

General Description of Changes to Module 3

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
7. Removed requirement for worker identification
8. Added questions about toilets

Module 3				
Q #	**New #**	**v3.2 Question**	**v3.2 Expectation**	**v3.2 Interpretation Guideline**
3.01.01		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.
3.01.02		No change in v3.2	Information gathering question. Current certification by an accredited organic certification organization (national/local) should cover the audited crops, be on file and available for review. N/A if not growing under organic principles.	No change in v3.2
3.01.03		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 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 records or food safety hygiene and health policy. • The policy is not in the relevant language(s). • Single/isolated instance(s) of workers and visitors not being trained or 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 records or food safety hygiene and health policy. • Over three points missing off the visitor personal hygiene, GAPs and health requirements listing. • Numerous cases of workers and visitors not signing a document stating that they will comply with the operations' personal hygiene and healthy policy. • Training occurring after starting work, and within the first month. • Numerous instances of workers not being trained. Non-compliance (0 points) if: • No records available. • Failure to maintain records. • The company does not have a document for workers and visitors to sign stating that they will comply with the operations' personal hygiene and health policies. • Fundamental failure of workers and visitors to sign a document stating that they will comply with the operations' personal hygiene and health policies.

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3.02.01		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.
3.02.03		No change in v3.2 **Point change 10 to 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, 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 have 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, 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 iii) 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

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				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.
3.02.03a		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.	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. 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.

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3.02.04		No change in v3.2	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 of the product and high-risk areas. 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 facility 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. 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. FSIS has created a self-assessment guideline for food processors titled “Food Security Guidelines for Food Processors.
3.02.05		Question removed		
3.02.06	3.02.05	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
	3.02.06 New question	Is any packaging stored outside, being stored protected?	Packaging should be stored off the ground (on pallets, racks, etc.) and protected from dust, leaks and other contaminants. Neither, food contact packaging (including RPCs if used as primary packaging) nor non-food contact packaging e.g. cardboard outers should be stored outside. If done, any outside stored packaging materials should be covered with a waterproof and dust proof shroud (often made of plastic material) and included under a pest control program.	Total compliance (10 points): Packaging should be stored off the ground (on pallets, racks, etc.) and protected from dust, leaks and other contaminants. Neither food contact packaging (including RPCs if used as primary packaging) nor non-food contact packaging e.g. cardboard outers should be stored outside. If done, any outside stored packaging materials should be covered with a waterproof and dust proof shroud (often made of plastic material) and included under a pest control program. Minor deficiency (7 points) if: • Single/isolated instance(s) of evidence of dust and/or leaks on packaging which does not pose an immediate threat of product contamination. • Non-food contact packaging is stored outside, with shroud and storage area is included in the pest control program. Major deficiency (3 points) if: • Numerous instances of dust and/or leaks on packaging which does not pose an immediate threat of product contamination. • Food contact packaging is stored outside (covered with shroud) and storage area is included in the pest control program. • Non-food contact packaging is stored outside, is not shrouded, with or without pest control. Non-compliance (0 points) if: • Widespread evidence of dust and/or leaks on packaging which has the potential for product contamination. • Food contact packaging items are stored outside, without shrouds, with or without pest control. **• Any observation of direct gross widespread contamination of product, ingredient or packaging materials (revert back to 3.05.10, automatic failure).**
3.02.11		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. 3.05.10, the automatic adulteration failure question.**

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	3.02.14 New Question	Is the audited area free from evidence of infants or toddlers?	Infants and toddlers can represent potential contamination to the growing area, to the crop, to packaging and should not be present in the operations, including chemical or equipment storage areas.	Total compliance (10 points): Infants and toddlers can represent potential contamination to the growing area, to the crop, to packaging and should not be present in the operations, including chemical or equipment storage areas. Minor deficiency (7 points) if: • Single/isolated instance or evidence of infants or toddlers in the audited area. Major deficiency (3 points) if: • Numerous instances or evidence of infants or toddlers in the audited area. Non-compliance (0 points) if: • Fundamental failure to keep infants or toddlers out of the audited area.
3.03.03		Is the pest control program properly documented, detailing the scope of the program, target pests and frequency of checks, including a copy of the contract with the exterminatio n company (if used), Pest Control Operator license(s)/tra ining (if baits are used), and insurance documents?	No change in v3.2	No change in v3.2

