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Operation: Harvest Crew CB Registration No. PLC-PGFS-6718-2 PrimusGFS
Preliminary Report Completed PrimusGFS ID #56470 Version 2.1
 Audit Report Summary Audited by PrimusLabs

Organization:	Roth Farms Inc Contact(s): Allison Meharg, Ryan Roth, Amado Reyes Address: 27502 County Rd 880 33430 Location: Belle Glade, Florida, United States Phone: 5619962991
Harvest Crew:	Celery Crew – Linked to Ranch shiver land Contact: Amado Reyes Location: 27502 County Rd 880
Shipper: Operation Type:	Ray's Heritage LLC Harvest Crew Audit of Good Agricultural Practices of a crew harvesting celery. There was approximately 60 acres of celery being harvested in the Roth Farms Shiverland tract. The crew operates seasonally with approximately 29 harvest crew employees. The crew uses knives to cut the celery off the stalk at the base and then cuts off the top of the celery. The celery is then placed on to packing tables where it is dipped and placed in a plastic sleeve. The individual sleeves are then placed into cardboard boxes and stacked onto trailers. The trailers are taken to a packing facility for further labeling. There is on site storage for packaging materials.
Audit Scope:	
Date Audit Started:	01/26/2015 10:00
Date Audit Finished:	01/26/2015 16:00
Product(s) Observed During Audit:	Celery
Similar Product(s) Not Observed:	None Specified
Product(s) Applied for but Not Observed:	None Specified
Auditor:	Kevin Kelley (PrimusLabs)
Audit Percentage Score:	93%

Please click here to upload/send your Corrective Actions:
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Audit Scoring Summary	
Food Safety Management System Requirements	Score: 198 Possible Points: 199 Percent Score: 99%
Good Agricultural Practices Requirements	Score: 550 Possible Points: 600 Percent Score: 91%
Total:	Score: 748 Possible Points: 799 Percent Score: 93%

Non-Conformance Summary By Count	Pre-Corrective Action Non-Conformances
Food Safety Management System Requirements	1
Good Agricultural Practices Requirements	6
Total:	7

Sections:

Food Safety Management System Requirements

- [Management System](#)
- [Control of Documents and Records](#)
- [Procedures and Corrective Actions](#)
- [Internal and external inspections](#)
- [Rejection and release of product](#)
- [Supplier Control](#)
- [Traceability and Recall](#)
- [Food Defense](#)

Good Agricultural Practices Requirements

- [Harvesting Inspections, Policies and Training](#)
- [Harvesting Employee Activities & Sanitary Facilities \(Applies to harvesting workers\)](#)
- [Harvest Practices](#)
- [Transportation and Tracking](#)
- [On site storage](#)

FSMS – Management System						
Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.01.01	Is there a Food Safety Manual or other documented food safety management system covering the scope of business included in this audit and procedures/instructions for all food safety processes?	Total Compliance	5	5	Yes. The manual is called the "Roth Farms GAP Manual", it includes SOP's, policies and risk assessment.	
1.01.02	Is there a documented food safety policy detailing the company's commitment to food safety?	Total Compliance	5	5	Yes. The policy is called "Food Safety Review" and is signed by Raymond R. Roth, President and Ryan Roth Vice President. The policy is dated 10/1/13 and is posted in the GAP Manual.	
1.01.03	Is there an organizational chart of all employees who have food safety related activities?	Total Compliance	3	3	Yes. The "Roth Farms Food Safety Program Review/Organizational Chart" includes 10 members and is dated 1/22/15.	
1.01.04	Is there a food safety committee and are there logs of food safety meetings with topics covered and attendees?	Total Compliance	5	5	Yes. The "Food Safety and Quality Control" outlines monthly meetings during the growing season and has minutes with topics such as SOP's and Corrective Actions for recent audits. The committee includes Amado Reyes, Food Safety Director, Ryan Roth Vice President, Olga Lopez and Jesus Salinas.	
1.01.05	Is there documented management verification of the entire food safety management system at least every 12 months?	Total Compliance	5	5	Yes. This verification is documented in the "Roth Farms Management Review Log" and was conducted last on 9/8/14. There were some changes and updates to SOP's that were reviewed.	
1.01.06	Is there a documented analysis detailing resources required to implement and improve the food safety management system processes with documented commitment from management to provide these resources?	Total Compliance	5	5	Yes. This is documented on the "Food Safety Budget" which has 7 items including training and other resources needed. Management has provided guidelines for what is required to implement and improve the food safety management system.	

