

General Description of Changes to Module 2

1. Changes to question numbers
2. New questions about microbiological testing of hand washing water
3. Expanded and explained requirements for pathogen testing of agricultural inputs
4. Added requirements for what should be included in records of anti-microbial water treatments
5. Pesticide usage questions rewritten for clarity
6.Combined several stand alone questions into other questions

PrimusGFS v3.2 Summary of Changes

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.01.01		No Change in v3.2	There should be a designated on-site person/persons responsible for the operation's food safety program. They should have documented formal training or trained by someone that has formal credentials that is documented. This training should meet all state and federal requirements.	Total compliance (10 points): There should be a designated on-site person/persons in charge of the operation's food safety program, including food safety document control and verification of food safety activities and ideally be independent of production. They should have documented formal training or trained by someone that has the documented formal credentials. This training should meet all state and federal requirements.
2.01.03		No Change in v3.2	There should be written food safety policy rules regarding worker and visitor personal hygiene, GAPs and health requirements. The policy should cover the rules related to hygiene and health (e.g., hand washing, eating/drinking, smoking, specific clothing rules, foreign material issues, cuts/wounds, illness rules, etc.), no infants and toddlers allowed in the growing area, what to do in the case of evidence of animals and/or fecal matter in the growing and/or storage areas, and what to do in the case of dropped product, and if the product comes into contact with blood or other bodily fluids. All workers and visitors should be issued a list of rules in the relevant languages and confirm by signing they understand and agree to abide. Training provided and associated records should meet local and national regulations.	Minor deficiency (10 points) if: • Single/isolated instance(s) of errors and omissions in the food safety hygiene and health policy. • The policy is not in the relevant language(s). • Single/isolated instance(s) of workers and/or visitors not signing a document stating that they will comply with the operations' personal hygiene and health policies. Major deficiency (5 points) if: • Numerous instances of errors and omissions in the food safety hygiene and health policy. • Numerous cases of workers and/or visitors not signing a document stating that they will comply with the operations' personal hygiene and healthy policy. Non-compliance (0 points) if: • No records available. • Failure to maintain records. • The company does not have a document for workers and/or visitors to sign stating that they will comply with the operations' personal hygiene and health policies. • Fundamental failure of workers and/or visitors to sign a document stating that they will comply with the operations' personal hygiene and health policies.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.01.04	2.02.04	No Change in v3.2 **Point change 5 to 10**	The operation should have implemented the necessary controls for preventing intentional contamination of the product, high-risk areas, external areas and vulnerable points (i.e. those that are not permanently locked) . These measures should be based on the risk associated with the operation, as detailed in the food defense plan (1.08.02). Some high-risk areas of the operation include: personnel, visitors, contractors, computers, raw material receipt (raw materials, product and packaging), trucks (incoming and outbound), water sources, storage areas for product, materials, chemicals, production areas, shipping areas, utensils or other items used in the growing area, etc.	Total compliance (10 points): The operation should have implemented the necessary controls for preventing intentional contamination (food defense, sometimes known as food security). These measures should be based on the risk associated with the operation, as detailed in the food defense plan (1.08.02). Some high-risk areas of the field include: water sources, storage areas for chemicals, equipment, packaging, utensils or other items used in the field, handling facilities, etc. The auditor down score if a lack of signage to prevent trespassing. A down score for any unprotected (open) water sources (ponds, reservoirs, rivers, etc) should only be given if the operation did not identify the water source in 1.08.02 and has not implemented the necessary controls for preventing intentional contamination to the water source.
2.02.01		No Change in v3.2	There is a map or similar document (photograph, drawing) that accurately shows the growing area(s), adjacent land use/features, location of permanent water fixtures and the flow of the water system, including any holding tanks and water captured for re-use. Permanent fixtures include wells, gates, reservoirs, returns and other above ground features. Septic systems, effluent lagoons or ponds, surface water bodies are also identified. Document should enable location of the water sources and the production blocks they serve.	Total compliance (5 points): There is a map or similar document (photograph, drawing) that accurately shows the growing area(s), adjacent land use/features, location of permanent water fixtures and the flow of the water system, including any holding tanks and water captured for re-use. Permanent fixtures include wells, gates, reservoirs, returns and other above ground features. Septic systems, effluent lagoons or ponds, surface water bodies are also identified. Document should enable location of the water sources and the production blocks they serve.
2.02.03	2.02.05	No Change in v3.2	No Change in v3.2	No Change in v3.2
2.02.04	2.02.06	No Change in v3.2	No Change in v3.2	No Change in v3.2
2.02.05	2.02.07	No Change in v3.2	No Change in v3.2	No Change in v3.2
2.02.06	2.02.08	No Change in v3.2	No Change in v3.2	No Change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.02.07	2.02.09	No Change in v3.2	Fill station area should not be a risk of contamination to the product, water sources, production areas, equipment, packaging materials, etc.	Total compliance (15 points): Fill station area should not be a risk of contamination to the product, water sources, production areas, equipment, packaging materials, etc. Minor deficiency (10 points) if: • Single/isolated instance of the fill station(s) being a risk of contamination. Major deficiency (5 points) if: • Numerous instances of the fill station(s) being a risk of contamination. Non-compliance (0 points) if: • Widespread failure to prevent contamination. • Direct contamination of the crop, ingredients (including water), food contact packaging or food contact surfaces. Auditor should consider reverting to Q. 2.05.04, the automatic adulteration failure question.
2.02.08	2.02.10	Is the audited area free from animal presence and/or animal activity (wild or domestic)? If Total Compliance, go to 2.02.11.	No Change in v3.2	No Change in v3.2
2.02.08a	2.02.10a	Is the audited area free from any evidence of animal fecal matter? **A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	Fecal matter is a potential contaminant to the product being grown. Produce that has come into direct contact with fecal matter is not to be harvested. A "no harvest zone" of approximately 5ft (1.5 m) radius should be implemented unless or until adequate mitigation measures have been considered. If evidence of fecal matter is found, a food safety risk assessment should be conducted by qualified worker and include appropriate corrective and preventative actions. Consideration of the maturity stage and type of crop involved is required. Any evidence of human fecal matter in the growing area is an automatic failure (scored under 2.02.11).	Total compliance (15 points): Fecal matter is a potential contaminant to the product being grown. Produce that has come into direct contact with fecal matter is not to be harvested. A "no harvest zone" of approximately 5ft (1.5 m) radius should be implemented unless or until adequate mitigation measures have been considered. If evidence of fecal matter is found, a food safety risk assessment should be conducted by qualified worker and include appropriate corrective and preventative actions. Consideration of the maturity stage and type of crop involved is required. Any evidence of human fecal matter in the growing area is an automatic failure (scored in 2.02.11). Minor deficiency (10 points) if: • Single instance of fecal matter found in the audited area and a food safety risk assessment was implemented correctly. • A “no harvest zone” is implemented but the radius is less than 5 ft.. Major deficiency (5 points) if: • More than one instance of fecal matter found in the audited area and a food safety risk assessment was implemented correctly. • Any instance of fecal matter is found in the audited area and a “no harvest zone” was not implemented. • Any instance of fecal matter is found, and a food safety risk assessment is not conducted. Automatic Failure (0 points) if: **• Any observation of widespread animal fecal contamination in the audited area is an automatic failure.** **• Any observation of any human fecal matter in the audited area is an automatic failure. Score under 2.02.11.**

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	2.02.11 New Question	Is the audited area free from any evidence of human fecal matter? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	Human fecal matter is a potential contaminant to the product being grown. Any evidence of human fecal matter in the growing area is an automatic failure. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	Total compliance (15 points): Human fecal matter is a potential contaminant to the product being grown. Any evidence of human fecal matter in the growing area is an automatic failure. Minor deficiency (10 points) if: • There is no minor deficiency category for this question Major deficiency (5 points) if: • There is no major deficiency category for this question. Automatic Failure (0 points) if: • Any observation of any human fecal matter in the audited area is an automatic failure.
2.02.08b		Question removed		
2.02.09	2.02.12	No Change in v3.2	No Change in v3.2	No Change in v3.2
2.03.01		Were growing area(s) used for growing food crops last season?	Information gathering question. Land should be purchased or leased that has previously been successfully utilized for growing crops without incidence.	Information gathering question. Land should be purchased or leased that has previously been successfully utilized for growing crops without incidence.
2.03.02		No Change in v3.2	No Change in v3.2	Total points 0: Information gathering question. Purchase or lease of ground previously used for non-agricultural functions (e.g., toxic waste site, landfill, mining, extraction of oil or natural gas) should be avoided. Land should be purchased or leased that has previously been successfully utilized for growing crops without incidence. https://www.epa.gov/superfund
2.03.02a		No Change in v3.2	If the growing area has been previously used for non-agricultural functions soil testing should be conducted to determine if the soil is free of contaminants (e.g. heavy metals, residues of persistent organic contaminants) that may still be present in the soil.	No Change in v3.2
2.03.03		Has the growing area(s) been used for animal husbandry or grazing land for animals in the last 12 months? If No, go to 2.03.04.	No Change in v3.2	Total points 0: Information gathering question. If the land was used previously for animal husbandry or grazing land for livestock, there should be a sufficient buffer time before growing a crop for human consumption.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.03.04		Has flooding from uncontrolled causes occurred on the growing area(s) since the previous growth cycle? If No, go to 2.03.05.	No Change in v3.2	Total points 0: Information gathering question. Uncontrolled causes includes the uncontrolled flowing or overflowing of a field with water that is reasonably likely to contain microorganisms or chemicals of significant public health concern and is reasonably likely to cause adulteration of edible portions of fresh produce in that field.
2.03.04a		If the growing area(s) and product was affected from the flood waters, is there documented evidence of a risk assessment and that corrective measures were taken to affected land and product?	If the growing area and/or product were affected from the flood waters, there should be a documented risk assessment and evidence that corrective measures were taken with affected land and/or product (e.g., photographs, sketched maps, etc.). There should be proof that affected product and product within approximately 30ft (9.1m) of the flooding should not have been harvested for human consumption and that replanting on formerly flooded production ground has not occurred for approximately 60 days if the ground has dried out, unless testing as noted in 2.03.04b has occurred.	Total compliance (15 points): If the growing area and/or product were affected from the flood waters, there should be a documented risk assessment and evidence (archived for 2 years) that corrective measures were taken with affected land and/or product (e.g., photographs, sketched maps, etc.). There should be proof that affected product and product within approximately 30ft (9.1m) of the flooding should not have been harvested for human consumption and that replanting on formerly flooded production ground did not occur for approximately 60 days, unless testing as noted in 2.03.04b has occurred. https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-evaluating-safety-flood-affected-food-crops-human-consumption https://extension.colostate.edu/docs/pubs/flood/soil-test.pdf https://lgmatech.com/wp-content/uploads/2017/06/CALGMA-Flooding-Fact-Sheet.pdf Minor deficiency (10 points) if: • Single/isolated instance(s) of errors or omissions on the risk analysis • Single/isolated instance of missing evidence of corrective actions performed. Major deficiency (5 points) if: • Numerous instance(s) of errors or omissions on the risk analysis • Numerous instances of missing evidence of corrective actions performed. Non-compliance (0 points) if: • Multiple widespread errors on the risk analysis • No documented risk analysis • No documented corrective actions were performed. • Product affected by flooding was harvested for human consumption.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.03.04b		Have soil tests been conducted on the flooded area(s) showing the soil was negative or within an appropriate regulatory agency's approved limits for contaminants?	If flooding has occurred on the farm, soil clearance testing should be conducted prior to planting, if planting is done earlier than 60 days from event and also before the soil has had adequate time to dry out. Soil testing should indicate soil levels of microorganisms lower than the standards for processed compost. Additional parameters to measure (e.g. heavy metals, pesticides, hydrocarbons) will depend on the characteristics of the flooding event. Suitable representative samples should be collected for the entire area suspected to have been exposed. If results indicate no issues, then the replanting time line can be reduced from approximately 60 days to approximately 30 days.	Total compliance (15 points): If flooding has occurred on the farm, soil clearance testing should be conducted prior to planting. Soil testing should indicate microorganisms lower than the standards for processed compost including <1,000 mpn/g fecal coliforms and negative for Salmonella and E. coli O157:H7. Additional parameters to measure (e.g. heavy metals, pesticides, hydrocarbons) will depend on the characteristics of the flooding event. Suitable representative samples should be collected for the entire area suspected to have been exposed. If results indicate no issues, then the replanting time line can be reduced from approximately 60 days to approximately 30 days. https://extension.colostate.edu/docs/pubs/flood/soil-test.pdf https://lgmatech.com/wp-content/uploads/2017/06/CALGMA-Flooding-Fact-Sheet.pdf Minor deficiency (10 points) if: • Suitable representative samples of the affected area(s) were not sampled. Major deficiency (5 points) if: • Soil tests were conducted but did not consider all microorganisms of significant public health concern. • Soil tests did not consider additional parameters relevant to the flooding event. Non-compliance (0 points) if: • No soil tests were performed. • Where soil tests demonstrated contamination, replanting occurred sooner than 60 days after flooding. • Where soil tests demonstrated no contamination, replanting occurred sooner than 30 days after flooding.
2.03.04c		No Change in v3.2	There should be records of inspecting the sewage/septic systems after flooding, showing that they are functioning properly and are not a source of contamination (e.g. overflow).	Total compliance (10 points): There should be records demonstrating that the sewage/septic systems were inspected after flooding, showing that they are functioning properly and are not a source of contamination (e.g. overflow).