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3.03.06		Are closed doors, and windows to the outside pest proof?	Doors, windows, louvers and screens should be maintained, should fit tightly with a maximum allowable gap of 1/8 inch (3 mm). Special attention should be given to the maintenance of weather strips. Air curtains and self-closing devices where used, should be operating properly.	Total compliance (10 points): All doors, windows, louvers and screens to the outside should be designed and properly fitted out to prevent the ingress of rodents and insects into the facility. Doors should have no gaps greater than approximately 1/8 inch (3 mm). If doors, windows or louvers have screens, the openings should be no greater than 1/8 inch (3 mm). Gaps are often at the bottom of doors and also at the top of roller doors. Air curtains are acceptable, provided they are operating properly. Worker doors to the outside should be loaded so that they close properly. As a guide, if you can see daylight gaps, then further investigation is required. Special attention should be given to the maintenance of weather strips. Air curtains and self-closing devices where used, should be operating properly.
3.03.07	3.02.12	Is the audited area free from animal presence and/or animal activity (wild or domestic)? If Total Compliance, go to 3.02.13	No change in v3.2	Total compliance (15 points): Animals can represent potential contamination to the growing area, to the crop, to the equipment, etc., and therefore, should not be present in the operations. Evidence of animal presence can include tracks, fecal matter, feathers, etc. Note: This includes any packaging or storage areas (e.g., equipment, agronomic inputs, chemicals). Minor deficiency (10 points) if: • Single/isolated instance of evidence of animal presence and/or animal activity. Major deficiency (5 points) if: • Numerous instances of evidence of animal presence and/or animal activity. Non-compliance (0 points) if: • Fundamental failure to prevent animal presence and/or animal activity in the audited area.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.03.07a	3.02.12a	Is there any evidence of animal fecal matter in the audited area? **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. Any evidence of human fecal matter in the growing area is an automatic failure (scored in 3.02.13).	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 3.02.13). 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 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 3.02.13.**
3.03.07b	3.02.13	Is the growing 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.**

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.03.08	3.03.07	No change in v3.2	All areas should be free of recurring/existing external pest activity. Evidence (e.g., activity/tracks, feces) of rodents, animals (e.g., dogs and/or birds) in active areas outside the facility is an indication of a pest pressure on the whole building. All possible measures should be taken to avoid attracting pests to the facility perimeter.	Non-compliance (0 points) if: • Evidence of significant (infestation level) rodent activity (burrows, trails, feces, tracks, animal spoor) • Significant bird activity in traffic zones. • More than one decomposed rodent or other animals (frogs, lizards, etc.) in external traps or along perimeter. • **Any observation of contaminated product or packaging contact qualifies as an automatic failure under 3.05.10.**
3.03.09	3.03.08	Are pest control devices located away from exposed raw materials (e.g., seeds, transplants, soil, media), finished goods and packaging, and poisonous bait stations are not used within the facility?	Pest control devices should be located away from exposed food products, packaging materials or equipment to prevent any physical or microbial contamination. Poisonous bait stations should not be located within the facility. No bait should be found outside of bait stations.	Total compliance (10 points): Pest control devices should be located away from exposed food products, packaging materials or equipment to prevent any physical or microbial contamination. Poisonous bait stations should not be located within the facility. Care should be taken to place pest control devices in such a manner that they do not pose a threat of contaminating product, packaging or raw materials. This includes the following restrictions: • Poisonous bait stations and other pesticides should only be used outside the facility. • There should be no domestic fly sprays used within the production and storage areas. • Block bait or soft, pouch-style bait as opposed to grain and pellet bait should be used (except for the external use of National Organic Program approved materials). • If used, insect light traps (ILTs), electrical fly killers (EFKs) or pheromone traps should be regularly cleaned out (kept free from a build-up of insects and debris). Sticky type ILTs should be monitored at least monthly and the sticky board replaced if ineffective. ILTs that use sticking as opposed to zapping methods (EFKs) are preferred. • If used, insect light traps or electric fly killers should not be placed above or in close proximity (10 feet, 3 meters) to product, food contact surfaces, equipment, or packaging material. Electric fly killers or insect light traps should not be located above dock doors (due to potential forklift damage) or in front of doorways (so attracting insects into the facility). Hallways or dock areas where product passes through are exempt from these distances, as long as product does not stop or is not stored in hallway or dock. • If used, insect light trap bulbs should be replaced at least every 12 months (this should be recorded), or as more frequently if directed by manufacturers. • No fly swatters should be evident in production or storage areas. • No bait should be found outside of bait stations. • If used, snap traps should be placed inside a trap box

