



# The Equitable Food Initiative Food Safety Standards, Guidance, & Interpretations

VERSION 2.0, NOVEMBER 30<sup>TH</sup>, 2018

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## Responsibility for these Requirements

The EFI Standards Committee has responsibility for this document and will periodically review and update it.

Users should verify that they are using the latest version by checking on the EFI website at:

[www.equitablefood.org](http://www.equitablefood.org).

## Versions Issued

Version No.	Date	Description of Amendment
EFI Standard_June, 2013	June, 2013	First public-facing version of the EFI Standard.
EFI Compliance Criteria_v1.0	January 24, 2014	First public-facing version of the EFI Compliance Criteria.
EFI Compliance Criteria_v1.1	June 30, 2014	Substantial Revision to Criteria Language.
		The EFI Standard_June 2013 and EFI Compliance Criteria_v1.1 (both now obsolete) have been merged and new classifications applied to what constitutes the Standards, Guidance and Interpretations.
EFI Standards_v1.2	January 1, 2015	Additional guidance on the relationship between conformance with the Standards and compliance with the law has been added to the introduction.
		No changes to the content of the indicators or, what was formerly called, the compliance criteria have been made.
EFI Standards, Guidance, & Interpretations_v1.3	September 20 <sup>th</sup> , 2017	New language for FC 1.1 & 1.2 has been added that shifts the Fair Compensation Standard away from a wage floor in favor of a mechanism for a price premium from the sale of certified product to flow from the buyer through the Grower to Farmworkers.  Copy edits were made to improve the clarity of the document. The meaning or intent of the Standards, indicators, or guidance was not changed.

Version No.	Date	Description of Amendment
EFI Food Safety Standards, Guidance, & Interpretations_v2.0	November 30 <sup>th</sup> , 2018	<p>Separated from the EFI Standards, Guidance, and Interpretations as the EFI Food Safety Standards, Guidance, and Interpretations.</p> <p>The food safety standards have been comprehensively rewritten to align more closely with GFSI and FSMA requirements.</p>

## About the Equitable Food Initiative (EFI)

EFI is a non-profit skill-building and certification organization that brings growers, farmworkers, retailers, and consumers together to create a safer, more equitable food system. This unique approach sets standards for labor practices, food safety and pest management while engaging workers at all levels to address issues and challenges in the produce industry.

## Our Mission Statement

To bring together growers, farmworkers, retailers and consumers to transform agriculture and the lives of farmworkers.

## We Believe:

- That being a farmworker is a valuable and honorable profession.
- The skills and contributions of farmworkers create a healthier work environment and produce safer food.
- The future of agriculture lies within the collaboration among growers, farmworkers, retailers and consumers.
- By transforming agriculture, we will transform lives.

## Introduction

The purposes of the EFI Food Safety Standards, Guidance, and Interpretations [this document] are:

1. To provide standards and indicators that must be conformed to in order to receive and maintain EFI certification;
2. To provide guidance and interpretations for auditors, growers, and Leadership Teams (LTs) on each indicator in order to add clarity to the required performance thresholds and to increase the quality and consistency of the auditing and certifying process; and
3. To provide transparency so the EFI certification program has credibility with stakeholders.

Growers should read this document in conjunction with EFI's Certification Program Summary. Certifying Bodies (CBs) should read this document in conjunction with the EFI's Certification Program Requirements and Certification Program Summary.

## Scope

This document covers the requirements of the EFI certification program that have direct impact on how conformity to the EFI Food Safety Standards are determined through the auditing and certifying process.

## Guidance & Interpretations

The Guidance & Interpretations in this document are intended to set clear expectations for growers, LTs, and auditors about how conformance with an indicator can be met and measured.

## **EFI Requirements and Legal Compliance**

The EFI standards and indicators establish and describe requirements to be carried out by participating growers, as well as other participants in the EFI system, that are in addition to those required by laws and regulations issued by governments. Neither an employer's policy stating that it will comply with laws and regulations nor actual compliance with laws and regulations will constitute proof of compliance with the EFI requirements when those requirements differ from, augment and/or exceed those in laws and regulations. Thus, under the EFI system, employers are required to comply with applicable laws and regulations regarding terms of employment, but, in addition, are required to comply with terms of employment which may augment and/or exceed what is required by laws and regulations. Consequently, for example, an audit under the EFI system may conclude that an employer complied with what is required by state or federal law, but may conclude that the employer is out of conformance with the EFI's requirements and such nonconformance must be corrected. Accordingly, the approval, implementation and verification of corrective action plans will be based on a grower's compliance with EFI requirements and not merely on compliance with, or policies that are consistent with laws and regulations.

Food Safety Standards		CMM	Guidance and Interpretations
<b>Accountability and Recordkeeping (AR)</b>			
Standard AR-1 Management demonstrates a clear commitment to food safety.			
AR 1.1	There is a clearly written organizational structure identifying those with responsibility for food safety and containing clearly identified job functions, including the Leadership Team.	Major	A review of the organizational structure of the farm shall verify that the identities of those with responsibility for food safety, including hygiene measures, and the role of the Leadership Team, are documented and include clearly identified job functions.
AR 1.2	There is a clearly written, HACCP-based food safety policy specifying the organizational commitment to food safety which is signed by senior management and communicated to all employees. The policy includes procedures for compliance with regulatory and other requirements for food safety and includes objectives by which it measures its food safety commitment, emphasizing a commitment to continuous improvement.	Major	A review of the HACCP-based written food safety policy shall verify that it: 1. Specifies the organization's commitment to food safety; 2. Contains a commitment to continuous improvement; 3. Contains procedures to comply with regulatory and other requirements for food safety; 4. Contains objectives by which it measures its food safety commitment; and 5. Is signed by senior management.
AR 1.3	Management provides sufficient, qualified resources necessary to implement, maintain, review, and improve the food safety system.	Minor	A review of the written food safety policy shall verify that sufficient, qualified resources necessary to implement, maintain, review, and improve the food safety system have been provided.
Standard AR-2 A written, HACCP-based food safety plan for the operation is developed and implemented.			
AR 2.1	The HACCP-based food safety plan identifies and assesses all locations of the operation and all products and/or product groupings covered by the plan. The plan assesses the likely physical, chemical, and biological hazards and contaminants and the procedures to control those hazards, including monitoring, verification, corrective actions, and recordkeeping, for the following areas: water, soil amendments, environmental assessments, animals, harvest and post-harvest, and worker sanitation. The food safety plan includes Standard Operating Procedures (SOPs) and other relevant work instructions appropriate to controlling the identified hazards.	Critical	A review of the HACCP-based written food safety plan shall verify that it: 1. Identifies and assesses all locations of the operation and all products and/or product groupings covered by the plan; 2. Assesses likely physical, chemical, and biological hazards; 3. Sets out procedures to control those hazards, including: a. Monitoring, b. Verification, c. Corrective actions, and d. Recordkeeping; 4. Covers the following areas: a. Water, b. Soil amendments, c. Environmental assessments, d. Animals, e. Harvest and Post-harvest, and f. Worker sanitation; 5. Identifies regulatory food safety requirements and details a commitment and processes for remaining in compliance with those requirements; 6. Includes SOPs and other relevant work instructions appropriate to controlling the identified hazards and ensuring regulatory compliance; and 7. Includes customer requirements that may exceed the above requirements that must also be met.
AR 2.2	The food safety plan is reviewed, revised as necessary and at least annually, and signed by senior management. The plan is revised whenever changes are made to production practices or production inputs that would impact safety of the product.	Major	A document review of the food safety plan shall verify that the plan has been reviewed, signed by senior management, and, if necessary, revised: 1. Whenever changes are made to production practices or production inputs; 2. When any material changes could impact the ability to grow, harvest, process, or otherwise ensure safe food; and 3. At least annually.

Food Safety Standards		CMM	Guidance and Interpretations
AR 2.3	If food safety regulations in a country of production or a country of intended distribution require a food safety control approach other than Codex Alimentarius HACCP principles, a food safety plan that meets both Codex and the applicable authorities' food safety requirements shall be documented, implemented, and maintained.	Major	A document review shall verify that if food safety regulations in a country of production or a country of intended distribution require a food safety control approach other than Codex Alimentarius HACCP principles, a food safety plan that meets both Codex and the applicable authorities' food safety requirements has been documented, implemented, and maintained.
Standard AR-3 Farmworkers and individual(s) responsible for food safety have received training commensurate with their responsibilities.			
AR 3.1	The individual(s) responsible for food safety receive annual training in food safety and are provided with periodic updates as necessary or upon observation or information indicating that personnel are not meeting regulatory requirements. Training includes HACCP principles and is at least equivalent to a curriculum recognized as adequate by that required in the country of production and the country of distribution.	Major	A document review shall verify that the individual(s) responsible for food safety receive updated training as necessary, including whenever there are significant operational changes, and at least annually.  A document review shall verify that the person responsible for the HACCP-based food safety plan must have completed formal, classroom-based HACCP training within the past five years. Recertification after five years may be completed online.
AR 3.2	The individual(s) responsible for food safety are onsite whenever the site is operating.	Major	A review of the food safety plan and management interviews shall verify that the individual(s) responsible for food safety are mandated to be onsite whenever the site is operating.
AR 3.3	Farmworkers are trained in food safety practices commensurate to their responsibilities on the farm and are provided with periodic updates as necessary.	Major	FWIs shall verify that farmworkers have been trained in food safety practices commensurate to their responsibilities on the farm upon hire and have been provided with updates as necessary, or anytime there are significant operational changes, and at least annually.
AR 3.4	A training program is documented and implemented. Records are kept that document training, including the date of the training, topics covered, personnel trained, and supervisor's verification that training was completed and that the trainee is competent to perform the required tasks.	Minor	A document review shall verify that food safety training records include: 1. Personnel trained; 2. The date of training; 3. The topics covered; and 4. A supervisor's verification that training was completed and that the trainees are competent to perform the required tasks.
Standard AR-4 All food safety policies pertaining to employees apply equally to all visitors and other personnel.			
AR 4.1	Written policies related to food safety state that they are applicable equally to all farmworkers, visitors, and other personnel.	Minor	A review of the food safety plan shall verify that it contains a visitor policy that states food safety policies are equally applicable to anyone who enters the farm.
AR 4.2	Visitors are informed of, and comply with, food safety policies and procedures.	Minor	Visual observation of posted visitors' policy and personal experience upon entering the farm shall verify that there is a site induction process where all visitors are informed of the applicable requirements of the food safety plan.
Standard AR-5 Adequate documentation and recordkeeping to demonstrate compliance with the EFI Standards is maintained.			
AR 5.1	Documentation and records are maintained at least equivalent to the requirements set forth by the applicable standards in the country of production and the country of distribution and are sufficient to demonstrate compliance with the EFI Standards.	Critical	Relevant policies, the food safety plan, food safety records, and SOPs are sufficiently available to allow the CB to verify conformity with the requirements of the EFI Standards.
AR 5.2	Documents may be maintained onsite or at an off-site location but in all cases must be available for inspection within 24 hours of request.	Major	Written documentation and records are available for review within 24 hours of request. Records shall be able to be located and provided to auditors during audits. Electronic records are considered to be onsite if the records are accessible from an onsite location at the farm.

