the bulk of equipment maintenance and repairs occurs in the winter months and offseason. At the end of each season, the equipment is cleaned, inspected, and stored. Any routine repairs such as oil changes are completed.

Equipment cleaning procedures: Equipment is thoroughly cleaned at the beginning of each season and before use. We use water that has been tested to clean equipment. Antimicrobial agents are also used in the cleaning process. The employees record their progress in equipment cleaning in the log.

Equipment storage procedures: Small equipment is stored inside and out of the weather whenever possible. Tractors, trucks, harvesters and planters are stored outdoors in a location that prevents contamination. Tractors are not used to move manure and company owned trucks are not used during the off-season to haul anything other than potatoes.

Product contaminated from oil, grease and any other source of foreign material will be disposed of and put into garbage containers. Equipment will be cleaned, washed and inspected after contamination.

Soil that has contacted fuel or oil will be scooped away and disposed of in a dumpster away from the production site. In order to prevent major spills or contamination, fueling is conducted in a designated area. Additionally, oil changes and maintenance of hydraulic systems occur within the designated shop area whenever possible.

Equipment is carefully inspected before use for signs of oil, fuel, and fluid leaks. During the annual equipment cleaning, employees check for physical hazards such as loose bolts or parts that are not well secured.

Vehicles, equipment, tools, and utensils are never used to move manure or located near point-source contaminations, such as livestock pens.

Additionally, foreign material is not permitted in the field which could cause a physical hazard, such as loose tie-wire and unmarked metal stakes. Employees are aware of the dangers of foreign material and scout for physical hazards during the growing season and harvest.

## Worker Health and Hygiene

On our farm, smoking, chewing tobacco, chewing gum, eating, drinking, defecating, urinating and spitting are prohibited anywhere in the growing, storage, transload, and production areas. Signs are posted as reminders. Employees caught doing any of the aforementioned violations are subject to our disciplinary policy.

Consumption of food and drinks are restricted to the designated location at least 50 feet away from harvested or unharvested product. Enclosed vehicles may be used as a designated location if they are outside of the field and away from the product.

Bottled water may be consumed inside the production and harvest area, but must be commercial bottled water or from a source with a water test within the last year. The bottle must be clean and composed of shatter-resistant plastic.

All workers have been trained in good hygiene policy and practices. Dates of training for each worker are documented and kept on file.

All visitors, contractors and employees must adhere to these policies upon entry to the location of the field crop or wherever the crop may be handled.

The food safety officer and/or farm manager is responsible for educating employees and visitors on the farm's policy with regard to hand sanitation, location of acceptable areas for consumption of food, and use of tobacco products. He/She will maintain the responsibility of placing appropriate placards to indicate where designated hand washing, eating and tobacco use areas are to be located on the premises.

All workers and visitors must use restrooms provided. Restrooms have water to wash with, single-use hand towels, toilet paper, and hand soap. One toilet facility and one hand washing facility are provided for each 20 employees or fraction thereof. Signs are posted in all bathrooms instructing employees to wash their hands before beginning or returning to work.

All employees must wash hands before starting work, after using restrooms, after eating, and before returning to work after any break. After eating or using the toilet, employees must use soap, water, and a single-use hand towel. **Water used for hand washing and cleaning must meet the safe drinking water standard, and water tests are kept on record.**

All sanitation units are cleaned and resupplied, with the date of service located in the unit and cleaning records kept on file. All sanitation units are easily accessible for servicing and for emergency cleanup. Care is taken to place sanitation units where any spills will not result in contaminated food product.

If a portable toilet is tipped over, damaged or leaking, it will be repaired or replaced immediately. Contaminated soil around it will be removed. Workers are instructed to inform supervisors of leaks or evidence of leakage contamination near toilets.

Bottled water is provided to all workers, and receipts of purchase are available on file. Only bottled and/or potable water is acceptable in work areas. It must be stored in clear plastic bottles with a closure and stored below the product flow zone. While bottled water is preferred for field

workers, potable water from a source with a water test within the last 12 months may be permitted.

Workers are not permitted to wear jewelry, watches, clothing with sequins or studs, bobby pins, false eyelashes and eyelash extensions, long nails, false nails, and nail polish. A worker may wear a single gold band if there are no stone insets. If nail polish has been applied to the hands, it must be covered with gloves.

Employees with exposed boils, open sores, open and/or infected wounds or any source of abnormal contamination are prohibited from contact with product and food packaging. Bandages must be covered with a non-porous covering such as a plastic glove. In the unforeseen instance where labor is supplied by a contracted company, this policy is available, along with other food safety policy guidance for the contracted crew. Workers are instructed to report illness and injury their supervisors immediately. Workers who show up sick are sent home. Workers experiencing gastrointestinal distress are sent home. All workers know the location of clean first aid supplies. Records of worker illness and injury are kept on file.

#### Glass Policy

Glass and brittle plastic containers are not permitted in fields, storages, packing facilities or near the harvest operation.

Light bulbs, glass components, and plastic coverings on harvesting equipment are to be protected so as not to contaminate produce or fields in the case of breakage.

Should glass or brittle plastic break on harvesting equipment, workers will cease operation immediately. Product contaminated from broken glass or brittle plastic will be disposed of and put into garbage containers which are emptied regularly. Equipment will be cleaned, washed, and inspected after contamination.

Glass light bulbs on center pivots occur only over the pad. Glass lights on pivots do not extend over the product. During routine pivot inspections, workers will observe the light bulbs so that any broken or malfunctioning light is identified quickly and is not a source of contamination. In the event that the pivot lightbulb should break, product within 30 feet of the pad will not be harvested.

#### Blood and Body Fluids Policy

Product that has come in contact with blood or other body fluids will be disposed of, burned or put into safe garbage container. Machinery that has come into contact with blood or other body fluids will be disinfected with bleach or other safe disinfectant. As with fecal contaminants, a 'no harvest zone' of a 5-ft radius will be observed around any blood or body fluid event in the field.

Workers are instructed to inform supervisors of product or equipment contact with blood or other body fluids, or any evidence of contamination.



### Infant and Toddler Policy

Infants and toddlers are not permitted in the production area. Small children may not enter storage facilities or contact harvesting equipment. Small children may never be present near or around the harvest crews.

### Visitors

All visitors to the farm are required to sign a log sheet upon entry.

### Garbage Management Policy

Garbage containers are provided and maintained in the eating area.

### Pest Control Program

Large animal pests include deer, coyotes, geese, ducks, and other migratory birds. These large pests are controlled using noise deterrents within the legal protective parameters of state and federal wildlife regulations. Large pests are chased from fields using the honking of vehicle horns, shouting, human foot traffic where possible, and waving of arms.

Small pests consist mainly of rodents. Potatoes undergo several stages of tilling and cultivation, which assist in control of the small pest population. Potato fields are treated in the spring or previous autumn with a fumigant to control pathogenic fungi and nematodes. The fumigant application process may involve a deep shank injection application followed by a water seal. The process turns over the soil and causes a disturbance, creating habitat that is not conducive for rodents. Planting of potato seed results in creating furrows in the soil and placing the seed pieces and fertilizer applications an average of 6 to 8 inches deep. This process disrupts rodent dens. After emergence, the common practice of hilling pushes additional soil onto the base of the potato plants from the furrow. This disturbance is unfavorable to rodents. Any rodents that may have tried to establish populations in the field at the time of harvest are readily disturbed and displaced in the digging process.

Potato packaging occurs within the packinghouse. Packaging materials are stored at the packinghouse location, thus are not present at the farm/ranch site or observable under the scope of this audit.

Harvest equipment primarily consists of large tractors which pull diggers with chains that carry potatoes from the ground and onto a truck through a conveyance process, eliminating vines and soil. Tractors and harvesters are stored outside in an open and clean area. Tractors and harvesters are open to the weather and do not offer the secure and confined habitat preferred by small rodents. Rodent nesting is not common on the harvest equipment when not in use. Prior to each harvest season, the tractors and harvesters are carefully inspected and cleaned. All possible sources of contamination are washed from the equipment using water that has been tested and an antimicrobial agent.

Rodents are controlled in the storage areas for tools and equipment undergoing repairs. Additional storage areas include chemical sheds and maintenance outbuildings. Rodents may be

controlled through bait stations and mechanical traps, depending on the location and specific rodent control need.

Where a third part rodent control service is used, records of bait stations and applicator licenses shall be available with pesticide application records. Bait stations and other pest control pesticides are NEVER used inside structures and never used in proximity to potato product.

### Security

All irrigation, planting, harvesting and transportation equipment is routinely inspected for unauthorized use or potential incorporation of unauthorized chemicals or substances into the water, chemical application system, or equipment.

All fields are routinely monitored for unauthorized entry. Workers are instructed to conduct visual inspection in the field, on harvesters, at transload, and other product sites to remove foreign material.

Training on farm security, theft prevention, acts of sabotage, and risk of criminal activities has been provided to management on the farm and records of training are kept on file.

### Storage and Transportation

Storages are sufficiently sealed to be protected from external contamination by birds, rodents and other pests. Door seals are checked each year. Rodent traps, when present, are always outside of storage buildings and are regularly emptied and serviced.

Nonfood-grade substances such as pesticides, fertilizers, lubricants and paints are not stored in the product storage facility. Storage facilities and surrounding areas are inspected for cleanliness, condition, and foreign material prior to loading with product. Documentation is on file showing date of inspection and inspector's name.

Potato storage buildings are thoroughly sanitized and climate control equipment cleaned prior to loading each year. Records are kept of sanitizing schedule, personnel responsible, and methods used.

Measures are taken to exclude animals and pests from the storage facility. There is an established pest control program for the storage facility. Service reports for the pest control program are documented and on file.

Potable water is used for cooling and humidification. Water tests are available on file.

Prior to loading, conveyances are clean, in good physical condition and free from disagreeable odors. Equipment used to move product is never loaded with potentially contaminating substances. Conveyances are maintained so that minimal damage to product occurs. All product is transported to storage or packing/processing facility in a way to avoid extremes in temperature that might damage product.