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				and should not use allergen containing baits (e.g., peanut butter). Any snap traps inside stations should be checked at least weekly and checks recorded (scored in 3.03.09). • Any indoor use of chemicals e.g. knock down sprays should be done without contaminating food, packaging, and equipment (see the next bullet point regarding poisonous rodent baits). All applications should be recorded properly (scored in 3.03.09), detailing where and when the application occurred, and any special methods used to avoid contamination. All applications should be made by experienced, licensed operators following any and all legal requirements and best practices. • The use of poisonous bait within the facility should not occur. If this use is required, then the area that is being trapped should have all the product and packaging removed prior to the use of the poisonous baits. Non-compliance (0 points) if: • More than one instance of bait/poison inside the facility (inside of a trap). • Single instance of bait/poison inside the facility (outside of a trap). • More than one instance of bait/poison found outside of a trap, outside the facility. • More than one major deficiency. • Widespread use of snap traps outside of trap boxes. • **Any observation of contamination of product or product contact material (this qualifies for an automatic failure and applies under 3.05.10).**

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3.03.10	3.03.09	No change in v3.2	All pest control devices should be maintained clean, in working order and replaced when damaged so that they will accomplish their intended use. Date of inspections should be posted on the devices (unless barcode scanned), as well as kept on file.	Total compliance (5 points): All pest control devices should be maintained clean, in working condition and replaced when damaged in order to accomplish their intended use. Date of inspections should be posted on the devices (unless barcode scanned), as well as kept on file. For digital monitoring systems, auditors should review time-stamped digital monitoring records and periodic physical inspection records to ensure program is working as intended. The following criteria should be met: • If non-toxic glue boards are used, they should be located inside a trap box or PVC piping, etc., and changed frequently ensuring that the surface has a shiny glaze with no build-up of dust or debris. • If cardboard traps are used (interior and dry areas only) they should be in good repair and marked as monitored (see below). • If mechanical wind-up traps are used, they should be wound. Winding is checked by triggering the spring device to operate the trap. The trap should be rewound after testing. • Approximately 10% of the traps, glue boards and bait stations should be checked by the auditor. • Record of service verification such as stickers, cards or bar codes should be on the inside of the station and on bottom of glue boards requiring the station to be opened to record data (date and initial of inspector) or to scan. External labeling is allowed on traps with a clear window on top. • Bait and other poisons should be controlled and applied by a licensed applicator (see 5.12.01). • Bait in bait stations should be secured inside the bait station on a rod above the floor of the station, or the bait station is designed so bait cannot be removed by a rodent or “float away” in a heavy rain. Bait stations should be tamper resistant. A key should be made available at the time of the audit. • No bait stations should be missing entire bait. • No old or moldy bait observed. • Bait stations and traps should not be fouled with weeds, dirt, and other debris. • External pest control devices should be checked at least monthly – these checks to be recorded. • Internal multiple-catch devices should be checked at least weekly – these checks to be recorded. • Any snap traps used should be inside stations and should be checked at least weekly – these checks to be recorded.