Food Safety Standards		CMM	Guidance and Interpretations
AR 5.3	Documentation is effectively maintained and securely stored to prevent damage. Documentation shall be retained for a minimum of two years or as specified by a customer or applicable regulation, whichever is longer.	Major	All document review shall verify that records are maintained for a minimum of two years. Documentation is securely stored.
AR 5.4	Measuring and monitoring devices are identified, appropriate to the component being measured, and are calibrated according to recognized industry standards. Calibration schedule is established and documented.	Minor	A document review shall verify that there are procedures to control measuring and monitoring devices that: 1. Specify the required accuracy of each device appropriate to the component being measured; 2. Set out how the device is verified or calibrated according to recognized industry standards; 3. Define the frequency of verification or calibration activities; 4. Set out corrective action to be taken if it is found that devices do not conform to specified accuracies. A document review shall verify that the calibration or verification schedules have been followed; and 5. Define an adequate number of measuring and monitoring devices for the operation.
AR 5.5	Equipment is clean, maintained, appropriate for its intended use, and has been assessed to reduce the risk of contamination by pathogens or reasonably foreseeable hazards.	Minor	A review of the food safety plan shall verify that equipment has been assessed for risks of contamination by pathogens or reasonably foreseeable hazards, and appropriate risk controls are in place.  Visual observation shall verify that equipment is appropriate for its intended use.
Standard AR-6 Corrective actions are implemented for findings out of compliance with the EFI Standards.			
AR 6.1	Written procedures and timelines for making corrective actions are developed and implemented.	Major	A document review shall verify that the farm has a written procedure for developing and implementing corrective actions.
AR 6.2	Records of corrective actions are documented and maintained. Documentation includes identification of root cause and resolution of food safety violations.	Major	A document review shall verify that each nonconformity pertaining to the food safety plan has been documented in a manner which: 1. Describes each nonconformity; 2. Identifies all nonconforming product (if any) and how nonconforming product is corrected, sold under new specifications, or disposed of; 3. Identifies the root causes; 4. Details corrective actions taken to address the nonconformity; and 5. Verifies the effectiveness of corrective actions.
AR 6.3	Nonconforming produce, packaging, or equipment shall be clearly identified and quarantined to prevent the risk of inadvertent use or distribution. Product release procedures have been documented.	Major	A document review and visual observation shall verify that nonconforming produce, packaging, or equipment is clearly identified and quarantined to prevent the risk of inadvertent use or distribution.  A document review shall verify that product release procedures have been documented.
Standard AR-7 An internal audit system is in place that covers the scope of the food safety plan.			
AR 7.1	An internal audit schedule is developed and maintained. Internal audits are conducted at least annually to verify the effectiveness of the food safety plan. Internal audits and corrective actions are documented.	Major	A document review shall verify that the food safety plan is audited through an internal audit system where: 1. There is an internal audit schedule; 2. Audits are conducted at least annually; and 3. Internal audit records, including corrective actions, are maintained for two years.

Food Safety Standards		CMM	Guidance and Interpretations
Standard AR-8 Food products can be accurately traced back to the farm.			
AR 8.1	Finished product is able to be traced to the customer and back to the field within two hours. Trace back information includes production inputs. Finished products must bear a sell by, use by, packed on, or other code that can be used for traceability and recall purposes.	Major	<p>A document review shall verify that the farm has implemented a traceability system.</p> <p>A trace back activity shall verify that finished product is identified so that within two hours it can be:</p> <ol style="list-style-type: none"> <li>1. Tracked to the immediate purchaser;</li> <li>2. Traced back to the field from which it was harvested; and</li> <li>3. Matched with the inputs used in the field in which it was grown.</li> </ol> <p>A document review shall verify that finished products bear a sell by, use by, packed on, or other code that can be used for traceability and recall purposes.</p>
AR 8.2	A trace back and forward exercise is conducted at least annually.	Minor	A document review shall verify that a trace back and forward exercise was successfully conducted within the last 12 months.
AR 8.3	Records sufficient for trace back and trace forward are maintained.	Minor	A document review shall verify that all records required to operate the traceability system are available.
Standard AR-9 A recall procedure is established, documented, and tested.			
AR 9.1	Written recall procedure identifies the personnel responsible for initiating, managing, and investigating product withdraw or recall procedures to be followed in the event of a recall.	Major	A review of the written recall procedure shall verify that the personnel responsible for initiating, managing, and investigating the withdrawal or recall of product have been identified.
AR 9.2	The recall procedure describes the methods to inform customers and other relevant bodies in a timely manner of the nature of the withdraw or recall.	Minor	A review of the written recall procedure shall verify that methods to inform customers and other relevant bodies in a timely manner of the nature of a withdraw or recall are described.
AR 9.3	The recall procedure includes an investigation to determine the root cause of a withdraw or recall.	Minor	<p>A review of the written recall procedure shall verify that an investigation to determine the root cause of a withdraw or recall is mandated.</p> <p>A review of documentation from past withdraws or recalls, if any, shall verify that a root cause investigation was undertaken.</p>
AR 9.4	The recall procedure is tested in the form of a mock recall at least annually and is applicable to all products.	Minor	Records shall verify that a mock recall was successfully conducted within the last 12 months and was applicable to all products.
AR 9.5	Records of all product withdrawal and recalls are maintained for at least two years.	Minor	Recall and withdrawal records for the past two years are complete and shall be available for review.
AR 9.6	Procedures and responsibility for handling and investigating the cause and resolution of customer food safety complaints (corrective actions) shall be documented and implemented. Trends of complaint data shall be investigated and analyzed by qualified personnel. Records of complaints and their investigations shall be maintained.	Major	A document review shall verify that procedures and responsibility for handling and investigating the cause and resolutions of customer food safety complaints have been documented and verified and that trends of complaint data have been investigated and analyzed by qualified personnel. A document review shall verify that records of complaints and resulting investigations have been maintained.

Food Safety Standards		CMM	Guidance and Interpretations
Standard AR-10 Inputs are assessed for food safety risk and managed to ensure control over processes.			
AR 10.1	Any inputs, including services, purchased from outside sources that may have an effect on food safety are documented and assessed for risk, documented in specifications, kept current and securely stored, and are readily accessible. There is a written specification review policy in place, and any risk identified is appropriately managed.	Major	A document review shall verify that a risk assessment and specifications for all inputs (including services) have been documented for all inputs that may impact food safety, are kept current and securely stored, are readily available, and that all identified risks are managed under the food safety plan.
AR 10.2	The farm maintains control over any processes or activities that are outsourced and could have an effect on food safety. Outsourced processes/activities are identified and documented.	Major	A document review shall verify that there is a documented risk assessment for all outsourced processes or activities that may impact food safety and that all risks identified are managed under the food safety plan.
AR 10.3	In packing and/or processing facilities, materials and ingredients are used in the correct order and within the allocated shelf life.	Major	A document review and visual observation shall verify that materials and ingredients are used in the correct order and within the allocated shelf life in packing and/or processing facilities.
Standard AR-11 Suppliers are continually evaluated, assessed, and monitored for any impact on food safety.			
AR 11.1	The farm documents its evaluation and assessment of all suppliers for any impact on food safety. Procedures are developed and implemented to adequately address supplier effects on food safety. Results of evaluations, investigations, and follow-up actions are documented.	Major	A document review shall verify that there are documented and implemented procedures for the evaluation and assessment of suppliers providing inputs that may impact food safety which: 1. Verify that inputs meet specifications; 2. Evaluate supplier performance; and 3. Investigate any instances where product does not meet specification.
AR 11.2	In packing and/or processing facilities, non-approved suppliers shall be accepted only on an emergency basis provided they are inspected or assessed before use.	Major	A document review shall verify that there is a written policy for accepting non-approved suppliers on an emergency basis and that any non-approved suppliers used in an emergency were inspected or assessed before use in packing and/or processing facilities.
Standard AR-12 Employees who show signs of illness or who have open wounds that are not properly covered are prohibited from direct contact with produce and food contact surfaces.			
AR 12.1	Farmworkers are trained to recognize signs of illness, including signs and symptoms of pesticide poisoning.	Major	FWIs shall verify that farmworkers have been trained on and can recognize signs of illness.
AR 12.2	A reporting system for illness is established. Employees report illness to their supervisor and/or the established illness reporting system, if different.	Major	A document review shall verify a documented illness reporting system.
AR 12.3	Employees are made aware of the illness reporting system.	Major	FWIs shall verify that employees are aware of the illness reporting system.
AR 12.4	Employees are required to report illness or injury and are not punished for reporting illnesses and injuries. Supervisors are required to watch for signs of unreported illnesses or injuries.	Minor	FWIs, management interviews, and a review of disciplinary records shall verify that employees have not been punished for reporting illnesses and injuries.  A review of training records shall verify that supervisors have been trained on how to recognize signs of unreported illnesses or injuries.
AR 12.5	Employees who show signs of illness are assigned to jobs other than those involving direct contact with produce and food contact surfaces. Farmworkers are excluded from the farm only to the extent necessary to prevent public health risks until requirements in AR 12.6 are met.	Major	FWIs and a document review shall verify that employees who show signs of illness are assigned to jobs other than those involving direct contact with produce and food contact surfaces or are excluded from the farm only to the extent necessary to prevent public health risks.

Food Safety Standards		CMM	Guidance and Interpretations
AR 12.6	Employees are symptom-free for 48 hours or produce a note from a doctor before returning to work involving direct contact with produce and food contact surfaces.	Major	A review of the food safety plan shall verify that a 48-hour period of being symptom-free or a note from a doctor be provided before farmworkers return to work involving direct contact with produce and food contact surfaces is documented.
AR 12.7	Employees who have open wounds or sores are issued protective coverings (such as gloves or bandages) if they will have direct contact with produce and food contact surfaces.	Minor	<p>A review of the food safety plan shall verify that it mandates that employees who have open wounds or sores are issued brightly-colored protective coverings (such as gloves or bandages) if they will have direct contact with produce or food contact surfaces.</p> <p>Visual observation by the auditor shall verify that wounds or open sores are covered.</p> <p>FWIs shall verify that employees know how sores and open wounds should be managed prior to beginning or continuing work.</p>
AR 12.8	A screening procedure for communicable disease shall be in place for all employees, visitors, and contractors who come into contact with produce or food contact materials.	Major	A document review and FWIs shall verify that there is a screening procedure for communicable diseases in place for all employees, visitors, and contractors.

Food Safety Standards	CMM	Guidance and Interpretations
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Standard AR-13 A written company policy on worker health and hygiene is established.