Temperatures of the stored potatoes are regularly checked and recorded in a log. If temperature monitoring is not done automatically by a computer monitoring system, a handwritten log is kept.

### **F-1.2 For indoor growing and field storage buildings, buildings shall be designed, constructed and maintained in a manner that prevents contamination of produce (M)**

The auditor will observe that buildings and equipment can be cleaned and maintained to prevent product contamination. If certain parts of the operation are not part of the audit, clearly document what buildings and/or structures are exempt from the audit, for example, a field storage facility that is used for equipment and tools, but not food handling. This structure would not be applicable to Requirement F-1.2 unless the auditor observes that the facility poses a food safety risk to produce. Buildings subject to the requirements include (a) any fully or partially-enclosed building used for growing, harvesting, packing and holding activities, including minimal structures that have a roof but do not have any walls and (b) storage sheds, buildings or other structures used to store food contact surfaces (such as harvest containers and food-packing materials).

### **F-1.3 Sewage or septic systems are maintained so as not to be a source of contamination (M)**

Describe sewage or septic system and address how it is maintained, by location or otherwise, so it would not contaminate product following a flood event or earthquake. Describe how such an event could be or was mitigated to keep sewage from contaminating product.

## **F-2: Water System Description**

### **F-2.1 A water system description shall be available for review (WP, M)**

Instructions to growers: Maps must be provided to the auditor showing locations of wells, ponds, and canals, include septic tanks, leach fields, and sewage conveyance locations. If personnel are trained to inspect pumps and valves, records of training should be on file. If future upgrades are planned, have an operational plan for irrigation improvements on file.

Please see this website for updated information on the Columbia Basin Project management plan and current data: <https://www.usbr.gov/projects/index.php?id=438>

### **F-2.2 The water source shall be in compliance with prevailing regulations**

Information for grower: This question requires that water use licenses and agreements be available for inspection on audit day. Supporting documents may include water use rights, reports from the Bureau of Reclamation and other legal agreements.

### **F-2.3 Water systems shall not be cross-connected with human or animal waste system (M)**

Our water system does not convey human or animal waste.

## **F-3: WATER SYSTEM RISK ASSESSMENT**

### **F-3.1 An initial risk assessment shall be performed and documented that takes into consideration the historical testing results of the water source, the characteristics of the crop, the stage of the crop, and the method of application (A, M)**

#### Water System Risk Assessment

Potatoes are not a ready to eat food and grow under the soil. These aspects are taken into consideration when mitigating risks associated with water quality. Our farm has access to both well water and Bureau of Reclamation water from the Columbia Basin Irrigation project. All of our wells are tested at least once a year via a commercial lab and the results are carefully evaluated. We have determined our wells to be low risk and assessed the food safety risk to be acceptably mitigated with yearly testing. Should a well ever test high for contaminants, we would cease irrigation and immediately try to locate the point source of contamination. We would work with local officials in an attempt to identify the nature of contaminants and evaluate the scope of food safety risk in relation to the timing of growing season, the end use of the product, and the possible public health impacts. Risks to underground aquifers utilized in irrigation include but are not limited to residential septic systems, failure of backflow devices, and contaminant leaching.

Our farm also receives water from the Columbia Basin Irrigation Project. Our farm draws irrigation district water from (enter canal locations). Water in this system is monitored by the irrigation districts for quality and quantity. The water is regularly tested throughout the season and is managed as a community resource. As the source of the water in this system is the Columbia River, the network of canals is complex and contaminants can be dealt with in a number of different ways. We deem the risks associated with this water source to be relatively low and rely on our community partners at the irrigation district to assist in mitigating the risk of contamination throughout the system.

The risk of chemical contamination was deemed low for this year, as all our pesticide mixing and staging areas are away from open canals and water sources. Pesticides are applied at label rates to avoid leaching. Water from a tested source may be used in chemical spray mixes. When water is used in spray applications, water tests are kept on file. Water is not used in any other pre-harvest operations.

The risk of biological hazards is relatively low and is mitigated through annual water tests. Biological hazards would be identified through tests with high microbial counts, and we would contact the irrigation district to assist in identifying the source of the biological contaminant.

The risk of physical hazards is relatively low, as foreign objects within the water supply on a closed-well system are unlikely. Furthermore, canals are regularly cleaned to prevent buildup of physical debris. Physical debris are incapable of entering the field through the water system, as we utilize center pivots in our field with sprinkler heads and pipes too small for physical hazards to pass through.

Our hazard control procedure includes routine maintenance of center pivots and scouting our water sources before planting each year. We continue to monitor our water system throughout the season. We collaborate with the irrigation districts to identify hazards associated with a community managed water system, and the districts manage hazards by use of regional ditch riders trained in hazard identification and mitigation. Water not intended for use in food production is not available on site.

WATER MANAGEMENT RISK ASSESSMENT AND HAZARD CONTROL PROCEDURES  
REVIEWED BY:

NAME : \_\_\_\_\_  
DATE: \_\_\_\_\_

**F-4.1 There shall be a water management plan to mitigate risks associated with the water system on an ongoing basis (WP M)**

WATER MANAGEMENT PLAN

Preventative Controls: On our farm, the primary control points are at the well pump and the series of canals that carry water to our fields. All wells are fitted with anti-backflow devices to prevent aquifer contamination. Additionally, we maintain and clean canal ditches on our property in collaboration with irrigation district personnel.

Monitoring and Verification Procedures: We monitor our wells annually via visual inspection and water tests. Leaking pumps or malfunctioning mechanisms are promptly replaced. Irrigation canals are monitored as part of the assigned duties of the ditch riders, who play a key role in the maintenance and upkeep of the system. Ditch riders conduct daily checks of canals feeding the region of my farm, and verify that the source canals are free of obstruction and obvious contaminants.

Corrective Actions: Records of canal maintenance activities are held by the regional irrigation districts. Annual repairs of ditches and feeder canals are incorporated into the management plan for the Columbia Basin Irrigation District. When our farm notes anything amiss with a water system, we promptly replace the faulty part or remove any source of contamination.

Date	Issue Observed	Initials of Employee	Action Taken
July 2, 2014	Leaking circle	JD	Stopped circle and repaired the leak
August 2, 2014	Tumbleweeds built up in canal	JD	Removed weeds with a rake to allow water to flow

Documentation: Our farm has current water tests on file. Test are conducted annually. Additionally, we keep a log of water-related corrective actions.

Training and Retraining of Personnel: Water provided by the Columbia Basin Irrigation District is managed by trained professionals in each district. Ditch riders receive both training and mentorship from their dispatching office. Additionally, our employees are in communication with ditch riders, who assist in providing cross training on any issues of concern relating to the irrigation system. Employees are given training regarding the proper use and maintenance of center pivots on our farm. All water system maintenance training is conducted by the farm manager and operation of irrigation systems occurs under supervision until the employee is fully trained.

#### REVIEW OF WATER MANAGEMENT PLAN

NAME OF EMPLOYEE: \_\_\_\_\_

DATE: \_\_\_\_\_

## Agricultural Chemicals /Plant Protection Products

### **F-2.1 Use of agricultural chemicals shall comply with label directions and prevailing regulation (R, M)**

Have all of your chemical application records available for review. Include all applications made by commercial companies and contract applicators. These must be current and show rates consistent with the label specifications. The auditor may ask to see a label for a product to ensure that it is registered for use on potatoes. Ensure that you have access to product labels during the audit. Electronic access is sufficient.

### **F-2.2 If product is intended for export, agricultural chemical use, including post-harvest chemicals, shall consider requirements in the intended country of destination**

The country of origin for our potatoes is not always known at the time of harvest. However, we always apply registered products at the labeled rates, therefore complying with MRLs for most markets. If we know which country we are going to export our potatoes to, we comply with MRLs by utilizing the MRL database at: <https://www.globalmrl.com/db#login> . Our policy on MRL is to strictly adhere to the label requirements, and thus fulfill the majority of MRL requirements for domestic consumption and export.

### **F-2.3 Agricultural chemicals shall be applied by trained, licensed and certified application personnel, as required by prevailing regulation (R)**

Our farm does not permit the application of pesticides without oversight by an employee or contracted applicator with a current Washington State Department of Agriculture Pesticide Applicator's License. We can verify the validity of a license by using the WSDA website: <http://agr.wa.gov/PestFert/LicensingEd/Search/>

Insert copies of the pesticide licenses held by your employees. Also ensure that your spray records include the name of the applicator, and the applicator license number he is working under.

### **F-2.3 Water used with agricultural chemicals shall not be a source of product or field contamination (R)**

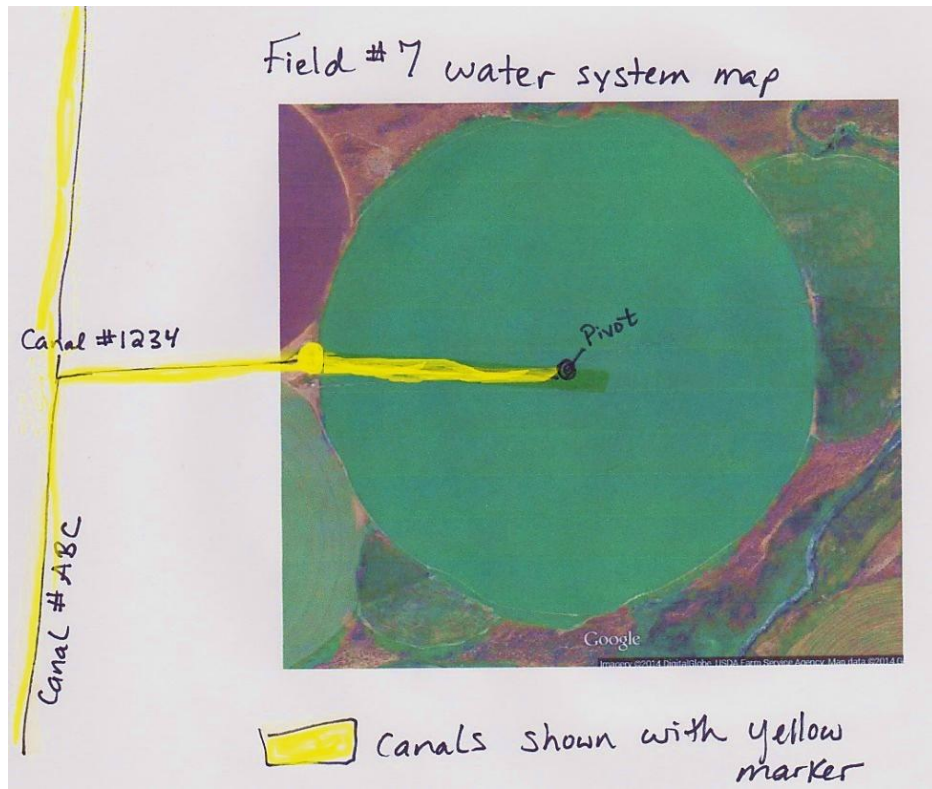
Water used to dilute or deliver agricultural chemicals shall be from a source in compliance with the Water System Risk Assessment and Water Management Plan, consistent with current industry practices or regulatory requirements for that commodity.

