



## AUDIT CHECKLIST

VERIFYING COMMODITY-SPECIFIC GUIDELINES  
FOR THE PRODUCTION AND HARVEST  
OF LETTUCE AND LEAFY GREENS

Effective February 20, 2020



## GENERAL REQUIREMENTS

Page	Line #	Questions
18	111-113	<b>GR 01 - Is a written Leafy Greens Compliance Plan which specifically addresses the Best Practices of the LGMA available for review?</b> <b>GR 02 - Does it specifically address the following subjects consistent with the LGMA:</b> GR 02a Water GR 02b - Soil Amendments GR 02c - Environmental Factors GR 02d - Work Practices GR 02e - Field Sanitation
18	114	<b>GR 03 - Is an up to date producers list with contact and location information available for review?</b>
18	115-117	<b>GR 04 - Is the shipper in compliance with the registration requirement of The Public Health Security and Bioterrorism Preparedness and Response Act of 2002?</b>
18	115-117	<b>GR 05 - Does the Shipper have a traceability process?</b> GR 05a - Does it enable identification of immediate non-transporter source? GR 05b - Does it enable identification of immediate non-transporter subsequent recipient?
18	118-119	<b>GR 06 - Has the handler (or if applicable, the grower) designated someone to implement and oversee the food safety program?</b> GR 06a - Is the name of the individual available? GR 06b - Is 24/7 contact information available for the individual available?

## RECORDS

Page	Line #	Questions
N/A	N/A	N/A
18	123-130	<b>RE 02 – Do records required by the Leafy Greens Compliance Plan include (as applicable):</b> RE 02a – farm name and location RE 02b – actual values and observations obtained during monitoring RE 02c – an adequate description of the leafy green product RE 02d – growing area location (i.e., production location, including block and/or lot) RE 02e – date and time of the activity being documented
18	132	<b>RE 03 – Do records indicate they were created at the time the activity was performed?</b>
19	134-135	<b>RE 04 – Were the records signed and dated by the person performing the documented activity?</b>
19	136-151	<b>RE 05 – Were all records readily available and accessible for inspection during the audit? (e.g. logs, checklist, spreadsheets, etc..)</b>
19	152	<b>RE 06 – Do SOPs require documentation and records to be kept for 2 years?</b>



## PERSONEL QUALIFICATIONS AND TRAINING

Page	Line #	Questions
19	166-167	<b>PE 01 – Do training records indicate all personnel receive training at hire and at least annually thereafter?</b>
20	177-183	<b>PE 02 – Does the training provided to all personnel who work with leafy greens or supervise those who do include:</b> PE 02a – the principles of food hygiene and safety? PE 02b – the importance of health and personal hygiene? PE 02c – the standards established in these best practices that are applicable to the employee’s job responsibilities?
20	184-193	<b>PE 03 – Do all harvest personnel receive additional training in:</b> PE 03a – recognizing leafy greens that may be contaminated and therefore not be harvested? PE 03b – inspecting product containers, harvest equipment, and packaging materials to ensure they are working properly and do not pose a product contamination risk? PE 03c – how to correct problems with product containers, harvest equipment, and packaging materials or report problems to supervisors?
20	194-196	<b>PE 04 – Has a food safety professional / representative for each farm completed the Produce Safety Alliance, "Grower Training" or a standard curriculum recognized by the FDA?</b> PE 04a – Grower PE 04b – Harvester PE 04c – Cooler/Holder
20	197-199	<b>PE 05 – Are there records of training events? Do they include:</b> PE 05a – training date PE 05b – topics covered PE 05c – trainee name PE 05d – supervisor’s signature indicating a record review was performed within a week

## ENVIRONMENTAL ASSESSMENTS

Page	Line #	Questions
21	212-214	<b>Pre-Season Assessment: Animal Activity</b>
48	624-653	<b>EA 01 - Did the assessment indicate that the production area was free from evidence of animal intrusion?</b>
<b>If EA 01 is answered "NO" then EA 001-EA 003 will drop down</b>		
76	Table 6	<b>EA 001 - Was the animal hazard or potential risk of intrusion assessed by Food Safety professional?</b>
		<b>EA 002 - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"?</b>
		<b>EA 002a - If "YES" were corrective actions carried out according to company SOP?</b>



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Page	Line #	Questions
76	Table 6	<p><b>EA 003 - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"?</b></p> <p>EA 003a - If "YES" were corrective actions formulated?</p> <p>EA 003b – N/A</p> <p>EA 003c - If "YES" is documentation available to show that actions were implemented?</p> <p>EA 003d - If "YES" are you periodically monitoring the effectiveness of any corrective actions?</p>
78	Table 7	<p><b>EA 02 - Was the adjacent land area free from compost operations within 400' of the crop edge?</b></p> <p>EA 02a - If "No" are there mitigation measures, topographical or climate features that indicate that the 400' recommendation should be modified?</p> <p>EA 02b - If "No" are mitigation measures in place and documented?</p>
21 78	225-239 Table 7	<p><b>EA 03 - Was the adjacent land area free from concentrated animal feeding operations (CAFO) within 1200' of the crop edge?</b></p> <p>EA 03a - If "No" are there mitigation measures, topographical or climate features that indicate that the 400' recommendation should be modified?</p> <p>EA 03b - If "No" are mitigation measures in place and documented?</p> <p>EA 03c- Was a pre=season assessment done to understand the impact of the CAFO on the production location?</p> <p><i>EA 03c1- Did the assessment address the following</i></p> <p><i>EA 03c2 – Information on the CAFOs Best Management Practices</i></p> <p><i>EA 03c3 – Number of animals within the CAFO?</i></p> <p><i>EA 03c4 – Water source and distribution system for the production location proximate to the CAFO? (e.g. Appendix A)</i></p>
21 78	225-239 Table 7	<p>EA 03d- Was the adjacent land area free from any CAFO with more than 80,000 animals within 1 mile of the crop edge?</p> <p><i>EA 03d1 - If "No" are there mitigation measures, topographical or climate features that indicate that the 1-mile recommendation should be modified?</i></p> <p><i>EA 03d2 - If "No" are mitigation measures in place and documented?</i></p> <p><i>EA 03d3 – Was a pre-season assessment done to understand the impact of the CAFO on the production location?</i></p> <p><i>EA 03d4 – Did the assessment address the following?</i></p> <p><i>EA 03d4(a) – Information on the facility on their Best Management Practices?</i></p> <p><i>EA 03d4(b) – Number of animals within the CAFO?</i></p> <p><i>EA 03d4(c) – Water source and distribution system source for the production location proximate to the CAFO? (e.g. Appendix A)</i></p>
79	Table 7	<p><b>EA 04 - Is the adjacent land area free from non-synthetic soil amendments stored within 400' of the edge of the crop?</b></p> <p>EA 04a - If "No" has the non-synthetic crop treatment been treated using a validated process and no closer than 30' from the edge of the crop?</p> <p>EA 04b - If "No" are there mitigation measures or topographical features that indicate that the 400' recommendation should be modified?</p> <p>EA 04c - If "No" are mitigation measures in place and documented?</p>



Page	Line #	Questions
79	Table 7	<b>EA 05 - Is the adjacent land area free from grazing lands/domestic animals within 30' from the edge of the crop?</b> EA 05a - If "No" are there topographical or climate features that indicate that 30' recommendation should be modified? EA 05b - If "No" are mitigation measures in place and documented?
79-80	Table 7	<b>EA 06 - Is the adjacent land area free from any septic leach fields (home or other building) within 30' of the edge of the crop?</b> EA 06a - If "No" are there mitigation measures, topographical or climate features that indicate that 30' should be modified is too short a distance? EA 06b - If "No" are mitigation measures in place and documented?
80	Table 7	<b>EA 07 - Are all well heads at least 200' from untreated manure?</b> EA 07a - If "No" are there topographical or climate features that indicate that 200' is too short a distance? EA 07b - If "No" are mitigation measures in place and documented?
80	Table 7	<b>EA 08 - Does documentation justify the buffer zone distance for all surface water sources on the ranch and their separation from untreated manure (raw manure and partially composted manure) as follows?</b> EA 08a - 100' for sandy soil with a slope <6% EA 08b - 200' for loamy or clay soil with a slope <6% EA 08c - 300' for all slopes >6%
21	240-243	<b>EA 09 - Is the adjacent land free from uses or conditions that pose a food safety risk to crops?</b> EA 09a - If "No" has a risk assessment been conducted to evaluate the risk? EA 09b - If "No" have corrective measures been put in place and documented?