AR 13.1	<p>The health and hygiene policy includes:</p> <ol style="list-style-type: none"> <li>1. Sanitation and hygiene training;</li> <li>2. Adequate access to bathroom facilities, including for menstruating women and urinary tract health issues;</li> <li>3. Requirements for frequent and regular hand washing, including scrubbing with unscented soap or other adequate surfactant, running water that satisfies requirements in the country of production and country of distribution, and drying hands thoroughly using single-service towels, sanitary towel service, electric hand dryers, or other adequate hand drying devices:             <ol style="list-style-type: none"> <li>a. before starting work,</li> <li>b. before putting on gloves (as applicable),</li> <li>c. after using the toilet,</li> <li>d. upon return to work after any break or other absence from the work station,</li> <li>e. after touching animals (including livestock and working animals), or any waste of animal origin, and</li> <li>f. after any incident of potential contamination;</li> </ol> </li> <li>4. Restrictions on smoking, eating, spitting, gum chewing, drinking alcohol, and urinating or defecating in any storage or growing area;</li> <li>5. Personal item storage;</li> <li>6. Requirements for head and hair coverings for all farmworkers;</li> <li>7. Requirements for personal attire, including:             <ol style="list-style-type: none"> <li>a. Clean and work-appropriate attire,</li> <li>b. In addition to the employee's own attire, protective garments (e.g. aprons) are provided,</li> <li>c. All garments are well maintained and cleaned, sanitized, or replaced according to SOPs. Outer garments should be removed each time the employee uses the restroom, takes breaks, and ends a shift. If outer garments are used, there should be a designated area for the garments to be stored, when they are not being worn. Records of sanitation and replacement are kept;</li> </ol> </li> <li>8. Requirements that no jewelry or watch of any kind, badges, buttons, false fingernails, pens, pencils, thermometers, etc. are worn or stored in unsecured pockets;</li> <li>9. Requirements that when gloves are used, they are clean and intact, provided by the grower, changed or cleaned frequently, and disposed of as required. Latex gloves and powder are prohibited;</li> <li>10. Requirements that produce or food contact surfaces that have come into contact with blood or other bodily fluids (e.g. from sneezing, etc.) are handled/disposed of properly;</li> <li>11. Requirements that broken glass, spills, leaks, and inoperative water sprays are handled properly;</li> <li>12. Requirements that chemicals are properly labeled, compliant with local and country regulations in the country of production and country of distribution, safely stored away from production areas, living areas, and harvested produce, disposed of in a way to not pose a risk of contaminating crops, and records are kept, inclusive of harvest date; and</li> <li>13. Any other adequate personal cleanliness to protect against contamination of produce and food contact surfaces.</li> </ol>	Critical	<p>A document review shall verify that there is a written health and hygiene policy that includes:</p> <ol style="list-style-type: none"> <li>1. Sanitation and hygiene training;</li> <li>2. Adequate access to bathroom facilities, including for menstruating women and urinary tract health issues;</li> <li>3. Requirements for frequent and regular hand washing, including scrubbing with unscented soap or other adequate surfactant, running water that satisfies requirements in the country of production and country of distribution, and drying hands thoroughly using single-service towels, sanitary towel service, electric hand dryers, or other adequate hand drying devices:             <ol style="list-style-type: none"> <li>a. before starting work,</li> <li>b. before putting on gloves (as applicable),</li> <li>c. after using the toilet,</li> <li>d. upon return to work after any break or other absence from the work station,</li> <li>e. after touching animals (including livestock and working animals), or any waste of animal origin, and</li> <li>f. after any incident of potential contamination;</li> </ol> </li> <li>4. Restrictions on smoking, eating, spitting, gum chewing, drinking alcohol, and urinating and defecating in any storage or growing area;</li> <li>5. Personal item storage;</li> <li>6. Requirements for head and hair coverings for all farmworkers;</li> <li>7. Requirement for personal attire, including:             <ol style="list-style-type: none"> <li>a. Clean and work-appropriate attire,</li> <li>b. In addition to the employee's own attire, protective garments (e.g. aprons) are provided,</li> <li>c. All garments are well maintained and cleaned, sanitized, or replaced according to SOPs. Outer garments should be removed each time the employee uses the restroom, takes breaks, and ends a shift. If outer garments are used, there should be a designated area for the garments to be stored, when they are not being worn. Records of sanitation and replacement are kept;</li> </ol> </li> <li>8. Requirements that no jewelry or watch of any kind, badges, buttons, false fingernails, pens, pencils, thermometers, etc. (e.g., ear gauges, clothing with sequins or studs, bobby pins, false eyelashes, eyelash extensions, or nail polish) are worn or stored in unsecured pockets;</li> <li>9. Requirements that when gloves are used, they are clean and intact, provided by the grower, changed or cleaned frequently, and disposed of as required. Latex gloves and powder are prohibited;</li> <li>10. Requirements that produce or food contact surfaces that have come into contact with blood or other bodily fluids (e.g. from sneezing, etc.) are handled/disposed of properly;</li> <li>11. Requirements that broken glass, spills, leaks, and inoperative water sprays are handled properly; and</li> <li>12. Requirements that chemicals are properly labeled, compliant with local and country regulations in the country of production and country of distribution, safely stored away from production areas, living areas, and harvested produce, disposed of in a way to not pose a risk of contaminating crops, and records are kept, inclusive of harvest date; and</li> <li>13. Any other personal cleanliness to protect against contamination of produce and food contact surfaces.</li> </ol>
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Food Safety Standards		CMM	Guidance and Interpretations
Standard AR-14 All employees participate in health and hygiene training prior to beginning work.			
AR 14.1	All employees are trained in: 1. Proper hand washing; 2. Proper personal hygiene; 3. Proper toilet use; 4. Proper glove use, if required; 5. Proper treatment of cuts and abrasions; 6. Identification of illness and signs of illness; 7. Control of bodily fluids (e.g. coughing, sneezing, spitting); and 8. Knowledge of reporting system for illness and injuries.	Critical	A review of health and hygiene training curriculum and training attendance records shall verify that farmworkers are trained on: 1. Hand washing; 2. Personal hygiene; 3. Toilet use; 4. Glove use, if required; 5. Treatment of cuts and abrasions; 6. Identification of illness and signs of illness; 7. Control of bodily fluids (e.g. coughing, sneezing, spitting); and 8. The reporting system for illness and injuries.  FWIs shall verify that farmworkers received health and hygiene training at the start of the growing season and apply the practices prior and during work.
AR 14.2	Health and hygiene training: 1. Is conducted in the employees' language; 2. Utilizes visual aids; 3. Is tailored to the education level of the workers being trained; 4. Takes into account cultural differences that may inhibit proper training; and 5. Is offered regularly as a refresher course.	Major	Training records and course documentation shall verify that health and hygiene training: 1. Is conducted in a language that farmworkers are fluent in; 2. Utilizes visual aids; 3. Is tailored to the education level of the farmworkers being trained; 4. Takes into account cultural differences that may inhibit proper training; and 5. Is offered regularly as a refresher course.
AR 14.3	Health and hygiene training is provided at hire and at the beginning of each growing season. Periodic updates are provided as necessary, including, without limit, upon observation or information indicating that personnel are not meeting regulatory requirements.	Major	FWIs shall verify that farmworkers received health and hygiene training at hire and at the start of the growing season.
AR 14.4	Signs are posted indicating proper hand washing and toilet use. Signs use pictures and/or are written in the predominant language of the workforce.	Minor	Visual observation shall verify that posted signs indicate proper hand washing and toilet use. Signs use pictures and/or are written in the predominant language(s) of the workforce.

Food Safety Standards		CMM	Guidance and Interpretations
Standard AR-15 Farmworkers have access to cool, potable water, shaded rest areas, clean, sanitary toilets, and hand washing facilities at the worksite.			
AR 15.1	<p>A process is in place which ensures:</p> <ol style="list-style-type: none"> <li>1. The farm assesses and manages risk of microbial and chemical contamination in drinking water.</li> <li>2. Farmworkers' unrestricted access to a clean, sanitary container of cool, potable water that is clearly labeled and in close proximity to workers at all times.</li> <li>3. Drinking cups are always available next to the source of drinking water.</li> <li>4. Unrestricted access to clean and sanitary toilets and washing facilities at all times and in close proximity to fields, packaging, and production areas at the ratio of one for every twenty farmworkers.</li> <li>5. Sanitary facilities are cleaned at a frequency sufficient to ensure suitability of use.</li> <li>6. Separate bathroom facilities are provided to female farmworkers at the same ratio.</li> <li>7. Soap, potable water, toilet paper, and paper towels are always available for handwashing in sufficient proximity to toilets and handling of produce.</li> <li>8. Shaded rest areas and rest periods in order to avoid heat illness during high heat conditions.</li> </ol>	Minor	<p>A document review shall verify that there is a written policy for:</p> <ol style="list-style-type: none"> <li>1. Assessing and managing the risk of microbial and chemical contamination of drinking water;</li> <li>2. Providing unrestricted access to clean, sanitary, cool, potable water that is clearly labeled and in close proximity to farmworkers at all times;</li> <li>3. Keeping drinking cups available next to the source of drinking water;</li> <li>4. Providing unrestricted access to clean and sanitary toilets that lock from the inside and washing facilities at all times and in close proximity to fields, packaging, and production areas at the ratio of one for every twenty farmworkers;</li> <li>5. Cleaning sanitary facilities at a frequency sufficient to ensure suitability of use;</li> <li>6. Providing unrestricted access for female farmworkers to separate toilets and washing facilities at the ratio of one for every twenty female farmworkers;</li> <li>7. Providing soap, potable water, toilet paper, and paper towels always available in sufficient proximity to toilets and handling of produce; and</li> <li>8. Providing shaded rest areas and rest periods in order to avoid heat illness during high heat conditions.</li> </ol>
AR 15.2	<p>The following exist:</p> <ol style="list-style-type: none"> <li>1. Farmworkers have unrestricted access to a clean, sanitary container of cool, potable water that is clearly labeled and in close proximity to workers at all times.</li> <li>2. Drinking cups are available next to the source of drinking water.</li> <li>3. Farmworkers have unrestricted access to clean and sanitary toilets and washing facilities at all times and in close proximity to fields, packaging, and production areas at the ratio of one for every twenty farmworkers.</li> <li>4. Sanitary facilities are cleaned at a frequency sufficient to ensure suitability of use.</li> <li>5. Separate bathroom facilities are provided to female farmworkers at the same ratio.</li> <li>6. Soap, potable water, toilet paper, and paper towels are always available for handwashing in sufficient proximity to toilets and handling of produce.</li> <li>7. Shaded rest areas and rest periods are provided in order to avoid heat illness during high heat conditions.</li> <li>8. The toilets lock from the inside.</li> </ol>	Minor	<p>FWIs and visual observation shall verify that the policies provided as evidence for HS 4.1 have been uniformly implemented.</p> <p>Document review shall verify the use of potable water.</p>
Standard AR-16 Food safety controls are verified as effective.			
AR 16.1	Food safety controls are verified to achieve their intended purpose. Verification schedule, activities, and results are documented.	Major	A document review shall verify that food safety controls achieve their intended purpose. Verification schedule, activities, and results are documented.
Standard AR-17 The responsibilities and methods of assessment and prevention of adulteration caused by deliberate acts intended to cause widespread harm to public health, including acts of terrorism, are documented, implemented, and maintained.			
AR 17.1	A food defense plan shall be documented and identify food defense threats and the measures and methods implemented to mitigate these threats.	Major	A document review shall verify that the assessment is in the form of a vulnerability assessment that should identify threats and document mitigation strategies to reduce or eliminate such threats.