FSMS – Control of Documents and Records						
Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.02.01	Is there a written document control procedure describing how documents will be maintained, updated and replaced?	Total Compliance	3	3	Yes. This procedure is called the "Administration Document Control", SOP #01-04, revision 1. The person responsible for document control is Amado Reyes, Food Safety Director. It is signed by Amado Reyes and Ryan Roth VP.	
1.02.02	Are all records stored for a minimum period of 12 months or for at least the shelf life of product if greater than a year?	Total Compliance	5	5	Yes. Documents are retained for at least 2 years as per policy. Reviewed current records for daily harvest logs and for 2012 and 2013.	
1.02.03	Are food safety related documents and records stored and handled in a secured manner?	Total Compliance	3	3	Yes. The food safety related documents and records are stored in a locked office in the main office in Belle Glade. The room is locked and the office is locked when not in use. A master copy of documents is kept on the computer which is password protected. Some logs are kept in the office in the shop and this office is key controlled. Management must approve any edits or new procedures with signature of a printed record.	
1.02.04	Are the records maintained in an organized and retrievable manner?	Total Compliance	3	3	Yes. The GAP Manual and SOP'S are kept in indexed binders with tabs. All records are also kept in electronic system.	

FSMS – Procedures and Corrective Actions

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.03.01	Are there documented instructions for the creation of Standard Operating Procedures?	Total Compliance	5	5	Yes. These instructions are called "Creating an SOP", SOP 01–01.	
1.03.02	Are the written procedures available to relevant users and is a master copy maintained in a central file?	Total Compliance	5	5	Yes. SOP's are available upon request and are kept in a master copy maintained in the main office.	
1.03.03	Is there a corrective action procedure that describes the requirements for handling deficiencies affecting food safety and prevention of future occurrences?	Total Compliance	5	5	Yes. This procedure is titled "Corrective Actions", SOP 10–01. Document is dated 11/5/12 and signed by Ryan Roth VP and Amado Reyes, Food Safety Director. Each SOP has a section in it for Corrective Actions.	
1.03.04	Is there a daily incidents report, sometimes called a Notice(s) of Unusual Occurrence and Corrective Actions Log (NUOCA) ?	Total Compliance	5	5	Yes. This operation does have a "NUOCA Log". There were no unusual occurrences recorded so far this year.	

FSMS – Internal and external inspections

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.04.01	Is there documented program for internal audits to be performed at the operations, covering all processes impacting food safety and the related documents and records?	Total Compliance	3	3	Yes. This documented program is named the "Internal Audit SOP", it is most recently completed on 12/14/14 and is based on a monthly review of Primus GFS checklist.	
1.04.02	Are there written procedures for handling regulatory inspections?	Total Compliance	3	3	Yes. Titled the "Regulatory Inspection SOP", Revision No: 1. This SOP was reviewed on 12/14/14 and it included policy, purpose, scope, responsibility and procedure.	
1.04.03	Are there records of regulatory inspections and/or contracted inspections, company responses and corrective actions, if any?	Total Compliance	5	5	Yes. The most recent inspection was on 3/14/14 and was a Primus GFS version 1.6 audit. The corrective actions are documented.	
1.04.04	Are there documented calibration procedures for measuring and monitoring devices used in the operations that are related to the safety of the product?	Total Compliance	10	10	Yes. This is called the "Calibration" SOP #9–01, dated 11/5/12. One of the calibrations reviewed was for sprayers, this is based on a continual calibration procedure. The process includes corrective actions for any deviation from the norm.	

FSMS – Rejection and release of product

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.05.01	Is there a written procedure for handling on hold or rejected products?	Total Compliance	5	5	Yes. Named "Hold and Release Procedure", SOP 11–01. The procedure outline how products are held if they are put on hold or rejected.	
1.05.02	Are there records of the handling of on hold or rejected products kept on file?	N/A	0	0	N/A. There are no records this year for hold or release.	
1.05.03	Is there a documented product release procedure available?	Total Compliance	5	5	Yes. Named "Hold and Release Procedure", SOP 11–01.	
1.05.04	Are there records of product releases kept on file?	N/A	0	0	N/A. There are no releases of product this year.	
1.05.05	Is there a documented system for dealing with customer and buyer food safety complaints/feedback along with records and company responses, including corrective actions?	Total Compliance	10	10	Yes. Named the "Buyer and Consumer Complaints and Feedback". There have been no complaints or feedback during this audit cycle.	

FSMS – Supplier Control

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.06.01	Are there current written food safety related specifications for all raw products, ingredients, materials and services purchased?	Total Compliance	5	5	Yes. According to the Supplier Approval SOP all material suppliers are required to submit a Letter of Guarantee including specifications. Letters of Guarantee were on file for fertilizer, packaging, toilets, etc. The most recent reviewed was for packaging dated 10/30/14.	
1.06.02	Is there a written procedure detailing how suppliers are evaluated, approved and monitored?	Total Compliance	5	5	Yes. The Supplier Approval & Monitoring SOP 12–01 dated 12/16/14 was reviewed. The SOP details how suppliers are evaluated, approved and monitored.	
1.06.03	Is there a list of approved suppliers?	Total Compliance	5	5	Yes. There is a list of approved suppliers. The suppliers were approved and added to the	

1.06.04	Does the organization have documented evidence to ensure that all products, ingredients or materials and services suppliers comply with the approval requirements and that they are being monitored as defined in the procedure?	Total Compliance	15	15	list between 10/1/14 and 12/11/14. Yes. Letters of Guarantee were reviewed for all 20 suppliers listed on the approved supplier list.
1.06.05	If the organization is outsourcing any processes that may affect food safety, are there control procedures over such processes?	Total Compliance	15	15	Yes. The organization is outsourcing portable toilet facilities, control procedures are in place in the form of contract and letter of guaranty from Hendersons San-Service Systems Inc.
1.06.06	If tests and/or analysis within scope to food safety are performed by external laboratories, are they licensed/accredited (e.g. ISO 17025 or equivalent, National Regulations, State Department, etc.)?	Total Compliance	5	5	Yes. Primus Labs is the external laboratory used. ISO 17025:2005 Accreditation was reviewed for Primus Labs. The accreditation includes E. coli and expires 3/31/16.