## ENVIRONMENTAL ASSESSMENTS: Recent Field History

Page	Line #	Questions
21	244-246	<b>EA 10 - Are production blocks free from all of the following:</b> EA 10a - History of flooding within the last 60 days
21	240-243	EA 10b - History of grazing on the crop land within the last 1 year EA 10c - History of hazardous activity including but not limited to CAFO, municipal waste, toxic waste, landfill, etc.?
<b>EA 10a - EA 10c if any of these are answered "NO" then EA 10d will drop down</b>		
48	639-640	<b>EA 10d - If no, were specific actions implemented and documented to mitigate the issue(s)?</b>

## ENVIRONMENTAL ASSESSMENTS: Pre-harvest Assessment

Page	Line #	Questions
20	206-210	<b>EA 11 - Was a Pre-Harvest Assessment conducted within 7 days for each harvested lot?</b>
76	Table 6	EA 11a - Did it address the following areas? EA 11b - Intrusion by animals
21	244-246	EA 11c - Flooding



Page	Line #	Questions
20	206-210	EA 11d - Potential contamination materials EA 11e - Condition of water source and distribution system
21	219-224	EA 11f - Unexpected adjacent land activity that will pose a risk to food safety
68	807-821	EA 11g - Worker hygiene and sanitary facilities
69	838-856	

## ENVIRONMENTAL ASSESSMENTS: Animal Intrusion

Page	Line #	Questions
76	Table 6	<b>EA 12 - Did the assessment indicate that the production area was free from evidence of animal intrusion?</b>
<b>If EA 12 is answered "NO" then EA 12a - EA 12f will drop down.</b>		
75	Figure 9	EA 12a - Was the animal hazard or potential risk of intrusion assessed by food safety professional or food safety personnel? EA 12b - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"? EA 12c - If "YES" were corrective actions carried out according to company SOP? EA 12d - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"? EA 12e - If "YES" were corrective actions carried out per the LGMA requirements? EA12f - If "YES" is documentation available to show that actions were implemented?

## ENVIRONMENTAL ASSESSMENTS: Unusual Events

Page	Line #	Questions
70	874-908	EA 13a - Do the records indicate that no fields were flooded at any time during the crop cycle?
71-72	919-947	EA 13b - If production blocks were flooded is there documentation to indicate the extent of flooding and the area of crop impacted? EA 13c - Was the product left un-harvested?
70-71	Table 5	EA 13d - If product was harvested, was a 30' (min) "no harvest" buffer from the high water mark established? EA 13e - Are these remedial activities documented?
20-21	206-210 215-220	<b>EA 14 - Is the pre-harvest lot free from all evidence of any other type of potential source of human pathogen contamination AND the food safety status of the adjacent land remains unchanged since the pre-season assessment was conducted?</b>
<b>If EA 14 is answered "NO" then EA 14a - EA 14h will drop down</b>		



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Page	Line #	Questions
75	Figure 9	EA 14a - If "No", was a food safety assessment completed?
76		EA 14b - Is the individual who conducted the assessment identified?
78	Table 6	EA 14c - Is the date of the assessment documented?
		EA 14d - Were remedial actions formulated?
		EA 14e - If "No", was the field harvested?
	Table 7	EA 14f - If "No", is there documentation to show the remedial actions were followed?
		EA 14g - Did the remedial action include creation of "no harvest" buffer or separation zones around the potentially contaminated area(s)?
		EA 14h - Is documentation which fully delineates the potential contamination available for review?
72	959-968	EA 015 – Are there environmental sources of contamination (i.e. CAFO), dairy, hobby farms and manure or livestock compost facility) proximate the production location? EA 015a – If “Yes”, did the assessment indicate that the production area had a change of weather (e.g., severe wind, hail, freeze, excessive rain or have consecutive weather events) and/or discharge/drainage events since the pre-season assessment EA 015b – If “Yes”, were corrective actions carried out according to Company SOP?

**WATER USE:**

<b>Assessment of Agricultural Water System</b>			
Water sources, irrigation methods, conveyance systems, and best practices			
Page	Line #	Questions	
22	269-275	WU01: Has a water system description that indicates the source, storage and conveyance of the system been completed and is it available for review? This description can use maps, photographs, drawings or other means to communicate the location of permanent fixtures and the flow of the water system.	Yes No
27	426-453	WU02: Is there an SOP outlining best practices to avoid contamination of water sources, storage, and conveyance system within your control and does the SOP include corrective actions?	Yes No
27	426-453	WU03: Is there a SOP for the maintenance of ancillary equipment, water storage, and conveyance components of each agricultural water system used in your operations, to ensure the condition of irrigation equipment does not pose a food safety risk and does the SOP include corrective actions?	Yes No
22-23	292-294, Appendix A	WU04: Prior to using water in any leafy green operation, was an agricultural water system assessment (including source, storage, and conveyance as described in Appendix A) performed?	Yes No
		WU05: Were corrective actions identified during the agricultural water system assessment? Describe below in comments.	Yes No
		Comments:	



Assessment of Agricultural Water System			
Water sources, irrigation methods, conveyance systems, and best practices			
		WU06: If "YES", were corrective actions carried out according to the SOP?	Yes No
		WU07: If "YES" is documentation available to show that actions were implemented?	Yes No
23-24	295-353	<p>WU08: What types of irrigation water sources are being used? Check all that apply and answer related questions.</p> <ul style="list-style-type: none"> <li>a. Type A Agricultural Water Systems Sourced from Public or Private Providers <input type="checkbox"/></li> <li>b. Type A Agricultural Water Systems Sourced from Private Wells or Regulated Tertiary Treated Recycled Water Supplies</li> <li>c. Treated Type B → A Agricultural Water Systems</li> <li>d. Type B Agricultural Water Systems – For example: Sources used as B, Untreated and exposed to the environment (open sources and/or delivery systems)</li> <li>e. Natural (IE: Rain)</li> <li>f. Other (please describe)</li> </ul>	See sect B See sect C  See Sect D
		Comments:	
		<p>WU09: How is the agricultural water system being used? Check all that apply and answer related questions.</p> <ul style="list-style-type: none"> <li>a. Aerial Irrigation (overhead sprinklers)</li> <li>b. Ground (furrow, drip)</li> <li>c. Post-Harvest</li> <li>d. Aerial Non-Irrigation (sprayer, aircraft)</li> <li>e. Other</li> </ul>	
		Comments:	
24	333-346	<p>WU10: What is the system type? Check all that apply.</p> <ul style="list-style-type: none"> <li>a. Closed delivery system</li> <li>b. Open delivery system</li> </ul>	
		Comments:	
		<p>WU11: When is your agricultural water system being used? Check all that apply.</p> <ul style="list-style-type: none"> <li>a. Greater than 21 days until the scheduled harvest date?</li> <li>b. Within 21 days of scheduled harvest date?</li> </ul>	
		Comments:	