Food Safety Standards		CMM	Guidance and Interpretations
AR 17.2	The food defense plan is signed by senior management and communicated to all employees. The plan is documented, integrated into the organization's Food Safety Management System, and is reviewed and revised at least annually.	Major	A review of the food defense plan shall verify that the plan is documented, integrated into the Food Safety Management System, reviewed at least annually, and signed by senior management.
Standard AR-18 The responsibilities and methods of assessment and prevention of food fraud vulnerabilities shall be documented, implemented, and maintained. The vulnerability assessment procedure shall be documented and identify food fraud vulnerabilities in all products and all processes. The food fraud vulnerability assessment shall include the site's vulnerability to potential food fraud incidents, including product substitution, dilution, counterfeiting, stolen goods, or mislabeling, which may impact food safety.			
AR 18.1	A food fraud mitigation plan shall be documented and identify food fraud vulnerabilities and the measures and methods implemented to control identified vulnerabilities.	Major	A document review shall verify that the assessment is in the form of a vulnerability assessment that should identify threats and document mitigation strategies to reduce or eliminate such threats.
AR 18.2	The food fraud vulnerability assessment and mitigation plan are documented, supported by the organization's Food Safety Management System, and reviewed and revised at least annually.	Major	A review of the food fraud vulnerability assessment shall verify that the assessment is documented, supported by the Food Safety Management System, and reviewed at least annually.
<b>Crisis Management (CM)</b>			
Standard CM-1 A written company policy on crisis management is established.			
CM 1.1	An incident management plan outlining response procedures and responsibilities for addressing known or reasonably foreseeable potential dangers that could impact food safety (e.g. flood, drought, fire, other severe weather) is documented and implemented.	Major	A document review shall verify that the plan is documented and implemented.
CM 1.2	The incident management plan is reviewed and tested at least annually. Records of review shall be maintained.	Major	A document review shall verify that the plan is reviewed and tested at least annually and that records are maintained.
<b>Allergen Management (AM)</b>			
Standard AM-1 Procedures and responsibilities used to control allergens and prevent allergen sources from contaminating product shall be documented and implemented.			
AM 1.1	The allergen management program shall include a risk assessment of products, inputs, processing aids, and other sources of allergens (e.g. outside contamination such as personnel lunches) and how identified allergen risks are controlled to prevent allergen cross-contact in the food safety plan. Farmworkers are trained in proper handling of allergens.	Major	A document review shall verify that procedures and responsibilities used to control allergens are documented and implemented.  A document review shall verify that farmworkers have been trained in proper handling of allergens.
AM 1.2	Finished product is labeled to meet regulatory requirements (including allergen labelling) and customer specification (if applicable) for the country of intended distribution.	Major	A document review and visual observation shall verify that finished product labels meet regulatory requirements, including requirements for allergen labelling.

Food Safety Standards		CMM	Guidance and Interpretations
Water (WA)			
Standard WA-1 Water sources, water distribution systems, and water used in crop production are assessed for risk and held to appropriate quality and safety standards.			
WA 1.1	<p>Water sources, uses, quality, delivery systems, and equipment are documented, assessed for food safety risk, and sourced in a manner that is compliant with existing regulations.</p> <ol style="list-style-type: none"> <li>1. A description of the water system sufficient to facilitate a risk assessment is prepared, which can include maps, photographs, drawings, etc. to communicate the location of the source, permanent fixtures, and the flow of the water system.</li> <li>2. An initial risk assessment is required to develop a microbial water quality profile of the agricultural water source. A minimum number of samples must be taken as close in time as possible but prior to harvest pursuant to the microbiological drinking water standards of the country of production and country of distribution for the following: <ol style="list-style-type: none"> <li>a. an untreated surface water source, and</li> <li>b. an untreated ground water source.</li> </ol> </li> </ol> <p>The number of samples of agricultural water must be representative of the farm's use.</p> <ol style="list-style-type: none"> <li>3. A review or new assessment is conducted at the beginning of each growing season, any time there is a change in the system, or when a situation occurs that could introduce an opportunity for contamination of the system.</li> <li>4. In crop production, the use and quality of water, water application methods, and application schedules are assessed with respect to crop characteristics and the degree of contact with the edible portion of the crop for the purpose of identifying conditions that may result in contamination with pathogens.</li> <li>5. Appropriate actions are taken to eliminate or minimize the potential for contamination from water used for crop production.</li> </ol>	Major	<p>A document review shall verify that there is a documented food safety risk assessment for water sources, delivery systems, and equipment. The risk assessment shall include:</p> <ol style="list-style-type: none"> <li>1. A description of the water system identifying the source, permanent fixtures, and the flow of the water system;</li> <li>2. A microbial water quality profile of the agricultural water source, based on a representative number of samples;</li> <li>3. Identification of conditions that may result in contamination with pathogens is made through an analysis of the use and quality of water, water application methods, and application schedules with respect to crop characteristics and the degree of contact with the edible portion of the crop;</li> <li>4. An analysis of irrigation methods for their potential to introduce, support, or promote growth of human pathogens, including the potential to deposit soil on the crops or for water leakage; and</li> <li>5. Written evidence demonstrates that actions are taken to eliminate or minimize the potential for contamination from water used for crop production.</li> </ol> <p>Written evidence shall verify that the risk assessment has been reviewed or updated, or a new assessment is conducted at the beginning of each growing season, any time there is a change in the system, or when a situation occurs that could introduce an opportunity for contamination of the system.</p>
WA 1.2	<p>A water management plan is established and documented and includes:</p> <ol style="list-style-type: none"> <li>1. Preventive controls;</li> <li>2. Monitoring and verification procedures;</li> <li>3. Corrective actions; and</li> <li>4. Documentation.</li> </ol>	Major	<p>A review of the written water management plan shall verify the plan includes:</p> <ol style="list-style-type: none"> <li>1. Preventive controls;</li> <li>2. Monitoring and verification procedures;</li> <li>3. Corrective actions; and</li> <li>4. Documentation.</li> </ol>
WA 1.3	<p>Water sources, distribution systems, and equipment used to maintain water quality are not a source of contamination and are inspected and maintained according to a documented maintenance schedule. Wells used as water sources are maintained and repaired as needed, and all unused wells are properly shut down. Reasonable measures must be implemented to reduce the potential for contamination of produce with known or reasonably foreseeable hazards as a result of contact with pooled water.</p>	Major	<p>A review of maintenance schedules and logs shall verify that:</p> <ol style="list-style-type: none"> <li>1. Water sources, distribution systems, and equipment used to maintain water quality are inspected and maintained according to a documented maintenance schedule;</li> <li>2. Wells used as water sources are maintained and repaired as needed;</li> <li>3. All unused wells are properly shut down; and</li> <li>4. Reasonable measures have been implemented to reduce the potential for contamination of produce by contact with pooled water.</li> </ol>

Food Safety Standards		CMM	Guidance and Interpretations
WA 1.4	Farm assesses and manages risk of microbial and chemical contamination in water (including water used for ice) that directly contacts grown and harvested crops or that is used on food contact surfaces. Water meets microbial standards of existing regulations in the country of production and destination, whichever is greater or more stringent. If water does not meet applicable microbial standards, use of the water source is discontinued, and water is treated with approved, suitable methods to achieve those standards. The treatment process is effectively monitored and controlled to ensure that treatment is effective. Treated water is tested to verify it meets microbial standards before using.	Critical	<p>A review of microbial test results shall verify that water, whether treated or not, (including water used for ice) that directly contacts grown and harvested crops or that is used on food contact surface has been:</p> <ol style="list-style-type: none"> <li>1. Tested according to the sampling and testing procedures of the water management plan; and</li> <li>2. Meets microbial standards.</li> </ol> <p>A review of corrective actions taken when water does not meet applicable microbial standards shall verify that the water was treated using a monitored, controlled, and effective process that resulted in achieving drinking water standards. Where this standard was not achieved, evidence shall verify that the use of the water source has been discontinued.</p>
WA 1.5	Irrigation methods are evaluated for their potential to introduce, support, or promote growth of human pathogens, including the potential to deposit soil on the crops or for water leakage. Procedures for storing irrigation pipes and drip tape that reduce or eliminate pest infestations are used.	Major	<p>A document review shall verify that irrigation methods have been evaluated for their potential to introduce, support, or promote pathogen growth and that there is an implemented procedure for the safe storage of irrigation pipes and drip tape that eliminates pest infestations.</p> <p>Visual observation shall verify that irrigation pipes and drip tape are properly stored.</p>
WA 1.6	Location and construction of functional wells is assessed for optimal water protection. Wells are located away from potential contaminants such as septic tanks and drain fields, and on an area of land that encourages drainage away from the water source or well.	Minor	<p>Visual observation shall verify there is evidence that wells are located:</p> <ol style="list-style-type: none"> <li>1. Away from potential contaminants such as septic tanks and drain fields; and</li> <li>2. On an area of land that encourages drainage away from the water source or well.</li> </ol>
WA 1.7	There is a written policy separating water systems that convey untreated human or animal waste from those for agricultural use. Policy is implemented.	Major	A document review and visual observation shall verify that there is a documented and implemented procedure to ensure separation of water for agricultural or potable use with systems used for human or animal wastes.
WA 1.8	The water system prevents backflow from and cross-contamination with wastewater or sewage piping systems. Plumbing is maintained to avoid being a source of contamination to produce, water sources, or food contact surfaces.	Major	A review of the water management plan and visual observation shall verify that there are elements designed to prevent backflow, backflow preventers, or other equivalent technologies between water for agricultural or potable use with systems used for human or animal wastes. A document review shall verify that plumbing is maintained.
WA 1.9	<p>Microbial testing is conducted using scientifically valid test methods to verify the adequacy of water quality. Testing is conducted according to current regulatory requirements, current science, and the risk assessment, for microbial pathogens of concern and standard indicators of fecal contamination. Points of water sampling are based on the particular history, location, and risk assessment of the source.</p> <p>Testing is conducted according to current regulatory requirements, current science, and the risk assessment, and at least monthly. If safety problems are identified, corrections should take place and testing should be increased to daily until problem is resolved. The local water authority microbial analysis may be used to document adequacy.</p> <p>Water analysis is performed by a laboratory accredited to ISO 17025 or equivalent.</p>	Major	<p>A review of microbial testing records shall verify that the sampling and testing of water for microbial contamination and standard indicators of fecal contamination was conducted in accordance with current regulatory requirements, current science, and the water management plan and at least monthly.</p> <p>A review of corrective actions taken when testing shows control limits have been or may soon be exceeded shall verify that the procedures set out in the water management plan are applied, and testing increased to daily until testing results confirm the problem is resolved.</p> <p>Evidence shall be sought that verifies that all water analyses are performed by a laboratory accredited to ISO 17025 or equivalent or by a local water authority.</p>
WA 1.10	Water sources are protected from runoff, flooding, and animal contamination.	Minor	Visual observation shall verify that water sources are protected from runoff, flooding, and animal contamination.