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.03.05	2.02.03	No Change in v3.2 **Point change 10-15**	A documented risk assessment of the growing area, each water source and surrounding areas should be performed prior to the first seasonal planting and at least annually, and when any changes are made to the growing area, water sources and adjacent land. This should detail known or reasonable foreseeable risks/hazards, the specific microbial, chemical and physical risks and their severity and likelihood of occurring in the following areas: previous use of the growing area, adjacent land use (e.g., CAFO), water source risks from animal access, upstream contamination/runoff, proper well condition, water treatment, water capture, backflow, maintenance, cross contamination from leaching, cross connections, recirculationg water, sewage and septic systems, etc. (chemical hazards e.g. heavy metals, perchlorate, etc., and microbial hazards e.g. pathogenic *E. coli)* , water use, fertilizers, crop protection chemicals, worker health and hygiene, equipment and tools used for harvest, storage, transportation, topography of the land for runoff (% slope, soil type), prevailing weather conditions or weather events. and any other applicable areas. Farms and indoor agriculture operations following the CA or AZ LGMA should reference current metrics e.g., a buffer zone of approximately 1,200 ft. (365m) for CAFO's with >1,000 head or 1 mile (1609m) for 80,000 head CAFO, which may increase or decrease after assessing the risks, determining, and deploying mitigation measures.	Total compliance (15 points): A documented risk assessment of the growing area (including potential food safety issues from previous crop voluneteers e.g., potatoes (solanine) before leafy greens), each water source and surrounding areas should be performed prior to the first seasonal planting and at least annually, and when any changes are made to the growing area, water sources and/or adjacent land. This should detail known or reasonably foreseeable risks/hazards, the specific microbial, chemical and physical risks and their severity and likelihood of occurring in the following areas: previous use of the growing area, adjacent land use (e.g., CAFO), water source risks from animal access, upstream contamination/runoff, proper well condition, water treatment, water capture, backflow, maintenance, cross contamination from leaching, cross connections, recirculating water, sewage and septic systems, etc. (chemical hazards e.g. heavy metals, perchlorate, etc., and microbial hazards e.g. pathogenic E. coli), water use, fertilizers, crop protection chemicals, worker health and hygiene, equipment and tools used for harvest, storage, transportation, topography of the land for runoff (% slope, soil type), prevailing weather conditions or weather events, and any other applicable areas. Farms and indoor agriculture operations following the CA or AZ LGMA should reference current metrics e.g., a buffer zone of approximately 1,200 ft. (365m) for CAFO's with >1,000 head or 1 mile (1609m) for 80,000 head CAFO, which may increase or decrease after assessing the risks, determining, and deploying mitigation measures. A detailed risk assessment should have been conducted and documented. One approach: i) Identify hazards ii) Determine who may be harmed and how ii) Evaluate the risks and decide on actions to control the risks iv) Document findings and implement actions v) Review and update assessment as necessary http://www.fsc.go.jp/sonota/foodsafety_riskanalysis.pdf https://www.epa.gov/waterresilience https://www.epa.gov/sustainable-water-infrastructure Minor deficiency (10 points): • Single/isolated instance(s) of errors or omissions on the risk analysis e.g. missing a physical, chemical or biological hazard. Major deficiency (5 points): • Numerous instance(s) of errors or omissions on the risk analysis e.g. missing a physical, chemical or biological hazard. • Last documented risk assessment was done over 12 months ago. • A single water source is not included in the risk assessment when multiple water sources are being used. Non-compliance (0 points): • Fundamental errors on the risk analysis. • More than one water source is not included in the risk assessment when multiple water sources are being used. • No documented risk analysis.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.03.05a	2.02.03a	No Change in v3.2 **Point change 10 to 15**	For any risks identified in the assessment, the operation should detail what practice is being done to minimize identified risk/hazard, how to measure/monitor the effectiveness of the practice, how often to measure, and how it is verified and recorded.There should be documented evidence/validation that corrective actions and/or preventative measures have been taken when any risk was identified and were adequate for the specific situation. If overhead, flood or furrow irrigation is used, there needs to be examples of how the operation is minimizing the risk.	Total compliance (15 points): For any risks identified in the assessment, the operation should detail what practice is being done to minimize identified risk/hazard, how to measure/monitor the effectiveness of the practice, how often to measure, and how it is verified and recorded. There should be documented evidence that corrective actions and/or preventative measures have been taken when any risk was identified and were adequate for the specific situation. Auditor must detail any mitigation steps for identified risks. There should be documented evidence/validation that corrective actions and/or preventative measures have been taken when any risk was identified and were adequate for the specific situation. If overhead, flood or furrow irrigation is used, there needs to be examples of how the operation is minimizing the risk. Minor deficiency (10 points): • Single/isolated instance(s) of corrective action and/or preventative measure records missing details or not being adequate. Major deficiency (5 points): • Numerous instances of corrective action and/or preventative measure records missing details or not being adequate. Non-compliance (0 points): • No corrective actions and/or preventative measures were performed or are inadequate to control risk(s). • Corrective actions and/or preventative measures were not recorded for identified risks.
2.04.01		No Change in v3.2 **Point change 10 to 0**	No Change in v3.2	Total points 0: Information gathering question. Adjacent refers to all parcels of land next to the growing operation or within a distance where the crop in question may be affected. Intensive livestock production involves large numbers of animals on limited land. Examples of intensive livestock production are concentrated animal feeding operations (CAFO), cattle feed lots, dairy operations, poultry houses, etc. Consideration should be made for the topography of the land for runoff, potential flooding issues, and prevailing winds for manure related dust issues.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.04.01a		No Change in v3.2	Animal or potential contaminant movement should be restricted with acceptable buffer zones, proper fencing and/or other physical barriers. A buffer zone of approximately 400 ft. (122 m) from the edge of the growing area which may increase or decrease depending on the risk variables i.e., topography (% slope uphill from the crop or downhill from the crop), soil type (sandy, loam. clay)) is needed. Rain induced runoff of animal waste should be diverted by trenching or similar land preparation. Leaking animal waste should be diverted by trenching or similar land preparation. Farms and indoor agriculture operations following the CA or AZ LGMA should reference current metrics e.g., a buffer zone of approximately 1,200 ft. (365m) for CAFO's with >1,000 head or 1 mile (1609m) for 80,000 head CAFO, which may increase or decrease after assessing the risks, determining, and deploying mitigation measures.	Total compliance (15 points): Animal or potential contaminant movement should be restricted with acceptable buffer zones, proper fencing and/or other physical barriers. A buffer zone of approximately 400 ft. (122 m) from the edge of the growing area which may increase or decrease depending on the risk variables (i.e., topography (% slope uphill from the crop or downhill from the crop), soil type (sandy, loam, clay)) is needed. Rain induced runoff of animal waste should be diverted by trenching or similar land preparation. Leaking animal waste should be diverted by trenching or similar land preparation. Farms and indoor agriculture operations following the CA or AZ LGMA should reference current metrics e.g., a buffer zone of approximately 1,200 ft. (365m) for CAFO's with >1,000 head or 1 mile (1609m) for 80,000 head CAFO, which may increase or decrease after assessing the risks, determining, and deploying mitigation measures.
2.04.02		Is there evidence of domestic animals and/or wild animals (includes homes with hobby farms, and non-commercial livestock) in proximity to the growing operation? If No, go to 2.04.03. **Point change 10 to 0**	No Change in v3.2	Total points 0: Information gathering question. This includes all non-intensive livestock production. Other examples include chicken coops, dogs, horses, homes with hobby farms, wild pigs, etc. Auditor must consider the maturity stage and type of crop involved. For example, pig activity around a ground level berry crop is different from a high-level tree crop.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.04.02a		Where there are domestic and/or wild animals (includes homes with hobby farms, and non-commercial livestock) have physical measures been put in place to restrain the animals and their waste from entering the growing area (e.g., vegetative strips, windbreaks, physical barriers, berms, fences, diversion ditches)?	Mitigating measures should include a buffer area of approximately 30 ft. (9.1m) from the edge of the crop which may increase or decrease depending on the risk variables e.g. topography (% slope uphill from the crop or downhill from the crop), soil type (sandy, loam, clay)). Other measures may be used such as vegetative strips, wind breaks, physical barriers, berms, fences, diversion ditches to prevent or control runoff, mitigate particulates, etc.	Total compliance (15 points): Mitigating measures should include a buffer area of approximately 30 ft. (9.1m) from the edge of the crop which may increase or decrease depending on the risk variables (e.g. topography (% slope uphill from the crop or downhill from the crop), soil type (sandy, loam, clay)). Other measures may be used such as vegetative strips, wind breaks, physical barriers, berms, fences, diversion ditches to prevent or control runoff, mitigate particulates, etc.
2.04.03		No Change in v3.2 **Point change 10 to 0**	No Change in v3.2	Total points 0: Information gathering question: Adjacent refers to all parcels of land next to the growing operation or within a distance where the crop in question may be affected by untreated animal manure piles, compost, biosolids, or non-synthetic amendment stored and/or applied on adjacent land.
2.04.03b		No Change in v3.2	No Change in v3.2	Non-compliance (0 points) if: • No documentation is available for the biosolids stored and/or applied in the adjacent land.
2.04.04		No Change in v3.2 **Point change 10 to 0**	No Change in v3.2	Total points 0: Information gathering question. "Higher risk" refers to any nearby activities or operations that could pose a threat to the growing area or facility(ies). These might include chemical, microbiological, or physical contamination or pollution. Examples include, but are not limited to, run-off or potential flooding from septic systems, sewers, toilet systems, industrial facilities, labor camps (issues of trash).