FSMS – Traceability and Recall

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.07.01	Is there a document that indicates how the company product tracking system works, thereby enabling trace back and trace forward to occur in the event of a potential recall issue?	Total Compliance	10	10	Yes. The "Roth Farms Traceback &Product Recall Plan" was reviewed. Product is tagged with a label indicating harvest date and harvest block. Product is labeled further at the packing facility. This labeling system allows trace back and trace forward.	
1.07.02	Does the organization have a documented recall program including procedures, recall team roles and contact details, external contact listings and explanation of different recall classes?	Total Compliance	15	15	Yes. The recall procedures were reviewed. The procedures included team roles, contact list dated 1/26/15, and explanation of recall classes.	
1.07.03	Is testing of recall procedures (including trace back) performed and documented at least every six months? Can the company identify where affected product was sent?	Total Compliance	10	10	Yes. Mock recalls occur seasonally. A mock recall was reviewed for 1/8/14 and 1/24/15. Both recalls identified where all affected product was sent.	

FSMS – Food Defense

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.08.01	Does the company have a documented food defense policy based on the risks associated with the operation?	Total Compliance	5	5	Yes. The company has "Food Defense" SOP. The SOP was dated 9/8/14.	
1.08.02	Is there a current list of emergency contact phone numbers for management, law enforcement and appropriate regulatory agencies?	Total Compliance	3	3	Yes. The Emergency Contact List was posted and was also available in the Food Safety Manual. The list is updated annually and was last updated on 12/8/14.	
1.08.03	Are visitors to the company operations required to adhere to food defense policies?	Minor Deficiency	2	3	MN. Visitors to the operations were required to be accompanied at all times and visitor policies were available in SOP 01-04. However, visitors were not required to review the food defense policy when signing in to the operation.	

GAP – Harvesting Inspections, Policies and Training

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.11.01	Have self-audits been completed for this harvest crew?	Yes	5	5	Yes. As part of "Food Safety Audit" based on Primus labs checklist, self audit for Celery harvest.	
2.11.02	Was a pre-harvest inspection performed on the block being harvested and was the block cleared for harvest? If No, go to 2.11.03.	Yes	5	5	Yes. Pre-Season inspection was performed and a daily Pre-Harvest inspection is recorded for the day of the audit 1/26/15.	
2.11.02a	Where pre-harvest inspections have discovered issues, have buffer zones been clearly identified and at the time of the audit, are these buffer zones being respected?	N/A	0	0	N/A. Pre-harvest inspections did not note any issues requiring buffer zones.	
2.11.03	Are there records of daily pre-operation inspections that check key aspects of equipment hygiene, personal hygiene, etc.?	Yes	5	5	Yes. Records reviewed for this daily pre-harvest inspection that check key aspects of equipment hygiene, personal hygiene, etc.	
2.11.04	Is there a documented and implemented policy that when commodities are dropped on the ground they are discarded? (Non-applicable for commodities such as tubers, root crops, etc.)	Yes	5	5	Yes. Food Safety policy #5 requires disposal of commodities dropped on the ground.	
2.11.05	Is there a food safety hygiene training program covering new and existing employees and are records of these training events?	Yes	15	15	Yes. Records are available which show that employees were trained using the "Chasing the Sun " Video.	
2.11.06	Is there a documented and implemented policy stating what happens when harvesters find evidence of animal intrusion e.g. fecal material?	Yes	5	5	Yes. Found in the "Buffer Zones-No Harvest Policy" document.	

GAP – Harvesting Employee Activities & Sanitary Facilities (Applies to harvesting workers)