Section A:			
Irrigation Water from Type A Agricultural Water Systems Sourced from Public or Private Providers			
		<p>WU12: Was Type A water sourced from public or private providers used in any overhead application within 21 days of schedule harvest?</p> <p>(If answer is yes, proceed to the following questions. If answer is no, proceed to Section B).</p>	Yes No





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Section A: Irrigation Water from Type A Agricultural Water Systems Sourced from Public or Private Providers			
		Comments:	
31	Line 515 TABLE 2B- B1 Baseline Microbial Assessment	WU13: In lieu of a baseline microbial assessment, is the supplier's most current Certificate of Analysis (COA) available to review? (Note: Supplier annual water quality report is acceptable.)	Yes No
		Comments:	
31	Line 515 TABLE 2B- B1 Baseline Microbial Assessment	WU14: Is water quality acceptable for Type A per COA & Per Table 2B in Metrics (If answer is NO, or COA is not available, water is considered Type B and go to Section C)	Yes No
		Comments:	
31	Line 515 TABLE 2B- B2 Initial Microbial Water Quality Assessment	WU15: Were three samples collected for testing at the end of the delivery system before the 21-day to scheduled harvest period began?	Yes No
		Comments:	
32	Line 515 TABLE 2B- B2 Initial Microbial Water Quality Assessment	WU16: Did the water testing show that at least 2 of the 3 samples did not have detectable levels of generic <i>E. coli</i> , and the third sample had $\leq$ 10 MPN generic <i>E. coli</i> ?	Yes No
		Comments:	
32	Line 515 TABLE 2B- B2 Initial Microbial Water Quality Assessment	WU17: If the initial microbial water quality assessment did not meet Type A water quality standards was a root cause analysis and an agricultural water system assessment (as described in Appendix A) completed and follow up testing conducted to use the system as Type A?	Yes No



<b>Section A:</b>			
<b>Irrigation Water from Type A Agricultural Water Systems Sourced from Public or Private Providers</b>			
		Comments:	
32	Line 515 TABLE 2B- B2 Initial Microbial Water Quality Assessment	WU18: If "YES" did follow up test results show that at least 4 out of 5 samples did not have detectable generic <i>E. coli</i> , and that the final sample had $\leq 10$ MPN generic <i>E. coli</i> ?	Yes No
		Comments:	
32	Line 515 TABLE 2B- B2 Initial Microbial Water Quality Assessment	WU19: If No was the system used as Type B?	Yes No
		Comments:	
33	Line 515 TABLE 2B- B3 Routine Microbial water testing	WU20: Was routine verification water testing performed at least once at each distinct irrigation system during the season?	Yes No
		Comments:	
33	Line 515 TABLE 2B- B3 Routine Microbial water testing	WU21: Did the test show that at least 2 of 3 samples did not have detectable levels of generic <i>E. coli</i> , and the final sample had less than or equal to 10 MPN generic <i>E. coli</i> ?	Yes No
		Comments:	



<b>Section A:</b>			
<b>Irrigation Water from Type A Agricultural Water Systems Sourced from Public or Private Providers</b>			
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU22: If No, were corrective actions taken and did the re-test show that 4 of 5 samples did not have detectable levels of generic <i>E. coli</i> and the final sample had $\leq 10$ MPN generic <i>E. coli</i> ?	Yes No
		Comments:	
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU23: If No, was the water system classified as type B?	Yes No
		Comments:	
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU24: If WU22 is No, were all affected lots (i.e., lots that have been irrigated with this water within the 21 days-to-scheduled-harvest window) tested for STEC (including <i>E. coli</i> O157:H7) and <i>Salmonella</i> prior to harvesting and after the last irrigation event?	Yes No
		Comments:	
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU25: If pathogens were present, from positive test results, did the crop NOT get harvested for the fresh market and human consumption?	Yes No
		Comments:	
		WU26: Was the water system classified as Type B?	
		Comments:	



<b>Section A:</b>			
<b>Irrigation Water from Type A Agricultural Water Systems Sourced from Public or Private Providers</b>			
31	Line 515 Table 2B – B2 Initial Microbial Water Quality Assessment	WU27: Were there any material (significant) changes to the system after the initial microbial water quality assessment and/or routine microbial water testing?	Yes No
		Comments:	
		WU28: If YES, was another initial system microbial water assessment conducted? (If yes auditor to re-answer questions dealing with initial system microbial water assessments. WU15 to WU19)	Yes No
		Comments:	

<b>Section B</b>			
<b>Irrigation Water from Type A Agricultural Water Systems Sourced from Private Wells or Regulated Tertiary Treated Recycled Water Supplies</b>			
	Page Line #	Questions	
		WU29: Was water used in any overhead application within 21 days of schedule harvest? (If answer is yes, proceed to the following questions. Otherwise skip this section.	Yes No
36	Line 527 TABLE 2C- C1 Baseline Microbial Assessment	WU30: Was baseline microbial assessment established using one of the following options? Choose all that apply. a. Most recent historical water test data with one test taken within the last 6 months <input type="checkbox"/> b. New water test data via sampling <input type="checkbox"/>	Yes No
		Comments:	



Section B			
Irrigation Water from Type A Agricultural Water Systems Sourced from Private Wells or Regulated Tertiary Treated Recycled Water Supplies			
36	Line 527 TABLE 2C- C1 Baseline Microbial Assessment	<p>WU31: Did the data establish that the water quality meets Type A acceptance criteria? For chronological historical test results (with one being within the last 6 months, 4 out of 5 samples did not have detectable generic <i>E. coli</i>, and that the final sample had <math>\leq 10</math> MPN generic <i>E. coli</i>? For new water test data 5 out of 6 samples did not have detectable generic <i>E. coli</i>, and that the final sample had <math>\leq 10</math> MPN generic <i>E. coli</i>? The 6 samples were taken during 2 sampling events (3 samples per event) at least 7 days apart.</p> <p>(If answer is NO, water is considered Type B and go to Section C)</p>	Yes No
		Comments:	
37	Line 527 TABLE 2C- C2 Initial Microbial Water Quality Assessment	<p>WU32: Were three samples collected for testing <u>during 1 irrigation event</u> at the end of the delivery system before the 21-day to scheduled harvest period began?</p>	Yes No
		Comments:	
37	Line 527 TABLE 2C- C2 Initial Microbial Water Quality Assessment	<p>WU33: Did the water testing show that at least 2 of the 3 samples did not have detectable levels of generic <i>E. coli</i>, and the third sample had less than or equal to 10 MPN generic <i>E. coli</i>?</p>	Yes No
		Comments	
37	Line 527 TABLE 2C- C2 Initial Microbial Water Quality Assessment Remedial Action	<p>WU34: If the initial microbial water quality assessment did not meet Type A water quality standards, was a root cause analysis and an agricultural water system assessment (as described in Appendix A) completed and follow up testing conducted to use the system as Type A?</p>	Yes No
		Comments:	