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.04.04a		No Change in v3.2	Mitigating measures should include appropriate buffer area around the crop. For example with a properly designed leach field a buffer zone of approximately 30 ft. (9 m). Very high risk issues should consider approximately 400ft (122 m) or higher buffer zones. Buffer zone distances should be determined by considering the risk variables (e.g. topography, type of crop). Other mitigating measures may include physical barriers, fences, ditches, etc.	Total compliance (15 points): Mitigating measures should include appropriate buffer areas around the crop. For example, with a properly designed leach field a buffer zone of approximately 30 ft. (9 m). Very high-risk issues should consider approximately 400ft (122 m) or higher buffer zones. Buffer zone distances should be determined by considering the risk variables (e.g. topography, type of crop). Other mitigating measures may include physical barriers, fences, ditches, etc.
2.04.05		No Change in v3.2 **Point change 10 to 0**	No Change in v3.2	Total points 0: Information gathering question. If there are any other potential sources of contamination to the growing area, this question is designed to allow the auditor to underline potential risks that are not covered by other more specific questions within the audit.
2.04.06		No Change in v3.2 **Point change 15 to 0**	No Change in v3.2	Total points 0: Information gathering question. If the fecal matter found combines with conditions that can increase the potential of contamination to the growing area, the crop or the field equipment, this represents a high-risk situation that should be addressed. Evidence of human fecal matter represents potential of contamination to the growing area, the crop and field equipment. If No, go to 2.05.01.
2.04.06a		No Change in v3.2	No Change in v3.2	Total compliance (15 points): If the fecal matter found combines with conditions that can increase the potential of contamination to the growing area, the crop or the field equipment, this represents a high-risk situation that should be addressed. There should be adequate controls in place, and records of any corrective or preventive actions taken. It is up to auditor discretion to determine whether issue should be scored as an automatic failure (Q 2.02.11 or 2.05.04). See Automatic Failure text below. Minor deficiency (10 points) if: • Mitigating measures do not consider a single/isolated factor that can be considered a low risk to the growing area. Major deficiency (5 points) if: • Mitigating measures do not consider numerous factors that can be a risk to the growing area. • No preventive actions have been taken. Non-compliance (0 points) if: • No mitigating measures have been implemented. • No corrective actions have been documented. Automatic Failure (0 points) if: • There is a single incidence of human fecal matter (score under 2.02.11) found in the growing area or contamination of growing area (score under 2.05.04).

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.05.01		No Change in v3.2	There should be records of the internal audits performed, meeting the frequency defined in the internal audit program. The records should include the date of the audit, name of the internal auditor, scope of the audit, justification for answers (not just checked √ or all Y/N), detailing any deficiencies found and the corrective actions taken. An audit checklist (ideally PrimusGFS) should be used that covers all areas of the PrimusGFS audit, including worker hygiene, harvest practices, on-site storage, etc. No down score if another audit checklist is used, as long as all areas are covered. See 1.04.01 for specific details..	Total compliance (15 points): There should be records of the internal audits performed at each operation, with the frequency defined in the internal audit program. Frequency depends on the type and size of the operation. The records should include the date of the audit, name of the internal auditor, justification for the answers (not just checked √ or all Y/N), detail any deficiencies found and the corrective action(s) taken. An audit checklist (ideally PrimusGFS) should be used that covers all areas of the PrimusGFS audit, including growing area, storage area, worker amenities, external areas, worker practices, etc. No down score if another audit checklist is used, as long as all areas are covered. See also 1.04.01 for specific details. Frequency Details for Farm, Indoor Agriculture and Harvest Crew: at least a pre-season growing area assessment and a full GAP self-assessment during harvest season covering growing and harvesting operations should be on file. If growing and harvest activities are under the same organizational authority the self-assessment should be on file covering both growing and harvesting and conducted during the harvest season. A harvesting company not under the authority of a grower should have self-assessments on file during harvest season covering each type of harvest process utilized for the crew(s), i.e. crew can harvest product in-field semi-processing and bulk/final packing in the field. A more frequent self-assessment frequency should be used depending on the crop type, farm or indoor agriculture location, any associated risk pressures, and/or if required by any national, local or importing country legal requirements, or customer requirements. These factors will also affect the need for pre-harvest inspections. Farm(s), indoor agriculture growing area(s), storage, harvesting, worker and visitor hygiene, agricultural water sources, training program, etc., and all associated paperwork should be included. Minor Deficiency (10 points) if: • Single/isolated instance(s) of follow up/corrective actions not noted. • Single/isolated instance(s) of incomplete answers or missing records. • Single/isolated instance(s) of areas/issues missing on the inspection. Major Deficiency (5 points) if: • Numerous instances of follow up/corrective actions not noted. • Numerous instances of incomplete answers or missing records. • Inspection frequency is not adequate relative to the type of business and the number of issues that require monitoring. • Numerous instances of areas/issues missing on the inspection. Non-compliance (0 points) if: • Fundamental failure to maintain records. • Widespread failure to complete inspection records with detailed responses. • No documented internal audits have been performed.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.05.02		No Change in v3.2	Chemicals within the scope of this question include pesticides, fertilizers, cleaners and sanitizers i.e. sanitation chemicals and food contact chemicals, such as chlorine, etc. Primary information in the product inventory includes: the product or chemical names, container volumes, number on hand, and location of containers. Inventory by storage area/type of chemical is optimal. The inventory should take into account the arrival of new stocks and any discrepancies should be explained. Minimum frequency for inventory checks should be monthly during production season and a copy should be maintained separate from the chemical storage location(s) and available for auditor review. The frequency of the inventory checks may decrease in short season or off-season operations; auditor discretion applies.	Total compliance (3 points): Chemical inventories should be on file. Chemicals within the scope of this question include pesticides, fertilizers, cleaners and sanitizers i.e. sanitation chemicals and food contact chemicals, such as chlorine, etc. Primary information in the product inventory includes: the product or chemical names, container volumes, number on hand, and location of containers. Inventory by storage area/type of chemical is optimal. The inventory should take into account the arrival of new stocks and any discrepancies should be explained. Minimum frequency for inventory checks should be monthly during production season and a copy should be maintained separate from the chemical storage location(s) and available for auditor review. The frequency of the inventory checks may decrease in short season or off-season operations; auditor discretion applies. Minor deficiency (2 points) if: • Single/isolated instance(s) of missing chemical inventory records. • Single/isolated instance(s) of omission(s) or error(s) in the chemical inventory records. • Single/isolated instance(s) of new deliveries not being accounted for. • Single/isolated instance(s) of minimum inventory frequency not being maintained. Major deficiency (1 point) if: • Numerous instances of missing chemical inventory records. • Numerous instances of omissions or errors in the chemical inventory records. • Numerous instances of new deliveries not being accounted for. • Numerous instances of minimum inventory frequency not being maintained. Non-compliance (0 points) if: • Chemical inventory is not available for review.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.05.03		Are all chemicals (pesticides, sanitizers, detergents, lubricants, etc.) stored securely, safely and are they labeled correctly?	Chemicals (i.e., pesticides, sanitizers, detergents, lubricants, etc.) are required to be stored in a well vented, designated (with a sign), dedicated, secure (locked) area away from food and packaging materials and separated from growing area and water sources. Spill controls should be in place for opened in use containers. All chemical containers should be off the floor, have legible labels of contents; this includes chemicals that have been decanted from master containers into smaller containers. Empty pesticide containers should be kept in a secured storage area until they can be recycled or disposed of properly. Where pesticide storage is not located on-site, auditor discretion applies on question applicability.	Total compliance (15 points): Chemicals (i.e., pesticides, sanitizers, detergents, lubricants, etc.) located on-site are required to be stored in a well vented, designated (with a sign), secure (locked) area. Access to chemicals needs to be controlled, so that only workers who understand the risks involved and have been trained properly are allowed to access these chemicals. The chemical storage area should be located away from any growing areas, raw materials, packaging & finished food products, water sources and living areas. Spill controls should be in place for opened in use containers. All chemical containers should be off the floor, have legible labels of contents; this includes chemicals that have been decanted from master containers into smaller containers. Liquid should not be stored above powders. Where chemicals are stored, adequate liquid containment (spill controls) techniques need to be employed (secondary containment, absorbent materials, angled sealed floors, spill kits etc.). Chemical storage should be designed to help contain spills and leaking containers. Empty containers should be stored and disposed of safely. All federal and state or local laws and regulations for pesticides storage should be considered. Empty pesticide containers should be kept in a secured storage area until they can be recycled or disposed of properly. If containers cannot be refilled, reconditioned, recycled or returned to the manufacturer, they should be crushed, broken or punctured to make them unusable. Containers should be disposed of in accordance with label directions and with federal and state or local laws and regulations. Pesticide containers designed to be returned and refilled should not be reused or tampered with. Food grade chemicals should not be commingled with non-food grade chemicals. Where pesticide storage is not located on-site auditor discretion applies on question applicability. Minor deficiency (10 points) if: • Single/isolated instance(s) of chemicals not properly stored. • Single/isolated instance(s) of improperly labeled or unlabeled chemical containers. • Single/isolated instance(s) of empty containers either not being stored properly or disposed of properly • The chemical storage area is not marked to indicate its use. • Single isolated instance(s) of chemicals being used without proper attention to chemical spillage. Major deficiency (5 points) if: • Numerous instances of improperly stored chemicals. • Numerous instances of improperly labeled or unlabeled chemical containers. • Chemical storage is segregated in an enclosed, designated area, but not locked. • Chemical storage area(s) has inadequate liquid containment systems. • Numerous instances of empty containers either not being properly stored or disposed of properly. • Numerous instances of chemicals being used without proper attention to chemical spillage. Non-compliance (0 points) if: • Failure to properly store chemicals. • There is no designated area for chemicals. • There is a designated area for chemicals but it is not an enclosed or locked area. • Spilled chemicals found in the chemical storage areas (not cleaned up properly)

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.05.04		Question removed		
2.05.05	2.05.04	No Change in v3.2	No Change in v3.2	No Change in v3.2
2.06.01		No Change in v3.2	There should be a formal training program to inform workers of the current policies and requirements of the company regarding hygiene. Training should be in the language understood by the workers, and training type and intensity should reflect the risks associated with the products/processes. Frequency should be at the start of the season before starting work and then some topics covered at least quarterly, but ideally monthly. These trainings should cover food safety and hygiene policies and basic food safety and hygiene topics, the importance of detecting food safety and/or hygiene issues with co-workers and visitors, and all food safety or hygiene issues in which they are responsible, and correcting and reporting problems. Training logs should have a clearly defined topic(s) covered, trainer(s) and material(s) used/given. Topics include, but not limited to, hand washing, protective clothing (where applicable), recognizing and reporting injury and illness, blood and bodily fluids, jewelry, dropped product, animal intrusion, food defense. There should be records of workers who have attended each session.	Total compliance (15 points): There should be a formal training program to inform all workers (including irrigation, planting and weeding crews) of the current policies and requirements of the company regarding hygiene. Trainings should be in the language understood by the workers, and training type and intensity should reflect the risks associated with the products/processes. Frequency should be at the start of the season before starting work then some topics covered at least quarterly, but ideally monthly. Full annual food safety refresher training sessions are encouraged but do not replace the ongoing more frequent training. Training material covering the content of the company policies and requirements regarding food safety and hygiene (2.01.03) and training should cover food safety and hygiene topics (e.g. toilet use, hand washing, protective clothing (where applicable), recognizing and reporting injury and illness, blood and other bodily fluids, jewelry, dropped product, animal intrusion, food consumption/taking breaks, foreign material requirements, food defense, etc.), the importance of recognizing and detecting food safety and/or hygiene issues with co-workers and visitors, and all food safety or hygiene issues for which they are responsible (e.g. recognizing contaminated produce that should not be harvested, inspecting harvest containers and equipment for contamination issues), correcting problems and reporting problems to a supervisor. Workers should also be trained on any new practices and/or procedures and when any new information on best practices becomes available. There should be records of training with date of training, clearly defined topic(s) covered, trainer(s), material(s) used/given and the names and signatures of workers trained. Training provided and associated records should meet all local and national regulations. Minor Deficiency (10 points) if: • Single/isolated instance(s) of logs having errors or incomplete information e.g. missing one of the following: training topic, trainer or material information. • Training does not include the importance of recognizing food safety and/or hygiene issues with co-workers and visitors and/or correcting problems and reporting problems to a supervisor. • Training has occurred but on a few occasions full attendance logs have not been kept and/or not all workers were covered. • Training materials and/or company food safety policy are not in the relevant language(s). • Training occurring, not before starting to work but within the first week. • Single/isolated instance(s) of workers not being trained. Major Deficiency (5 points) if: • Numerous instances of logs having errors or incomplete information e.g. missing one of the