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.12.01	Does the harvesting operation have written and implemented policies and procedures regarding employees with open sores and/or wounds and for dealing with employees who appear to be physically ill, or who become ill while working?	Yes	5	5	Yes. Found in the "Food safety Policy" in the "Employee" section 14.	
2.12.02	Are any employees eating and drinking (other than water) in active harvest areas, areas yet to be harvested, near harvested product or storage areas?	No	5	5	No. Employees were not observed eating or drinking (other than water) in the active harvest area during the audit.	
2.12.03	Does the harvesting operation have written and implemented policies and procedures covering employees using tobacco products in active harvest areas, areas yet to be harvested, near harvested product or storage areas? Spitting is not allowed in any areas?	Yes	5	5	Yes. The written and implemented policy and procedure covering employees using tobacco products in active harvest areas is found in the "Food Safety Policy" section 20.	
2.12.04	Is it evident the clothing harvesters are wearing is not posing a cross contamination risks?	Yes	5	5	Yes. It is evident the clothing harvesters were wearing is not posing a cross contamination threat.	
2.12.05	Is it evident that employees are free of exposed jewelry (except for a single plain wedding band) and other items that may be a source of foreign contamination issue ?	Yes	5	5	Yes. It is evident that employees are free of exposed jewelry and other items that may be a source of foreign contamination.	
2.12.06	Where gloves are required to be used by the auditee, are they appropriate for the type of harvesting (e.g., not using cotton gloves for harvesting a product such as lettuce) and are they in good working order?	Yes	5	5	Yes. The gloves being used during the audit were appropriate for the type of harvesting and in good working order.	
2.12.06a	Where gloves are used, are they latex-free?	Yes	0	0	Yes. The gloves being used were the blue nitrile gloves and were latex free.	
2.12.07	If any protective clothing is used by the auditee (e.g., gloves, aprons, sleeves) are they removed prior to using restrooms, going on breaks, etc?	N/A	0	0	N/A. No employees were observed either going to the bathroom or taking a break.	
2.12.07a	Are secondary hand sanitation stations (e.g., hand dip, gel or spray stations) adequate in number and location? Are the stations maintained properly? NOTE: Secondary hand sanitation does not replace hand washing requirements (lack surfactant qualities).	N/A	0	0	N/A. Did not verify during the audit.	
2.12.08	Are there operational toilet facilities provided? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT. If No, go to 2.12.09	Yes	20	20	Yes. Operational toilet facilities are provided, the facilities are trailer mounted and easily moved.	
2.12.08a	Are toilet facilities located in a suitable area and within ¼ mile or 5 minutes walking distance of all employees?	Yes	10	10	Yes. The toilet facilities are located in a suitable area and within 1/4 mile of all employees.	
2.12.08b	Are toilet facilities in a suitable location to prevent contamination to product, packaging, equipment, and growing areas?	Yes	15	15	Yes. Toilet facilities were located just outside the growing area at the end of the field.	
2.12.08c	Are separate toilet facilities provided for men and women in groups larger than 5 employees?	N/A	0	0	N/A. No women were a part of this harvest crew.	
2.12.08d	Is a minimum of one toilet facility provided for each group of 20 employees?	Yes	10	10	Yes. There were 2 facilities available for the harvest crew which totaled 29 men.	
2.12.08e	Do toilet facilities have visuals or signs, written in the appropriate languages, reminding employees to wash their hands before returning to work?	Yes	5	5	Yes. Toilet facilities have signs, written in the appropriate languages, (Spanish and English) reminding employees to wash their hands before returning to work.	
2.12.08f	Are toilets supplied with toilet paper and is the toilet paper maintained properly (e.g. toilet paper rolls not stored on the floor or in the urinals)?	Yes	5	5	Yes. Toilets are supplied with toilet paper and maintained properly.	
2.12.08g	Are the toilets maintained in a clean condition?	Yes	10	10	Yes. The toilets were in a clean condition on the day of the audit.	
2.12.08h	Are toilets constructed of materials that are easy to clean?	Yes	2	2	Yes. These toilets observed were constructed of materials that are easy to clean.	
2.12.08i	Are the toilet's construction materials of a light color allowing easy evaluation of cleaning performance?	Yes	2	2	Yes. The toilet is made of an easy to clean light color material. Toilets were observed to be clean.	
2.12.08j	Is there a documented and implemented policy that if portable toilets are used, waste is disposed of properly and the units are cleaned in an appropriate location?	Yes	5	5	Yes. There is a documented and implemented policy from Hendersons San-Service Systems Inc. SOP that the waste is disposed of properly and the units are cleaned in an appropriate location.	
2.12.08k	Are there toilet cleaning records and for portable toilets, are there servicing records?	Yes	2	2	Yes. Toilet cleaning and servicing records were located on the inside of the doors of the portable toilets.	
2.12.08l	If used, are catch basins of the toilets designed and maintained to prevent contamination (e.g. free from leaks and cracks)?	Yes	5	5	Yes. The catch basins of the toilets were designed and maintained to prevent contamination.	
2.12.08m	Are the toilet catch basins emptied properly?	Yes	5	5	Yes. Toilet catch basins are emptied properly.	
2.12.09	Is there evidence of human fecal contamination in the harvesting area? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	No	20	20	No. There is no evidence of human fecal contamination in the harvesting areas.	
2.12.10	Are operational hand washing facilities provided? If No, go to 2.12.11. A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Yes	20	20	Yes. Operational hand washing facilities are available.	
2.12.10a	Are the hand washing facilities placed within ¼ mile or 5 minutes walking distance of all employees?	Yes	15	15	Yes. The hand washing facilities were placed within 1/4 mile of all employees.	
2.12.10b		Yes	2	2		