<b>Section B</b>			
<b>Irrigation Water from Type A Agricultural Water Systems Sourced from Private Wells or Regulated Tertiary Treated Recycled Water Supplies</b>			
37	Line 527 TABLE 2C- C2 Initial Microbial Water Quality Assessment Remedial Action	WU35: If "YES", did follow up test results show that at least 4 out of 5 samples did not have detectable generic <i>E. coli</i> , and that the final sample had less than or equal to 10 MPN generic <i>E. coli</i> ?	Yes No
		Comments:	
37	Line 527 TABLE 2C- C2 Initial Microbial Water Quality Assessment Remedial Action	WU36: If "NO" was system used as Type B?	Yes No
		Comments:	
38	Line 527 TABLE 2C- C3 Routine Verification of Microbial Water Quality	WU37: Was routine verification water testing performed at least once at each distinct irrigation system during the season?	Yes No
		Comments:	
38	Line 527 TABLE 2C- C3 Routine Verification of Microbial Water Quality	WU38: Did the test show that at least 2 of 3 samples did not have detectable levels of generic <i>E. coli</i> , and the final sample had less than or equal to 10 MPN generic <i>E. coli</i> ?	Yes No
		Comments:	



<b>Section B</b>			
<b>Irrigation Water from Type A Agricultural Water Systems Sourced from Private Wells or Regulated Tertiary Treated Recycled Water Supplies</b>			
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU39: If No, were corrective actions taken and did the re-test show that 4 of 5 samples did not have detectable levels of generic <i>E. coli</i> and the final sample had $\leq 10$ MPN generic <i>E. coli</i> ?	Yes No
		Comments:	
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU40: If No were all affected lots (i.e., lots that have been irrigated with this water within the <21 days-to-scheduled-harvest window) tested for STEC (including <i>E. coli</i> O157:H7) and <i>Salmonella</i> prior to harvesting and after the last irrigation event?	Yes No
		Comments:	
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU41: Was the system classified as Type B?	
		Comments:	
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU42: If pathogens were present, from positive test results, did the crop NOT get harvested for the fresh market and human consumption?	Yes No
		Comment:	
37	Line 527 TABLE 2C- C2 Initial Microbial Water Quality Assessment	WU43: Were there any material (significant) changes to the system after the initial microbial water quality assessment?	Yes No  Yes No



Section B Irrigation Water from Type A Agricultural Water Systems Sourced from Private Wells or Regulated Tertiary Treated Recycled Water Supplies			
37	Line 527 TABLE 2C- C2 Initial Microbial Water Quality Assessment	WU44: If YES, was another initial system microbial water assessment conducted?  (If yes auditor to re-answer questions dealing with initial system microbial water assessments. WU32 TO WU36)	
		Comments:	

Section C Irrigation Water from Treated Type B to A Agricultural Water Systems: Water from canals, rivers or reservoirs (Type B) or water from Sections A&B that did not meet Type A standard.			
	Page Line #	Questions	
		WU45: Has any water been treated from Type B to A. If yes, answer the following questions.	
21	Appendix A Table 9 Initial Irrigation Water Treatment Assessment	WU46: Was an Initial Irrigation Water Treatment Assessment conducted and an SOP established outlining the water baseline quality, treatment method, mitigations used, dose, and methods for verification of treatment to change water from Type B to A per Appendix A guidance?	Yes No
		Comments:	
21	Appendix A Table 9 Initial Irrigation Water Treatment Assessment	WU47: Are antimicrobial treatments used and managed in a manner that meets all federal, state and local regulations and label requirements?	Yes No
		Comments:	
22-23	Appendix A Table 10 Initial Microbial Water Quality Assessment	WU48: Did the Initial Microbial Water Quality Assessment water testing show that at least 2 of the 3 samples did not have detectable levels of generic <i>E. coli</i> , and the third sample had $\leq 10$ MPN generic <i>E. coli</i> and for total coliform a monitoring maximum level of 99 MPN in 100 mL in all water samples or an adequate log reduction per Appendix A guidance?	Yes No
		Comments:	





Section C			
<b>Irrigation Water from Treated Type B to A Agricultural Water Systems: Water from canals, rivers or reservoirs (Type B) or water from Sections A&amp;B that did not meet Type A standard.</b>			
22-23	Appendix A Table 10 Initial Microbial Water Quality Assessment Remedial Action	WU49: If the initial microbial water quality assessment did not meet Type A water quality standards, was a root cause analysis and an agricultural water system assessment (as described in Appendix A) completed and follow up testing conducted to use the system as Type A?	Yes No
		Comments:	
	Appendix A Table 10 Pg. 22-23 Initial Microbial Water Quality Assessment Remedial Action	WU50: If "YES" did follow up test results show that at least 4 out of 5 samples did not have detectable generic <i>E. coli</i> , that the 5th sample had ≤ 10 MPN generic <i>E. coli</i> , and all samples met the Total Coliform monitoring requirement of a max value of 99 MPN or an adequate log reduction? If "NO" was system used as Type B?	Yes No
		Comment:	
42	Line 537 TABLE 2D- D1 Routine Verification of Microbial Water Quality	WU51: Was routine water testing performed on a monthly frequency and if the irrigation treatment system is being used within the 21 days to scheduled harvest window was each distinct system sampled on at least 2 occasions separated by at least 3 days?	Yes No
		Comment:	
42	Line 537 TABLE 2D- D1 Routine Verification of Microbial Water Quality	WU52: Did water testing show that at least 2 of the 3 samples did not have detectable levels of generic <i>E. coli</i> , and the third sample had ≤ 10 MPN generic <i>E. coli</i> and for Total Coliform a monitoring maximum level of 99 MPN in 100 mL in all water samples or an adequate log reduction per Appendix A guidance?	Yes No
		Comments:	



Section C			
Irrigation Water from Treated Type B to A Agricultural Water Systems: Water from canals, rivers or reservoirs (Type B) or water from Sections A&B that did not meet Type A standard.			
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU53: If the answer is No, were corrective actions taken and 4 of 5 samples did not have detectable levels of generic <i>E. coli</i> and < 10 MPN as the single sample maximum for one (1) sample and were all samples at a level ≤ 99 MPN for Total coliform or an adequate log reduction?	Yes No
		Comments:	
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU54: For generic <i>E. coli</i> re-test failure if the water from the initial sampling to the last round of sampling has been applied to leafy greens, was the crop tested from all affected lots (i.e., lots that have been irrigated with this water within the <21 days-to-scheduled-harvest window) for STEC (including <i>E. coli</i> O157:H7) and <i>Salmonella</i> per Table 2F?	Yes No
		Comments:	
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU55: For Total Coliforms re-test failure was a root cause analysis performed to evaluate the irrigation treatment system and corrections made per Table 2F?	Yes No
		Comments:	
43	TABLE 2D- D2 Routine Water Treatment Monitoring	WU56: For each irrigation event are treatment monitoring records available?	Yes No
		Comments:	
		WU57: Do the records show that the monitoring requirements are being met? If yes skip to WU78.	Yes No
		Comments:	
43	TABLE 2D- D2 Routine Water Treatment Monitoring	WU58: If monitoring records show that treatment parameters weren't met, in accordance to the monitoring SOP, were remedial actions conducted including taking microbial verification water samples in accordance to Table 2D section D2?	Yes No