### **F-2.4 Agricultural chemical disposal shall not be a potential source of product or field contamination (R)**

Operation shall have procedures for disposal of waste agricultural chemicals and for cleaning of application equipment that protects against contamination of product and growing areas.

### **F-3.1 A water system description shall be available for review (WP, M)**

You must have a map of EACH potato field that is part of your farm. The map must show the source of the water, and where it enters the field. If you are using Columbia Basin Irrigation District water, list the name of the canal that sources your water. Be as specific as possible. You need to show where the pipes feed your circle. The easiest way to do this is to go to Google maps and print out colored copies of your fields. Take a highlighter and hand draw the locations of your water sources on each field.



### **F 3.2 The water source shall be in compliance with prevailing regulations**

Our farm applies both well and Columbia Basin Irrigation Project water in a manner consistent with federal and state law. Irrigation water channeled through the Columbia Basin Irrigation Project is subject to regional governance, ensuring appropriate allocations and management. Likewise, fields irrigated with wells have obtained all necessary permits and water-right authorizations prior to installing center pivots or other irrigation systems.

### **F-3.3 Agricultural water systems shall not be cross-connected with human or animal waste systems (M)**

All of the water systems on our farm are well or center pivots fed by canals from the Columbia Basin Irrigation Project. These systems do not cross-connect with any human or animal waste water systems. Furthermore, the integrity of these systems is regularly verified by laboratory testing.



## F-4: WATER SYSTEM RISK ASSESSMENT

**F-4.1 An initial risk assessment shall be performed and documented that takes into consideration the historical testing results of the water source, the characteristics of the crop, the stage of the crop, and the method of application (A, M)**

### WATER SYSTEM RISK ASSESSMENT

Our farm has access to both well water and water via the Columbia Basin Irrigation project. All of our wells are tested at least once a year via a commercial lab and the results are carefully evaluated. We have determined our wells to be low risk and assessed the food safety risk to be well mitigated with yearly testing. Should a well ever test high for contaminants, we would cease irrigation and immediately try to locate the point source of contamination. We would work with local officials in attempt to identify the nature of contaminants and evaluate the scope of food safety risk in relation to the timing of growing season, the end use of the product, and the possible public health impacts. Risks to underground aquifers utilized in irrigation include but are not limited to residential septic systems, failure of backflow devices, and contaminant leaching.

Our farm also receives water from the Columbia Basin Irrigation Project. Water in this system is monitored by the irrigation districts for quality and quantity. The water is regularly tested throughout the season and is managed as a community resource. As the source of the water in this system is the Columbia River, the network of canals is complex and contaminants can be dealt with in a number of different ways. We deem the risks associated with this water source to be relatively low and rely on our community partners at the irrigation district to assist in mitigating the risk of contamination throughout the system.

The risk of chemical contamination was deemed low for this year, as all our pesticide mixing and staging areas are away from open canals and water sources. Pesticides are applied at label rates to avoid leaching.

The risk of biological hazards is relatively low, and is monitored with annual water tests. If biological hazards were identified through tests with high microbial counts, and we would contact the irrigation district to get assistance in identifying the source of the biological contaminant and determine the best means of mitigating the risk.

The risk of physical hazards is relatively low, as foreign objects within the water supply on a closed-well system are unlikely. Furthermore, canals are regularly cleaned to prevent buildup of physical debris. Physical debris are incapable of entering the field through the water system, as we utilize center pivots in our field with sprinkler heads and pipes too small for physical hazards to pass through.

Our hazard control procedure includes routine maintenance of center pivots and scouting our water sources before planting each year. We continue to monitor our water system throughout the season. We collaborate with the irrigation districts to identify hazards associated with a

community managed water system, and the districts manage hazards by use of regional ditch riders trained in hazard identification and mitigation.

**WATER MANAGEMENT RISK ASSESSMENT AND HAZARD CONTROL PROCEDURES  
REVIEWED BY:**

**NAME :** \_\_\_\_\_

**DATE:** \_\_\_\_\_

**F-4.2 Water testing shall be part of the water management plan, as directed by the water risk assessment and current industry standards or prevailing regulations for the commodities being grown (WP, M)**

As noted above, our farm conducts annual water tests of all wells, and where Columbia Basin Irrigation District water is available we rely on district tests to ensure quality. The district tests the water routinely throughout the growing season.

Have water tests available to show auditor for all fields. Every well must have its own water test.

**F-4.3 The testing program shall be consistent with the water management plan (R, M)**

As noted above, our farm conducts annual water tests of all wells, and where Columbia Basin Irrigation District water is available, we rely on district tests to ensure quality. The district tests the water routinely throughout the growing season.

Have water tests available to show auditor for all fields. Every well must have its own water test.

**F-4.4 If water is treated to meet microbiological criteria, the treatment is approved and effective for its intended use and is appropriately monitored (R, M)**

Treatment is approved for its intended use (e.g., EPA-registered antimicrobial pesticide, or registration as required by the prevailing regulation of the country of use) and is delivered in a manner to ensure that the treated water is consistently safe and of adequate sanitary quality for its intended use and/or consistently meets the relevant microbial quality criteria. Treatment is monitored at a frequency adequate to ensure that the treated water is consistently safe and of adequate sanitary quality for its intended use and/or consistently meets the relevant microbial quality criteria.

**F-4.5 If post-harvest handling is used to achieve microbial criteria, operation has documentation supporting its use (R, M)**

Post-harvest handling is not used to achieve microbial criteria.

**F-4.6 If operation uses an alternative approach to regulatory microbiological testing, operation has scientific data or information to support the alternative (R, M)**

Our operation does not use alternative approaches to regulatory microbiological testing.

## **F-5: ANIMAL CONTROL**

**F-5.1 The operation has a written risk assessment on animal activity in and around the production area (A, M)**

### **ANIMAL ACTIVITY RISK ASSESSMENT**

As potatoes are grown on large expanses of land, the presence of animal activity is inevitable and unavoidable. Animals present in our fields may include deer, coyotes, rabbits, geese, native prairie songbirds, and several species of snakes. These animals are largely protected by federal game laws and attempts at harassment or removal of these species without a permit would be both unlawful and impractical. Because potato tubers grow underground, are not a ready-to-eat product, we have assessed that the risks associated with wildlife in our fields is low, and this conclusion is supported by the industry-wide risk assessment conducted by the National Potato Council in 2011. Migratory birds frequently land on open water systems near our farm. While we note their presence, removal of these species is not lawful or in keeping with sustainable stewardship of our land. Domestic animals are prohibited from entering our fields. Our employees are not allowed to have dogs in or near our fields during the growing season. During our annual risk-assessment for land-use, we ensure that all bordering livestock are within secured paddocks to avoid intrusion into our growing areas.

#### **RISK ASSESSMENT REVIEWED BY MANAGEMENT**

**NAME:** \_\_\_\_\_

**DATE:** \_\_\_\_\_

**F-5.2 The operation routinely monitors for animal activity in and around the growing area during the growing season (R)**

Fill in the wildlife log each year and keep it continually updated throughout the season. Do not just make one entry a few days before the auditor shows up. Demonstrate you have been watching for animals all season.

**Wild and Domestic Animal Monitoring Log**

Name of Operation: \_\_\_\_\_

<b>Date</b>	<b>Field Designation</b>	<b>Checked for Animals and their Signs</b>	<b>Initials</b>

**Completed By:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**F-5.3 Based on the risk assessment, there shall be measures to prevent or minimize potential for contamination from animals, including domestic animals used in farming operations (WP, R, M)**

As noted in the above risk assessment, employees are not permitted to bring dogs to work or have domestic animals in the growing area. Routine checks of fields ensure that any domestic livestock residing on bordering lands are secured behind appropriate fences and secure gates. We honk our horns when we see geese or deer in the field, but wildlife and game laws prohibit the harassment of these animals and they are deemed to pose minimal risk in potato production. When intruding animals are accompanied by human owners, we educate the person about the dangers to food safety their dog, cat, or horse may cause and request they not permit their pet to enter our field.

**Record of Mitigation or Corrective Actions for Animal Intrusion:**

Date	Issue	Action
June 5 2017	Neighbor’s calf got out of fence	Herded the calf back to their field and informed neighbor to secure the bottom strand of wire
June 15 2017	A jogger attempted to traverse the edge of the field with their dog	The jogger was informed by farm manager that dogs were not permitted near the field for food safety reasons

**F-6: SOIL AMENDMENTS AND ALTERNATIVE GROWING MEDIA/SUBSTRATE**

**F6.1 The food safety plan shall address risk, preparation, use and storage of animal-based soil amendments or biosolids (A, R, M)**

If animal-based soil amendments or biosolids are used, records of composition, dates of treatment, methods utilized and application dates must be documented. Evidence of processing adequate to eliminate pathogens of human concern, such as letter of guarantee, certificate of analysis (COA) or any test results or verification data (e.g., time and temperature) demonstrating compliance with process or microbial standards, shall be documented. Such soil amendments must be produced, handled, stored and applied in accordance with applicable federal, state, or local regulations.