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
				following: training topic, trainer or material information. • Training has occurred but on many occasions full attendance logs have not been maintained. • Up to three key topics e.g. hand washing, reporting injury/illness, blood and other bodily fluids, jewelry, dropped produce, animal intrusion, etc., have been omitted from the training. • Only annual refresher training has occurred and the operation runs for more than 3 months of the year. • Training occurring, not before starting to work but within the first month. • Numerous instances of workers not being trained. Non-compliance (0 points) if: • Failure to maintain records. • No records of training or workers not being trained. • More than three key topics e.g. hand washing, reporting injury/illness, blood and other bodily fluids, jewelry, dropped produce, animal intrusion, etc., have been omitted from the training program • No specific orientation given or given after the worker has been working for more than one month.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.06.02		No Change in v3.2	No Change in v3.2	Total compliance (10 points): There should be documented procedures that are communicated to food handlers (signed records), requiring them to report any cuts, grazes and/or any illnesses that might be a food safety cross contamination risk. The procedures should indicate return to work requirements for affected workers: to whom the food handlers should report, how the issue is recorded and appropriate actions to be taken for a particular issue. Auditors should not request to review records where countries have laws covering privacy/confidentiality of health records, and therefore, a verbal confirmation should be gained. Minor deficiency (7 points) if: • Single/isolated instance(s) of errors or omissions in procedure. • Single/isolated instance(s) of evidence that workers are unaware of the procedure requirements. Major deficiency (3 points) if: • Numerous instances of errors or omissions in the procedure. • Numerous instances of evidence that workers are unaware of procedure requirements. Non-compliance (0 points) if: • There is not a documented procedure in place. • A procedure is in place but it has not been communicated to food handlers.
2.06.03		No Change in v3.2	There should be records covering when workers are found not following food safety requirements. These records should also show corrective actions and evidence that retraining has occurred (where relevant).	Total compliance (3 points): There should be a disciplinary system in place. A worker non-conformance should be recorded when workers are found not following food safety requirements. The auditee should have a record for worker non-compliance, corrective actions and evidence that retraining has occurred (where relevant). Auditee records might be viewed as confidential, and therefore, a verbal confirmation should be gained. There might be a tier system, which includes re-training, verbal and written disciplinary actions and allowance for immediate termination for gross misconduct. Minor Deficiency (2 points) if: • Single/isolated instance(s) of follow up/corrective action not noted. Major Deficiency (1 point) if: • Numerous instance(s) of follow up/corrective actions not noted. Non-compliance (0 points) if: • No records or no disciplinary system. • Widespread failure to record follow up/corrective actions.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.07.01a		No Change in v3.2	Placement of toilet facilities should be in a suitable location to prevent contamination to product, packaging, equipment, water sources, and growing areas. Consideration should be given when portable units are used that they are not parked (if on trailers) too close to the edge of the crop and have a minimum 15 ft (4.5 m) buffer distance in the event of a spill or leak. If pit toilets are used, consider proximity to crop and water sources.	Total compliance (15 points): Placement of toilet facilities should be in a suitable location to prevent contamination to product, packaging, equipment, water sources, and growing areas. Consideration should be given when portable units are used that they are not parked (if on trailers) too close to the edge of the crop and have a minimum 15 ft (4.5 m) buffer distance in the event of a spill or leak. If pit toilets are used, consider proximity to crop and water sources.
2.07.01b		Are toilet facilities designed and maintained to prevent contamination (e.g., free from leaks and cracks)?	Toilet facilities should be free from cracks and leaks and any waste holding tanks from toilets must be designed and maintained properly to prevent contamination. Waste holding tanks should be free of leaks, cracks and constructed of durable materials (e.g. plastic) that will not degrade or decompose (no wood). Each toilet should be ventilated to outside air. Pit toilets cannot be considered to be properly designed to prevent contamination.	Total compliance (5 points): Toilet facilities should be free from cracks and leaks and any waste holding tanks from toilets must be designed and maintained properly to prevent contamination. Waste holding tanks should be free of leaks, cracks and constructed of durable materials (e.g. plastic) that will not degrade or decompose (no wood). Each toilet should be ventilated to outside air. Note: pit toilets cannot be considered to be properly designed to prevent contamination. https://www.waterpathogens.org/book/pit-toilets-latrines Minor deficiency (3 points) if: • Single observation of one of the waste holding tank(s) not designed or maintained improperly. • Single observation of a toilet facility not being well maintained (e.g. cracks, holes, leaks) or not vented to outside air. Major deficiency (1 point) if: • More than one observation of the waste holding tank(s) designed or maintained improperly. • More than one observation of a toilet facility not being well maintained (e.g. cracks, holes, leaks) or not vented to outside air. Non-compliance (0 points) if: • Waste holding tank(s) poses a risk of contamination to the growing area, product, packaging, and equipment, such as observing leaks or being improperly constructed. • Failure to provide adequately maintained toilet facilities.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.07.01c	2.07.01f	Where used, is there a documented procedure for emptying the waste holding tanks in a hygienic manner and also in a way that prevents product, packaging, equipment, water systems and growing area contamination?	If toilets have waste holding tanks, they should be emptied, pumped, and cleaned in a manner to avoid contamination to product, packaging, equipment, water systems and growing area(s). Equipment used in emptying/pumping must be in good working order. A documented procedure should exist and should include a response plan for major leaks or spills, including indicating where pumped waste is disposed of and requiring communication to the designated person(s) responsible for the food safety program regarding the actions taken when a major leak or spill occured.	Total compliance (5 points): If toilets have waste holding tanks, they should be emptied, pumped, and cleaned in a manner to avoid contamination to product, packaging, equipment, water systems and growing area(s). Equipment used in emptying/pumping must be in good working order. A documented procedure should exist and should include a response plan for major leaks or spills, as well as indicating where pumped waste is disposed of and requiring communication to the designated person(s) responsible for the food safety program regarding the actions taken when a major leak or spill occurred.
2.07.01d	2.07.01c	Are toilet facilities constructed of materials that are easy to clean?	Toilet facilities should be constructed of non-porous materials that are easy to clean and sanitize. The floors, walls, ceiling, partitions and doors should be made of a finish that can be easily cleaned.	Total compliance (3 points): Toilet facilities should be constructed of non-porous materials that are easy to clean and sanitize. The floors, walls, ceiling, partitions and doors should be made of a finish that can be easily cleaned. Minor Deficiency (2 points) if: • Single/isolated instance of toilet facilities not being constructed of non-porous materials. Major Deficiency (1 point) if: • Numerous instances of toilet facilities not being constructed of non-porous materials. Non- compliance (0 points) if: • Toilet facilities are not constructed of non-porous materials.
2.07.01e	2.07.01d	Are the toilet facility materials constructed of a light color allowing easy evaluation of cleaning performance?	Toilet facilities should be constructed of materials light in color, allowing easy evaluation of cleaning performance.	Total compliance (3 points): Toilet facilities should be constructed of materials light in color, allowing easy evaluation of cleaning performance.
2.07.01f	2.07.01e	Are toilet facilities supplied with toilet paper and is the toilet paper maintained properly (e.g., toilet paper rolls are not stored on the floor or in the urinals)?	No Change in v3.2	No Change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.07.01g		Are toilet facilities and hand washing stations clean and are there records showing cleaning, servicing and stocking is occurring regularly?	Toilet facilities and hand washing stations should be cleaned and sanitized on a regular basis. Servicing records (either contracted or in-house) should be available for review showing toilet cleaning, servicing and stocking is occurring regularly. Soiled tissue should be flushed down the toilet/placed in the holding tank (not placed in trash cans and/or on the floor).	Minor deficiency (7 points) if: •Single/isolated instance(s) of non-compliance to above requirements. •Single/isolated instance(s) of soiled toilet tissues being placed in trash can. •Single/isolated instance(s) of incomplete or missing records. Major deficiency (3 points) if: •Numerous instances of non-compliance to the above requirements. •Widespread observation of soiled toilet tissues being placed in trash cans. •Numerous instances of incomplete or missing records.
2.07.02		No Change in v3.2	Toilet facilities should have hand washing signs as a reminder to wash hands before and after eating, returning to work and after using the toilet. Signs need to be posted and in the language of the workers (picture signs are allowed). The signs should be permanent and placed in key areas where workers can easily see them.	Total compliance (5 points).: Toilet facilities should have hand washing signs as a reminder to wash hands before and after eating, returning to work and after using the toilet. Signs need to be posted visibly and in the language of the workers (picture signs are allowed). The signs should be permanent and placed in key areas where workers can easily see them.
	2.07.04	Are total coliforms (TC) and generic *E. coli* tests conducted on the water used for hand washing at the required and/or expected frequency?	Total coliforms (TC) and generic E. coli testing should occur prior to use and at least annually. Water samples should be taken from as close to the point of use as is practical e.g. hand wash spigot/faucet. If there are multiple hand wash units, then samples should be taken from a different location each test (randomize or rotate locations). If there are multiple sources for hand wash water, testing should also account for each source used.	Total compliance (15 points): Total coliforms (TC) and generic E. coli testing should occur prior to use and at least annually. Water samples should be taken from as close to the point of use as is practical e.g. hand wash spigot/faucet. If there are multiple hand wash units, then samples should be taken from a different location each test (randomize or rotate locations). If there are multiple sources for hand wash water, testing should also account for each source used. Reference: https://extension.psu.edu/coliform-bacteria https://www.govinfo.gov/content/pkg/CFR-2011-title40-vol23/pdf/CFR-2011-title40-vol23-part141.pdf https://www.epa.gov/dwstandardsregulations Minor deficiency (10 points) if: • Single instance of water testing not occurring at the right frequency. • Sample(s) was not taken from the closest practical point of use. Major deficiency (5 points) if: • More than one instance of water testing not occurring at the right frequency. Non-compliance (0 points): • No microbiological test results are available. • Last test was done over 12 months ago.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	2.07.04a	Do written procedures (SOPs) exist covering proper sampling protocols, which include where samples should be taken and how samples should be identified?	There should be a documented procedure in place detailing how water samples are to be taken, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, identifying the hand wash station, the water source and the date.	Total compliance (10 points): There should be a documented procedure in place detailing how water samples are to be taken, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, identifying the hand wash station, the water source and the date. Minor Deficiency (7 points) if: • Single/isolated instance(s) of incomplete or missing details in the procedure. Major Deficiency (3 points) if: • Numerous instances of incomplete or missing details in the procedure. Non-compliance (0 points) if: • There is no documented procedure.
	2.07.04b	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	Written procedures (SOPs) should exist covering corrective measures, not only for the discovery of unsuitable or abnormal water testing results, but also as a preparation on how to handle such findings.	Total compliance (10 points): Written procedures (SOPs) should exist covering corrective measures, not only for the discovery of unsuitable or abnormal water testing results, but also as a preparation on how to handle such findings. Minor Deficiency (7 points) if: • Single/isolated instance(s) of incomplete or missing details in the procedure. Major Deficiency (3 points) if: • Numerous instances of incomplete or missing details in the procedure. Non-compliance (0 points) if: • There is no documented procedure.
	2.07.04c	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	For total coliforms (TC) and generic *E. coli* , there should be negative or < detection limit (MPN or CFU/100mL). Where thresholds have been exceeded, there should be recorded corrective actions, including investigations and water retests.	Total compliance (15 points): For total coliforms (TC) and generic E. coli, there should be negative or < detection limit (MPN or CFU/100mL). Where thresholds have been exceeded, there should be recorded corrective actions, including investigations and water retests. Minor Deficiency (10 points) if: • Single/isolated instance(s) of records showing unsuitable or abnormal test results for total coliforms without adequate documented corrective actions. Major Deficiency (5 points) if: • Numerous instances of records showing unsuitable or abnormal test results for total coliforms without adequate documented corrective actions. Non-compliance (0 points) if: • No corrective actions have been performed. • A single out of specification result for generic E. coli without proper corrective actions.
2.07.04	2.07.05	No Change in v3.2	No Change in v3.2	No Change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.07.05	2.07.06	Are workers who are working directly or indirectly with food, free from signs of boils, sores, open wounds and are not exhibiting signs of foodborne illness?	No Change in v3.2	Minor deficiency (7 points) if: • A single instance of a worker with exposed boils, sores, exposed infected wounds, foodborne illness or any other source of abnormal microbial contamination. There is not a threat of product or packaging contamination. Major deficiency (3 points) if: • More than one instance of workers with exposed boils, sores, exposed infected wounds, foodborne illness or any other source of abnormal microbial contamination. There is not a threat of product or packaging contamination. Non-compliance (0 points) if: • One or more workers are observed working in contact with food, food contact surfaces or packaging that has or have exposed boils, sores, infected wounds, showing signs of food borne illness or any other source of abnormal microbial contamination that is a hazard. • **The auditor should consider whether this is adulteration and whether to apply 2.05.04 and score an automatic failure.**
2.07.06	2.07.07	Is jewelry confined to a plain wedding band and watches, studs, false eyelashes, etc., are not worn?	No Change in v3.2	No Change in v3.2
2.07.07	2.07.08	Are worker personal items being stored appropriately (i.e. not in the growing area(s) or material storage area(s))?	Workers should have a designated area for storing personal items such as coats, shoes, purses, medication, phones, etc. Areas set aside for workers' personal items should be far enough away from growing area(s) and material storage area(s) to prevent contamination and avoid food defense risks.	Total compliance (5 points): Workers should have a designated area for storing personal items such as coats, shoes, purses, medication, phones, etc. Areas set aside for workers' personal items should be far enough away from growing area(s) and material storage area(s) to prevent contamination and avoid food defense risks.
2.07.08	2.07.09	No Change in v3.2	No Change in v3.2	No Change in v3.2
2.07.09	2.07.10	No Change in v3.2	No Change in v3.2	No Change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.07.09a	2.07.10a	No Change in v3.2	Single use cups should be provided so that cross contamination issues are avoided from person to person. Examples include single use cups, drinking fountains, etc. Common drinking cups and other common utensils are prohibited.	Total compliance (5 points): Single use cups should be provided so that cross contamination issues are avoided from person to person. Examples include single-use cups, drinking fountains, etc. Common drinking cups and other common utensils are prohibited.
2.07.10	2.07.11	No Change in v3.2	No Change in v3.2	No Change in v3.2
2.07.11	2.07.12	No Change in v3.2	There should be adequate measures for trash disposal so that the growing and storage areas are not contaminated. Containers (e.g. dumpsters, cans) should be available and placed in suitable locations for the disposal of waste and trash e.g. near hand wash stations.	Total compliance (5 points): There should be adequate measures for trash disposal so that the growing and storage areas are not contaminated. Containers (e.g. dumpsters, cans) should be available and placed in suitable locations for the disposal of waste and trash, e.g., near handwash stations. N/A option available if there is no work taking place at the time of the audit.
2.07.12	2.07.13	Are any potential foreign material issues (e.g., metal, glass, plastic) controlled?	No Change in v3.2	No Change in v3.2
2.08.01		Is human sewage sludge (biosolids) used as an input? Information gathering question.	Human sewage sludge (biosolids), which are by-products of waste water treatment, should not be used in the growing cycle for indoor growing operations, and also where specifically prohibited under best management practices (e.g., LGMA, T-GAPs). The use of untreated biosolids is prohibited. Information gathering question.	Human sewage sludge (biosolids), which are by-products of waste water treatment, should not be used in the growing cycle for indoor growing operations, and also where specifically prohibited under best management practices (e.g., LGMA, T-GAPs). The use of untreated biosolids is prohibited. Information gathering question.
2.08.01a		No Change in v3.2	No change in v3.2	Removed "Only fertilizer approved for that specific crop should be used."