	Are hand wash stations clearly visible (e.g. situated outside the toilet facility) and easily accessible to workers?				Yes. The hand wash stations are clearly visible just outside the toilet facility and are easily accessible to workers.
2.12.10c	In the event of running out of toilet materials (e.g., water, soap, toilet tissue, hand paper towels) are there extra supplies readily available so that toilets can be restocked quickly?	Yes	5	5	Yes. The toilets were stocked with extra materials and extra supplies were available close by.
2.12.10d	Is soap made available at all hand washing facilities? If No, go to 2.12.10f.	Yes	10	10	Yes. Soap is made available at the hand washing facilities observed during the audit.
2.12.10e	Is non-perfumed soap available?	Yes	5	5	Yes. The soap is non-perfumed.
2.12.10f	Are single-use towels available at all hand washing facilities and trash cans for them?	Yes	10	10	Yes. Single use paper towels were available and there was trash cans with lids available.
2.12.10g	Are the hand wash stations designed and maintained properly (e.g. ability to capture or control rinse water to prevent contamination onto product, packaging, and growing area, free of clogged drains, etc)?	Yes	5	5	Yes. Hand wash stations are designed with a catch basin which is pumped out regularly.
2.12.10h	Are the employees washing their hands prior to beginning work? Score NA if this discipline is not observed at the time of the audit.	N/A	0	0	N/A. Discipline not observed on the day of the audit.
2.12.10i	Are the employees washing their hands after break periods? Score NA if this discipline is not observed at the time of the audit.	N/A	0	0	N/A. Discipline not observed during the audit.
2.12.10j	Are the employees washing their hands after using the toilet facilities? Score NA if this discipline is not observed at the time of the audit.	N/A	0	0	N/A. Discipline not observed during the audit.
2.12.10k	Is it evident that corrective action is taken when employees fail to comply with hand washing guidelines?	N/A	0	0	N/A. Did not see employee fail to comply with hand washing guidelines.
2.12.11	Is fresh potable drinking water readily accessible to employees.? If No, go to 2.12.12.	Yes	7	7	Yes. Fresh potable drinking water was readily accessible to employees.
2.12.11a	Are the water containers maintained in a clean condition?	Yes	5	5	Yes. The water containers were clean.
2.12.11b	Are single use cups provided (unless a drinking fountain is used) made available near the drinking water?	Yes	7	7	Yes. Single use cups are provided.
2.12.12	Are first-aid kits available and is the inventory maintained properly?	Yes	5	5	Yes. The first-aid kit reviewed was available and the inventory was maintained properly. The eye wash expired on 7/17.
2.12.13	If observed, are all commodities that come in contact with blood and/or other bodily fluids destroyed? A NO ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	N/A. Not observed.
2.12.13a	Does the harvesting operation have written and implemented policies and procedures in place for all commodities that come in contact with blood and other bodily fluids, stating that they must be destroyed? Are these policies and procedures available to harvest crew workers?	Yes	5	5	Yes. The harvest operation has available the policies for commodities that come in contact with blood or bodily fluids. The policy is found in the "Food Safety Policy" # 14 and covered in the video "Chasing the Sun", records show harvest workers had been given the training.
2.12.14	Is garbage disposed of properly in the harvesting areas?	Yes	10	10	Yes. Garbage is disposed of properly.
2.12.15	Are garbage containers provided in the field for the disposal of food and beverage containers, cups, and paper towels? If No, go to 2.12.16	Yes	5	5	Yes. Garbage containers are provided in the field just outside the growing area.
2.12.15a	Are garbage containers constructed and maintained (e.g. bags, lids) to protect against pre harvest or post harvest contamination of the crop?	Yes	5	5	Yes. The garbage containers were maintained with garbage bags and were equipped with lids.
2.12.16	Have any potential metal, glass, or plastic contamination issues been controlled?	Yes	5	5	Yes. Potential metal, glass, or plastic contamination issues have been controlled.
2.12.17	Are there any infant or toddler aged children observed in active harvest areas, areas yet to be harvested, near harvested product or storage areas?	No	10	10	No. There were no infant or toddler aged children observed in the active harvest area.

GAP – Harvest Practices

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.13.01	Is there evidence of animal presence and/or animal activity in the harvesting area? If answer is NO, go to Q 2.13.02.	No	15	15	No. No evidence of animal presence and/or animal activity observed in the harvesting area during the audit.	
2.13.01a	Is the evidence of animal presence and/or animal activity found, in the form of fecal contamination? If answer is NO, go to Q 2.13.02.	N/A	0	0		
2.13.01b	Is the fecal matter found in the audited area, a systematic event (not sporadic)? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0		
2.13.02	Is the product harvested and transported to a facility for additional handling and/or final packing?	Yes	0	0	Yes. Harvested product is transported to a facility for further handling to label product further.	
2.13.03	Is the product packed in the final packing unit in the field? If No, go to 2.13.04.	Yes	0	0	Yes. Celery is packed in plastic sleeves and those individual units are packed into boxes. No re-packing occurs once the packed product leaves the field, only additional labeling.	
2.13.03a	Is packing material (e.g. cartons, bags, clamshells, sacks, RPCs) intended for carrying product used for that purpose only?	Yes	5	5	Yes. The plastic sleeves are designed for holding celery and were only being used in this capacity during the audit. Boxes are designed for further packing celery and were only being used in this capacity during the audit.	
2.13.03b	Is packing material free from evidence of pest activity, foreign materials and other signs of hazardous materials? A 'NO' ANSWER	Yes	20	20	Yes. No pest activity, foreign material or other hazardous material was observed on the packing	

TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.				material during the audit.	
2.13.03c	Is packed product free from evidence of pest activity, foreign materials, hazardous materials and any adulteration issues? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Yes	20	20	Yes. No pest activity, foreign material or other hazardous material was observed on the packed product during the audit.
2.13.03d	Is product and packing material free from exposure to the ground and or any handling contamination?	No	0	5	No. After boxes are filled with sleeved celery packs they are placed on the ground. The boxes are later picked up and stacked for transportation to the packing facility.
2.13.03e	Does the operation inspect packaging prior to use and is packed product inspected after packing; where contamination issues are found is corrective action taken and record?	Yes	5	5	Yes. All packaging is visually inspected prior to use. Packed product is visually inspected as it is loaded for transportation to the packing facility. Contamination issues were not found during the audit.
2.13.03f	If packing material is left in the field overnight is it secured and protected?	Yes	5	5	Yes. If packing material is left in the field overnight it is secured and protected by a plastic tarp over the truck containing packing materials.
2.13.03g	Does finished product packaging display information to enable proper storage and use of the product within the food supply chain?	Yes	3	3	Yes. Individual sleeves do not contain information to enable proper storage and use of the product within the food supply chain. Information was available on the bulk packed boxes but not on the individual selling unit.
2.13.04	Are grading and packing tables used? If No, go to 2.13.05.	Yes	0	0	Yes. Packing tables are used to grade and pack celery into plastic sleeves.
2.13.04a	Does the surface allow for easy sanitation?	Yes	5	5	Yes. Packing tables are made of stainless steel and have smooth welds.
2.13.04b	Are grading and packing tables subject to a documented cleaning program including stating the frequency of cleaning and cleaning procedures? If No, go to 2.13.05.	Yes	5	5	Yes. Grading and packing tables are on the cleaning program outlined in the "Celery Harvester Decontamination and Sanitation Policy." The policy states packing tables are cleaned daily prior to harvest.
2.13.04c	Is an anti-microbial solution (e.g. chlorinated or equivalent) used to sanitize the grading and packing tables after cleaning has occurred?	Yes	5	5	Yes. According to the "Celery Harvester Decontamination and Sanitation Policy" packing tables are sanitized daily prior to harvest. They are sanitized with Hydrogen Dioxide with oxidate as the active ingredient.
2.13.04d	Are records of grading and packing tables equipment cleaning being maintained?	Yes	5	5	Yes. Records of packing table equipment cleaning is performed daily prior to the start of the day. Records were reviewed and initialed.
2.13.05	Are re-useable containers (e.g. buckets, field totes, lugs, bins) used in the harvesting operation? If No, go to 2.13.06.	Yes	0	0	Yes. Re-useable dip bins are used to remove excess dirt from the bottom of the celery.
2.13.05a	Are re-useable containers made of easy to clean materials?	Yes	5	5	Yes. Re-useable dip bins are made of smooth plastic.
2.13.05b	Are re-useable containers subject to a documented cleaning program including stating the frequency of cleaning and cleaning procedures? If No, go to 2.13.05e.	No	0	5	No. Re-useable dip bins are not subject to a documented cleaning program. There is no policy for cleaning the dip bins and therefore no frequency of cleaning.
2.13.05c	Is an anti-microbial solution (e.g. chlorinated or equivalent) used to sanitize the re-useable containers after cleaning has occurred?	N/A	0	0	
2.13.05d	Are records of re-useable containers cleaning being maintained?	N/A	0	0	
2.13.05e	Are re-useable containers free from any handling contamination?	Yes	5	5	Yes. No handling contamination of the re-useable dip bins was observed during the audit.
2.13.06	Are tools (e.g. knives, clippers, scissors, etc.) used in harvesting? If No, go to 2.13.07.	Yes	0	0	Yes. Knives are used for cutting the celery off during harvest.
2.13.06a	Are harvest tools (e.g. knives, coring rings, holsters) being used, made of non corrosive and easy to clean materials (e.g. no wood or fabric parts)?	Yes	5	5	Yes. All harvesting knives observed during the audit had plastic handles. No wood or fabric parts was observed on any harvesting knives used during the audit.
2.13.06b	Are harvest tools not being taken into break or toilet areas or used for any other purpose other than product harvesting?	Yes	5	5	Yes. The "Harvesting Knives Procedure" indicates harvesting knives are to be left in an identified bin when employees leave the field, break for lunch, use the restroom and at the end of the shift. No deviance from this policy was observed during the audit.
2.13.06c	Are harvest tools free from exposure to the ground and or any handling contamination?	No	0	5	No. Harvesting knives are not free from exposure to the ground. When harvesting celery it is cut off at the base. Harvest knives come into contact with the ground and dirt almost every time the celery is chopped off at the base.
2.13.06d	Is there an equipment and utensil (e.g. knives) storage and control procedures when not in use?	Yes	5	5	Yes. The "Harvesting Knives Procedure" outlines the storage of all harvest knives when not in use. Harvest knives are stored in a specified bin when not being used.
2.13.06e	Are harvest tools subject to a documented cleaning program including stating the frequency of cleaning and cleaning procedures? If No, go to 2.13.06h.	Yes	5	5	Yes. The "Harvesting Knives Procedure" outlines a documented cleaning program. The procedure states knives are cleaned twice daily and prior to harvest.
2.13.06f	Is an anti-microbial solution (e.g. chlorinated or equivalent) used to sanitize the harvesting tools after cleaning has occurred?	Yes	5	5	Yes. The "Harvesting Knives Procedure" indicates the anti-microbial solution for knife