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3.03.11	3.03.10	No change in v3.2	The distance between devices should be determined based on the activity and the needs of the operation. As a reference, the following guidelines can be used to locate devices. Inside pest control: mechanical traps every 20-40 ft (6-12 m). Outside building perimeter: mechanical traps and/or bait stations every 50-100 ft (15-30 m). Interior and exterior devices should be placed on both sides of doorways. Land Perimeter (if used): within 50 ft (30 m) or buildings and at 50-100 ft (15-30 m).	Total compliance (5 points): The distance between devices should be determined based on the activity and the needs of the operation. As a guide (i.e. not expecting the use of tape measures) to number and placement of traps and bait stations: • Multiple catch traps or glue boards in stations or PVC pipes should be positioned between 20 to 40 feet (6 to 12 meters) intervals around the inside perimeter of all rooms. Spacing might be affected by the structure, storage and types activities occurring. • Multiple-catch traps may be supplemented with snap traps in stations if necessary in certain areas (e.g., in areas with high dust levels (e.g., potatoes, onions)) or box mezzanines where large traps or glue boards are not practical. • Inside the facility, traps should be placed within 6 feet (about 2 meters) of both sides of all outside exit/entry doors. This includes either side of the pedestrian doors. Effort should be made to avoid placing traps on curbing. • Bait stations or multiple-catch traps should be positioned between 50-100 feet (15-30 meters) intervals around the exterior of the building perimeter and within 6 feet (about 2 meters) of both sides of all outside exit/entry doors, except where there is public access (public access is defined as access easily gained by the general public such as parking lots or sidewalks, school areas or areas of environmental concern). Device placement might be affected by the structure, external storage and type of area (urban, rural etc.). • Bait stations (where used) should be positioned within 100 feet (30 m) of structures. This may impact fence line/property boundary baiting i.e. bait stations must be within 100 feet (30 m) of buildings and at 50-100 feet (15-30 m) intervals. If an exterior fence line/property perimeter program is utilized at distances greater than 100 feet (30 m) from buildings, then non-bait traps (e.g. multiple catch traps) should be positioned at 50-100 feet (15-30 m) intervals along perimeter. Auditor should check label for bait and ensure compliance to distance requirements on label. • Outside packaging and any outside food storage should be protected by an adequate number of pest control devices. https://www.epa.gov/rodenticides/restrictions-rodenticide-products#types http://npmapestworld.org/default/assets/File/2016%20Pest%20Management%20Standards%20for%20Food%20Processing-Electronic.pdf Minor deficiency (3 points) if: • Single/isolated instance(s) of devices positioned at longer intervals than mentioned above. • Single/isolated instance(s) of devices missing or not within 6 feet (about 2 meters) of exit/entry doors. • No bait stations along facility property fence line (auditor discretion on necessity for fence line trapping). • Devices not located in a single area that should be covered e.g. break area, etc.

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				Major deficiency (1 point) if: • Numerous instances of devices positioned at longer intervals than mentioned above. • Numerous instances of devices missing or not within 6 feet (about 2 meters) of exit/entry doors. • Devices not located in more than one area that should be trapped e.g. building perimeters (see text above). • No exterior devices. Non-compliance (0 points) if: • Device positioning is such that the number of devices is nowhere near adequate in terms of spacing and coverage of entry points, e.g. one or two traps to cover a large production area. • Devices not located in numerous areas that should be covered.
3.03.12	3.03.11	No change in v3.2	All devices should be clearly identified (e.g. numbered) to facilitate monitoring and maintenance. All internal rodent devices should be located with signs (that state the trap number and also that they are pest control device identifier signs).	Total compliance (5 points): The devices are numbered, and a coding system is in place to identify the type of device on a map. Auditor should check that the trap map numbering and trap positions, match reality. All internal rodent devices, should be located with a wall sign (that states the device number and that it is a pest control device identifier), in case they are moved.
3.03.13	3.03.12	Are all pest control devices effective and bait stations secured?	All devices should be correctly orientated with openings parallel with and closest to walls. Bait stations should be locked and tamper resistant in some way (e.g., locks, screws, etc.). Bait stations should be secured to prevent removal.	Total compliance (5 points): All devices should be correctly orientated with openings parallel with and closest to wall. Bait stations should be secured to minimize movement of the device and be tamper resistant. Bait stations should be secured with a ground rod, chain, cable or wire, or glued to the wall/ground, or secured with a patio stone to prevent the bait from being removed by shaking, washed away, etc. Bait stations should be tamper resistant through the use of screws, latches, locks, or by other effective means. Note – only devices containing bait are required to be secured. Live traps used indoors are not required to be secured to the ground; auditee may use metal “sleeves” or similar solutions to prevent displacement, crushing by forklifts, etc. Glue boards should be inside a device (e.g. trap box, PVC pipe, etc.) rather than loose on the floor. Auditor discretion applies to traps placed on curbing. Minor deficiency (3 points) if: • Single/isolated instance(s) of bait stations not being secured. • Single/isolated instance(s) of devices “out of position” or incorrectly orientated. • Lacking wall signs for external traps that are secured to a patio block. Major deficiency (1 point) if: • Numerous instances of bait stations not being secured. • Numerous instances of devices “out of position” or incorrectly orientated.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.04.01		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 usage logs and/or inventories. • Single/isolated instance(s) of omission(s) or error(s) in the chemical usage logs and/or inventories. • Single/isolated instance(s) of new deliveries not being accounted for. • Single/isolated instance(s) of minimum inventory frequency not being maintained (if usage logs are not being utilized). Major deficiency (1 point) if: • Numerous instances of missing chemical usage logs/inventories. • Numerous instances of omissions or errors in the chemical usage logs and/or inventories. • Numerous instances of new deliveries not being accounted for. • Numerous instances of minimum inventory frequency not being maintained (if usage logs are not being utilized). Non-compliance (0 points) if: • No chemical usage logs/inventories are on file. • Chemical inventory is not available for review.
3.04.02		Question removed		