Food Safety Standards		CMM	Guidance and Interpretations
WA 1.11	Water used in hydroponic culture is tested and treated to reduce levels of microbial pathogens.	Major	<p>A review of microbial testing records shall verify that the sampling and testing of water for microbial contamination and standard indicators of fecal contamination was conducted in accordance with the water management plan and at least monthly.</p> <p>A review of corrective actions taken when testing shows control limits have been or may soon be exceeded shall verify that the procedures set out in the water management plan are applied, and testing increased to daily until testing results confirm the problem is resolved.</p> <p>Evidence shall be sought that verifies that all water analyses are performed by a laboratory accredited to ISO 17025 or equivalent or by a local water authority.</p>
WA 1.12	Local rain patterns are observed to determine the effect of runoff from adjacent and nearby properties.	Minor	Written and/or visual observations of water flow patterns shall verify that the effects of rainwater and irrigation water introduced from adjacent or nearby properties is known.
Standard WA-2 Antimicrobial agent use should be documented and the use of antimicrobial agents significant to human and animal health is avoided.			
WA 2.1	Antimicrobial agents used in water are not significant to human and animal health. Other antimicrobial agents are used in accordance with Good Agricultural Practices.	Major	<p>A document review shall verify that Material Safety Data Sheets (MSDSs) are available for antimicrobial agents.</p> <p>Written evidence shall verify that the use of antimicrobial agents significant to human and animal health has been avoided.</p>
<b>Soil Amendments/Manure (SAM)</b>			
Standard SAM-1 Soil amendments and manure use are thoroughly documented and assessed for risk.			
SAM 1.1	The risk of contamination of food products, food contact surfaces, water sources, and distribution systems from soil amendments and treatment methods is assessed and documented. Appropriate actions are taken to eliminate microbial pathogens from soil amendments used for crop production.	Major	<p>Written evidence shall verify that a plan has been developed and implemented that documents the risks of contamination of food products, food contact surfaces, water sources, and distribution systems from soil amendments, manure use, and treatment methods.</p> <p>A document review shall verify that the plan sets out actions taken to eliminate microbial pathogens from soil amendments used for crop production.</p> <p>A document review shall verify that all applications of soil amendments, treatments, and manure have been recorded.</p>
SAM 1.2	A review or new assessment is conducted at the beginning of each growing season, any time there is a change in the system, or when a situation occurs that could introduce an opportunity for contamination of the system.	Major	A document review shall verify that the plan presented as evidence for SAM 1.1 has been reviewed and, as necessary, updated at the start of each growing season or when a situation occurs that could introduce an opportunity for contamination of the system.
SAM 1.3	The location, composition, treatment, application date, and method of soil amendment application is documented.	Minor	<p>A document review shall verify that all applications of soil amendments, treatments, and manure have been documented showing:</p> <ol style="list-style-type: none"> <li>1. The location of use;</li> <li>2. The material used and its composition;</li> <li>3. Any treatments given to the material used;</li> <li>4. The application date; and</li> <li>5. The method of soil amendment application.</li> </ol>

Food Safety Standards		CMM	Guidance and Interpretations
Standard SAM-2 Thorough documentation is required of the compost supplier.			
SAM 2.1	<p>Documentation is obtained from the supplier of soil amendments or, if generated on the farm, maintained by the farm, documenting the origin, composition, treatment used, aging procedure, handling practices (including curing and turning), water source, and scientific validation of effectiveness of treatment, including tests performed and test results in compliance with regulatory requirements in the country of production and the country of distribution. Documentation is available for inspection for two years.</p> <p>Supplier documentation includes materials, time and temperature treatments, number of turnings, watering frequency, carbon dioxide concentrations, ammonia concentrations, and test results in compliance with regulatory requirements in the country of production and the country of distribution.</p> <p>A minimum curing period that meets or exceeds regulatory requirements within the country of production and the country of distribution is included in criteria for properly composting animal manures.</p>	Major	<p>Documents provided by suppliers or supplied by the Grower shall verify that there are records for all manures and composts used showing:</p> <ol style="list-style-type: none"> <li>1. The origin, composition, treatment used, aging procedure, handling practices (including curing and turning), and scientific validation of effectiveness of treatment, including tests performed and test results;</li> <li>2. The raw materials used, time and temperature treatments, number of turnings, watering frequency, carbon dioxide concentrations, ammonia concentrations, and test results in compliance with regulatory requirements in the country of production and the country of distribution; and</li> <li>3. For animal wastes, a minimum curing period.</li> </ol>
SAM 2.2	Soil amendment suppliers have written SOPs to prevent cross-contamination of treated soil amendment with raw materials.	Major	A document review shall verify that the Grower holds copies of SOPs from suppliers related to the prevention of cross-contamination of treated materials with raw materials.
Standard SAM-3 Manure management plans are utilized.			
SAM 3.1	Written procedures establish a treatment process for manure that ensures inactivation of pathogens and complies with regulatory requirements in the country of production and the country of distribution. Treatment methods are scientifically validated and are verified as being effective. Records, including time and temperature controls, of validation and verification activities are maintained.	Major	<p>A document review shall verify that a manure management plan has been developed and implemented which includes:</p> <ol style="list-style-type: none"> <li>1. Treatment methods are validated as being effective to inactivate pathogens and comply with regulatory requirements in the country of production and the country of distribution;</li> <li>2. There is a process of verification that treatments are used in conformity with scientifically validated processes; and</li> <li>3. Records, including time and temperature controls, of validation and verification activities are maintained.</li> </ol>
SAM 3.2	Treated soil amendments are properly handled, conveyed, and stored to avoid contamination of water sources, produce, food contact surfaces, areas used for activities, water distribution systems, and cross-contamination with untreated soil amendments. Insulated covers are applied to aerated static piles and windrows to help ensure that all soil amendment material is subjected to the thermophilic conditions necessary for inactivation of pathogens.	Minor	Visual observation shall verify that treated soil amendments are handled, conveyed, and stored in a manner to avoid contamination of water sources, produce, food contact surfaces, areas used for activities, water distribution systems, and cross-contamination with untreated soil amendments and that insulated covers are applied to aerated static piles and windrows.
SAM 3.3	Any product containing human waste, except for biosolids as described in SAM 3.4, or raw or incompletely treated manure is not used.	Critical	<p>A document review shall verify that a prohibition on human waste, except for biosolids as described in SAM 3.4, and raw manure has been documented.</p> <p>Visual observation shall verify that no human waste or raw manure is being applied.</p>
SAM 3.4	If biosolids are used, they meet requirements in the country of production and country of distribution for use, including the requirements of 40 CFR Part 503 (EPA standards for use of sewage sludge). The risk of contamination is adequately assessed, and appropriate controls are implemented to reduce microbial contaminants.	Major	A document review shall verify that all biosolids used by the farm meet requirements in the country of production and country of distribution, including the requirements of 40 CFR Part 503.

Food Safety Standards		CMM	Guidance and Interpretations
SAM 3.5	Soil amendments are applied in such a way as to protect surface water or edible crops in crop fields and in adjacent fields.	Major	A review of SOPs and visual observation shall verify that soil amendments have been applied in a way as to protect surface water or edible crops in both fields where they have been applied and in adjacent fields.
SAM 3.6	Soil amendment application and harvest records demonstrate that the interval between soil amendment application and harvest does not compromise food safety.	Major	A review of soil amendment application and harvest records shall verify that the interval between soil amendment application and harvest does not compromise food safety.
SAM 3.7	Microbial testing of soil amendments for microbial pathogens of human health concern is conducted prior to application and test results are documented. Microbial testing demonstrates that soil amendment has no detectable levels of microbial pathogens of human health concern, including <i>E. coli</i> , <i>Salmonella</i> , and <i>Listeria monocytogenes</i> .	Major	<p>A review of testing results shall verify that test results show no detectable levels of microbial pathogens of human health concern (including <i>E. coli</i>, <i>Salmonella</i> and <i>Listeria</i>) that are dated prior to application dates for soil amendments.</p> <p>A review of the sampling section of the manure management plan shall verify that test were done in compliance with the documented sampling practices.</p> <p>Sampling results should conform to the following guidelines:</p> <ol style="list-style-type: none"> <li>1. <i>L. monocytogenes</i> - not detected using a method that can detect one colony-forming unit (CFU) per 5 gram (or milliliter, if liquid is being sampled) analytical portion;</li> <li>2. <i>Salmonella</i> species - not detected using a method that can detect three most probable numbers (MPN) per 4 grams (or milliliters, if liquid is being sampled) of total solids; and</li> <li>3. <i>E. coli</i> O157:H7 - not detected using a method that can detect 0.3MPN per 1 gram (or milliliter, if liquid is being sampled) analytical portion.</li> </ol>
SAM 3.8	Fields in close proximity to on-farm stacking of soil amendments are monitored to minimize the likelihood of wind-dispersed or aerosolized sources of contamination.	Minor	A document review and visual observation shall verify that: <ol style="list-style-type: none"> <li>1. Soil amendment storage sites were chosen to minimize the probability of contamination; and</li> <li>2. Fields in close proximity to storage sites have been monitored to detect any contamination that may have taken place.</li> </ol>
SAM 3.9	Equipment, vehicles, and tools used for soil amendments are maintained in good condition and are segregated from other uses. Sanitation of equipment, vehicles, and tools is documented and maintained. The equipment is calibrated to ensure accurate application.	Minor	A review of maintenance, sanitation, and calibration records along with visual observation shall verify that equipment, vehicles, and tools used for soil amendments are: <ol style="list-style-type: none"> <li>1. Maintained in good condition;</li> <li>2. Segregated from other uses;</li> <li>3. Sanitized; and</li> <li>4. Calibrated to ensure accurate application.</li> </ol>

Food Safety Standards		CMM	Guidance and Interpretations
<b>Environmental Assessments (EA)</b>			
Standard EA-1 Land use history, including adjacent lands, is evaluated and documented for food safety risks and appropriate steps are taken to minimize potential for contamination.			
EA 1.1	<p>Historical land uses for production fields are identified, documented, and assessed for any food safety issues that could arise from these uses.</p> <ol style="list-style-type: none"> <li>1. Evaluation includes a physical description of the soil type in each field, the crop history, and soil amendment history.</li> <li>2. Land has not previously been used for animal husbandry or biosolid disposal. (If the land has been used for animal husbandry, a three-year buffer time is required before using the field for edible crop cultivation. If the land has been used for animal husbandry or biosolid disposal, the soil should be tested for persistent pathogen populations.)</li> <li>3. Where there is a possibility of pathogen contamination, necessary corrections are performed to minimize the potential for an adverse food safety impact or conclude that the land shall not be used for produce production until the risks have been minimized.</li> </ol>	Major	<p>A document review shall verify that a land use assessment has been completed for all crop fields that identifies food safety risks that arise from the historical use of the land which:</p> <ol style="list-style-type: none"> <li>1. Includes a physical description of the soil type in each field, the crop history, and soil amendment history;</li> <li>2. Stipulates that land previously used for animal husbandry must have had a three-year buffer time before using the field for edible crop cultivation;</li> <li>3. Stipulates that land previously used for or biosolid disposal must have had soil tested for persistent pathogen populations;</li> <li>4. Stipulates that where there is a possibility of pathogen contamination, either: <ol style="list-style-type: none"> <li>a. Necessary corrections have performed to minimize the potential for an adverse food safety impacts, or</li> <li>b. The land has not been used for produce production until the risks have been minimized.</li> </ol> </li> </ol>
EA 1.2	A review or new assessment is conducted at the beginning of each growing season, any time there is a change in the system, or when a situation occurs that could introduce an opportunity for contamination of the system.	Major	A review of the land use assessment shall verify that it has been updated at the beginning of each growing season, or when there is a situation that could introduce contamination.
EA 1.3	Evaluation encompasses adjacent land and waterways including manure and compost storage, concentrated animal feeding operations (CAFOs), grazing/open range areas, surface water, sanitary facilities, and composting operations.	Minor	<p>A review of the land use assessment shall verify that it includes an evaluation of:</p> <ol style="list-style-type: none"> <li>1. Adjacent land and waterways including manure and compost storage;</li> <li>2. CAFOs;</li> <li>3. Grazing/open range areas;</li> <li>4. Surface water; and</li> <li>5. Sanitary facilities.</li> </ol>
Standard EA-2 Flooding or other events that may result in contamination are documented and assessed.			
EA 2.1	Potential for flooding or other events that may result in contamination is evaluated and documented; risk mitigation plan is developed for significant flooding events.	Major	A review of the land use assessment shall verify that the potential for flooding or other events that may result in contamination has been evaluated and that there is a risk mitigation plan for significant flooding events.
EA 2.2	An environmental assessment is conducted following heavy rains or flooding. Any produce that has been in contact with flood waters is excluded from the food supply.	Major	A document review shall verify that an environmental assessment has been conducted following heavy rains or flooding, that there is a written procedure that requires produce that has been in contact with flood waters to be excluded from the food supply, and that product that has been in contact with flood water has been removed from the food supply.