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.08.01b		No Change in v3.2	Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure.	Total compliance (15 points): Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure. A shorter interval is possible if the fertilizer has been through a physical/chemical/biological process to inactivate human pathogens and the auditee has validation study documentation that shows that the material is safe. Validation studies must be applicable to the situation at hand and care should be taken not to over extrapolate. There should be confirmation that monitoring records of the validation study's key requirements are being kept and that these monitoring records are being verified. The applications should be incorporated into the soil prior to planting or bud burst for tree crops. Minor deficiency (10 points) if: • Single/isolated instance(s) of errors or omissions in the records. Major deficiency (5 points) if: • Numerous instances of errors or omissions in the records. Non-compliance (0 points) if: • Fundamental failure to maintain records. • No records are available. • The interval between application and harvest is not being respected, and there is no validation study to verify application timelines. • **Any incident of direct product contamination constitutes as a health hazard and is viewed as adulteration. Revert to Q 2.05.04**.
2.08.01c		Question removed		
2.08.01d	2.08.01c	No Change in v3.2	Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn)).	Total compliance (10 points): Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn). See Table 2-1 Ceiling Concentrations for Pollutants, EPA Guide to 40 CFR Part 503 Rule. There should be sufficient identification information that would make it possible to trace back to the source if needed, therefore, only approved suppliers should be used limited to those firms demonstrating consistent compliance with prevailing national/local standards and guidelines.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.08.01e	2.08.01d	No Change in v3.2	Certificates of analysis should be available for each lot (containing animal materials) used. As a minimum, microbial testing should include Salmonella spp., Listeria monocytogenes and E. coli O157:H7 for non-synthetic crop treatments (e.g., compost teas, fish emulsions, fish meal, blood meal, “bio fertilizers”) and for animal-based compost, using approved sampling and testing methods (e.g., AOAC and an accredited laboratory). Where legally allowed, a reduced sampling rate is possible if the material is produced by the auditee (e.g. mushroom growing operations with in-house compost production) and has been through a physical/chemical/biological process to inactivate human pathogens and the auditee has validation study documentation that shows that the material is safe and proper process control records (e.g., time/temperature records and calibration records, such as, temperature probe) are maintained and available during the audit. Validation studies must be applicable to the situation at hand and care should be taken not to over extrapolate. All local and national legislation should also be followed. The grower should have proof that compost suppliers have cross contamination SOPs and temperature/turning logs.	No Change in v3.2
2.08.01f	2.08.01e	No Change in v3.2	Certificate(s) of Analysis (CoA), letters of guarantee or other documents should be available from the crop treatment supplier(s) that cover heavy metal testing. Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn)).	Total compliance (10 points): Certificate(s) of Analysis (CoA), letters of guarantee or some other documents from the compost supplier(s) that covers heavy metal testing should be available. Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn). See Table 2-1 Ceiling Concentrations for Pollutants, EPA Guide to 40 CFR Part 503 Rule. All local and national legislation should also be followed.
2.08.02		Is compost produced from animal derived materials used as an input? Information gathering question.	No change in v3.2	No Change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.08.02a		No Change in v3.2	No Change in v3.2	Removed "Only fertilizer approved for that specific crop should be used."
2.08.02b		No Change in v3.2	Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure. The applications should be incorporated into the soil prior to planting or bud burst for tree crops.	Total compliance (15 points): Records should be legible and at least detail the date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure. A shorter interval is possible if the fertilizer has been through a physical/chemical/biological process to inactivate human pathogens and the auditee has validation study documentation that shows that the material is safe. Validation studies must be applicable to the situation at hand and care should be taken not to over extrapolate. There should be confirmation that monitoring records of the validation study's key requirements are being kept and that these monitoring records are being verified. The applications should be incorporated into the soil prior to planting or bud burst for tree crops. Minor deficiency (10 points) if: • Single/isolated instance(s) of errors or omissions in the records. Major deficiency (5 points) if: • Numerous instances of errors or omissions in the records. Non-compliance (0 points) if: • Fundamental failure to maintain records. • No records are available. • The interval between application and harvest is not being respected, and there is no validation study to verify application timelines. • **Any incident of direct product contamination constitutes as a health hazard and is viewed as adulteration. Revert to Q 2.05.04.**
2.08.02c		Question removed		

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.08.02d	2.08.02c	No Change in v3.2	Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn)).	Total compliance (10 points): Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn). There should be sufficient identification information that would make it possible to trace back to the source if needed, therefore, only approved suppliers should be used limited to those firms demonstrating consistent compliance with prevailing national/local standards and guidelines.
2.08.02e	2.08.02d	No Change in v3.2	Certificates of analysis should be available for each lot (containing animal materials) used. As a minimum, microbial testing should include Salmonella spp., Listeria monocytogenes and E. coli O157:H7 for non-synthetic crop treatments (e.g., compost teas, fish emulsions, fish meal, blood meal, “bio fertilizers”) and for animal-based compost, using approved sampling and testing methods (e.g., AOAC and an accredited laboratory). Where legally allowed, a reduced sampling rate is possible if the material is produced by the auditee (e.g. mushroom growing operations with in-house compost production) and has been through a physical/chemical/biological process to inactivate human pathogens and the auditee has validation study documentation that shows that the material is safe and proper process control records (e.g., time/temperature records and calibration records, such as, temperature probe) are maintained and available during the audit. Validation studies must be applicable to the situation at hand and care should be taken not to over extrapolate. All local and national legislation should also be followed. The grower should have proof that compost suppliers have cross contamination SOPs and temperature/turning logs.	No Change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.08.02f	2.08.02e	No Change in v3.2	Certificate(s) of Analysis (CoA), letters of guarantee or other documents should be available from the crop treatment supplier(s) that cover heavy metal testing. Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn)).	Total compliance (10 points): Certificate(s) of Analysis (CoA), letters of guarantee or some other documents from the supplier(s) that covers heavy metal testing should be available. Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn). See Section 17868.2. Maximum Metal Concentrations for reference levels for an example of local State laws. All local and national legislation should also be followed.
2.08.03		Is untreated animal manure used as an input (e.g., raw manure &/or uncomposted, incompletely composted animal manure, green waste, non-thermally treated animal manure)? Information gathering question.	Untreated animal manure refers to manure that is raw and has not gone through a treatment process. Examples include raw manure and/or uncomposted, incompletely composted animal manure and/or green waste or non-thermally treated animal manure. Untreated animal manure should not be used in indoor growing operations or where prohibited under best management practices. Information gathering question.	No Change in v3.2
2.08.03a		No Change in v3.2	No change in v3.2	Removed "Only fertilizer approved for that specific crop should be used."