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.04.03	3.04.02	No change in v3.2	Chemicals are stored in a designated (with a sign), secure (locked) area, away from fertilizers and pesticides, food and packaging materials and separated from the growing 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. Empty pesticide containers should be kept in a secured storage area until they can be recycled or disposed of properly.	Total compliance (15 points): 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 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
3.04.04	3.04.03	Are "food grade" and "non-food grade" chemicals used appropriately, according to the label and not commingled?	All chemicals applied should be approved by the prevailing authority for their designated use and used according to label instructions. Only food grade lubricants should be used anywhere near product and packaging materials. "Food grade" and "non-food grade" materials should be stored in separate designated areas and adequately labeled. Grease guns and containers should be labeled adequately. Access to non-food grade materials should be limited to those with knowledge of the correct use of chemicals.	Total compliance (10 points): Food grade chemicals, including lubricants, greases, etc., are used in all product/packaging contact areas. All chemicals applied should be approved by the prevailing authority (e.g., US: EPA/FDA, Canada: CFIA/Environment Canada, Chile: SAG/Ministerio de Salud, Mexico: COFEPRIS) for their designated use and used according to label instructions. Only food grade lubricants should be used anywhere near product and packaging materials. Food grade chemicals should be stored apart from non-food grade items to eliminate confusion between types, and adequately labeled. Non-food grade chemicals also include cleaning chemicals and paint, for example use of domestic polishes which are not intended for food contact surfaces and have strong fragrances should not be used on food contact surfaces; office cleaning materials, restroom cleaning material should be stored separately from production cleaning materials. Grease guns and containers should indicate which are for food grade greases and which are for non-food grade use. Non-food grade material use, where required should not be used in food contact areas and be limited to workers who know how to use the chemicals to avoid contamination issues. Non-food grade materials should not be found in the growing/storage areas (unless stored securely, with access to entrusted workers only). Chemicals should be used according to label instructions e.g. following correct dilutions, H1 designation on lubricants, etc. Any chlorine bleach that is used for making a sanitizing solution, must be of sufficient purity to be categorized as a “food grade” substance. Some commercially available household chlorine bleaches contain fragrances, thickeners and/or other additives not approved for food use. These products are not suitable for making sanitizing solutions. If any chemicals are used to alter or buffer the pH of a sanitizing solution these should also be “food grade.” Non-compliance (0 points) if: • No attempt to split non-food grade from food grade materials. • Widespread use of non-food grade materials found/used in the production/storage areas. • Widespread use of a chemical(s) used contrary to label. • **Evidence of the use of a non-food grade that has caused product contamination – revert to 3.05.10, automatic failure.**