Food Safety Standards		CMM	Guidance and Interpretations
<b>Animals (AN)</b>			
Standard AN-1 Wild and domestic animal activity is assessed and documented for risks to food safety.			
AN 1.1	Assessment considers the crop characteristics, type and number of animals, pathogens of concern, nearness to the growing field, proximity to harvest, and other relevant factors.	Major	A review of the animal assessment shall verify that it has assessed all risks arising from wild or domestic animals and includes: 1. Crop characteristics; 2. The type and number of animals; 3. Pathogens of concern; 4. Nearness to the growing field; 5. Proximity of time to harvest; and 6. Other relevant factors.
AN 1.2	A review or new assessment is conducted at the beginning of each growing season, any time there is a change in the system, or when a situation occurs that could introduce an opportunity for contamination of the system.	Major	A review of the animal assessment shall verify that it has been updated at the beginning of each growing season or when there is new evidence of potential or actual contamination.
AN 1.3	Animal activity assessments take place immediately prior to planting and regularly during production periods.	Major	A review of the animal assessment shall verify that an assessment has taken place prior to planting and during the growing season.
Standard AN-2 Preventative and remedial measures are used to reduce the risk of contamination.			
AN 2.1	Action is taken to prevent the risk of contamination of produce from wild or domestic animals to the extent possible, including from animal feces. Physical barriers are used to prohibit the movement of animals in the growing field and to control the movement of animals in adjacent fields. Fencing, gates, barriers, noisemakers, buffer zones, or other practices as applicable are used to reduce intrusions in the growing fields or in buildings. Limited exceptions may be made for guard dogs and guide dogs provided that the presence of these dogs does not present a potential for contamination of produce, food contact surfaces, or food packaging materials.	Major	Visual observation shall verify that mitigation efforts have been taken to reduce risks identified in the animal assessment.  A document review shall verify that corrective actions, including physical barriers as applicable, have been taken in response to known contamination of produce from wild or domestic animals.
AN 2.2	Bird populations are monitored to the extent possible and actions are taken to control bird populations above baseline levels. Actions are taken to reduce risk of birds contaminating produce.	Minor	A review of the animal assessment shall verify that thresholds have been set for acceptable bird activity.  A document review shall verify that actions have been taken to control bird populations above the threshold and to reduce the risk of contamination.
AN 2.3	Animals are physically kept out of water sources and buildings to prevent contamination of produce, food contact surfaces, and food packaging.	Minor	Visual observation shall verify that animals are prevented, as far as practical, from entering water sources and buildings.
AN 2.4	When the assessment or monitoring indicates a possibility of contamination with pathogens, corrective actions are taken as needed to significantly minimize the potential for an adverse food safety impact, including, without limit, deciding not to harvest product that may reasonably likely be contaminated with pathogens.	Major	A document review shall verify that when there has been the possibility for animal contamination corrective action has been undertaken as set out in AR 6.1 and AR 6.2.
AN 2.5	A system is implemented and maintained for control of animal feces and litter. If animal feces are visible, product should not be harvested.	Major	A documented review and visual observation shall verify that a system has been implemented and maintained to control for animal feces and litter and that if feces are visible, product is not harvested.

Food Safety Standards		CMM	Guidance and Interpretations
Harvest (H)			
Standard H-1 A pre-harvest risk assessment is performed.			
H 1.1	A risk assessment is conducted immediately prior to harvest and identifies and documents conditions that may result in contamination of produce. Appropriate action is taken to address findings to reduce risk to food safety prior to harvest.	Major	A document review shall verify that a pre-harvest risk assessment has been completed prior to harvest that identifies conditions that may result in contamination.  A review of records shall verify that corrective actions have been undertaken as set out in AR 6.1 and AR 6.2.
Standard H-2 Harvesting equipment is clean and does not contribute to contamination risk.			
H 2.1	Harvesting containers, tools, and equipment are inspected prior to use to ensure they are functioning properly and do not serve as a source of contamination.	Major	Visual observation shall verify that harvesting containers, tools, and equipment are functioning properly and do not serve as a source of contamination.
H 2.2	Harvesting containers, tools, and equipment are cleaned prior to use and maintained so as not to serve as a source of contamination.	Major	Visual observation shall verify that harvesting containers, tools, and equipment are cleaned prior to use and maintained so they do not serve as a source of contamination.
H 2.3	Harvesting containers, tools, and equipment are stored in a manner so as not to serve as a source of contamination.	Minor	Visual observation shall verify that harvesting containers, tools, and equipment are stored and handled in a manner that reduces the risk of them serving as a source of contamination.
H 2.4	Food contact surfaces, including, without limit, food contact containers, bins, and totes, are appropriate for the commodity being harvested, are made from non-toxic material, and are not used for other purposes.	Minor	Visual observation shall verify that food contact surfaces, including containers, bins, and totes, are appropriate for the commodity being harvested, are made from non-toxic material, and are not used for other purposes.
H 2.5	Harvesting containers, tools, and equipment are of adequate design, construction, and workmanship to enable them to be adequately cleaned and properly maintained. All reusable containers have a documented cleaning schedule.	Major	A document review and visual observation shall verify that all harvesting containers, tools, and equipment are of adequate design, construction, and workmanship to be cleaned and maintained.  A document review shall verify that all reusable containers are cleaned according to a schedule.
Standard H-3 Harvest personnel are properly trained to identify and correct food safety issues.			
H 3.1	Personnel who come into direct contact with produce during harvest: 1. Practice good hygiene and sanitary practices; 2. Inspect equipment, tools, containers, produce, and/or food contact surfaces to ensure sanitary conditions; 3. Take steps to minimize the risk of contamination by known or reasonably foreseeable hazards and potential physical damage to produce; and 4. Report such problems to the supervisor (or other individuals responsible for food safety), as appropriate to the person's job responsibilities.	Major	FWIs and visual observation shall verify that farmworkers who come into direct contact with produce during harvest: 1. Practice good hygiene and sanitary practices; 2. Inspect equipment, tools, containers, produce, and/or food contact surfaces to ensure sanitary conditions; 3. Take steps to minimize the risk of contamination by known or reasonably foreseeable hazards and potential physical damage to produce; and 4. Report such problems to the supervisor (or other individuals responsible for food safety), as appropriate to the person's job responsibilities.

Food Safety Standards		CMM	Guidance and Interpretations
Post-Harvest: Packing, Storage, Testing, Transportation (PH)			
Standard PH-1 A post-harvest risk assessment is performed.			
PH 1.1	A risk assessment identifies and documents conditions during post-harvest including sorting, packing, washing, cooling, storage, loading, and transport, which may result in contamination of produce. Appropriate actions are taken to address findings to reduce risk to food safety.	Major	<p>A document review shall verify that a post-harvest risk assessment has been completed that includes a corrective action plan to reduce risks to food safety that may arise during:</p> <ol style="list-style-type: none"> <li>1. Sorting;</li> <li>2. Packing;</li> <li>3. Washing;</li> <li>4. Cooling;</li> <li>5. Storage;</li> <li>6. Loading; and</li> <li>7. Transport.</li> </ol> <p>A document review shall verify that corrective actions have been undertaken as set out in AR 6.1 and AR 6.2.</p>
PH 1.2	A review or new assessment is conducted prior to harvest, any time there is a change in the system, or when a situation occurs that could introduce an opportunity for contamination of the system.	Major	A review of the post-harvest risk assessment shall verify that the plan has been reviewed and, if necessary, updated prior to the start of harvest, when there is a change in the system, or when a situation has occurred that could introduce an opportunity for contamination of the system.
Standard PH-2 Post-harvest personnel are properly trained to identify and correct food safety issues.			
PH 2.1	<p>Personnel who come into direct contact with produce during post-harvest:</p> <ol style="list-style-type: none"> <li>1. Practice good hygiene and sanitary practices;</li> <li>2. Inspect equipment, tools, containers, produce, and/or food contact surfaces to ensure sanitary conditions; and</li> <li>3. Take steps to minimize potential physical damage and contamination to produce.</li> </ol> <p>Records are kept.</p>	Major	<p>A document review, FWIs, and visual observation shall verify that farmworkers who come into direct contact with produce during post-harvest:</p> <ol style="list-style-type: none"> <li>1. Have been trained in good hygiene and sanitary practices;</li> <li>2. Have an understanding of hygiene and sanitary practices;</li> <li>3. Practice good hygiene and sanitary practices;</li> <li>4. Inspect equipment, tools, containers, produce, and/or food contact surfaces to ensure sanitary conditions; and</li> <li>5. Take steps to minimize potential physical damage and contamination to produce.</li> </ol>
Standard PH-3 Cooling and water systems are sanitary and do not contribute to contamination risk.			
PH 3.1	Cooling systems are maintained in a clean and sanitary condition. Condensate and defrost water from cooling systems do not drip onto fresh produce or food contact surfaces.	Major	Visual observation shall verify that cooling systems have been maintained in a clean and sanitary condition and that condensate and defrost water from cooling systems has not dripped onto fresh produce or food contact surfaces.
PH 3.2	Water systems are maintained in a clean and sanitary condition. Water systems are of appropriate size and design and installed and maintained so as not to serve as a source of contamination of produce or water supplies, or to create unsanitary conditions.	Major	Visual observation shall verify that water systems are: <ol style="list-style-type: none"> <li>1. Of appropriate size and design;</li> <li>2. Installed so as not to serve as a source of contamination of produce or water supplies, or to create unsanitary conditions; and</li> <li>3. Maintained in a clean and sanitary condition.</li> </ol>
PH 3.3	Water that is in direct contact with fresh produce meets microbial and chemical standards for safe drinking water in the country of production and destination, whichever is greater or more stringent. The water quality in these systems is controlled, verified, and documented.	Major	<p>A document review shall verify that there is a written policy that water which is in direct contact with produce meets microbial standards for drinking water.</p> <p>A review of microbial test results shall verify that water which is in direct contact with produce meets microbial standards for drinking water.</p>