**F-6.2 If a soil amendment containing raw or incompletely treated manure is used, it shall be used in a manner so as to not serve as a source of contamination to produce as required by current industry standard or prevailing regulation (R, M)**

If such a product is used, there shall be documentation of the composition, and time and method of application. Such use will be consistent with current industry practices or regulatory restrictions for that commodity. Untreated human waste shall not be used.

**F-6.3 If an alternative growing media, soil-less media, or substrate not of animal-origin is used (e.g., perlite, peat, coconut fiber, rock wool, clay pebbles), it is appropriate for its intended use and stored and handled in a manner to minimize the risk of contamination (WP, R)**

This operation does not use alternative growing medias.

## **F-7: VEHICLES, EQUIPMENT, TOOLS AND UTENSILS**

**F-7.1 Equipment, vehicles, tools, utensils and other items or materials used in farming operations that may contact produce are identified (R)**

Make a detailed list of all equipment “that may contact produce”. Make sure you identify each truck and implement individually. Don’t just lump all into the category of “trucks” and “tractors”. Also include hand tools, like shovels and rakes.

### **Equipment List**

Date Updated: \_\_\_\_\_

Name of Employee Taking Inventory: \_\_\_\_\_

Item Name and Identification	Location
Shovel (1 per truck, 4 total)	Half-ton company manager trucks
Wheelbarrow	Potato Storage Shed
John Deer Tractor #54	North lot
Planter #3	North lot
Harvester #2	South lot
Piler #4	West end of potato storage shed #2

**F-7.2 Equipment, vehicles, tools and utensils used in farming operations which come into contact with product are in good repair, and are not a source of contamination of produce (WP, R)**

Equipment repair procedures: At our farm, the bulk of equipment maintenance and repairs occurs in the winter months and offseason. At the end of each season, the equipment is cleaned, inspected, and stored. Any routine repairs such as oil changes are completed.

Equipment cleaning procedures: Equipment is thoroughly cleaned at the beginning of each season and before use. We use water that has been tested to clean equipment. The employees record their progress in equipment cleaning in the log.

Equipment storage procedures: Small equipment is stored inside and out of the weather whenever possible. Tractors, trucks, harvesters and planters are stored outdoors in a location that prevents any contamination. Tractors are not used to move manure and company owned trucks are not used during the off-season to haul anything other than potatoes.

You must have a log detailing when all equipment was sanitized. The chart below is an example.

**Equipment Cleaning Log**

**Name of Operation:** \_\_\_\_\_

**Please see the food safety plan for overall equipment sanitation service procedures.**

*	Equipment Description	Date of Cleaning	Cleaned By (name)	Description of Cleaning Process	Supplies Used*

Sanitation supplies used, name of disinfectants, detergents, hot water, etc.

If contracted with cleaning company, attach service/cleaning receipt.

**Reviewed by:** \_\_\_\_\_

**Title:** \_\_\_\_\_ **Date:** \_\_\_\_\_

## **F-7.2a All equipment and instruments which have an effect on food safety shall be identified, adequately maintained and calibrated at a frequency sufficient to assure continuous accuracy (R, M)**

Equipment that comes in contact with product is made of materials that are non-toxic and designed and constructed to ensure that they can be cleaned, disinfected, and maintained to avoid contamination. Maintenance activities shall not present food safety risks. Calibration of equipment with impact on food safety shall be traceable to a national or international standard or method.

Equipment repair procedures: At our farm, the bulk of equipment maintenance and repairs occurs in the winter months and off-season. At the end of each season, the equipment is cleaned, inspected, and stored. Any routine repairs such as oil changes are completed on schedule.

Equipment cleaning procedures: Equipment is thoroughly cleaned at the beginning of each season and before use. We use water that has been tested to clean equipment. The employees record their progress in equipment cleaning in the log.

Equipment storage procedures: Small equipment is stored inside and out of the weather whenever possible. Tractors, trucks, harvesters and planters are stored outdoors in a location that prevents any contamination. Tractors are not used to move manure and company owned trucks are not used during the off-season to haul foreign materials.

Equipment is cleaned using an antimicrobial agent and water prior to contact with product. Water used in the cleaning process is from a tested source on the farm. Equipment is cleaned in areas that prevent run-off or potential contamination. The location where washing occurs has good drainage and is not close to field production areas.

During the annual equipment cleaning, employees check for physical hazards such as loose bolts or parts that are not well secured. Additionally, foreign material is not permitted in the field which could cause a physical hazard, such as loose tie-wire and unmarked metal stakes. Employees are aware of the dangers of foreign material and scout for physical hazards during the growing season and during harvest.

### Inspection of Crop Protection Application Equipment

Before every application, the employee responsible for applying the crop protection product shall do a thorough inspection of the equipment. The employee should look for signs of leaks, residue from past applications, cracks in tanks, wheels needing servicing and other worn parts. The employee should pressurize the system when appropriate to ensure all systems are working prior to traveling from the mix/load site to the field. Care should be taken to ensure that all nozzles are delivering product and not clogged



## Replacement of Crop Protection Application Equipment

Worn or leaky nozzles should be replaced before use. Hoses showing signs of brittleness or cracking should be immediately replaced. Clogged nozzles should be inspected and cleaned. If after cleaning, the nozzle continues to show an irregular spray pattern, it should be discarded and replaced. Mechanical components should be observed for signs of corrosion. Where necessary, supporting mechanical components should be replaced when signs of wear become evident.

### **F-7.2b Calibration of equipment is traceable to a recognized standard (WP)**

#### Calibration of Crop Protection Application Equipment

Equipment shall be calibrated in accordance with standard procedures set out by the Washington State Department of Agriculture in their applicator license training materials. This information is equivalent to the information on how to calibrate application equipment published by the extension team at Montana State University. Applicators have been trained on this method and employ these practices on our farm.

Referenced publications for how to calibrate crop protection spray equipment:

<http://store.msueextension.org/publications/AgandNaturalResources/MT200914AG.pdf>

<http://pesticidestewardship.org/calibration/Pages/default.aspx>

Aerial applicators carefully calibrate their spray equipment in accordance with guidance set forth in the following reference manual:

Aerial Applicator's Manual: A National Pesticide Applicator Certification Study Guide  
<https://www.epa.gov/system/files/documents/2023-11/national-aerial-applicator-manual-2014.pdf>

Calibration of equipment occurs through various forms on the farm.

Commercial applicators (ground, chemigation, and aerial) calibrate their equipment regularly and often before each use – as applicable to the particular application and conditions. Many of these commercial providers offer certificates of calibration or guarantee for their products and services.

On-farm calibration – Calibrations on farm are based on proven calculations and procedures established and accepted by researchers, state agency, and federal regulatory standards. Records of repeated on-farm calibrations are kept.

### **F-7.2c The cleaning and sanitation program shall include measures for monitoring to verify effectiveness. WP, R (WP, R)**

All chemicals used for cleaning or sanitizing of food contact equipment, tools, utensils, containers and other food contact surfaces shall be approved for that use, according to the chemical manufacturer or supplier and all federal, state and local requirements, and shall be used in a manner consistent with the approved use.

### **F-7.3 Vehicles, equipment tools, and utensils shall be controlled so as not to be a source of chemical hazards (WP)**

Product contaminated from oil, grease and any other source of foreign contamination will be disposed of, buried or put into garbage containers. Equipment will be cleaned, washed and inspected after contamination.

Soil that has contacted fuel or oil will be scooped away and disposed of in a dumpster or off the farm site. In order to prevent major spills or contamination, fueling is conducted in a designated area. Additionally, oil changes and maintenance of hydraulic systems occur within the designated shop area whenever possible.

Equipment is carefully inspected before use for signs of oil, fuel, and fluid leaks.

See F-7.2, F-7.2a, and 7.2c.

### **F-7.4 Vehicles, equipment, tools and utensils shall be controlled so as not to be a source of physical hazards (R)**

Glass and brittle plastic containers are not permitted in fields, storages, packing facilities or near the harvest operation.

Light bulbs, glass and plastic on harvesting equipment are to be protected so as not to contaminate produce or fields in the case of breakage.

Should glass or brittle plastic break on harvesting equipment, workers will cease operation immediately. Product contaminated from broken glass or brittle plastic will be disposed of and put into garbage containers which are emptied regularly. Equipment will be cleaned, washed and inspected after contamination.

Vehicles, equipment, tools, and utensils are never used to move manure or located near point source contaminations, such as livestock pens.

During the annual equipment cleaning, employees check for physical hazards such as loose bolts or parts that are not well secured. Additionally, foreign material is not permitted in the field which could cause a physical hazard, such as loose tie-wire and unmarked metal stakes. Employees are aware of the dangers of foreign material and scout for physical hazards during the growing season and during harvest.

### **F-7.5 Cleaning and sanitizing procedures do not pose a risk of product contamination**

You must state where the equipment is cleaned. The water that you use to clean your equipment must have a water test. Ensure that your cleaning log above includes all tools, such as shovels, rakes, etc.

All chemicals used for cleaning or sanitizing of food contact equipment, tools, utensils, containers and other food contact surfaces shall be approved for that use, according to the chemical manufacturer or supplier and all federal, state and local requirements, and shall be used in a manner consistent with the approved use.

### **F-7.6 Water tanks are cleaned at sufficient frequency so as to not be a source of contamination (WP, R)**

Be sure to include your water trucks on your cleanings logs.

Our farm primarily utilizes water trucks and tanks for dust control. The trucks are cleaned each year before use, and the dates of sanitation are noted in the log. The trucks are filled with water that has been water tested; such as well or irrigation source water. We do not fill the water tanks or trucks with anything other than water when not in use.