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.04.05	3.04.04	No change in v3.2	The strength (concentration, pH, etc.) of anti-microbial chemicals should be checked on a regular basis and recorded. All test solutions/strips should be within date code, appropriate for the concentrations used and stored correctly.	Total compliance (15 points): The strength of anti-microbial chemicals (product and cleaning) 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 disinfectant supplier). Water samples should be taken from, and/or probes located in, areas farthest from the antimicrobial injection/addition site. Any water treatment at source (e.g. well, canal) should be monitored. Solutions that are too weak will be ineffective, while those too strong may be harmful to workers or product. Where necessary, pH of solutions should also be checked. Methods include, dip sticks, test strip papers, conductivity meters, titration, color comparison methods e.g. tintometers, etc. All test solutions/strips should be within date code, appropriate for the concentrations used and stored correctly (especially light and temperature sensitive materials). The auditor should have the auditee check the strength of anti-microbial chemicals while touring the operation.
3.05.01		No change in v3.2	No change in v3.2	Total compliance (10 points): The company should have a master sanitation program that covers all the growing areas, storage areas, break areas, restrooms, maintenance, and waste areas. The master sanitation program should reflect the type of indoor growing operation. (i.e. mushroom production, hydroponic, aeroponic, vertical growing). Within these locations, areas such as walls, floors, light covers, overhead pipes, etc. should be included. List should also include equipment (food contact and non-food contact), pallet jacks, forklifts, carts, floor scrubbers, trash cans, cooling equipment (evaporators, cooling coils, drip pans, etc., in-house delivery trucks, etc.). In-house delivery and shuttle trucks should be included in sanitation schedules, have SSOPs and cleaning records. The master sanitation schedule should include a detailed list of areas and equipment to be cleaned as well as the frequency. Infrequent schedules i.e. weekly and above, are usually created for several reasons e.g. cleaning areas and equipment that are not cleaned daily, using a different cleaning technique/chemical than what is used on a daily schedule and/or doing a more “in depth” clean on equipment. Note that all cleaning mentioned on the schedule should be covered somewhere in the cleaning procedures and also on the sanitation logs. Schedule should be kept on file in an easily retrievable manner. Master sanitation schedule should include what is to be cleaned and when, i.e.: • List of areas, equipment, internal transport vehicles, in-house delivery trucks, etc. • Frequency of cleaning (daily, weekly, monthly, quarterly, annually, etc.)

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.05.04		Where used, are there records showing filters in air conditioning, evaporative coolers, ventilation and air filtration units are regularly cleaned and replaced?	No change in v3.2	Total compliance (5 points). Records should be made available to verify that filters in air conditioning, ventilation and air filtration units are regularly cleaned and replaced. Records might include in-house sanitation records, maintenance records and/or contractor records/invoices. Non-applicable if air conditioning, evaporative coolers, ventilation and air filtration units are not used in the operation.
3.05.05		Where used, are there records showing cooling units are maintenance serviced and cleaned at least every 12 months or more frequently as required?	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.05.06		No change in v3.2	All fan guards (cooling units and general ventilation) in the facility are clean. There is no build-up of dust or other materials on the fan guards. Other blowing equipment (e.g. swamp cooler) are kept clean and properly maintained.	Total compliance (5 points): All fan guards (cooling units and general ventilation) in the facility are clean. There is no build-up of dust or other materials on the fan guards. Other blowing equipment (e.g. swamp cooler) are kept clean and properly maintained. Non-applicable if fans or blowing equipment are not used in the operation. Minor deficiency (3 points) if • Single/isolated instance(s) of unclean fans/blowing equipment and/or evidence of potential contamination to product or packaging. Major deficiency (1 point) if: • Numerous instances of unclean fans/blowing equipment and/or evidence of potential contamination to product or packaging. Non-compliance (0 points) if: • Fundamental failure to maintain clean fan guards and evidence of potential contamination to product or packaging. **• There is a single gross incidence of evidence of unacceptable limits of spoilage or adulteration in raw materials, finished goods, or packaging. In this case the score reverts back to 3.05.10.**