2.13.06g	Are records of harvesting tools cleaning being maintained?	Yes	5	5	dips is 200 PPM. The knife dip was checked during the audit and reached 200 PPM.
2.13.06h	Are harvesting tool dips being maintained properly in terms of anti-microbial solution strength and are records of the solutions checks being maintained? AUDITORS SHOULD REQUIRE A TEST AT THE TIME OF THE AUDIT.	Yes	5	5	Yes. There are records of knife cleaning. Yes. The harvesting tool dip was tested during the audit. The strength of the anti-microbial solution tested at 200 PPM.
2.13.07	Is machinery used in the harvesting process? If No, go to 2.13.08.	No	0	0	No. Machinery is not used in the harvesting process.
2.13.07a	Are all food contact surfaces on the machinery used in the harvest process constructed of food grade materials or stainless steel?	N/A	0	0	
2.13.07b	Does the packing surface allow for easy sanitation?	N/A	0	0	
2.13.07c	Is the harvesting equipment subject to a documented cleaning program including stating the cleaning frequency and cleaning procedures? If No, go to 2.13.07f.	N/A	0	0	
2.13.07d	Is an anti-microbial solution (e.g. chlorinated or equivalent) used to sanitize the harvesting equipment after cleaning has occurred?	N/A	0	0	
2.13.07e	Are records of harvesting equipment cleaning being maintained?	N/A	0	0	
2.13.07f	Is equipment designed and used properly to minimize product contamination (e.g. drip pans utilized, lights protected)?	N/A	0	0	
2.13.07g	Are only food grade lubricants used on the critical parts of the harvesting machinery that have the potential to contaminate product?	N/A	0	0	
2.13.07h	Are all glass issues on harvesting machines, in-field trucks, and tractors protected in some manner?	N/A	0	0	
2.13.07i	Are all platforms above product, packaging, or food contact surfaces (e.g. belts) on the harvest machinery, in-field trucks fitted with protection to prevent product contamination?	N/A	0	0	
2.13.08	Is water used directly on product contact(e.g. re-hydration, core in field)? If No, go to 2.13.09.	Yes	0	0	Yes. Celery is dipped into water prior to being packed into sleeves to remove dirt.
2.13.08a	Are microbial tests conducted including Generic E.coli on water used for washing, hydrating, etc. harvested crops (e.g. re-hydration, core in field) ? If No, go to 2.13.08c.	No	0	10	No. A microbial test including Generic E.coli has not been conducted on water used for dipping the celery prior to packing. This water comes into direct contact with the product and should meet microbial standards set forth by the EPA National Drinking Water Regulations.
2.13.08b	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0	
2.13.08c	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	Yes	10	10	Yes. The Water Usage SOP outlines corrective measure taken if unsuitable or abnormal water testing results occur.
2.13.08d	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	N/A. No unsuitable or abnormal results have been detected.
2.13.08e	Are the anti-microbial parameters clearly documented and correct for the type anti-microbial being used?	Yes	10	10	Yes. Water used for dipping celery is treated with Chlorine. Chlorine levels are 2.0 PPM for the dipping water.
2.13.08f	Are anti-microbial checks being performed on a routine basis?	Yes	10	10	Yes. Water used for dipping is checked throughout the day while harvesting. Chlorine levels for the tank holding the dip water was tested and found to be adequate at 2.0 PPM.
2.13.08g	Are corrective actions recorded where anti-microbial results are less than the stated minimum criteria?	Yes	10	10	Yes. Record indicate water used for dipping is tested frequently and where anti-microbial results are less than required more anti-microbial is added.
2.13.09	Is the harvested product 'in-field processed' or 'In-field semi-processed' (e.g. core in field, top & tail, florets)? If No, go to 2.13.10.	Yes	0	0	Yes. When the celery is harvested it is cut off at the base. The top of the celery is also cut off.
2.13.09a	Does the process flow, machine layout, employee control, utensil control, etc. ensure that processed products are not contaminated by unprocessed products?	Yes	5	5	Yes. The process flow ensures processed product is not contaminated by unprocessed product. The harvesting crew works down a row harvesting and cutting of the tops of the celery. The celery is immediately packed in sleeves and then bulk packed into boxes. Finished product is protected from contamination by unfinished product.
2.13.09b	Do all employees that come in contact with the product being harvested wear clean protective outer garments (e.g. hairnets, plastic gloves, sleeves and aprons)?	Yes	5	5	Yes. All employees that come into contact with the harvested celery are wearing gloves.
2.13.09c	Do all employees that wear protective outer garments remove and keep them in a clean and secure area during breaks or when using the toilet facilities?	N/A	0	0	N/A. Employees were not observed during breaks or using toilet facilities so this was not observed during the audit.
2.13.09d	Are all plastic bin liners closed immediately after harvest to avoid contamination of the harvested product?	N/A	0	0	N/A. No plastic bin liner is used. Celery is protected by individual unit plastic sleeves.
2.13.10	Is there any post-harvest treatment performed to the product in the field? If No, go, 2.14.01	No	0	0	No. No post-harvest treatment is performed in the field.
2.13.10a	Are there up to date records of all crop protection products applied in the field to the harvested product? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	
2.13.10b	Are there plant protection products registered and/or authorized by a	N/A	0	0	