## **F-8: PREHARVEST ASSESSMENT**

### **F-8.1 A preharvest risk assessment shall be performed (A, M)**

Before harvest commences each year, our farm scouts the fields to ensure that no chemical, biological, or physical risks exist. Each field is evaluated and any risks of concern are immediately addressed by the farm manager. In addition to scouting fields for food safety risk, a review of the readiness of equipment, harvest crews, and sanitation facilities is performed.

The grower must have a record that is signed and dated to prove that a risk assessment was completed for EACH FIELD. The document must show that each field was visited and a record of the event should be present in your records to show the auditor.

## Pre-harvest Assessment

Name of Operation: \_\_\_\_\_

Fields and harvest-related equipment should be assessed prior to harvest to be sure they are available, clean, free of contamination, etc.

Field	Date of Assessment	Conditions	Corrective Actions Taken
		<p>Are toilet and wash facilities properly located?</p> <p>Is potable water available for workers?</p> <p>Have workers received food safety training?</p> <p>Is harvest and transportation equipment clean and in good working order?</p> <p>Has the field been examined for possible contamination by animals, chemicals, fuels, etc.?</p> <p>Other:</p>	

Completed by: \_\_\_\_\_

Date: \_\_\_\_\_

## **F-9 WATER/ICE USED IN THE HARVESTING AND POSTHARVEST OPERATIONS**

### **F-9.1 Operation has procedures for water used in contact with product or food contact surfaces (WP, R, M)**

#### Standard Operation Procedure for Water Use during Harvest

Our farm does not use ice during the harvest, and has therefore determined we do not need a risk assessment for ice. Water present at harvest includes water trucks used to control dust on the roads. Water trucks do not enter the field or spray product that has been harvested. Water trucks are always filled with water from a source that has had a microbial test in the past 12 months. Water trucks are washed and cleaned before use each year, and evidence of this is recorded on our equipment wash logs. Furthermore, all harvesting equipment that contacts the potatoes is washed with water that has undergone a microbial water test in the last 12 months. This includes the harvesters, piling equipment, and truck beds. During the mechanized harvest, water is not applied to our potatoes. The potatoes do not contact water or receive rinse/wash until entry into a packinghouse or processor. We avoid contact with moisture as much as possible, as wet tubers tend to break down in storage quickly. Water applied during processing and fresh packing is reviewed during the packinghouse audit and is beyond the scope of our farm.

### **F-9.2 Water use SOPs address the microbial quality of water or ice that directly contacts the harvested crop or is used on food-contact surfaces (R, M)**

As noted in the above, no ice is used in our operation. Furthermore, contact with water is avoided as potatoes must be stored dry. For potatoes transiting directly to a processor or fresh-packing, no washing occurs at the point of harvest. All flume treatments and wash steps occur in the packing-house or at the processing location, and are beyond the scope of this farm audit.

### **F-9.3 If an antimicrobial process or chemical treatment is used for harvest or post-harvest water, it shall be used in accordance with manufacturer instructions and the operation's written SOP (R, M)**

No water is re-used as part of our farm harvest operation. All flume treatments and wash steps occur in the packing-house or at the processing location, and are beyond the scope of this farm audit.

**F-9.4 If water contacting product or food contact surfaces is re-used, it shall be treated using a registered or approved antimicrobial process or chemical treatment (M)**

No water is re-used as part of our farm harvest operation. All flume treatments and wash steps occur in the packing-house or at the processing location, and are beyond the scope of this farm audit.

**F-9.5 Water use sops address condition and maintenance of water-delivery system (R, M)**

Our water delivery system during the growing season and nearing harvest relies on center pivot irrigation systems. These center pivots are maintained yearly and continuously monitored throughout the season. Some of the technologically advanced pivots on the farm notify the farm manager via a cell phone message when they are malfunctioning, thus further securing the purity and efficacy of the water delivery system. The pivots operate under high pressures, thus are self-flushing systems and not prone to harborage of contaminants. The water sourced in this manner is covered in the above irrigation risk assessment documentation. Water used in water trucks is noted above and comes from a source tested for microbial contamination annually.

**F-9.6 If applicable to the specific commodity, water use sops address control of wash water temperature (R)**

As noted above, as part of this farm and field audit, our potatoes do not undergo a wash during harvesting. All flume treatments and wash steps occur in the packing-house or at the processing location, and are beyond the scope of this farm audit.

## **F-10 CONTAINERS, BINS AND PACKAGING MATERIALS**

**F-10.1 Operation has written policy regarding storage of harvesting containers (WP)**

During harvest, the principle product containers/receptacles are the beds of trucks. Each truck can be considered a harvesting container. All trucks owned by our farm are washed before use as described above in the equipment record and log. Water for washing is from a water source tested for microbial contamination in the last 12 months. Some of our product is harvested and loaded into trucks owned or contracted by the processing company. When trucks not owned by our company are used, the processor and/or contracted trucking company are requested to provide record of a thorough wash before use.

Have wash/cleaning records from ALL trucks that your potatoes are going into. If you are loading or transloading into trucks owned or contracted by the processors, you must obtain cleaning records for your files. Additionally, if a contracted company is used, you need wash records from these trucks. The auditor will ask for a record as proof of truck washing, and may select a truck in the field and ask to see its wash records. If you cannot produce records for whatever truck is present – even if you do not own or operate it – you will be down-scored.

## **F-10.2 Operation has written policy regarding inspection of food contact containers prior to use (WP)**

### Policy for Inspection of Trucks and Transloading Equipment

Before use each season, all food contact containers are thoroughly cleaned and washed. In our farm operation, containers are defined as trucks, including those owned and operated by a processor or contractor, and transloading equipment. Potatoes are not a ready-to-eat product, so we deem a thorough wash of this equipment before harvest commences to be in keeping with the industry best practices. Additionally, we carefully inspect all third-party trucks before our potatoes are loaded into them. If foreign material or contamination is present, the truck is rewashed. If the truck exhibits very poor maintenance or poses a threat to food safety, it will be refused access to our field, even if it was dispatched by a processor or third-party buyer.

## **F-10.3 Operation has written policy regarding acceptable harvesting containers (WP)**

### Policy for Acceptable Harvesting Containers

Our farm operation defines harvesting containers as trucks. Whenever possible, we only load into trucks that are dedicated for use with potatoes. At times, our potatoes may be carried in processor trucks or those of a third-party contractor. We require that all trucks carrying our product show proof of a thorough washing before use. Unacceptable harvest containers include any semi-truck that has been used to carry manure or animal waste. Additionally, trucks with obvious signs of oil or fuel leakage are not permitted in the field. Trucks with fuel or oil leaks will be rejected, regardless of the dispatching authority.

## **F-10.4 Operation has written policy prohibiting use of harvest containers for non-harvest purposes (WP, M)**

All potato trucks owned by our farm are only used to carry potatoes at harvest. Similarly, semi-trucks and trans-loading trucks owned and operated by our processors are only used to haul potatoes and are cleaned according to our above stated policy. As potatoes are not a ready-to-eat product, at times contracted trucks may be utilized to move potatoes. Many of these trucks carry only potatoes in their beds, but all are required to show proof of sanitation before use. As our containers are actually semi-trucks, it is not feasible to assume that such an expensive piece of equipment when owned by a contracted shipping company would only be used once a year. In the case of contracted trucking firms, we carefully inspect, verify sanitation, and document to

mitigate the use associated with a multi-use truck bed. Our farm avoids this scenario whenever possible by utilizing our own dedicated potato trucks.

## **F-11: FIELD PACKAGING AND HANDLING**

### **F-11.1 Operation shall have a written policy that damaged or decayed produce is not harvested, or is culled (WP, M)**

#### Culls and Damaged Produce Policy

In the event of a large percentage of culled or damaged potatoes in the field, the entire area will be tilled under and not planted back into potatoes for at least a year. If the percentage of culls is moderate, they will be removed in the sorting line as they enter storage. If the potatoes are destined for fresh-pack or will go directly to a processor, they are also subjected to a sorting process to remove culls. In the packing house and processing facility, mechanized sorting and hand sorting may be utilized depending on the facility. Culls and damaged product may either be buried, disposed of in a landfill, or sold as cattle feed. Culls that are rejected for non-food safety reasons – like size – may be sent to a dehydration facility.

### **F-11.2 Product that contacts the ground shall not be harvested unless the product normally grows in contact with the ground (WP, M)**

Potatoes grow in the ground, so our entire harvest contacts soil. As potatoes are not a ready-to-eat product, the soil contact poses little risk and the low risk status is supported by the 2011 Risk Assessment conducted by the National Potato Council.

### **F-11.3 Harvest procedures shall include measures to inspect for and remove physical hazards**

Removal of foreign objects occurs at several different locations during the harvesting process. Foremost, small objects of concern will fall through the chains of the mechanized harvester. Foreign objects traveling up the chain often bounce off the belts. Hand sorters also vigilantly scan the potatoes, looking for hazards and foreign material. Additionally, in the packinghouse and processing facility, hand-sorting occurs. Many buyers have electronic or mechanized sorting capabilities targeted at hazards and foreign material.

### **F-11.4 Cloths, towels, or other cleaning materials that pose a risk of cross-contamination shall not be used to wipe produce unless mitigation procedures are in place**



Clothes, towels and cleaning materials are not used on the potatoes during the harvesting process. At harvest, the potatoes are carried up the chain and into a truck traveling in tandem with the mechanized harvester pulled by a large tractor. Employees rarely contact the tubers with their hands during this process. Any cloth or towels present on the harvester, in the tractor cab, or inside the truck would be for the purpose of wiping hands or cleaning dust. We have assessed the risk and concluded that the presence of cloths and towels in these designated locations pose limited risk to the produce, and do not come in contact with the potatoes.

**F-11.5 Packing materials shall be appropriate for their intended use (M)**

Our potatoes are not packed in the field. All packaging is conducted inside the packing-house or processor facility and is not covered under the scope of this audit.

**F-11.6. Packaging shall be stored in a manner that prevents contamination**

Our potatoes are not packed in the field. All packaging is conducted inside the packing-house or processor facility and is not covered under the scope of this audit.