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.05.07		No change in v3.2	There should be a documented site glass management procedure including company glass and brittle plastic policy, glass and brittle plastic breakage procedure and glass register if necessary (a no glass policy in growing, storage or maintenance areas policy should be the target). If certain glass and brittle plastic items are allowed, a glass register should describe each item, location and quantity; items should be checked on a routine basis. Clean-up procedure after glass and brittle plastic breakage should indicate what equipment to use and include boot and tool checks/decontamination procedures to ensure broken glass or brittle plastic is not unintentionally transported out of the area.	Total compliance (10 points). There should be a written glass and brittle plastic policy and procedure, which should state: • Where glass and brittle plastic areis prohibited and where glass and brittle plastic areis allowed. • Policy should state how workers should report missing or broken spectacles or contact lenses and to whom they report the issue. • If certain glass and brittle plastic items are allowed, then a glass register should exist describing each item, location and quantity. The glass register should only list items that could not be replaced with a less dangerous material. The glass register should not be abused by allowing glass items on site that are usually viewed as poor GMP e.g. allowing glass drinking bottles into production areas, unprotected glass light bulbs. Glass register items should be checked on a routine basis (at least monthly) to ensure they are not damaged/cracked etc. Checks should be documented. • Glass breakage procedure including requiring recording what happened, recording what happens to potentially affected product, recording future preventative actions and especially where to record the incident details e.g. in the NUOCA log. • Clean-up procedure after glass or brittle plastic breakage should indicate what equipment to use and include boot and tool checks/decontamination procedures to ensure broken glass or brittle plastic is not unintentionally transported out of the area. • A no glass policy in production, storage or maintenance areas should be the target. Minor deficiency (7 points) if: • Policy lacks an element listed above. • Single/isolated instance(s) where glass or brittle plastic breakage details have not been recorded properly. • Single/isolated instance(s) of glass register items not being checked on a routine basis. Major deficiency (3 points) if: • Policy lacks more than one element noted above. • Numerous instances where glass or brittle plastic breakage details are not being recorded properly • Numerous instances of glass register items not being checked on a routine basis. Non-compliance (0 points) if: • No policy exists • There has been a glass or brittle plastic breakage, but no records exist. • SystematicFundamental failures to check glass register items on a routine basis.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.05.08		Are any potential foreign material issues (e.g., metal, glass, plastic) controlled?	There should be no foreign material issues that are or could be potential risks to the product. Examples include, but are not limited to, glass bottles, unprotected lights on equipment, staples on wooden crates, hair pins, using “snappable” blades instead of one piece blades, broken and brittle plastic issues on re-useable totes.	Total compliance (10 points): No metal, glass or plastic issues noted (excluding issues noted under specific questions already noted within this audit). This question is designed to allow the auditor to underline potential foreign material contaminants to the auditee that are not covered by other more specific questions within the audit. Examples include: pins in sign boards within the facility, using “snappable” blades instead of one-piece blades, noting broken and brittle plastic issues on re-useable totes and finding uncontrolled glass items like coffee pots, computer screens, clock faces, eye glasses, office window glass, brittle plastic from any source, staples, etc. in production areas. Plastic coated shatterproof light bulbs are also acceptable without further protection. Auditors should take precaution not to bring glass items into the facility during inspections. If a glass or brittle plastic item cannot be replaced immediately or glass is necessary, e.g. a high-pressure gauge, then use of a glass register might be considered, see question in 3.05.07. Minor deficiency (7 points) if: • Single/isolated instance(s) of potential foreign material contaminants observed. • Single/isolated instance(s) of glass or brittle plastic item noted in the production/storage areas, but is not accounted for on the glass register. Major deficiency (3 points) if: • Numerous instances of potential foreign material contaminants observed. • Numerous glass or brittle plastic items noted in the production/storage areas, but are not accounted for on the glass register. • Single instance of a broken glass item found within the facility. Non-compliance (0 points) if: • Widespread failure to control potential foreign objects on site. • More than one instance of a broken glass or brittle plastic item found within the facility. • Any incident of direct product contamination with a foreign material like glass, metal or plastic constitutes a health hazard and is viewed as adulteration. Revert to Q 3.05.10.
3.05.10		Question removed		
3.05.11	3.05.10	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
3.05.12	3.05.11	Are materials (commodities, packaging, inputs, etc.) properly marked with codes (receipt dates, manufacture dates, etc.)?	No change in v3.2	Minor deficiency (3 points) if: • Single/isolated instance(s) of missing receipt dates and/or tracking information on commodities, packaging, inputs, etc. • Packaging missing receipt dates and/or tracking information. Major deficiency (1 point) if: • Numerous instances of missing receipt dates and/or tracking information on commodities, packaging, inputs, etc. Non-compliance (0 points) if: • There are no receipt dates and/or tracking information on commodities, packaging, inputs, etc.
3.05.13	3.05.12	Are materials (commodities, packaging, etc.) rotated using FIFO policy?	No change in v3.2	No change in v3.2
3.05.14	3.05.13	No change in v3.2	No change in v3.2	No change in v3.2
3.05.15	3.05.15	No change in v3.2	No change in v3.2	Non-compliance (0 points) if: • No protective devices have been installed to eliminate potential contamination. • **Any observation of direct contamination of raw materials, work in progress, finished product, or packaging materials. In this case the score reverts back to 3.05.10.**
3.05.16	3.05.14	Is there proper storage and adequate separation of raw materials (e.g. seeds, transplants, soil, media), products and packaging?	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.05.17	3.05.16	No change in v3.2	No change in v3.2	Total compliance (10 points): All areas should be maintained in a clean and sanitary state. Auditors should check the ceilings, lights, corners, against walls and alongside equipment (look up, look down, look all around). Inside light covers should be clean, free of algae, insects and excessive dirt. This question is designed to capture any hygiene issues that are not covered by specific issues noted in other questions. Auditors should carefully note which areas are dirty when down scoring in this question.
3.05.18	3.05.17	No change in v3.2	No change in v3.2	No change in v3.2
3.05.19	3.05.18	No change in v3.2	No change in v3.2	Total compliance (5 points): All re-usable containers should be able to be cleaned or used with a clean liner to protect against contamination. Cleaning type and frequency should be determined based on the products and processes involved. Bins, boxes, hoppers, barrels, baskets, etc. used for the storage of raw materials (e.g., seeds, transplants, soil, media), finished goods or packaging should be kept in a clean state. The storage of these items should ensure that they remain clean and uncontaminated (e.g., covered clean). In-house re-usable containers should be labeled or color-coded (visually or in the language understood by the workers) so that their designated purpose can be easily identified. Returnable plastic containers (RPCs) (e.g., CHEP, IFCO) should be treated like single service containers and only used for product (score in 3.05.17). If the trash container is the only re-used container on site and is a specific and unique design, so that it cannot be mistaken for another use, then it should not be down scored. Non-applicable if re-usable containers are not used in the operation.
3.05.20	3.05.19	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
3.05.21	3.05.20	Are floor drains covered, do they appear clean, free from odors, in good repair, and flow in a manner that prevents contamination (e.g., from high to low risk areas, from high risk directly to drain system)?	No change in v3.2	Total compliance (5 points): • All facility floor drains, including covers and internal channels are clean, and free of decayed/old material. • Drains flow from high to low risk areas, from high risk directly to drain system. • All facility floor drains are free of odors. • There is no overflow or excessive standing water in the floor drains. • Drains should have smooth walls and bases that allow free flow of water without catching debris, and also aid in the cleaning of the drains. • Water from refrigeration drip pans is drained and disposed of away from product and product contact surfaces.
3.05.22	3.05.21	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
3.06.01		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 regarding internal audit program requirements. 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 growing area. 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. • Fundamental 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
3.07.01		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, 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 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 and 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 (3.01.03) 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 or not signing a document stating that they will comply with the operation's food safety hygiene program. Major Deficiency (5 points) if: • Numerous instances of logs having errors or incomplete information e.g. missing one of the 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