Food Safety Standards		CMM	Guidance and Interpretations
PH 3.4	Ice that comes into direct contact with fresh produce meets microbial and chemical standards for safe drinking water in the country of production and destination, whichever is greater or more stringent. Ice is produced, handled, and stored to protect it from contamination.	Critical	<p>A document review shall verify that there is a written policy that ice which is in direct contact with produce meets microbial standards for drinking water.</p> <p>Visual observation shall verify that ice production, handling, and storage is done in a manner which reduces the risk of contamination.</p> <p>A review of microbial test results shall verify that ice which is in direct contact with produce meets microbial standards for drinking water.</p>
PH 3.5	Water systems are periodically assessed for risk of contamination. Assessment includes water source, use, delivery system, and equipment.	Major	A document review shall verify that water systems have been assessed for risk of contamination and that this assessment has been updated periodically.
PH 3.6	Equipment designed to assist in maintaining water quality, such as chlorine injectors, filtration systems, and backflow devices, are routinely inspected and maintained to ensure effective operation. Chlorine levels are tested daily to assure correct dilution.	Major	<p>A review of inspection and maintenance records shall verify equipment designed to assist in maintaining water quality have been routinely inspected and maintained.</p> <p>A review of testing results shall verify that chlorine is tested daily to assure correct dilution.</p>
PH 3.7	Water used in washing, dump tanks, flumes, wash tanks, and hydro-coolers is monitored (including for temperature), cleaned, and sanitized according to SOPs that include water-change schedules.	Major	A review of SOPs shall verify that water used in washing, dump tanks, flumes, wash tanks, and hydro-coolers is monitored, cleaned, and sanitized.
PH 3.8	Recirculated water may be used with no further treatment provided its use does not constitute a risk to the safety of fresh fruits and vegetables (e.g. use of water recovered from the final wash for the first wash) and that the safety of water is verified and documented through testing. Where water is recirculated for final produce washing, it is filtered and disinfected; pH levels, concentration levels, and exposure levels of disinfectant are routinely monitored. Documented records are maintained.	Major	A review of the water system indicates that recirculated water is not used if it presents a food safety risk to produce. A review of water system demonstrates that recirculated water used for final produce washing is filtered and disinfected. A review of water quality testing results shall verify that the safety of recirculated water has been established through monitoring and testing.
PH 3.9	Air cooling systems are appropriately designed and maintained to avoid contaminating fresh produce.	Minor	A review of maintenance records and visual observation shall verify that air cooling systems are designed to avoid contaminating produce and are routinely inspected and maintained.
PH 3.10	Fresh fruits and vegetables are maintained at temperatures sufficient to minimize microbial growth. The temperature of the cold storage is controlled, monitored, and documented.	Minor	<p>A document review shall verify that there is a rationale for the optimal temperature sufficient to minimize microbial growth.</p> <p>A review of temperature monitoring records shall verify that the established temperature has been maintained.</p>
PH 3.11	The facility uses wash and cooling methods appropriate to the commodity and maintains an adequate water temperature to prevent internalization of microorganisms from the water into produce tissue.	Minor	A document review shall verify that washing and cooling methods are appropriate to the commodity and that water temperatures were maintained to prevent internalization of microorganisms from the water into produce tissue.
PH 3.12	Processing water is regularly tested to ensure it meets microbial standards for drinking water. Testing and results are documented.	Major	<p>A document review shall verify that there is a written policy that processing water meets microbial standards for drinking water.</p> <p>A review of testing results shall verify that processing water meets the microbial standards for drinking water.</p>

Food Safety Standards		CMM	Guidance and Interpretations
Standard PH-4 Written sanitation standard operating procedures are developed, followed, and documented.			
PH 4.1	<p>Sanitation schedule includes, but is not limited to, SOPs for cleaning, sanitizing, and maintaining the following:</p> <ol style="list-style-type: none"> <li>1. Harvest containers and equipment;</li> <li>2. Fields;</li> <li>3. Packing facilities, floors, drains, equipment, food contact surfaces, fixtures, tools;</li> <li>4. Lines used for washing, grading, sorting, and packing;</li> <li>5. Packing materials;</li> <li>6. Storage facilities;</li> <li>7. Cooling rooms, cooling units, coolers, cooling systems;</li> <li>8. Containers for finished product; and</li> <li>9. Trash cans and cleaning equipment.</li> </ol> <p>Cleaning agents, chemicals, and lubricants are stored in a designated area, away from produce, and are suitable for their intended use.</p> <p>Records of date and method of cleaning and sanitizing are maintained.</p>	Major	<p>A review of Sanitation SOPs and records shall verify that a sanitation schedule has been developed for:</p> <ol style="list-style-type: none"> <li>1. Harvest containers and equipment;</li> <li>2. Fields;</li> <li>3. Packing facilities, floors, drains, equipment, food contact surfaces, fixtures, tools;</li> <li>4. Lines used for washing, grading, sorting, and packing;</li> <li>5. Packing materials;</li> <li>6. Storage facilities;</li> <li>7. Cooling rooms, cooling units, coolers, cooling systems;</li> <li>8. Containers for finished product; and</li> <li>9. Trash containers and cleaning equipment.</li> </ol> <p>Visual observation shall verify that the SOPs have been implemented and cleaning agents, chemicals, and lubricants are stored in a designated area away from produce and are suitable for their intended use.</p>
PH 4.2	<p>Washing, grading, sorting, and packing lines and food contact surfaces are cleaned and sanitized, at least daily when in use, to reduce risk of contamination with pathogens.</p> <p>Records of date and method of cleaning and sanitizing are maintained.</p> <p>There is a written sanitation verification program that is implemented to verify sanitation effectiveness.</p>	Major	<p>A review of Sanitation SOPs and records shall verify that there is a written policy that washing, grading, sorting, and packing lines, and food contact surfaces are cleaned and sanitized, at least daily when in use and that there is a written sanitation verification program that applies to both food contact and non-food contact surfaces and that verifies effectiveness of the SOPs.</p> <p>FWIs and visual observation shall verify that the sanitation SOPs have been fully implemented.</p>
PH 4.3	<p>Trash and waste containers are available for use. Trash and waste are collected and stored in such a way as to minimize the potential to attract or harbor pests. Trash and waste are removed regularly from the fields and packing facility, and disposal minimizes the potential for contamination of produce, water sources, or food contact surfaces.</p>	Minor	<p>Visual observation shall verify that trash and waste have been:</p> <ol style="list-style-type: none"> <li>1. Collected and stored in such a way as to minimize the potential to attract or harbor pests;</li> <li>2. Removed regularly from fields and packing facilities; and</li> <li>3. Disposed of in a way that minimizes the potential for contamination of produce, water sources, or food contact surfaces.</li> </ol>
Standard PH-5 Facilities, equipment, and procedures are designed and monitored to reduce potential for contamination.			
PH 5.1	<p>Packing facilities are designed to prevent cross-contamination:</p> <ol style="list-style-type: none"> <li>1. Packing house uses a linear product flow;</li> <li>2. Roof does not leak;</li> <li>3. Floors are properly sloped and maintained to ensure adequate drainage and minimize pooling water;</li> <li>4. Drains and pipes are covered and corrosion-resistant;</li> <li>5. Maintenance areas are separate from processing area, and care is taken when making repairs on the line; and</li> <li>6. Access to the facility is limited to necessary personnel and approved visitors.</li> </ol>	Minor	<p>Visual observation of packing facilities shall verify that:</p> <ol style="list-style-type: none"> <li>1. There is a linear flow of material through the facility;</li> <li>2. The roof does not leak;</li> <li>3. Floors have been sloped to ensure adequate drainage, minimize pooling water, and have surfaces that facilitate cleaning;</li> <li>4. Walls, fixtures, and ceilings are able to be adequately cleaned;</li> <li>5. Drains and pipes are covered and are corrosion-resistant and can be accessed for cleaning;</li> <li>6. Maintenance areas are separate from processing area, and care is taken when making repairs on the line; and</li> <li>7. Access points leading into the facility can be restricted so access can be limited to necessary personnel and approved visitors.</li> </ol>

Food Safety Standards		CMM	Guidance and Interpretations
PH 5.2	<p>Facility and equipment location, design, and layout are constructed and installed to avoid contamination of produce. Facility is constructed in such a way that floors, walls, fixtures, drains, and pipes can be adequately cleaned and kept in good repair.</p> <p>Maintenance of facility and equipment is carried out in a manner that prevents contamination of the produce.</p>	Major	<p>Visual observation of packing facilities shall verify that:</p> <ol style="list-style-type: none"> <li>1. Facility location is evaluated to allow for grounds surrounding location to be maintained to prevent the contamination of produce;</li> <li>2. Floors, walls, fixtures, drains, and pipes can be easily cleaned and maintained; and</li> <li>3. The facility and equipment are maintained in a manner that prevents contamination of the produce.</li> </ol>
PH 5.3	<p>Sewage is disposed into an adequate sewage or septic system. Sewage or septic systems are maintained in a manner that prevents contamination of produce, food contact surfaces, water sources, and distribution systems. Spills or leaks of human waste are managed in a way that prevents contamination of produce, food contact surfaces, water sources, and distribution systems. Single service towels are disposed in a manner that prevents contamination of produce, food contact surfaces, water sources, and distribution systems.</p>	Major	<p>Visual observation shall verify that sewage is disposed into an adequate sewage or septic system, and that the sewage system is maintained in proper working order. Visual observation shall verify that towels are disposed of in a manner that prevents contamination of produce, food contact surfaces, water sources, and distribution systems.</p> <p>A review of SOPs shall verify that spills and leaks are managed in a way that prevents contamination of produce, food contact surfaces, water sources, and distribution systems from sewage or gray water.</p>
PH 5.4	<p>Procedures are developed and implemented to reduce the risk of glass, plastic, metal, rocks, and other hazards from contaminating produce during harvesting and post-harvest.</p>	Minor	<p>A review of the post-harvest risk assessment shall verify that there are SOPs for reducing the risk of hazards from contaminating produce.</p> <p>Visual observation shall verify that the SOPs have been implemented.</p>
PH 5.5	<p>A pest management program is established, monitored, and documented to exclude or minimize pests, birds, and animals in and around packing facilities, so as to prevent potential contamination of produce, food contact surfaces, and food packaging. Domestic animals must be excluded from closed buildings where produce is handled. Bait stations and other pesticides are only used outside.</p>	Minor	<p>A review of the food safety plan shall verify that there are SOPs for excluding or minimizing pests, birds, and animals in and around packing facilities, with efforts made to eliminate/prevent pests and, in certain circumstances, minimize pests by use of screens or monitoring/removal.</p> <p>Visual observation shall verify that the SOPs have been implemented, that there are no apparent risks of pests, birds, or animals contaminating produce, and that bait stations and other pesticides are only used outside.</p>
PH 5.6	<p>Food contact surfaces, packing containers, and food packaging material are clean and maintained so as not to be a source of contamination and are suitable for their intended use. A written policy is in place that identifies how food packaging material is obtained and identifies the manufacturer.</p>	Major	<p>Visual observation of food contact surfaces, packing containers, and food packaging material shall verify that they are cleaned and maintained so as to not be a source of contamination.</p> <p>A document review shall verify that there is a policy for how food packaging material is obtained and that the manufacturer of the material is identified.</p>
PH 5.7	<p>Packing materials, containers, equipment, and monitoring devices are stored in a clean, dry area and in a manner that prevents contamination.</p>	Minor	<p>Visual observation shall verify that packing materials, containers, equipment, and monitoring devices are stored in a clean, dry area and in a way that prevents contamination.</p>
PH 5.8	<p>Cleaning tools are kept separate according to function.</p>	Minor	<p>Visual observation shall verify that cleaning tools are stored and maintained in a manner that prevents contamination of produce.</p>
PH 5.9	<p>A written policy is developed and implemented requiring that damaged or decaying produce is disposed of properly. Produce that contacts the ground shall not be harvested (unless that product typically contacts the ground). Policy includes clear identification of disposed product.</p>	Minor	<p>A review of SOPs shall verify that there is a documented policy covering how damaged or decaying produce is clearly identified and properly disposed.</p>
PH 5.10	<p>Containers and equipment are clean and maintained so as not to be a source of contamination and are suitable for their intended use. Harvest containers are kept separate from packing containers.</p>	Minor	<p>Visual observation shall verify that harvest and packing containers are stored separately, suitable for their intended use, and maintained so as to not be a source of contamination.</p>