**F-11.7 Operation has written policy regarding whether packaging materials are permitted in direct contact with soil (WP)**

Our potatoes are not packed in the field. All packaging is conducted inside the packing-house or processor facility and is not covered under the scope of this audit. Moderate soil contact of packing material would not be an assessed risk for potatoes in our harvest operation, as our product comes directly from soil.

**F-11.8a Operation has a product release procedure (WP, R)**

Potatoes are observed for defects and contamination at a “sorting table” after harvest and before being stored or loaded onto transport truck.

**Instruction to grower: Write a “Product Release Procedure”.**

**F12: POSTHARVEST HANDLING AND STORAGE  
(FIELD PRIOR TO STORAGE OR  
PACKINGHOUSE)**

**F-12.1 Harvested produce is handled in a manner such that it is not likely to become contaminated (M)**

As potatoes are being conveyed into storage or transport trucks from the field, workers with gloves remove potatoes that are compromised physically or by disease.

### **F-12.1a When product is field packed, collection, storage, and distribution points are maintained in a clean and hygienic condition**

If you intend to walk across the pile during storage, you must have designated boot coverings, rubber boots, or overshoes designated for this purpose. Show the auditor that these boots are stored in a clean place in the storage facility and are kept clean and in good repair. It is advisable to have a checklist showing that the boots are inspected and cleaned before the storage season.

#### Policy on Handling Practices for Post-Harvested Potatoes

Post-harvest storage occurs as a bulk product in piles. The potatoes touch the walls of the post-harvest storage facility, as this is the only way to contain such a large volume of produce. We have deemed that having potatoes touching the walls of our bulk storages poses no food-safety risk. Additionally, in order to identify sources of unwanted moisture, scout for pockets of potato breakdown or rot, and ensure proper airflow is occurring in the system, farm personnel must traverse the massive pile on foot. While this occurs infrequently, traversing the pile on foot is in keeping with standard industry practice and imperative to proper management of potatoes in large storage facilities. Care is taken not to damage the product in this process. **Designated boot coverings, overshoes, or designated rubber boots are reserved for this purpose, and are kept clean.** Employees are thoroughly trained on the dangers of foreign matter, thus are careful not to introduce any objects into the pile during a traverse. This process is industry standard and the risks are well-mitigated by the fact that potatoes are not a ready to eat product and that **designated clean boots or overshoes are used at all times.**

### **F-12.2 Materials that come in contact with the produce shall be clean and in good repair (WP, R, M)**

In post-harvest operation, the trucks and pilers that come in contact with potatoes are subject to the same cleaning and maintenance requirements addressed in the above equipment and container sections. Additionally, before potatoes are stored in bulk storage for the season, the storage bays are cleaned and sanitized. Care is taken to ensure that all storage duct work is clean and in good repair. Pallets, produce bins, and totes are not used in our farm operation.

## **F-14: EQUIPMENT SANITATION AND MAINTENANCE**

### **F14.1 The operation shall have a policy, written procedures, and a checklist to verify cleanliness and functionality of shipping units (e.g. trailer) (WP, R, M)**

#### Policy for Verifying Cleanliness of Shipping Units

At our farm, our shipping units are the aforementioned trucks. The potato trucks that travel beside the harvesters to collect the potatoes are also used to transport the potatoes to bulk storage locations, and on to packinghouses or processors. The policy and procedure governing these shipping units is the same as described above for harvesting containers and equipment. All shipping containers are cleaned, as evidenced by the wash log. Truck trailers are visually inspected before use and any unclean semi-trucks are not permitted to haul our product from the farm to packinghouse or processor. Shipments from the packinghouse and processor are governed by our customers and not covered in the scope of this audit. We do not utilize refrigerated trucks in route to bulk storage or packinghouse/processor facility.

### **F-14.2 Loading/unloading procedures and equipment shall minimize damage and prevent contamination of produce**

All loading and unloading equipment is cleaned and maintained, as per the wash records noted above. Bruises on potatoes lower their quality, and our farm adjusts the chain speed on the harvester to accommodate varying soil types, moisture levels and internal temperature. Additionally, the boom height is raised and lowered throughout the harvest to ensure that the potatoes encounter a minimal drop at each transfer point. We pay particular attention to temperatures at harvest and make every attempt to optimize our equipment for bruise prevention.

# **USDA HARMONIZED AUDIT**

## **P: POSTHARVEST OPERATIONS**

### **P-1: PRODUCE SOURCING**

**P-1.1 The operation has a policy and takes affirmative steps to ensure that all fresh produce that are packed or stored in the operation are grown following requirements in *field operations and harvesting* harmonized standard (R)**

If potatoes from other growers are packed or stored by the operation, records of compliance with Field Operations and Handling needs to be documented as described above.

### **P-2: FACILITY**

**P-2.1 Operation has initially and at least annually thereafter, performed and documented a risk assessment of the packinghouse, and has addressed all identified risks (A, M)**

Provide documentation, dated within a year of the audit, that the packinghouse and activities taking place within was evaluated for potential food safety hazards, and that workers are trained on what the hazards are and how to manage them.

**P-2.1a If microbiological hazards requiring a control are identified in the risk assessment of the packinghouse a microbial environmental monitoring program shall be established (WP, R)**

This may not apply to your situation. The operation has established an environmental monitoring program based on the packinghouse risk assessment. The program shall address microbiological risks and include procedures for sampling, testing and frequency. acceptable results shall be clearly defined and include procedures for when unacceptable results have occurred. Records of environmental monitoring sampling, testing and any corrective actions shall be kept.

**P-2.2 Building shall be located, designed, constructed and maintained in a manner that prevents contamination of produce during handling, storage and cooling**

Product flow is designed to minimize risk of cross-contamination. Building and equipment structures and surfaces (floors, walls, ceilings, doors, frames, hatches, etc.) shall be constructed in a manner that facilitates cleaning and sanitation and does not serve as harborage for contaminants or pests. Drop ceilings shall enable cleaning and monitoring for pest activity. Chill and cold storage loading dock areas shall be sealed, drained and graded, as appropriate for the operation. Fixtures, ducts, pipes and overhead structures shall be installed and maintained so that drips and condensation do not contaminate produce, raw materials or food contact surfaces. Drip pans and drains shall be designed to ensure that condensate does not become a source of contamination. Water from refrigeration drip pans shall be drained and disposed of away from product and product contact surfaces. Floors are designed to minimize and/or facilitate the removal of standing water. Air intakes shall not be located near potential sources of contamination.

### **P-2.3 Adequate lighting shall be provided in all areas**

Lighting in all areas shall be sufficient to enable cleaning, sanitation, repairs, etc.

### **P-2.4 Only essential glass and brittle plastic shall be present in the building (R)**

Light bulbs, fixtures, windows, mirrors, skylights and other glass and brittle plastic in the building or in the product path entering or exiting the building shall be of the safety type, or shall be otherwise protected to prevent breakage. If glass or brittle plastic must be used, there shall be a written glass and brittle plastic control policy, including a glass and brittle plastic register.

### **P-2.5 Catwalks above product zones are protected to prevent produce or packaging contamination.**

Light bulbs, fixtures, windows, mirrors, skylights and other glass and brittle plastic in the building or in the product path entering or exiting the building shall be of the safety type or shall be otherwise protected to prevent breakage. If glass or brittle plastic must be used, there shall be a written glass and brittle plastic control policy, including a glass and brittle plastic register.

### **P-2.6 If applicable, Operation has a written Allergen Control Program (A, WP, M)**

The Allergen Control Program lists the allergens in use or storage at the Operation specific to country regulations. If applicable, procedures address identification and segregation of allergens during storage and handling as based on a risk assessment conducted by the Operation.

## **P-3: PEST AND ANIMAL CONTROL**

### **P-3.1 Operation has procedures to manage pests to the extent appropriate to the operation (WP, R, M)**

Instruction to grower: Have a written pest control program, performed by a trained pest control operator (or licensed where required by prevailing regulation). The written program includes policies and procedures applicable to that operation, such as storage of outside equipment or other factors dealing with pest harborages, and maps of the location of pest traps outside and inside the operation. The operation will maintain a pest-control log that includes dates of inspection, inspection reports and steps taken to eliminate any problems. Applications of pesticides (e.g., insecticides, rodenticides) shall be performed in compliance with local, state, and federal pesticide regulations.

### **P-3.2 Operation restricts animals from food handling areas (M)**

Domesticated animals are prohibited from pack house, cooling, and storage facilities unless procedures are in place for their safe presence. Procedures are in place to exclude wild and feral animals to the degree practical and to monitor for and mitigate contamination from animal excreta.

### **P-3.3 If used, pest control devices, including rodent traps and electrical flying insect devices, are located so as to not contaminate produce or food handling surfaces**

Only non-toxic traps and pest control devices are used inside the packing house or storage building.

## **P-4: EQUIPMENT, TOOLS AND UTENSILS**

### **P-4.1 All food contact equipment, tools and utensils are designed and made of materials that are easily cleaned and maintained (WP, M)**

The operation shall develop, implement, and schedule repair, cleaning, sanitizing, storage and handling procedures of all food contact surfaces to reduce and control the potential for contamination. These procedures shall be documented. Product contact tools, utensils and equipment shall be made of materials that can be cleaned and sanitized. Seams between food contact surfaces are smooth and cleanable.

## **P-4.2 Equipment is installed in a way that provides access for cleaning**

Cooling, packing and other food contact equipment is installed away from walls and otherwise positioned so as not to inhibit access for proper cleaning.

## **P-4.3 Equipment lubrication is managed so as not to contaminate food products**

Only food-grade lubricants are used on food processing and packaging equipment, or on any other equipment where incidental food contact may occur, unless the equipment manufacturer specifies only a non-food grade lubricant. Lubricant leaks are fixed or catch pans are installed to prevent product contamination.