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.08.03b		No Change in v3.2	Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure. The applications should be incorporated into the soil prior to planting or bud burst for tree crops.	Total compliance (15 points): Records should be legible and at least detail the date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure. A shorter interval is possible if the fertilizer has been through a physical/chemical/biological process to inactivate human pathogens and the auditee has validation study documentation that shows that the material is safe. Validation studies must be applicable to the situation at hand and care should be taken not to over extrapolate. There should be confirmation that monitoring records of the validation study's key requirements are being kept and that these monitoring records are being verified. The applications should be incorporated into the soil prior to planting or bud burst for tree crops. Minor deficiency (10 points) if: • Single/isolated instance(s) of errors or omissions in the records. Major deficiency (5 points) if: • Numerous instances of errors or omissions in the records. Non-compliance (0 points) if: • Fundamental failure to maintain records. • No records are available. • The interval between application and harvest is not being respected, and there is no validation study to verify application timelines. • Any incident of direct product contamination constitutes as a health hazard and is viewed as adulteration. Revert to Q 2.05.04.
2.08.03c		Question removed		
2.08.03d	2.08.03c	No Change in v3.2	Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn).	Total compliance (10 points): Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn). There should be sufficient identification information that would make it possible to trace back to the source if needed, therefore, only approved suppliers should be used limited to those firms demonstrating consistent compliance with prevailing national/local standards and guidelines.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.08.03e		Question removed		
2.08.03f	2.08.03d	No Change in v3.2	Certificate(s) of Analysis (CoA), letters of guarantee or other documents should be available from the crop treatment supplier(s) that cover heavy metal testing. Concerns are for heavy metals that may affect human health(e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn)).	Total compliance (10 points): Certificate(s) of Analysis (CoA), letters of guarantee or some other documents from the supplier(s) that covers heavy metal testing should be available. Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn). See Table 2-1 Ceiling Concentrations for Pollutants, EPA Guide to 40 CFR Part 503 Rule. All local and national legislation should also be followed.
2.08.04		Are other non-synthetic crop treatments used as an input (e.g., compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc.)? Information gathering question.	No Change in v3.2	No Change in v3.2
2.08.04a		No Change in v3.2	No change in v3.2	Removed "Only fertilizer approved for that specific crop should be used."