Food Safety Standards		CMM	Guidance and Interpretations
PH 5.11	Equipment and tools that are no longer suitable for use are effectively repaired or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to food safety. Records of the handling, repair, or disposal of such equipment and tools are maintained.	Minor	A document review shall verify that there is a written policy on the repair and disposal of tools.  Visual observation shall verify that equipment is properly maintained.
PH 5.12	If food-packing materials are reused, adequate steps must be taken to ensure that food contact surfaces are clean, such as by cleaning food-packing containers or using a clean liner.	Major	Visual observation shall verify that if food-packing materials are reused, the surfaces are clean.
PH 5.13	Plumbing must be of adequate size and design and adequately installed and maintained to distribute water under pressure as needed, in sufficient quantities, in all areas where used for activities, for sanitary operations, or for hand-washing and toilet facilities.	Major	A document review and visual observation shall verify that plumbing is of adequate size and design, is adequately installed and maintained to distribute water under pressure as needed, in sufficient quantities, and where needed.
Standard PH-6 Storage facilities, equipment, and procedures are designed to reduce potential for contamination.			
PH 6.1	Harvested produce shall be handled and stored in a manner so as not to become contaminated.	Major	A document review and visual observation shall verify that harvested produce is handled and stored in a manner that does not cause contamination.
PH 6.2	Produce is held in designated storage facilities that are kept clean and dry. Storage unit has a dehumidifying function.	Minor	Visual observation of storage facilities shall verify that the facilities are clean and dry and that if a dehumidifying function is necessary, it is operating to maintain a low humidity level.
PH 6.3	Refrigerators are maintained at temperatures sufficient to minimize microbial growth. Temperature is monitored and recorded. Temperature indicators are appropriately calibrated.	Minor	A document review shall verify that there is a rationale for the optimal temperature sufficient to minimize microbial growth.  A review of temperature monitoring records shall verify that the established temperature has been maintained.
Standard PH-7 A microbiological testing program is implemented and conforms to established testing protocols.			
PH 7.1	Environmental samples are taken at multiple, representative areas of the fields, packing facilities, and processing areas. Sampling program includes agricultural inputs, including water and soil amendments, and is risk-based.	Major	A review of the microbiological testing program shall verify that there is a sampling plan for environmental samples and agricultural inputs.  A document review shall verify that microbial testing of multiple, representative areas of the fields, packing facilities, and processing areas has been undertaken based on risk.
PH 7.2	Testing program and results are documented, including test frequency, sampling, test procedures, responsibilities, and actions to be taken based on test results.	Major	A review of the microbiological testing program shall verify that the document details: 1. Sampling frequency; 2. Sampling methods; 3. Identification of individuals who are responsible for sampling; and 4. Actions to be taken based on test results.
PH 7.3	All testing results, processes, and equipment validations are recorded, and records are maintained for two years after equipment or process is discontinued.	Major	A review of testing results, processes, and equipment validations shall verify that all records are maintained for two years after equipment or process is discontinued.
PH 7.4	Samples are handled according to standard sampling protocol and procedures to avoid cross-contamination of samples are followed.	Major	A review of the microbiological testing program shall verify that the document details: 1. Processes for sample segregation, identification and preservation; and 2. Shipping samples to laboratories in a way that protects the samples from degradation.

Food Safety Standards		CMM	Guidance and Interpretations
PH 7.5	Laboratory analysis is conducted by a laboratory accredited to ISO 17025 or equivalent using scientifically valid test methods.	Major	Evidence shall be sought that verifies that all microbial testing or other testing conducted to verify food safety is performed by a laboratory accredited to ISO 17025 or equivalent for all products and inputs and uses scientifically valid test methods.
PH 7.6	If finished product is tested for microbial pathogens, product is held until test results are obtained.	Major	A review of the microbial testing plan shall verify that there are written procedures for holding finished product until test results are obtained.
Standard PH-8 Pesticide residue testing is conducted as necessary.			
PH 8.1	If agricultural chemicals, including pesticides, are used that have established maximum residue levels (MRLs), post-harvest spot testing is conducted to ensure that pesticide residues do not exceed the MRLs as defined by the International Maximum Residue Level Database provided by the EPA or applicable regulatory requirements in the country of production and country of destination, whichever is lower.	Minor	A document review shall verify which pesticides have established MRLs.  A review of testing results shall verify that MRLs in harvested produce are below those set by the International Maximum Residue Level Database or the acceptable level in the country of production and country of destination, whichever is lower.
Standard PH-9 Transportation facilities, equipment, and procedures reduce potential for contamination.			
PH 9.1	Procedures for loading and unloading of produce are maintained and documented. Personnel involved in the loading and unloading of produce during transport practice good hygiene and sanitary practices and ensure that produce is not likely to become contaminated.	Minor	FWIs, visual observation, and a review of SOPs and training material shall verify that requirements have been developed and implemented that farmworkers engaged in the loading or unloading of produce: 1. Practice good hygiene and sanitary practices; and 2. Ensure that produce is not likely to become contaminated.
PH 9.2	Transport vehicles, including farm, contracted, and other transport vehicles, and containers are cleaned and maintained in good repair according to a schedule so as to avoid contamination of product and are suitable for transporting product.	Minor	A document review shall verify that all transport vehicles and containers are cleaned and maintained according to a written schedule and are suitable for transporting product.
PH 9.3	Transport vehicles are not used for the transport of hazardous substances or materials that may be a source of contamination unless they are adequately cleaned and sanitized, and, where necessary, disinfected, to avoid cross-contamination.	Minor	A review of the farm equipment cleaning and maintenance records and visual observation shall verify that vehicles being used for produce transport are not used to transport hazardous substances or materials unless they are adequately cleaned and sanitized, and, where necessary, disinfected, to avoid cross-contamination.
PH 9.4	The individual(s) responsible for loading produce inspect the cargo area of transport vehicles to ensure they are as clean as practicable and take steps to minimize the potential of physical damage to produce. 1. Personnel are aware of prior use of transport vehicles and take steps to avoid cross contamination of produce. 2. Loading dock personnel do not stack pallets that have touched the ground on top of pallets of product.	Major	FWIs and visual observation shall verify that farmworkers responsible for loading produce: 1. Have inspected the cargo area of transport vehicles to ensure they are as clean as practicable and take steps to minimize the potential of physical damage to produce; 2. Are aware of the prior use of transport vehicles and take steps to avoid cross contamination of produce; and 3. Do not stack pallets that have touched the ground on top of pallets of product.
PH 9.5	When refrigeration is required for safety during transport, the cargo area is pre-cooled to a temperature appropriate for the type of produce.	Minor	A document review shall verify that when refrigeration is required for safety during transport, the cargo area has been pre-cooled to a temperature appropriate for the type of produce.
PH 9.6	Refrigerated transport vehicles have properly maintained and fully functional refrigeration equipment controlled by a thermostatic device.	Major	Visual observation and a review of maintenance records shall verify that refrigerated trucks have been properly maintained and the refrigeration equipment is controlled by a thermostatic device.

Food Safety Standards		CMM	Guidance and Interpretations
Standard PH-10 Indoor facilities associated with growing and harvesting are appropriate.			
PH 10.1	For operations where fresh fruits and vegetables are grown indoors (greenhouses, hydroponic culture, etc.), premises and equipment are constructed in such a way as to avoid contamination of produce.	Major	Visual observation shall verify that structures and equipment for growing covered crops have been constructed in such a way as to avoid contamination of produce.
<b>Worker Involvement – Food Safety (WI-FS)</b>			
Standard WI-FS-1 Farmworkers are knowledgeable, trained, and empowered to ensure compliance with food safety stewardship standards.			
WI-FS 1.1	Farmworkers are trained on food safety practices and understand the importance of following food safety practices and why they should do so.	Major	FWIs shall verify that farmworkers have been trained on, and retained an understanding of, the importance of and reasons for following food safety practices.
WI-FS 1.2	Farmworkers recognize signs of illness and understand the relationship between illness and food safety on the farm.	Major	FWIs shall verify that farmworkers have been trained on, and retained an understanding of, signs of illness and the relationship between illness and food safety on the farm.
WI-FS 1.3	Farmworkers have been trained on health and hygiene protocols and demonstrate an understanding of the relationship between practicing these behaviors and food safety on the farm.	Major	FWIs shall verify that farmworkers have been trained on, and retained an understanding of, hygiene protocols and how these affect food safety.
WI-FS 1.4	Farmworkers understand the risks to human health that rodents and other pests can introduce. Farmworkers report presence of pests in fields or packing facilities.	Major	FWIs shall verify that farmworkers have been trained on, and retained an understanding of, the risks to human health that rodents and other pests can introduce.  FWIs shall verify that farmworkers understand and utilize the reporting channel when they encounter pests in the fields or packing facilities.
WI-FS 1.5	Farmworkers are trained on and demonstrate an understanding of risks posed by the presence of animals in fields, are trained to avoid contact with animals other than working animals, and report evidence of animals in fields, including animal urine and feces.	Minor	FWIs shall verify that farmworkers have been trained on, and retained an understanding of, the risks posed by the presence of animals in fields.  FWIs shall verify that farmworkers understand and utilize the reporting channel when they encounter animals in the fields and avoid contact with animals other than working animals.
WI-FS 1.6	Farmworkers are trained to report presence of animals in water sources.	Major	FWIs shall verify that farmworkers understand and utilize the reporting channel when they encounter animals in water sources.
WI-FS 1.7	Farmworkers are trained on good hygiene and sanitation practices and follow practices in harvesting, packing, loading/unloading, and storage of produce.	Major	FWIs shall verify that farmworkers have been trained on, and retained an understanding of, good hygiene and sanitation practices.  FWIs shall verify that farmworkers practice good hygiene and sanitation practices during all farm activities.
WI-FS 1.8	Farmworkers inspect cargo holds for potential sanitation or other problems and alert management to problems.	Major	FWIs shall verify that farmworkers have been trained on, and retained an understanding of, how to inspect a cargo hold for potential sanitation or other problems.  FWIs shall verify that farmworkers understand and utilize the reporting channel when they encounter a cargo hold that has a potential sanitation issue.

Food Safety Standards		CMM	Guidance and Interpretations
WI-FS 1.9	Farmworkers are trained on, and demonstrate understanding of, when to take appropriate steps to minimize the likelihood of contamination of produce when in direct contact with working animals.		FWIs shall verify that farmworkers have been trained on, and retained an understanding of, when to take appropriate steps to minimize the likelihood of produce when in direct contact with working animals.
WI-FS 1.10	Leadership Team has access to and reviews food safety plan and accompanying documentation, including risk assessments, testing results, sanitation schedules, and training schedules. Leadership Team is empowered to raise food safety issues with management.	Critical	LTIs shall verify that LT members have access to and can review food safety plans and accompanying documentation, including risk assessments, testing results, sanitation schedules, and training schedules, and that they feel empowered to raise food safety issues with management.