## **P-4.4 All instruments used to measure temperature, pH, antimicrobial levels and or other important devices used to monitor requirements in this section shall be adequately maintained and calibrated at a frequency sufficient to assure continuous accuracy (R, M)**

Records shall be kept. If an ORP system is used, an independent measurement shall be used to verify compliance. Test methods or test strips used to monitor requirements shall be appropriate to their use, sufficiently sensitive to their intended purpose and available in adequate numbers for their designated use.

### **P-4.4a Calibration of equipment is traceable to a recognized standard (WP)**

Calibrations on this operation are based on proven calculations and procedures established and accepted by researchers, state agency, and federal regulatory standards. **Records of repeated on-farm calibrations are kept.**

## **P-4.5 Foreign material control devices are inspected and maintained (R)**

If included in the Food Safety Plan, foreign material control devices shall be included as part of a Preventive Maintenance Schedule or other program and maintained to ensure effective operation. Calibration checks shall be performed according to written procedure or manufacturer's recommendations.

### **P-4.5a Metal detection equipment, if utilized, shall be checked at a scheduled frequency as outlined in the operation's food**

## **safety/HACCP plan using iron, non-iron and stainless-steel testing wands (R)**

Instruction to grower: if metal detection equipment is used they should be frequently checked to ensure that they are working correctly, and information logged. Foreign material issues should be documented and corrective actions implemented as written in the food safety program.

## **P-5: MAINTENANCE AND SANITATION**

### **P-5.1 A preventive maintenance and/or master cleaning schedule, with related sops, shall be established (WP, R, M)**

There is a written cleaning and sanitation schedule for all food and non-food contact surfaces including floors, drains, walls, ceilings and other surfaces that may pose a source of product contamination. Roof leaks shall be promptly identified, controlled and repaired. Operation has procedures for cleaning and sanitation of cooling equipment. Drip pans and drains shall be maintained to assure condensate does not become a source of contamination. If standing water exists, it is removed from floors and floors cleaned in a manner and at a frequency sufficient to prevent creation of a source of contamination.

#### **P-5.1a Routine housekeeping practices must be implemented**

Routine housekeeping practices must be implemented. These could include sweeping, mopping, emptying trash and cull piles, cleaning up spills, and keeping storage areas neat and tidy

### **P-5.2 A master cleaning schedule with related SOPs shall be established (WP, R, M)**

Instruction to grower: generate a written cleaning schedule for all food and non-food contact surfaces including equipment, floors, drains, walls, ceilings, and other surfaces which may pose a source of product contamination. Established SOPs shall include instructions, person(s) responsible, specific frequency, and cleaning products and concentration. Sanitation tools must be appropriate for their designated purpose.

### **P-5.3 Any temporary repairs on food contact surfaces are constructed of food-grade material. operation has a procedure to ensure that permanent repairs are implemented in a timely manner**

The operation has procedures to ensure temporary repairs are compliant with all food safety requirements, and do not create potential sources of chemical, microbiological or physical contamination. Permanent repairs are implemented as soon as practical; operation establishes timelines and responsibilities for completion.



#### **P-5.4 Cleaning equipment and tools are clean, in working order, and stored properly away from product handling areas**

Equipment, utensils and tools used for cleaning or sanitizing, including food contact and non-food contact surfaces, are maintained in a manner sufficient to avoid becoming a source of produce contamination and are stored away from product handling areas.

#### **P-5.5 Food contact surfaces shall be cleaned, sanitized and maintained according to the food safety plan (R, M)**

Prior to use, the lines used for washing, grading, sorting, or packing shall be cleaned and sanitized as appropriate per risk assessment or prevailing regulations. Records must include the date and method of cleaning and sanitizing equipment. When in use, the lines shall be maintained so as not to be a source of contamination with pathogens.

#### **P-5.5a The cleaning and sanitation program shall include measures for monitoring to verify effectiveness. (WP, R)**

Operation develops and implements program procedures for cleaning and sanitation. Operation identifies chemicals approved-for-use in the cleaning and sanitation program and establishes and maintains records of all cleaning and sanitizer concentrations. Retraining of cleaning and sanitation program policies and procedures are performed and documented.

#### **P-5.6 Transporting equipment shall be maintained to prevent contamination of products being transported (R)**

Pallet jacks, carts, trolleys and forklifts, shall be maintained to prevent contamination of products being transported and are listed on the Preventive Maintenance and/or Master Cleaning Schedules.

#### **P-5.7 Waste materials and their removal are managed to avoid contamination (M)**

Trash, leaves, trim, culls, waste water and other waste materials are removed from the produce handling areas at a frequency sufficient to avoid becoming a source of produce contamination.

#### **P-5.8 Outside garbage receptacles/dumpsters are closed and located away from building entrances and the area around such sites is reasonably clean**

Waste containers and compactors are located away from produce handling areas, are closed or have lids (except for waste collection/cull trailers in active use), are emptied on a scheduled basis or as needed, and weeds and other pest harborage are minimized around the containers.

### **P-5.9 The plant grounds are reasonably free of litter, waste culls, vegetation, debris and standing water**

Operation has procedures to maintain the grounds surrounding the building in a manner to minimize sources of contamination, such as litter, vegetation, waste culls, debris and standing water that may be pest attractants or harborages. Equipment and materials stored outside are stored away from the building perimeter. Outside storage areas are included in pest control program. Vegetation that does not serve as an attractant or harborage is permitted.

### **P-5.10 Sewage or septic systems are maintained so as not to be a source of contamination (M)**

After a significant event (such as flooding or an earthquake) that could negatively impact a sewage or septic system, Operation takes appropriate steps to ensure that sewage and septic systems continue to operate in a manner that does not contaminate produce, food contact surfaces, areas used for produce handling, agricultural water sources, or agricultural water distribution systems.

### **P-5.11 The sewage disposal system is adequate for the process and maintained to prevent direct or indirect product contamination (M)**

The human waste and gray water sewage system has sufficient capacity to handle the Operation's peak flows and not cause direct or indirect product contamination. Cross-connections with product contact water systems are prohibited. Floor drains are adequate, functional, free of obstruction, and are properly maintained and cleaned to prevent them from becoming sources of contamination.

## **P-6: POST-HARVEST WATER/ICE**

### **P-6.1 A postharvest water system description shall be prepared (R, M)**

Water sources and the operations they serve shall be documented and current. The description shall include one or more of the following: maps, photographs, drawings (hand drawings are acceptable) or other means to communicate the location of water source(s), permanent fixtures and the flow of the water system (including holding systems, reservoirs or any water captured for re-use). Permanent fixtures include wells, gates, reservoirs, valves, returns, backflow prevention

and other above ground features that make up a complete water distribution system shall be documented in such a manner as to enable location in the operation.

### **P-6.2 Documented scheduled assessment of water system including delivery equipment shall be performed (R, M)**

The water-delivery system shall be maintained so as not to serve as a source of contamination of produce, water supplies or equipment with pathogens, or to create an unsanitary condition. Water installations and equipment are constructed and maintained to prevent back siphonage backflow and cross connections between product contact water and wastewater. Routine checks verify that back siphonage and backflow prevention units are functioning properly (annual or as needed to maintain continuous protection). Results are documented.

### **P-6.3 Water use sops address the microbial quality of water or ice that directly contacts the harvested crop or is used on food-contact surfaces (R, M)**

If water or ice directly contacts the harvested crop or is used on food-contact surfaces, Operation's water use SOP requires that water or ice when applied meets the microbial standards for drinking water, as defined by prevailing regulation or the country in which the product is intended to be traded, whichever is more stringent. Water may be treated (e.g., with chlorine) to achieve the microbial standards or to prevent cross-contamination. Ice and water shall be sourced/manufactured, transported, and stored under sanitary conditions.

### **P-6.4 The operation's food safety plan includes produce washing process, if used (A, WP, M)**

If produce is washed, an initial risk assessment of the washing process shall be performed that takes into consideration the commodity, type of wash system, type of sanitizer, and water quality.

### **P-6.5 Re-used water that contacts product or food contact surfaces shall be treated using a registered or approved antimicrobial process or chemical treatment (R, M)**

Re-used water shall be treated using an antimicrobial treatment sufficient to prevent cross-contamination, unless prevailing regulation or commodity specific standards provide an alternative. Treatments shall be in compliance with prevailing regulation or the country in which the product is intended to be traded, whichever is more stringent.

**P-6.6 If a postharvest water antimicrobial is used, it shall be used in accordance with established operational procedure and manufacturer instructions (R, M)**

Records shall be kept. Operation shall have a procedure that includes minimum limits for antimicrobial in wash water for food safety. Procedure shall include how to control, monitor and record use of wash water antimicrobial as needed to assure compliance with minimum limits. Operation shall have a procedure as to what corrective actions are taken if criteria are not met.

**P-6.7 If applicable to the specific commodity, water use sops address control of immersion water temperature (R)**

For produce that is immersed in water and demonstrated as being susceptible to microbial infiltration from water, water temperature differentials during immersion shall be controlled in accordance with prevailing regulation or industry guidelines.

**P-6.8 Water-change schedules shall be developed for all uses of water where water is re-used**

Operation shall have procedures for changing water that is re-used, such as recirculated water, flumes and dump tanks.

**P-6.9 Debris, damaged and/or visibly contaminated produce shall be removed from wash areas/dump tanks to the extent possible**

Operation has procedures to determine how and when debris, damaged and/or visibly contaminated produce shall be removed from wash areas/dump tanks.

## **P-7: CONTAINERS, BINS AND PACKAGING**

Much of section P-8 may not apply to your operation.

**P-7.1 Specifications for all packaging materials that impact on finished product safety shall be provided and comply with prevailing regulations (R)**

The methods and responsibility for developing and approving detailed specifications and labels for all packaging shall be documented. A register of packaging specifications and label approvals shall be maintained and kept current.

### **P-7.2 Operation has a written procedure for inspecting incoming packaging materials (WP, R)**

Product-contact containers, as appropriate to the specific Operation (e.g., harvest bins, totes, crates, sacks, buckets, finished product clam shells, bags or packaging films), shall be stored, or handled (e.g., cleaned prior to post-storage use), in a manner so as not to serve as a source of contamination.