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.08.04b		No Change in v3.2	Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure. The applications should be incorporated into the soil prior to planting or bud burst for tree crops.	Total compliance (15 points): Records should be legible and at least detail the date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure. A shorter interval is possible if the fertilizer has been through a physical/chemical/biological process to inactivate human pathogens and the auditee has validation study documentation that shows that the material is safe. Validation studies must be applicable to the situation at hand and care should be taken not to over extrapolate. There should be confirmation that monitoring records of the validation study's key requirements are being kept and that these monitoring records are being verified. The applications should be incorporated into the soil prior to planting or bud burst for tree crops. Minor deficiency (10 points) if: • Single/isolated instance(s) of errors or omissions in the records. Major deficiency (5 points) if: • Numerous instances of errors or omissions in the records. Non-compliance (0 points) if: • Fundamental failure to maintain records. • No records are available. • The interval between application and harvest is not being respected, and there is no validation study to verify application timelines. • Any incident of direct product contamination constitutes as a health hazard and is viewed as adulteration. Revert to Q 2.05.04.
2.08.04c		Question removed		
2.08.04d	2.08.04c	No Change in v3.2	Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn).	Total compliance (10 points): Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn). There should be sufficient identification information that would make it possible to trace back to the source if needed, therefore, only approved suppliers should be used limited to those firms demonstrating consistent compliance with prevailing national/local standards and guidelines.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.08.04e	2.08.04d	No Change in v3.2	Certificates of analysis should be available for each lot (containing animal materials) used. As a minimum, microbial testing should include Salmonella spp., Listeria monocytogenes and E. coli O157:H7 for non-synthetic crop treatments (e.g., compost teas, fish emulsions, fish meal, blood meal, “bio fertilizers”) and for animal-based compost, using approved sampling and testing methods (e.g., AOAC and an accredited laboratory). Where legally allowed, a reduced sampling rate is possible if the material is produced by the auditee (e.g. mushroom growing operations with in-house compost production) and has been through a physical/chemical/biological process to inactivate human pathogens and the auditee has validation study documentation that shows that the material is safe and proper process control records (e.g., time/temperature records and calibration records, such as, temperature probe) are maintained and available during the audit. Validation studies must be applicable to the situation at hand and care should be taken not to over extrapolate. All local and national legislation should also be followed. The grower should have proof that compost suppliers have cross contamination SOPs and temperature/turning logs.	No Change in v3.2
2.08.04f	2.08.04e	No Change in v3.2	Certificate(s) of Analysis (CoA), letters of guarantee or other documents should be available from the crop treatment supplier(s) that cover heavy metal testing. Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn)).	Total compliance (10 points): Certificate(s) of Analysis (CoA), letters of guarantee or some other documents from the non-synthetic crop treatment supplier(s) that covers heavy metal testing should be available. Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn). All local and national legislation should also be followed.
2.08.05		Are soil or substrate amendments used as an input (e.g., plant by-products, humates, seaweed, inoculants, and conditioner, etc.)? Information gathering question.	No Change in v3.2	No Change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.08.05a		No Change in v3.2	No change in v3.2	Removed "Only fertilizer approved for that specific crop should be used."
2.08.05b		No Change in v3.2	Records should be legible and at least detail date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. The applications should be incorporated into the soil prior to planting or bud burst for tree crops.	Total compliance (15 points): Records should be legible and at least detail the date of application, type of fertilizer, amount, method of application (drip, bulk, etc.), where it was applied and operator name. There should be sufficient identification information in the records that would make it possible to trace an application back to the site if needed. There should be an interval between application and harvest of at least 45 days for non-synthetic crop treatments and compost, and an interval of at least 120 days (but ideally 9 months) for untreated animal manure. A shorter interval is possible if the fertilizer has been through a physical/chemical/biological process to inactivate human pathogens and the auditee has validation study documentation that shows that the material is safe. Validation studies must be applicable to the situation at hand and care should be taken not to over extrapolate. There should be confirmation that monitoring records of the validation study's key requirements are being kept and that these monitoring records are being verified. The applications should be incorporated into the soil prior to planting or bud burst for tree crops. Minor deficiency (10 points) if: • Single/isolated instance(s) of errors or omissions in the records. Major deficiency (5 points) if: • Numerous instances of errors or omissions in the records. Non-compliance (0 points) if: • Fundamental failure to maintain records. • No records are available. • The interval between application and harvest is not being respected, and there is no validation study to verify application timelines. • Any incident of direct product contamination constitutes as a health hazard and is viewed as adulteration. Revert to Q 2.05.04.
2.08.05c		No Change in v3.2	Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn)).	Total compliance (10 points): Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn). There should be sufficient identification information that would make it possible to trace back to the source if needed, therefore, only approved suppliers should be used limited to those firms demonstrating consistent compliance with prevailing national/local standards and guidelines.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.08.06		Are inorganic fertilizers used as an input (e.g., ammonium nitrate, ammonium sulfate, chemically synthesized urea, etc.)? Information gathering question.	No Change in v3.2	No Change in v3.2
2.08.06a		No Change in v3.2	No change in v3.2	Removed "Only fertilizer approved for that specific crop should be used."
2.08.06c		No Change in v3.2	Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer's or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health(e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn)).	Total compliance (10 points): Certificate(s) of Analysis (CoA), letters of guarantee or other formal documentation from the fertilizer manufacturer(s) or supplier(s) should be current and state any inert or active ingredient substances used as "fillers" (e.g., clay pellets, granular limestone). Concerns are for heavy metals that may affect human health (e.g. Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Lead (Pb), Mercury (Hg), Molybdenum (Mo), Nickel (Ni), Selenium (Se), Zinc (Zn). There should be sufficient identification information that would make it possible to trace back to the source if needed, therefore, only approved suppliers should be used limited to those firms demonstrating consistent compliance with prevailing national/local standards and guidelines.
2.09.01		Is municipal/district water used in the growing operation?	No Change in v3.2	No Change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.01a		Are generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	No Change in v3.2	Minor deficiency (10 points) if: • Single/isolated instance(s) of water testing not occurring at the right frequency. • Sample(s) was not taken from the closest practical point of use.
2.09.01c		No Change in v3.2	No Change in v3.2	Non-compliance (0 points) if: • There are no SOPs covering corrective measures for unsuitable/abnormal water test results. • The written SOPs were not followed when unsuitable or abnormal water testing results were recorded in the last 12 months.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.01e		Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction based test or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well “shocking” should be recorded.	Total compliance (15 points): Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction-based test, test probe, or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well “shocking” should be recorded. Minor deficiency (10 points) if: • Single/isolated instance(s) of an error or omission in the records or corrective action details. • Single/isolated instance(s) of checks not being carried out at the required frequencies. • Single/isolated instance(s) of incorrect parameters being monitored. Major deficiency (5 points) if: • Multiple instances of errors or omissions in the records or corrective action details. • Numerous instances of checks not being carried out at the required frequencies. • Numerous instances of incorrect parameters being monitored. • No supporting documentation of the monitoring method and/or frequency being used. Non-compliance (0 points) if: • No records. • Monitoring frequency is insufficient to verify the process is in control. • Monitoring parameters in use are insufficient to verify the process is in control. • Failure to maintain records properly. • Failure to record corrective action details.
2.09.01f		Are records kept for periodic visual inspection of the water source and available for review?	"Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken.	Total compliance (5 points): "Records” may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken. The appropriate documentation should be available for review. Minor deficiency (3 points) if: • Single/isolated instance(s) of an error or omission in the records or corrective action details. Major deficiency (1 point) if: • Multiple instances of errors or omissions in the records or corrective action details. Non-compliance (0 points) if: • Failure to maintain records. • Failure to record corrective action details.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.02a		Are generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	No Change in v3.2	Minor deficiency (10 points) if: • Single/isolated instance(s) of water testing not occurring at the right frequency. • Sample(s) was not taken from the closest practical point of use.
2.09.02c		No Change in v3.2	No Change in v3.2	Non-compliance (0 points) if: • There are no SOPs covering corrective measures for unsuitable/abnormal water test results. • The written SOPs were not followed when unsuitable or abnormal water testing results were recorded in the last 12 months.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.02e		Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction based test or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well “shocking” should be recorded.	Total compliance (15 points): Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction-based test, test probe, or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well “shocking” should be recorded. Minor deficiency (10 points) if: • Single/isolated instance(s) of an error or omission in the records or corrective action details. • Single/isolated instance(s) of checks not being carried out at the required frequencies. • Single/isolated instance(s) of incorrect parameters being monitored. Major deficiency (5 points) if: • Multiple instances of errors or omissions in the records or corrective action details. • Numerous instances of checks not being carried out at the required frequencies. • Numerous instances of incorrect parameters being monitored. • No supporting documentation of the monitoring method and/or frequency being used. Non-compliance (0 points) if: • No records. • Monitoring frequency is insufficient to verify the process is in control. • Monitoring parameters in use are insufficient to verify the process is in control. • Failure to maintain records properly. • Failure to record corrective action details.
2.09.02f		Are records kept for periodic visual inspection of the water source and available for review?	"Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken.	Total compliance (5 points): "Records” may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken. The appropriate documentation should be available for review. Minor deficiency (3 points) if: • Single/isolated instance(s) of an error or omission in the records or corrective action details. Major deficiency (1 point) if: • Multiple instances of errors or omissions in the records or corrective action details. Non-compliance (0 points) if: • Failure to maintain records. • Failure to record corrective action details.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.03a		Are generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	No Change in v3.2	Minor deficiency (10 points) if: • Single/isolated instance(s) of water testing not occurring at the right frequency. • Sample(s) was not taken from the closest practical point of use.
2.09.03c		No Change in v3.2	No Change in v3.2	Non-compliance (0 points) if: • There are no SOPs covering corrective measures for unsuitable/abnormal water test results. • The written SOPs were not followed when unsuitable or abnormal water testing results were recorded in the last 12 months.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.03e		Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction based test or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well “shocking” should be recorded.	Total compliance (15 points): Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction-based test, test probe, or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well “shocking” should be recorded. Minor deficiency (10 points) if: • Single/isolated instance(s) of an error or omission in the records or corrective action details. • Single/isolated instance(s) of checks not being carried out at the required frequencies. • Single/isolated instance(s) of incorrect parameters being monitored. Major deficiency (5 points) if: • Multiple instances of errors or omissions in the records or corrective action details. • Numerous instances of checks not being carried out at the required frequencies. • Numerous instances of incorrect parameters being monitored. • No supporting documentation of the monitoring method and/or frequency being used. Non-compliance (0 points) if: • No records. • Monitoring frequency is insufficient to verify the process is in control. • Monitoring parameters in use are insufficient to verify the process is in control. • Failure to maintain records properly. • Failure to record corrective action details.
2.09.03f		Are records kept for periodic visual inspection of the water source and available for review?	"Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken.	Total compliance (5 points): "Records” may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken. The appropriate documentation should be available for review. Minor deficiency (3 points) if: • Single/isolated instance(s) of an error or omission in the records or corrective action details. Major deficiency (1 point) if: • Multiple instances of errors or omissions in the records or corrective action details. Non-compliance (0 points) if: • Failure to maintain records. • Failure to record corrective action details.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.04		No Change in v3.2	Water sourced from canals, rivers, ditches or other open flowing surface water systems may carry more of a risk for contamination than closed water sources. For surface waters, consider the impact of storm events on irrigation practices. Bacterial loads in surface water are generally much higher than other sources, and caution should be exercised when using these waters for irrigation. Information gathering question.	Total points 0: Information gathering question. Water sourced from canals, rivers, ditches or other open flowing surface water systems may carry more of a risk for contamination than closed water sources. For surface waters, consider the impact of storm events on irrigation practices. Bacterial loads in surface water are generally much higher than other sources, and caution should be exercised when using these waters for irrigation.
2.09.04a		Are generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	No Change in v3.2	Minor deficiency (10 points) if: • Single/isolated instance(s) of water testing not occurring at the right frequency. • Sample(s) was not taken from the closest practical point of use.
2.09.04c		No Change in v3.2	No Change in v3.2	Non-compliance (0 points) if: • There are no SOPs covering corrective measures for unsuitable/abnormal water test results. • The written SOPs were not followed when unsuitable or abnormal water testing results were recorded in the last 12 months.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.04e		Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction based test or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well “shocking” should be recorded.	Total compliance (15 points): Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction-based test, test probe, or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well “shocking” should be recorded. Minor deficiency (10 points) if: • Single/isolated instance(s) of an error or omission in the records or corrective action details. • Single/isolated instance(s) of checks not being carried out at the required frequencies. • Single/isolated instance(s) of incorrect parameters being monitored. Major deficiency (5 points) if: • Multiple instances of errors or omissions in the records or corrective action details. • Numerous instances of checks not being carried out at the required frequencies. • Numerous instances of incorrect parameters being monitored. • No supporting documentation of the monitoring method and/or frequency being used. Non-compliance (0 points) if: • No records. • Monitoring frequency is insufficient to verify the process is in control. • Monitoring parameters in use are insufficient to verify the process is in control. • Failure to maintain records properly. • Failure to record corrective action details.
2.09.04f		Are records kept for periodic visual inspection of the water source and available for review?	"Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken.	Total compliance (5 points): "Records” may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken. The appropriate documentation should be available for review. Minor deficiency (3 points) if: • Single/isolated instance(s) of an error or omission in the records or corrective action details. Major deficiency (1 point) if: • Multiple instances of errors or omissions in the records or corrective action details. Non-compliance (0 points) if: • Failure to maintain records. • Failure to record corrective action details.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.05		Is reclaimed water used in the operation? Note, this refers to wastewater that has gone through a treatment process.	Information gathering question. Reclaimed water should be treated with adequate disinfection systems and tested frequently, ideally under the direction of a water reclamation authority or other management body. Reclaimed water should be subject to applicable local and national regulations and standards including World Health Organisation (WHO) guidelines for the safe use of wastewater, excreta and greywater in agriculture. Prior to using this water for agricultural purposes, growers should check with regulatory bodies to determine the appropriate parameters and tolerances to be used.	Information gathering question. Reclaimed water should be treated with adequate disinfection systems and tested frequently, ideally under the direction of a water reclamation authority or other management body. Reclaimed water should be subject to applicable local and national regulations and standards including World Health Organisation (WHO) guidelines for the safe use of wastewater, excreta and greywater in agriculture. Prior to using this water for agricultural purposes, growers should check with regulatory bodies to determine the appropriate parameters and tolerances to be used.
2.09.05a		Are generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	No Change in v3.2	Minor deficiency (10 points) if: • Single/isolated instance(s) of water testing not occurring at the right frequency. • Sample(s) was not taken from the closest practical point of use.
2.09.05c		No Change in v3.2	No Change in v3.2	Non-compliance (0 points) if: • There are no SOPs covering corrective measures for unsuitable/abnormal water test results. • The written SOPs were not followed when unsuitable or abnormal water testing results were recorded in the last 12 months.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.05e		Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction based test or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well “shocking” should be recorded.	Total compliance (15 points): Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction-based test, test probe, or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well “shocking” should be recorded. Minor deficiency (10 points) if: • Single/isolated instance(s) of an error or omission in the records or corrective action details. • Single/isolated instance(s) of checks not being carried out at the required frequencies. • Single/isolated instance(s) of incorrect parameters being monitored. Major deficiency (5 points) if: • Multiple instances of errors or omissions in the records or corrective action details. • Numerous instances of checks not being carried out at the required frequencies. • Numerous instances of incorrect parameters being monitored. • No supporting documentation of the monitoring method and/or frequency being used. Non-compliance (0 points) if: • No records. • Monitoring frequency is insufficient to verify the process is in control. • Monitoring parameters in use are insufficient to verify the process is in control. • Failure to maintain records properly. • Failure to record corrective action details.
2.09.05f		Are records kept for periodic visual inspection of the water source and available for review?	"Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken.	Total compliance (5 points): "Records” may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken. The appropriate documentation should be available for review. Minor deficiency (3 points) if: • Single/isolated instance(s) of an error or omission in the records or corrective action details. Major deficiency (1 point) if: • Multiple instances of errors or omissions in the records or corrective action details. Non-compliance (0 points) if: • Failure to maintain records. • Failure to record corrective action details.
2.09.06		Is tail water (run-off water including hydroponics) used in the operation?	Tail water return systems, including hydroponics, catch spilled or runoff water and pump the water back to the top of the field. Information gathering question.	No Change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.06a		Are generic *E. coli* tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? **A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	No Change in v3.2	Minor deficiency (10 points) if: • Single/isolated instance(s) of water testing not occurring at the right frequency. • Sample(s) was not taken from the closest practical point of use.
2.09.06c		No Change in v3.2	No Change in v3.2	Non-compliance (0 points) if: • There are no SOPs covering corrective measures for unsuitable/abnormal water test results. • The written SOPs were not followed when unsuitable or abnormal water testing results were recorded in the last 12 months.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.06e		Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?	Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction based test or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well “shocking” should be recorded.	Total compliance (15 points): Where any water treatment is performed at the source (e.g., well, canal, holding tank) this should be monitored. The strength of anti-microbial chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction-based test, test probe, or as recommended by the disinfectant supplier). If using an anti-microbial treatment system (e.g. chlorination), there should be monitoring logs completed on at least a daily basis when the system is being used. Any well “shocking” should be recorded. Minor deficiency (10 points) if: • Single/isolated instance(s) of an error or omission in the records or corrective action details. • Single/isolated instance(s) of checks not being carried out at the required frequencies. • Single/isolated instance(s) of incorrect parameters being monitored. Major deficiency (5 points) if: • Multiple instances of errors or omissions in the records or corrective action details. • Numerous instances of checks not being carried out at the required frequencies. • Numerous instances of incorrect parameters being monitored. • No supporting documentation of the monitoring method and/or frequency being used. Non-compliance (0 points) if: • No records. • Monitoring frequency is insufficient to verify the process is in control. • Monitoring parameters in use are insufficient to verify the process is in control. • Failure to maintain records properly. • Failure to record corrective action details.
2.09.06f		Are records kept for periodic visual inspection of the water source and available for review?	"Records" may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken.	Total compliance (5 points): "Records” may include calendar books with commentary regarding what was checked, the condition, unusual occurrences, (e.g. issues regarding well cap, well casing, seals, piping tanks, treatment equipment, cross connections, trash, animal presence, pooled water, etc.), and any action taken. The appropriate documentation should be available for review. Minor deficiency (3 points) if: • Single/isolated instance(s) of an error or omission in the records or corrective action details. Major deficiency (1 point) if: • Multiple instances of errors or omissions in the records or corrective action details. Non-compliance (0 points) if: • Failure to maintain records. • Failure to record corrective action details.
2.09.08		Removed question, covered by		
2.09.09	2.09.08	No Change in v3.2	No Change in v3.2	No Change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.09.10	2.09.09	No Change in v3.2	No Change in v3.2	No Change in v3.2
2.10.01	2.10.01	Are there up-to-date records of all pesticides applied during the growth cycle? **A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	The growing operation should follow a pesticide application record keeping program that at least includes the following: date and time of application, crop name, treated area size and location (must be traceable), brand/product name, EPA (or equivalent) registration information, active ingredient, amount applied (rate/dosage), applicator identification, pre-harvest interval, restricted entry interval, application equipment identification and target pests. **A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	Total compliance (15 points): The growing operation should follow a pesticide application record keeping program that at least includes the following: date and time of application, crop name, treated area size and location (must be traceable), brand/product name, EPA registration number (or country of production equivalent registration information), active ingredient, amount applied (rate/dosage), applicator identification, pre-harvest interval, restricted entry interval, application equipment identification and target pests. Records should include biopesticides (http://www2.epa.gov/pesticides/biopesticides). Information may be recorded on separate documents providing all information is available and consistent. Minor deficiency (10 points) if: • Single/isolated instance(s) of missing required information (e.g. missing target pest, applicator identification, equipment identification, etc.). • Major deficiency (5 points) if: • Numerous instances of missing required information (e.g. missing target pest, applicator identification, equipment identification, etc.). Automatic Failure (0 points) if: • Any failure to record critical required information (e.g. brand/product name, date, amount applied, location, etc.). • Fundamental failure to record required information.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.10.02	2.10.02	Are all pesticides applied during the growth cycle authorized/registered by the authority/government of the country of production? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	Application records should show all pesticides applied during the growth cycle are officially registered by the country of production for the target crop (e.g. EPA in the US, COFEPRIS in Mexico, SAG in Chile, Pest Management Regulatory Agency (PMRA) in Canada). In countries where there is approval for its use, this is acceptable, when the program is operated by the government and considers at a minimum the target crop, pesticide trade name and active ingredient, formulation, dosage, pre-harvest intervals and target pest(s) or in cases where the government authorizes an active ingredient but not a trade name, there must be evidence of compliance with the MRLs of the destination countries for the applied "authorized" active ingredient (see 2.10.05) When pesticide product registration/authorization information does not exist for the target crop in the country of production or there are not enough products registered/authorized to control a pest or disease (partial registration/authorization), extrapolation is possible if that practice is allowed by the country of production (e.g. in Mexico "Anexo Técnico 1. Requisitos Generales para la Certificación y Reconocimiento de Sistemas de Riesgos de Contaminación (SRRC) Buen Uso y Manejo de Plaguicidas (BUMP) o Buenas Prácticas Agrícolas en la Actividad de Cosecha (BPCo) durante la producción primaria de vegetales – Section 12.3 should be considered. ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	Total compliance (15 points): Application records show all pesticides applied during the growth cycle are officially registered by the country of production for the target crop (e.g. EPA in the US, COFEPRIS in Mexico, SAG in Chile, Pest Management Regulatory Agency (PMRA) in Canada). In countries where there is approval for its use, this is acceptable when the program is operated by the government and considers as a minimum the target crop, pesticide trade name and active ingredient, formulation, dosage, pre-harvest intervals and target pest(s) or in cases where the government authorizes an active ingredient but not a trade name, there must be evidence of compliance with the MRLs of the destination countries for the applied "authorized" active ingredient (see 2.10.05) When pesticide product registration/authorization information does not exist for the target crop in the country of production or there are not enough products registered/authorized to control a pest or disease (partial registration/authorization), extrapolation is possible if that practice is allowed by the country of production (e.g. in Mexico "Anexo Técnico 1. Requisitos Generales para la Certificación y Reconocimiento de Sistemas de Riesgos de Contaminación (SRRC) Buen Uso y Manejo de Plaguicidas (BUMP) o Buenas Prácticas Agrícolas en la Actividad de Cosecha (BPCo) durante la producción primaria de vegetales – Section 12.3 should be considered. ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT. Minor deficiency (10 points) if: • There is no minor deficiency category for this question Major deficiency (5 points) if: • There is no major deficiency category for this question. **Automatic Failure (0 points) if:** **• There is a single incidence of pesticides being used without being registered or authorized by the country of production government.**