Section C			
Irrigation Water from Treated Type B to A Agricultural Water Systems: Water from canals, rivers or reservoirs (Type B) or water from Sections A&B that did not meet Type A standard.			
		Comments:	
42	Line 537 TABLE 2D-D1 Routine Verification of Microbial Water Quality	WU59: Did verification sample results show that at least 2 of the 3 samples did not have detectable levels of generic <i>E. coli</i> , and the third sample had $\leq 10$ MPN generic <i>E. coli</i> and for Total Coliform a monitoring maximum level of 99 MPN in 100 mL in all water samples or an adequate log reduction per Appendix A guidance?	Yes No
		Comments:	
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU60: If the answer is No, were corrective actions taken and were 4 of 5 samples non-detect for generic <i>E. coli</i> and $< 10$ MPN as the single sample maximum for one (1) sample and were all samples at a level $\leq 99$ MPN for Total coliform or an adequate log reduction?	Yes No
		Comments:	
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU61: For generic <i>E. coli</i> re-test failure if the water from the initial sampling to the last round of sampling has been applied to leafy greens, was the crop tested from all affected lots (i.e., lots that have been irrigated with this water within the $< 21$ days-to-scheduled-harvest window) for STEC (including <i>E. coli</i> O157:H7) and <i>Salmonella</i> per Table 2F?	Yes No
		Comments:	
48	Line 551 TABLE 2F Routine Microbial water testing Remedial Action	WU62: For Total Coliforms re-test failure was a root cause analysis performed to evaluate the irrigation treatment system and corrections made per Table 2F?	Yes No
		Comments:	
		WU63: Was the water classified as Type B?	Yes No



Section C			
Irrigation Water from Treated Type B to A Agricultural Water Systems: Water from canals, rivers or reservoirs (Type B) or water from Sections A&B that did not meet Type A standard.			
22-23	Appendix A Table 10 Initial Microbial Water Quality Assessment	WU64: Were there any material (significant) changes to the system after the initial microbial water quality assessment?	Yes No
		Comments:	
		WU65: If YES, was another initial system microbial water assessment conducted? (If yes auditor to re-answer questions dealing with initial system microbial water assessments.)	Yes No
		Comments:	

Section D			
Irrigation Water from Type B Agricultural Water Systems			
	Page Line #	Questions	
29 & 45	Line 494 TABLE 2A Line 543 TABLE 2E	WU66: Was a source water quality microbiological test conducted for each source of water within 60 days of first use on post germinated fields?	Yes No
		Comments:	
29 & 45	Line 494 TABLE 2A Line 543 TABLE 2E	WU 67: Are records available to demonstrate that one (1) 100 mL water sample has been collected from each water distribution system on a monthly basis?	Yes No
		Comments:	
29 & 45	Line 494 TABLE 2A Line 543 TABLE 2E	WU68: Do Records show that the water samples are taken no less than 18 hours apart?	Yes No
		Comments:	
29 & 45	Line 494 TABLE 2A Line 543 TABLE 2E	WU69: Is the geometric mean less than or equal to 126 MPN/100 mL?	Yes No
		Comments:	



<b>Section D</b>			
<b>Irrigation Water from Type B Agricultural Water Systems</b>			
29 & 45	Line 494 TABLE 2A Line 543 TABLE 2E	WU70: Are all individual samples less than or equal to 235MPN/100 ml (foliar) or 576 MPN/100mL (non-Foliar)? If no answer the applicable questions below. Non-foliar: WU71 to WU76 Foliar: WU77 to WU83	Yes No
		Comments:	
29-30	Line 494 Non-Foliar Remedial Actions TABLE 2A Figure 1	WU71: Was an agricultural water system assessment conducted and were samples for the required water re-testing taken at the previous sampling point?	Yes No
		Comments:	
30	Non-Foliar Remedial Actions Figure 1	WU72: Was one (1) 100 mL water test taken daily (not less than 18 hours apart) for 5 days?	Yes No
		Comments:	
30	Non-Foliar Remedial Actions Figure 1	WU73: Were these 5 test results meeting the acceptance criteria: average less than 126 MPN/100mL (based on rolling geometric mean=5) and no sample exceeded 576 MPN/100 mL (non-foliar)?	Yes No
		Comments:	
30	Non-Foliar Remedial Actions Figure 1	WU74: Do records show the water system was not used while the water quality was inadequate?	Yes No
		Comments:	
30	Non-Foliar Remedial Actions Figure 1	WU75: If no, was product sampled for STEC (including <i>E. coli</i> O157:H7) and Salmonella?	Yes No
		Comments:	
30	Non-Foliar Remedial Actions Figure 1	WU76: Do records show that the crop was not harvested for human consumption when the tests were positive for STEC (including <i>E. coli</i> O157:H7) and Salmonella?	Yes No
		Comments:	
47	Line 549 Foliar Remedial Actions Figure 5	WU77: If the water source is a well was an agricultural system assessment and/or treatment performed?	Yes No
		Comments:	



<b>Section D</b>			
<b>Irrigation Water from Type B Agricultural Water Systems</b>			
47	Foliar Remedial Actions Figure 5	WU78: Were samples for the required water re-testing taken at the previous sampling point?	Yes No
		Comments:	
47	Line 549 Foliar Remedial Actions Figure 5	WU79: Were (3) 100 mL water test taken (not less than 18 hours apart)?	Yes No
		Comments:	
47	Line 549 Foliar Remedial Actions Figure 5	WU80: If yes, were these (3) test results meeting the acceptance criteria? (all less than 126 MPN/100mL?)	Yes No
		Comments:	
		WU81: If no, was the water source discontinued for use until brought back within acceptance criteria?	Yes No
		Comments:	
47	Line 549 Foliar Remedial Actions Figure 5	WU82: If crop was contacted by the water exceeding the acceptance criteria was product sampled for STEC (including <i>E. coli O157:H7</i> ) and Salmonella?	Yes No
		Comments:	
47	Line 549 Foliar Remedial Actions Metrics Figure 5	WU83: Do records show that the crop was not harvested for human consumption when the tests were positive for STEC (including <i>E. coli O157:H7</i> ) and Salmonella?	Yes No
		Comments:	



Section E			
Post- harvest water use on products and Food contact surfaces			
	Page Line #	Questions	
		WU84: Was water used during post- harvest application to the edible portion of the crop or food contact surfaces? (If answer is yes then proceed to following questions otherwise stop here)	Yes No
		Comments:	
50	Line 553 TABLE 2G	WU85: Is there an SOP prepared to make sure that water used for postharvest food contact and food contact surfaces is microbially equivalent to potable water standards?	Yes No
		Comments:	
50	Line 553 TABLE 2G	WU86: Did water quality meet potable water microbial standards? <ul style="list-style-type: none"> <li>• Single pass use – Water must have non-detectable levels of <i>E. coli</i> or breakpoint disinfectant present at point of entry</li> <li>• Multi-pass use – Water must have non-detectable levels of <i>E. coli</i> and/or sufficient disinfectant to ensure returned water has no detectable <i>E. coli</i></li> </ul> <u>Chlorine</u> ≥ 1 ppm free chlorine after application and pH 5.5 – 7.5 <b>OR</b> ORP ≥ 650 mV and pH 5.5 – 7.5 If no answer the questions below.	Yes No
		Comments:	
50	Line 553 TABLE 2G	WU87: Are there records demonstrating that the water was no longer used until corrective actions were complete?	Yes No
		Comments:	
50	Line 553 TABLE 2G	WU88: If the water source is a well was an agricultural system assessment and/or treatment performed?	Yes No
		Comments:	
50	Line 553 TABLE 2G	WU89: Was one (1) 100 mL water test taken daily (not less than 18 hours apart) for 5 days?	Yes No
		Comments:	
50	Line 553 TABLE 2G	WU90: Were all samples less than or equal to 2 MPN/100mL for generic <i>E. coli</i> ?	Yes No
		Comments:	
50	Line 553 TABLE 2G	WU91: If crop, or food contact surfaces, were contacted by the water exceeding the acceptance criteria was product sampled for STEC (including <i>E. coli O157:H7</i> ) and Salmonella?	Yes No
		Comments:	