### **P-7.3 Operation has written policy regarding storage and post-storage handling of product-contact containers (WP)**

Product-contact containers, as appropriate to the specific operation (e.g., harvest bins, totes, crates, sacks, buckets, finished product clam shells, bags or packaging films), shall be stored, or handled (e.g., cleaned prior to post-storage use), in a manner so as not to serve as a source of contamination.

### **P-7.4 Materials that come in contact with the produce shall be clean and in good repair (WP, R)**

The operation has written procedures for cleaning and, if practicable, sanitizing of pallets, produce bins, totes and materials that come in contact with the produce during handling or storage so as not to be a source of contamination. Procedures require that cleaning and sanitizing be documented.

### **P-7.5 Operation has written policy regarding whether product-contact containers are permitted in direct contact with the ground or floor (WP)**

If produce does not normally contact the ground during production, Operation has considered and developed written policies regarding placement of product-contact containers directly on the ground or floor, or whether a physical buffer (e.g., buffer bin or slip sheet) is required, or use of containers constructed to prevent contact of the produce or produce contact surfaces with the ground. Policy shall be consistent with industry standards.

### **P-7.6 Operation has written policy regarding inspection of food contact containers and bins prior to use (WP)**

Food-contact totes, bins, packing and packaging materials, other harvest containers, and pallets shall be visually inspected, clean, intact and free of any foreign materials prior to use. Containers shall be sufficiently maintained so as not to become a source of contamination. A

### **P-7.7 Operation has written policy regarding acceptable product-contact containers (WP, M)**

The types and construction of product-contact containers and packing materials shall be appropriate to the commodity being handled and suited for their intended purpose. Produce shall only be stored in clean and sanitary containers.

**P-7.8 Operation has written policy prohibiting use of product-contact containers for non-product purposes unless clearly marked or labeled for that purpose (WP)**

Food-contact totes, bins, packing and packaging materials, other harvest containers, and pallets shall be visually inspected, clean, intact and free of any foreign materials prior to use. Containers shall be sufficiently maintained so as not to become a source of contamination.

**P-7.9 Pallets shall be kept clean and in good condition as appropriate for their intended use**

The operation inspects pallets prior to use for conditions that may be a source of produce contamination. Pallets that are not cleanable are removed from use. Pallets and other wooden surfaces are properly dried after being washed.

## **P-8: STORAGE**

**P-8.1 Product storage areas and conditions shall be appropriate to the commodities stored**

Produce storage locations and conditions shall not pose a risk of produce contamination, consistent with industry standards or prevailing regulation.

**P-8.2 Iced produce is handled so as not to serve as a source of contamination**

Ice is not used to cool potatoes

**P-8.3 Non-product storage areas shall be maintained so as not to be a source of product or materials contamination**

Areas designated to store materials, whether indoors or out, shall be clean, well ventilated, and designed to protect materials and produce from contaminants.

#### **P-8.4 Food packaging and packing materials shall be stored in a manner that minimizes contamination**

Materials stored in uncovered areas shall be protected from condensate, sewage, dust, dirt, chemicals, allergens or other contamination. Materials shall be stored off the floor/ground on pallets, slip-sheets or stands and covered where applicable.

#### **P-8.4a The operation has a procedure to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable (WP)**

The operation clearly outlines a procedure in which work in progress, finished products, purchased materials, such as packing materials, cleaning chemicals and any other materials that may have an impact on food safety, shall be used in accordance with the allocated shelf life, i.e., materials used on a first in first out basis or in the correct order as established by the policy or procedure.

#### **P-8.5 Adequate space shall be maintained between rows of stored materials to allow cleaning and inspection (WP)**

Materials shall be stored away from walls and ceilings. Written procedures shall be followed to guarantee the proper cleaning, inspection and monitoring for pest activity in storage areas.

#### **P-8.6 All chemicals shall be stored in a secure separate area. all chemicals shall be properly labeled**

Chemicals, including cleaning and maintenance compounds and lubricants, when not being used, are stored away from product handling areas and in a manner that inhibits unauthorized access. Food-grade and nonfood-grade lubricants are kept separate from each other.

#### **P-8.7 When produce is cooled, it is cooled to temperatures appropriate to the commodity according to current established regulatory or industry standards (R)**

When required for food safety or by industry guidelines, steps are taken to minimize temperature increases and minimize the time between produce receipt and cooling at the operation. The product temperature and equipment control mechanisms are calibrated and monitored at a defined frequency and temperatures are kept appropriate to the commodity. Records are maintained.

**P-8.8 Where temperature control is required for food safety, cooling facilities shall be fitted with temperature monitoring equipment or suitable temperature monitoring device (R)**

Temperature monitoring equipment shall be located in all temperature-controlled areas and shall be located so as to accurately monitor the temperature. Temperature measuring devices shall be monitored and calibrated on a scheduled basis or as needed.

**P-8.9 Cooling equipment shall be maintained so as not to be a source of product contamination (WP, R, M)**

Cooling equipment (e.g. hydrocoolers, air coolers), shall be inspected, all debris removed, and cleaned and sanitized according to written sanitation SOPs.

**P-9: TRANSPORTATION (PACKINGHOUSE TO CUSTOMER)**

**P-9.1 There is a written policy for transporters and conveyances to maintain a specified temperature(s) during transit (WP)**

When refrigerated transport is required for food safety, transporters have written, predetermined temperature ranges for commodities being transported.

**P-9.2 Prior to loading, the vehicle shall be pre-cooled (WP, R)**

When refrigerated transport is required for food safety, the proper temperature for pre-cooling is appropriate to the type of produce and as specified by documented protocol.

**P-9.3 The refrigerated transport vehicles shall have properly maintained and fully functional refrigeration equipment (WP)**

When refrigerated transport is required for food safety, Operation has a written policy that refrigerated transportation equipment shall be controlled by a thermostatic device as necessary to maintain temperatures in the cargo area for the particular type of produce being transported and as specified by documented protocol.

**P-9.4 Where required, temperatures of product are taken and recorded prior to or upon loading (WP, R)**



When refrigerated transport is required for food safety, Operation has a written procedure for when and how to measure product temperatures prior to or during loading.

**P-9.5 The operation shall have a policy, written procedures, and a checklist to verify cleanliness and functionality of shipping units (e.g., trailer) (WP, R, M)**

Shipping units shall be clean, functional and free of objectionable odors before loading, in compliance with current industry practices or regulatory requirements for that commodity. Refrigeration units, if used, must be in working order. Procedures include prohibition of raw animal or animal product transport, or other materials that reasonably may be a source of contamination with biological, chemical or physical hazards. Shipping units shall be washed between loads if prior transport included materials that reasonably may be a source of contamination. A responsible individual shall sign or initial the completed checklist or inspection report.

**P-9.6 Loading/unloading procedures and equipment shall minimize damage to and prevent contamination of produce**

Personnel responsible for the loading and unloading of produce shall take steps to minimize the potential of physical damage to produce, which can introduce and/or promote the growth of pathogens. Loading/unloading equipment shall be clean and well maintained and of suitable type to avoid contamination of the produce.

## **L-1: FOOD SAFETY PLAN OR QUALITY MANUAL**

**L-1.1 The operation's food safety plan or quality manual contains procedures on how the USDA GAP & GHP logo will be used (WP, M)**

The operation shall have a written policy describing proper use of the logo including having attained approved GAP & GHP program status by meeting the acceptance criteria for the audit being performed covering all scopes of the audit which are applicable to their Operation. All commodities grown, handled or processed by the Operation must be covered by the audit.

**L-1.2 There is a designated person to be responsible for the control of inventory bearing the logo (WP, M)**

The operation shall designate, in their food safety plan or quality manual, an individual or individuals that are responsible for the control of inventory (any containers or labels) bearing the logo or language.

## **L-2: TRACEABILITY AND RECALL PROGRAMS**

**L-2.1 The operation uses the USDA GAP & GHP logo only on packages, containers, or consumer units which are traceable (WP, M)**

The operation shall have a policy that prohibits the use of the logo on any packages, containers or consumer units that are not part of the established traceability program.

## **L-3: APPROVED SUPPLIERS**

**L-3.1 The operation has supplied a list of approved suppliers to the local federal or state auditor's office (R, M)**

Operation supplies the local Federal or State office who conducts the audit, with a current list of approved suppliers. The operation will notify the office of any additions to the suppliers list as well as if a supplier is no longer in compliance and must be removed from the list.

**L-3.2 All suppliers currently in use by the operation are listed on the supplied list of approved suppliers (WP, R, M)**

Operation procures ingredients and materials only from approved suppliers.

**L-3.3 All suppliers have successfully completed and met the requirements of a USDA approved GAP & GHP audit (USDA GAP&GHP audit, commodity specific audit, produce GAPS HARMONIZED audit, or HARMONIZED GAP plus+ audit) (R, M)**

The operation requires the packinghouses, distribution centers and other post-farm gate operations who wish to utilize the logo, to have an approved supplier program, which at a minimum verifies that all suppliers of fresh produce have successfully completed and met the requirements of a USDA approved GAP & GHP audit. All audits must be conducted by a licensed USDA auditor under federal oversight.

## **L-4 GAP & GHP LOGO APPROVED USE**

### **L-4.1 The logo is only used on products, processes, and packaging as approved on the SC-652 (R, M)**

The operation shall have a copy of the approved SC-652 which lists the products, processes, and packaging types the logo is approved to be used on. The logo is being used as approved.

### **L-4.2 All packaging or labels, which bear the GAP & GHP logo, are accountable items (WP, R, M)**

The operation shall have a policy stating all packaging or labels are accounted for.

### **L-4.3 The operation's inventory list of these packaging or labels is maintained and current (R, M)**

The operation shall have an inventory list of any packaging or labels bearing the logo or language.

### **L-4.4 The logo is only used on packaging and labels that are clean and bright in appearance, without marks, stains, or other evidence of previous use (R, M)**

The operation is only using packaging and labels that are clean and bright in appearance without marks, stains, or other evidence of previous use.