	government agency for use in the post–harvest period to the target crops in the country of production? If No, go to 2.13.10e.				
2.13.10c	Has the growing operation have the information available for the plant protection products registered and/or authorized for use in the post–harvest period for the target crops in the country of production? A ‘NO’ ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	
2.13.10d	Are applications or treatments to the harvested product restricted by the guidelines established by the product label, manufacturer recommendation, or by prevailing national/ local standards and guidelines? A ‘NO’ ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	
2.13.10e	If applicable, for those plant protection products that are not registered for use in the post–harvest period on target crops in the country of production, if the country has no or a partial legislative framework to cover plant protection products, can the grower show that they have registration information, label information, MRL tolerances, etc. for the country of destination? A ‘NO’ ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	
2.13.10f	Is there evidence available that the grower is taking all the necessary measures to comply with the country(ies) of destination expectations regarding the post–harvest treatments used (e.g. registration information, label information, MRL tolerances or any other guidelines applicable)? A ‘NO’ ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	

GAP – Transportation and Tracking

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.14.01	Are the vehicles transporting fresh produce from field to facility limited to this function only and maintained in proper condition?	Yes	5	5	Yes. Vehicles transporting fresh produce are limited to carrying product from the field to the facility. All vehicles were observed to be clean and not emitting toxic fumes.	
2.14.02	Is there a system in place to track product from the farm? If No, go to 2.15.01.	Yes	20	20	Yes. Product is labeled with harvest date and block in the field to enable tracking of product to the farm and farm block.	
2.14.02a	If product is being packed in the field, are the cartons, boxes, RPC’s or any other packaging material used, identified with the harvesting date and growing location information on them? This question does not apply for raw material/bulk product destined for further handling in a packinghouse or processor facility.	Yes	10	10	Yes. Product packed in the field is labeled with harvest date and farm information including the block. Product is further labeled at the facility.	
2.14.02b	If product is being packed in the field and individual packing units are used (e.g., clamshells, bags, baskets or others), are these individual units identified with the harvesting date and growing location information on them? This question does not apply for raw material/bulk product destined for further handling in a packinghouse or processor facility.	N/A	0	0	N/A. The product is being sent to a packing facility for further labeling.	

GAP – On site storage

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.15.01	Is there an on site storage for items and/or equipment used in the harvest process (e.g., packing material, cartons, clamshells, re–usable containers, disinfectants, grading/packing tables, RPCs, harvesting equipment, etc)? If No, skip the rest of the questions in this section.	Yes	0	0	Yes. There is a storage trailer on site for storing packing materials.	
2.15.02	Are packaging, containers, and harvesting equipment stored to prevent cross contamination (this includes RPCs, cartons, clamshells, bins, and other harvesting type of containers that are single use or reusable, etc.)?	Yes	5	5	Yes. Packaging is stored so it is not contaminated. Cross contamination issues were not observed during the audit.	
2.15.03	Is the storage area under a sanitation program?	No	0	5	No. There is no sanitation program for on–site trailers storing packaging materials.	
2.15.04	Has the operation implemented a pest control program in the storage area? If answer is NO, skip the rest of the subquestions.	No	0	20	No. There is no pest control program for storage trailers.	
2.15.04a	Are pest control devices (inc. rodent traps and electrical fly killers) located away from items and/or equipment used in the harvest process (e.g., packing material, cartons, clamshells, re–usable containers, disinfectants, grading/packing tables, RPCs, harvesting equipment, etc)? Poisonous rodent bait traps are not used inside the storage areas?	N/A	0	0		
2.15.04b	Are pest control devices maintained in a good working condition and marked as monitored (or bar code scanned) on a regular basis?	N/A	0	0		
2.15.04c	Are pest control devices adequate in number and location?	N/A	0	0		
2.15.04d	Are all pest control devices identified by a number or other code (e.g. barcode) ?	N/A	0	0		
2.15.04e	Are all pest control devices properly installed and secured?	N/A	0	0		

2.15.04f	Is there a schematic drawing of the plant showing numbered locations of all traps and bait stations, both inside and outside the storage area?	N/A	0	0
2.15.04g	Are service reports created for pest control checks detailing inspection records, application records, and corrective actions (if issues were noted) (in-house and/or contract)?	N/A	0	0