Section E			
Post- harvest water use on products and Food contact surfaces			
50	Line 553 TABLE 2G	WU92: Do records show that the crop was not distributed for human consumption when the tests were positive for STEC (including <i>E. coli O157:H7</i> ) and Salmonella?	Yes No

## SOIL AMENDMENTS

Page	Line #	Questions
<b>All soil amendments are free from raw or partially composted animal manure and solids</b>		
27	230-232	<b>SA 01 – Raw or partially composted animal manure, animal by-products or biosolids have not been applied in the last 1 year?</b> SA 01a – If "No" to the above were any of these fields used in the production of leafy greens?
		Comments:
29	Table 2	<b>SA 02 – No soil amendment containing fully composted animal manure has been applied in the field within the last year</b>
		Comments:
<b>If SA 02 is answered "NO" then SA 02a-SA 02u will drop down</b>		
29	Table 2	SA 02a – Are Process Validation records available for review? SA 02b – If the Enclosed or Within-Vessel Composting method is used, do the records show:
32	Figure 2A	SA 02c – ...that the active compost maintained a minimum of 131°F for 3 days? <b>SA 02c(1) – ...Is a Letter of Guaranty or other comparable documentation available that shows the soil amendment has been adequately cured?</b> SA 02d – If the Windrow Composting method is used do the records show: SA 02e – ...that the active compost maintained aerobic conditions for a minimum of 131°F or higher for 15 days or longer? SA 02f – ...a minimum of five turnings during this period? <b>SA 02f(1) – ...Is a Letter of Guaranty or other comparable documentation available that shows the soil amendment has been adequately cured?</b> SA 02g – If the Aerated Static Pile Composting method is used do the records show that: SA 02h – ...the active compost was covered with 6 to 12 inches of insulating materials? SA 02i – ...maintain a minimum of 131°F for 3 days? <b>SA 02i(2) – ...Is a Letter of Guaranty or other comparable documentation available that shows the soil amendment has been adequately cured?</b> SA 02j – Has each lot of composted material that is equal to or less than 5000 cubic yards been tested as required? SA 02k – Has each lot of composted material been applied to the production location more than 45 days before harvest? <b>SA 02k(1) – For on-farm compost, are process control monitoring records reviewed, dated and signed by supervisor or responsible party within a week after records were made?</b>





Page	Line #	Questions
		Comments:
<b>Records must be available to document the following criteria have been meet for each lot of compost containing animal material used.</b>		
55 56	Table 3 Figure 7A	<p><b>a. Acceptance criteria</b> SA 02l – Fecal coliforms: &lt;1000 MPN/gram SA 02m – <i>Salmonella</i>: Negative per sample size of the prescribed test SA 02n – <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test</p> <p><b>b. Recommended test methods</b> SA 02o – Fecal coliforms: U.S. EPA Method 1680; multiple- tube MPN SA 02p – <i>Salmonella</i> spp: U.S. EPA Method 1682 SA 02q – <i>E. coli</i> O157:H7: Any laboratory validated method for compost SA 02r – Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate.</p> <p><b>c. Sampling plan</b> SA 02s – A composite sample shall be representative and random and obtained as described in the California state regulations. SA 02t – Sample may be taken by the supplier if trained by a testing laboratory or state authority. SA 02u – Laboratory must be certified/accredited for microbial testing by a certification or accreditation body.</p>
		Comments:
28	261 - 270	<p><b>SA 03 - Is a Letter of Guarantee or other comparable documentation (ingredient statement, agricultural label, etc.) available that shows the soil amendment does not contain animal manure or is composed of a single ingredient?</b> SA 03a - Is the name of the authority issuing the Letter of Guarantee or another comparable document shown?</p>
<b>Soil Amendments that contain animal manure that are heat treated or processed to equivalent methods</b>		



Page	Line #	Questions
57-58	Table 3 Figure 7B	<p><b>SA 04 - No soil amendment containing animal manure that has been heat treated or processed by other equivalent methods have been applied in the field within the last year</b></p> <p style="text-align: center;"><b>If SA 04 is answered "NO" then SA 04a-SA 04m will drop down</b></p> <p>SA 04a – Are process records or other comparable documentation available that show the lethality of the process?</p> <p>SA 04b – Is the name of the process authority issuing the Letter of Guaranty or another comparable document shown?</p> <p>Records must be available to document the following criteria have been meet for each lot of heat treated or processed by other equivalent method compost containing animal material used.</p> <p><b>a. Acceptance criteria</b></p> <p>SA 04c – Fecal coliforms: Negative MPN/gram</p> <p>SA 04d – <i>Salmonella</i> spp.: Negative per sample size of the prescribed test</p> <p>SA 04e – <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test</p> <p>SA 04e(1) – <i>Listeria monocytogenes</i>: Negative per sample size of the prescribed test</p> <p><b>b. Recommended test methods</b></p> <p>SA 04f – Fecal coliforms: 9 tube MPN</p> <p>SA 04g – <i>Salmonella</i> spp: U.S. EPA Method 1682</p> <p>SA 04h – <i>E. coli</i> O157:H7: Any laboratory validated method for compost</p> <p>SA 04i – Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate.</p> <p>SA 04i(1) – <i>Listeria monocytogenes</i>: Any laboratory validated method for testing soil amendments</p> <p><b>c. Sampling plan</b></p> <p>SA 04j - Take at least 12 equivolume samples from 12 or more separate locations or 12 samples from 12 individual bags, if bagged individually.</p> <p>SA 04k - Sample may be taken by the supplier if trained by a testing laboratory or state authority.</p> <p>SA 04l - Laboratory must be certified/accredited by a certification or accreditation body.</p> <p><b>SA 04m - If testing records are NOT available is a Certificate of Process Validity as defined by the "Guidelines" available for review?</b></p>
		Comments:
<b>Soil Amendments that are Non-Synthetic Treatments (compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc.) Table 3 &amp; Figure 3</b>		
34		<b>SA 05 - No non-synthetic crop treatment has been applied to the crop?</b>
		Comments:
<b>If SA 05 if answered "NO" then SA 05a - SA 05v will drop down</b>		
62	Table 4	<p>SA 05a – If "No" to the above, the product (non-synthetic soil amendment) was not applied to the edible portion of the crop?</p> <p>SA 05b – Is a letter of compliance or comparable document outlining the actual conditions of use and conformance to standards available for review (including presence of animal products or manure)?</p>
		Comments:



Page	Line #	Questions
34	293-294	SA 05b(1) – If compost / treated agricultural tea containing nutrients intended to increase microbial biomass (e.g., molasses, yeast extract, algal powder) is applied to edible portion of the crop, do records indicate that the nutrients were added prior to treatment?
		Comments:
<b>Records must be available to document the following criteria have been meet for each lot of non-synthetic crop treatment used.</b>		
62-64	Table 4 Figure 8	<p>SA 05c – Did each lot/batch used meet the microbial criteria identified below?  <b>SA 05c(1) – Fecal coliforms: Negative MPN/gram</b>            SA 05d – <i>Salmonella</i>: Negative per sample size of the prescribed test            SA 05e – <i>E. coli</i> O157:H7: Negative per sample size of the prescribed test  <b>SA 05e(1) – <i>Listeria monocytogenes</i>: Negative per sample size of the prescribed test</b>            SA 05f – If this treatment is applied as a liquid <b>was the solution made with water that meets the quality standard for post-harvest water listed n Table 1.</b>  <b>Application intervals were met:</b>            SA 05g – Was this non-synthetic crop treatment produced using a validated process for pathogen control?            SA 05h – If "No" to above, was the treatment applied at least 45 days before harvest?            SA 05i – If "Yes", are process validation records and documentation available to show that the process is capable of reducing pathogens of human health significance to acceptable levels.  <b>Acceptable testing methods were followed:</b>  <b>SA 05i(1) - Fecal coliforms: Negative MPN/gram</b>            SA 05j – <i>Salmonella</i> spp: U.S. E.P.A. Method 1682            SA 05k – <i>E. coli</i> O157:H7: Any laboratory validated method for compost sampling  <b>SA 05l(1) – <i>Listeria monocytogenes</i>: Negative per sample size of the prescribed test</b>            SA 05l – Other U.S. EPA, FDA, AOAC, or TMECC-accredited methods may be used as appropriate.  <b>The proper sampling plan was followed:</b>            SA 05m – Solid: 12-point sampling plan composite sample            SA 05n - Liquid: Single well-mixed sample per lot            SA 05o - Sample may be taken by the supplier if trained by the testing laboratory            SA 05p - Laboratory must be certified/accredited by annual review of laboratory protocols based on GLPs by a <b>certification or accreditation body.</b>  <b>Testing Frequency:</b>            SA 05q - Each lot before application to production fields.            SA 05r - Identify the crop treatment.            SA 05s - Show the name of the laboratory completing the testing.            SA 05t - Show date of application?            SA 05u - Does it show the date of harvest?            SA 05v - Show the supplier name?</p>
		Comments:



Page	Line #	Questions
34	298-300	<b>SA 06 - Is there a written policy implementing management plans (e.g. timing of applications, storage location, source and quality, transport, etc.) that significantly reduce the likelihood that soil amendments and/or crop treatments being used contain human pathogens and assure to the greatest degree practicable that the use of crop treatments does not pose a significant pathogen contamination hazard?</b>
		Comments:

## WORKER PRACTICES: General Requirements

Page	Line #	Questions
41	443-445	<b>WP 01 - Is there a written policy for all employees and all visitors to the field location which describes the required hygiene rules?</b> WP 01a - Does the Policy address the following:
		Comments:
41	450-453	WP 01b - Sanitary Facilities
		Comments:
41-42	443-470	WP 01c - Field Worker Practices (GMP's, GHP's, etc.)
		Comments:
42	471-479	WP 01d - Worker Health Practices
		Comments:



## WORKER PRACTICES: Sanitary Facilities

Page	Line #	Questions
69	838-856	<p><b>WP 02 - Is there a documented field sanitary facility program that addresses the following?</b></p> <p>WP 02a – N/A</p> <p>WP 02b - The number, condition, and placement of field sanitation units complies with applicable state and/or federal regulations.</p> <p>WP 02c - Sanitary facilities are readily accessible (proximate) to the work area.</p> <p>WP 02d - Sanitary facilities are regularly maintained according to schedule.</p> <p>WP 02e - Sanitary facilities have sufficient consumable supplies (i.e.: hand soap, water that meets the postharvest acceptance criteria, paper towels, toilet paper, etc.).</p> <p>WP 02f - Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work.</p> <p>WP 02g - Field sanitation facilities are cleaned and serviced with waste disposed of on a scheduled basis and at a location that minimizes the potential risk for product contamination.</p> <p>WP 02h - Address the placement of the sanitary facility in order to minimize any impact on the crop in the field including:</p> <p>WP 02i - Minimize the impact on the crop from leaks and/or spills</p> <p>WP 02j - Ability to access the unit for service</p> <p>WP 02k - Documented response plan in the event of a major leak and/or spill.</p>
		Comments:
68	808-817	<p><b>WP 03 - Is there a written worker practices program that establishes employee work rules that address the following:</b></p> <p>WP 03a - N/A</p> <p>WP 03b - Training on proper sanitation and hygiene practices</p> <p>WP 03c - Requirement for workers to wash their hands with soap and water before beginning or returning to work, and any other time when hands may have become contaminated.</p> <p>WP 03d - Confine smoking, eating and drinking (except water) to designated areas.</p> <p>WP 03e - Storage requirements for personal items in/or adjacent to the field?</p> <p>WP 03f - The appropriate use and sanitation of gloves.</p> <p>WP 03g - Avoid contact with animals</p>
		Comments:
68	822-828	<p><b>WP 03h - For materials targeted for further processing, is there a written physical hazard prevention program which includes the following?</b></p> <p>WP 03i - The proper wearing of head and facial hair restraints.</p> <p>WP 03j - The proper wearing of apron and other food safety apparel.</p> <p>WP 03k - Removal of visible jewelry (rings, bracelets, necklaces, body piercings, etc.) or covering of hand jewelry prior to the start of work.</p> <p>WP 03l - Removal of all objects from upper pockets.</p> <p>WP 03m - Prohibitions on spitting, urinating or defecating in the field.</p>
		Comments:



## WORKER PRACTICES: Worker Health Practices

Page	Line #	Questions
68-69	829-837	<p><b>WP 04 - Is there a written worker health practices program that establishes employee work rules which address the following?</b></p> <p>WP 04a- <b>N/A</b></p> <p>WP 04b - Workers with diarrheal disease or symptoms of other infectious disease are prohibited from <b>being in the field</b> or handling fresh produce <b>or food-contact surfaces?</b></p> <p>WP 04c - Workers with open cuts or lesions are prohibited from handling fresh produce.</p> <p>WP 04d - Actions for employee to take in the event of injury or illness (<b>e.g. notifying supervisor</b>).</p> <p>WP 04e - A policy describing procedures for handling/disposition of produce or food contact surfaces that have come into contact with blood or other body fluids.</p>
		Comments:

## FIELD SANITATION: General Requirements

Page	Line #	Questions
68	819-821	<p><b>FS 01 - Is there a written policy for all employees and all visitors in the field location which describes the required field sanitation SOPs?</b></p>
		Comments:

## FIELD SANITATION: Field Activities

Page	Line #	Questions
41	446-447	<p><b>FS 02 - Does the written field activity SOP address the following:</b></p> <p><b>FS 02a(a) – is a specific individual assigned the food safety responsibility for growing operations?</b></p>
		Comments:
69	857-873	<p>FS 02a - Cross contamination by farming equipment and tools that come into contact with raw manure, untreated compost, waters of unknown quality, animal hazards or other potential sources.</p> <p>FS 02b - If "yes", does it appropriately restrict the use or require a documented cleaning and sanitation program of the equipment?</p> <p>FS 02c - If cleaning and sanitation is required, are records of the cleaning/sanitation available for review.</p>
		Comments:



## FIELD SANITATION: Harvest Activities

Page	Line #	Questions
41	446-447	<b>FS 03 - Does the written harvest activity SOP address the following:</b> FS 03a - Is a specific individual assigned the food safety responsibility for harvesting?
		Comments:
48	628-631	FS 03b - Is a documented daily food safety harvest assessment available for review? FS 03c - Is the assessment dated? FS 03d - Is the individual who conducted the assessment identified?
50	Figure 5	FS 03e - Are the specific growing blocks associated with the assessment clearly identified? FS 03f - Is the Harvester name and contact information documented? FS 03g - Did the assessment indicate that the production area was free from evidence of animal intrusion?
		Comments:
<b>If FS 03g is answered NO, then FS 03gg – FS 01i2 will drop down</b>		
48	628-631	FS 03gg - Was the animal hazard or potential risk of intrusion assessed by food safety professional or food safety personnel? FS 03h - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"?
50	Figure 5	FS 03h1 - If "YES" were corrective actions carried out according to company SOP? FS 03i - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"?
		FS 03i1 - If "YES" were corrective actions carried out per the LGMA requirements? FS 03i2 - If "YES" is documentation available to show that actions were implemented?
		Comments:
39	385-387	<b>FS 03j - Is there an SSOP for food-contact surfaces of harvest equipment, tools and containers addressing the following:</b> FS 03k - Method and frequency of cleaning and sanitation
		Comments:
41	448	FS 03l - Chemical usage and record keeping (e.g. soap, detergent, sanitizer, etc.) FS 03m - Equipment specific cleaning instructions <b>FS 03n - Chemical storage</b> FS 03o - All chemical storage containers are labeled appropriately
		Comments:
39	388	<b>FS 03p - Sanitation Procedures Verification</b>
		Comments:
38	342	<b>FS 03q - Daily inspection</b>
		Comments:
39	385-387	<b>FS 03q (1) - Is there an SOP for non-food-contact surfaces of harvest equipment, tools, and containers addressing the following:</b> FS 03q (2) – Method and frequency of cleaning



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Page	Line #	Questions
		Comments:
41	448	FS 03q (3) - Chemical usage and record keeping? (e.g. soap, detergent, sanitizer, etc.) FS 03q (4) - Equipment-specific cleaning instructions?
		Comments:
39	388	FS 03q (5) - Cleaning verification?
		Comments:
38	342	FS 03q (6) - Daily inspection?
		Comments:
39	389-390	FS 03r - Question deleted per LGMA Board action on 7/10/2009 FS 03r (1) - Has a supervisor or responsible party signed and dated equipment cleaning and sanitation records within a week of the activities being performed?
		Comments:
38	347-352	<b>FS 03s - Is there an SOP for handling and storage of product containers which addresses the following:</b> FS 03t - Overnight storage FS 03u - Contact with the ground FS 03v - Container assembly (RPC, fiber bin, plastic bin, etc.) FS 03w - Damaged containers FS 03x - Use of containers only as intended
		Comments:
38-39	347-342	<b>FS 03y - Is there an SOP for sanitary operation of equipment?</b> FS 03z - Are spills and leaks addressed?
		Comments:
39 40	391 - 392 402-403	FS 03aa - Harvest equipment protection FS 03bb - Overnight equipment and tool storage FS 03cc - Does the SOP for Sanitary Operation of Equipment, address remedial actions taken as necessary?
		Comments:
39	357-360	FS 03dd - Is there an SOP for water tanks, containers, and equipment used for hydration.
		Comments:
40	389-401	<b>FS 03zd – Are packing materials or containers cleanable or designed for single use?</b> FS 03ze – Are reusable packing materials or containers cleaned and sanitized or fitted with a clean liner?
		Comments:





Page	Line #	Questions
39	368-372	FS 03zf – Are instruments or controls used to measure, regulate, or record temperature, hydrogen ion concentration, pH, sanitizer concentration or other conditions: FS 03zf (1) - Accurate and precise as necessary and appropriate for their intended use? FS 03zf (2)– Adequately maintained? FS 03zf (3) – Adequate in number for their intended use?
39	373-376	<b>FS 03zf (4)– Is waste, trash, and other debris conveyed, stored, and disposed of in a manner that protects product and production area from contamination?</b>
		Comments:
40	406-417	FS 03zg – Are there any buildings used to store packing material? FS 03zg (1) – Does the building have proper drainage and protection from condensate or drips to keep food-contact surfaces from getting wet? FS 03zg (2) – Are packaging materials and other food-contact surfaces kept separate from contamination sources by partition, time, location, enclosed system, or other effective means?
		Comments:
50 51	Figure 5 Table 5	<b>FS 04 - Is there a written SOP which addresses corrective actions for "Low Hazard" animal intrusion?</b>
		Comments:

### FIELD OBSERVATIONS: Water Use

Page	Line #	Questions
19	153	<b>FO 01 - Are all active and/or inactive water sources recorded in the Water Use Audit?</b>
		Comments:
19	154 159	FO 01a - From visual inspection, there is no evidence that the water sources and distribution systems may pose a contamination risk (damage, inadequately maintained, evidence of animal activity, connection with effluent systems)? FO 01b - No other observations of improper use of water
		Comments:

### FIELD OBSERVATIONS: Soil Amendments

Page	Line #	Questions
27 – 33	229- 272 Table 2	<b>FO 02 - No evidence of undocumented use of soil amendments?</b> FO 02a - No evidence of improperly applied soil amendments? FO 02b - No evidence of improperly stored soil amendments? FO 02c - No other observations of improper use of soil amendments
		Comments:



## FIELD OBSERVATIONS: Environmental Factors

Page	Line #	Questions
50	Fig. 5	<b>FO 03 - No evidence of fecal contamination in the field?</b> FO 03a - No evidence of animal hazards in the field?
		Comments:
51 - 52	Table 5	FO 03b - No evidence of non-compliance with distances as outlined in the Environmental Assessment? FO 03c - No evidence that remedial actions such as animal barriers (fences, gates, grates, etc.) are not in good repair and operational? FO 03d - No evidence that worker hygiene rules have been violated during the crop cycle? FO 03e - No other observations of environmental risk factors.
		Comments:

## FIELD OBSERVATIONS: Worker Practices

Page	Line #	Questions
41	459	<b>FO 04 - No employees eating, drinking (except water), chewing tobacco or smoking in crop production actively harvested areas?</b>
		Comments:
41	450-453	FO 04a - All employees observed to have washed their hands after; restroom usage, work breaks or any returning to work occasion?
		Comments:
42	480-498	FO 04b - No evidence that sanitary facilities are not routinely clean and operational?
		Comments:
		FO 04c - No evidence that worker hygiene rules have been violated during the crop cycle? FO 04d - No evidence that sanitary facilities are not adequately stocked with disposable supplies?
		Comments:
41-42	464-469	FO 04e - No improperly stored personal items observed in the field?
		Comments:
41	460	FO 04f - No evidence or observations that employees are not using the restrooms?



Page	Line #	Questions
		Comments:
42	472-475	FO 04g - No employees with uncovered wounds, boils or cuts? FO 04h - No employees with symptoms of infection or contagious disease?
		Comments:
41-42	434-479	FO 04i - No other observations of improper work practices.
		Comments:

## FIELD OBSERVATIONS: Field Sanitation

Page	Line #	Questions
		<b>FO 05 - No evidence of excessive non-vegetative debris in the field?</b> FO 05a - No evidence of open and/or unsupervised chemicals in the field? FO 05b - No evidence of leaks and spills on equipment in the field? FO 05c - No evidence of the use of non-sanitized farm equipment that may have come in contact with raw manure, untreated compost, waters of unknown quality, wildlife or domestic animals? FO 05d - No evidence of other cross-contamination potential of product and/or product contact surfaces? FO 05e - No other evidence of improper field sanitation.
		Comments:

## SOIL FERTILITY

Page	Line #	Questions
57	693 - 705	<b>SF 01: Have all production blocks intended for spinach been evaluated for the presence of cadmium?</b> SF02: Has a soil fertility program been developed
		Comments:

## TRANSPORTATION

Page	Line #	Questions
57	712 - 715	<b>TR 01 – Is there an inspection program for equipment and shipping containers used to transport leafy greens from the farm and on the farm?</b> TR 01a - Are shipping units and equipment used to transport leafy greens on the farm or from the farm to a cooling, packing, or processing facility part of an inspection program? TR 01b – Is the condition of shipping units and equipment checked for cleanliness before being used to ship leafy greens?
		Comments