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.10.03	2.10.03	Are all pesticides used during the growth cycle applied as recommended/ directed in the label? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	Application records should show that pesticides used during the growth cycle are applied in accordance with label directions and any federal, state or local regulation(s). In operations applying pesticides “authorized” by the government, where use directions are not in the label, application records should show “authorization program” use/application directions are followed.	Total compliance (15 points): Application records should show that pesticides used during the growth cycle are applied in accordance with label directions and any federal, state or local regulation(s). In operations applying pesticides “authorized” by the government, where use directions are not in the label, application records should show “authorization program” use/application directions are followed. Minor deficiency (10 points) if: •There is no minor deficiency category for this question Major deficiency (5 points) if: •There is no major deficiency category for this question. **Automatic Failure (0 points) if:** **•There is a single incidence of pesticides being used without following label directions**.
2.10.04	2.10.04	Where harvesting is restricted by pre-harvest intervals, are required pre-harvest intervals on product labels, national (e.g., EPA) registration and any federal, state or local regulations and guidelines being adhered to? **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	Application and harvest records show pre-harvest intervals on product labels, national (e.g., EPA) registration and any federal, state or local regulations and guidelines are being adhered to. In operations applying pesticides “authorized” by the government, where use directions are not in the label, application and harvest records show the “authorization program” directions for pre-harvest intervals are followed. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	Total compliance (15 points): Pesticide application records and harvest records should show pre-harvest intervals, as directed by the label, have been adhered to. In operations applying pesticides “authorized” by the government, where use directions are not in the label, application and harvest records show the “authorization program” directions for pre-harvest intervals are followed. Minor deficiency (10 points) if: • There is no minor deficiency category for this question Major deficiency (5 points) if: • There is no major deficiency category for this question. **Automatic Failure (0 points) if:** **• There is a single incidence of pre-harvest intervals not being adhered to.** **• There is no evidence that pre-harvest intervals are being adhered to (e.g. missing or non-traceable to the location harvest records).**

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.10.05	2.10.05	Where products are destined for export, is there information for pesticide Maximum Residue Limits (MRLs) compliance considering country of destination, target crop(s), and active ingredients applied?	Where products are destined for export, the operation should have documented evidence about the MRL requirements for each country of destination for each pesticide (active ingredient) applied during the growth cycle. If there is no MRL defined by the country of destination for any active ingredient applied, the operation should have documented evidence of the applicable regulations in that country (e.g. default MRL, Codex Alimentarius, non-detectable, etc.). In the case where the MRLs have been standardized or harmonized for a group of countries (i.e. European Union) it is acceptable that the operation demonstrate compliance by referencing the "list" of MRLs issued from the formal body that represents those countries for this purpose. This question is Not Applicable if the product is only sold in the country of production (domestic market).	Total compliance (15 points): Where products are destined for export, the operation should have documented evidence about the MRL requirements for each country of destination for each pesticide (active ingredient) applied during the growth cycle. This assumes that grower is meeting country of origin MRL and label requirements. If there is no MRL defined by the country of destination for any active ingredient applied, the operation should have documented evidence of the applicable regulations in that country (e.g. default MRL, Codex Alimentarius, non-detectable, etc.). In the case where the MRLs have been standardized or harmonized for a group of countries (i.e. European Union) it is acceptable that the operation demonstrate compliance by referencing the "list" of MRLs issued from the formal body that represents those countries for this purpose. **This question is Not Applicable if the product is only sold in the country of production (domestic market).** Minor deficiency (10 points) if: • Single/isolated instance(s) of missing required information (e.g. missing MRL information for an active ingredient) Major deficiency (5 points) if: • Numerous instances of missing required information (e.g. missing MRL information for 3 or more active ingredients) Non-conformance (0 points) if: • There is no MRL information for the destination countries (or widespread missing information)

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.10.06	2.10.06	Where products are destined for export, is there evidence that Maximum Residue Limits (MRLs) of the intended markets are met?	Maximum Residue Limits (MRLs) analysis should be performed when the MRLs of the destination countries are lower (stricter) than the country of production. This assumes that grower is meeting country of origin MRL and label requirements. MRL test results and records should demonstrate that products/crops meet MRL regulations in those intended markets and any non-conforming product is diverted from those markets. This question is Not Applicable if the product is only sold in the country of production (domestic market).	Total compliance (15 points): Maximum Residue Limits (MRLs) analysis should be performed when the MRLs of the destination countries are lower (stricter) than the country of production. This assumes that grower is meeting country of origin MRL and label requirements. MRL test results and records should demonstrate that products/crops meet MRL regulations in those intended markets and any non-conforming product is diverted from those markets. The auditor should review MRL laboratory reports to ensure MRL entry requirements are met for the country of destination or the applicable regulation in the country of destination when there is no MRL set for any active ingredient, (e.g. the Codex Alimentarius Commission, default MRL, under the limit of detection [LOD], etc.). MRL laboratory reports should be traceable to the operation and consider at least the active ingredients applied during the growth cycle. Other alternative or complementary methods to demonstrate MRL compliance for an active ingredient include: i) Documented analysis of degradation curves and corresponding dosage and/or pre-harvest interval modifications. Degradation curves used as reference should be issued/provided by the manufacturer of the pesticide or country of production government and correspond to the degradation of the pesticide active ingredient in the agroclimatic zone where the Plant Protection Product was applied. ii) Industry guidelines (e.g. “Agenda de Pesticidas” From ASOEX Chile). Following a procedure for when and where to pull samples for MRL testing based on risk considering factors such as active ingredients applied, timing of the application and harvest, pre-harvest intervals, dosage, etc., is an ideal practice. **This question is Not Applicable if the product is only sold in the country of production (domestic market).** Minor deficiency (10 points) if: • There is no minor deficiency category for this question Major deficiency (5 points) if: • There is no deficiency category for this question. **Non-compliance (0 points) if:** **•There is a single incidence of an active ingredient with an exceeded MRL.** **•There is no evidence of MRL compliance for any active ingredient applied.** **•Evidence provided is not sufficient to support MRL compliance.** **•Automatic failure if corrective actions are not provided and accepted by the certification body.**

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.10.07	2.10.07	Is there a documented procedure for the pesticide applications, considering mixing and loading, applying, and equipment cleaning? **Point change 5 to 15**	There should be a documented procedure for pesticide applications, specifically mixing and loading, application procedures and equipment cleaning. The procedure should adhere to the product label and include: requiring activity to be in a well-ventilated, well-lit area away from unprotected people, food and other items that might be contaminated; necessary PPE, re-entry intervals, excessive winds, posting of treated areas, etc; how to rinse and clean pesticide equipment including measuring devices, mixing containers and application equipment.	Total compliance (15 points): There should be a documented procedure describing how to mix and load pesticides, how to apply pesticides and how to rinse and clean pesticide application equipment. The procedure should include adhering to the product label. Mixing and loading procedures should require activity to be in a well-ventilated, well-lit area away from unprotected people, food and other items that might be contaminated. Application procedures should include information about the necessary Personal Protective Equipment (PPE), re-entry intervals, excessive winds, posting of treated areas, etc. Equipment cleaning procedures should include measuring devices, mixing containers, application equipment (e.g. sprayer), rinseable containers, etc., and should address: rinsing empty equipment immediately to prevent residues from drying and becoming difficult to remove, and adding the rinsate (water from rinsing containers or equipment) to spray tanks as part of the pesticide mixing process. If any of these practices are observed during the inspection, it should be evident that the procedures are being followed. Minor deficiency (10 points) if: • Single/isolated instance(s) of an error or omission in the procedure or practice. Major deficiency (5 points) if: • Numerous instances of an error or omission in the procedure or practice. Non-conformance (0 points) if: • Widespread errors or omissions in the procedure or practice. • There is no procedure.
2.10.08		Question removed, covered by 2.10.07		
2.10.09		Question removed, covered by 2.10.07		
2.10.10	2.10.08	Is there documentation that shows the individual(s) making decisions for pesticide applications is competent?	Current valid certificates, licenses, another form of proof of training recognized by prevailing national/local standards and guidelines should be available for the individual(s) making decisions on pesticide applications (e.g., choice of pesticides, application timings, rates, etc.).	Total compliance (15 points): Current valid certificates, licenses, or another form of proof of training recognized by prevailing national/local standards and guidelines should be available for the individual(s) making decisions on pesticide applications (e.g., choice of pesticides, application timings, rates, etc.) Minor deficiency (10 points) if: • Single/isolated instance(s) of missing documentation. Major deficiency (5 points) if: • Single/isolated instance of a proof of training/certificate/license being out of date. • Numerous instances of missing documentation. Non-compliance (0 points) if: • There is no documentation for the individual(s) making the decision(s).

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
2.10.11	2.10.09	Is there documentation that shows that individuals who handle pesticide materials are trained and are under the supervision of a trained person?	All workers who handle pesticides must have current certificates, licenses, or other forms of proof of training (recognized by prevailing national/local standards and guidelines) qualifying them to do so independently or they must have proof of training (in-house or external) and be under the supervision of a worker who can do so independently.	Total compliance (15 points): All workers who handle pesticides must have current certificates, licenses, or other forms of proof of training (recognized by prevailing national/local standards and guidelines) qualifying them to do so independently or they must have proof of training (in-house or external) and be under the supervision of a worker who can do so independently. Minor deficiency (10 points) if: • Single/isolated instance(s) of missing training documentation. Major deficiency (5 points) if: • Numerous instances of missing training documentation. • Worker who is not qualified to handle pesticide materials independently has training but no supervision Non-compliance (0 points) if: • There is no documentation showing training for individuals handling pesticide materials. • There is no documentation for the supervising person
2.10.12		Question removed		
2.10.13		Question removed		
2.10.14		Question removed		