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
				operation runs for more than 3 months of the year. • Numerous cases of workers not signing a document stating that they will comply with the operations' food safety hygiene program. • 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.
3.07.02		No change in v3.2	Sanitation training should ensure that the workers understand the importance of proper sanitation, cleaning efficacy, how to use the cleaning chemicals and how to understand Sanitation Standard Operating Procedures. Unless sanitation workers attend regular food safety trainings, sanitation training should also include elements of food safety training pertinent to sanitation operations (e.g., hand washing, restroom use, foreign material, etc.). Training logs should have a clearly defined topic(s) covered, trainer(s) material(s) used/given and who attended the training (name and signature).	Total compliance (5 points): Sanitation training should ensure that the workers understand the importance of proper sanitation, cleaning efficacy, how to use the cleaning chemicals and how to understand Sanitation Standard Operating Procedures. Unless sanitation workers attend regular food safety trainings, sanitation training should also include elements of food safety training pertinent to sanitation operations (e.g., hand washing, restroom use, foreign material, etc.). Training logs should have a clearly defined topic(s) covered, trainer(s) and material(s) used/given and who attended the training (name and signature). Training would also ideally include worker safety issues (e.g., use of personal protective equipment, accident prevention, what to do in case of an accident, procedures for avoiding electrical hazards when cleaning, etc.). Recorded training should occur at least on a 12-month basis.
3.07.03		No change in v3.2	No change in v3.2	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.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.07.04		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
3.08.01		Are toilet facilities adequate in number and location? A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.	Toilet facilities should be available to all workers and visitors, while work is actively occurring. At least one toilet per 20 workers should be provided, or if more stringent, as per prevailing national/local guidelines. Toilet facility placement should be within 1/4 mile or 5 minutes walking distance of where workers are located, or if more stringent, as per prevailing national/local guidelines. A 5 minute drive is not acceptable while work is actively occurring with groups of three or more workers. Where there are two or less workers present (e.g., spray activities, irrigation check) and workers have transportation that is immediately available to toilets within a 5 minute drive, it is acceptable to score as total compliance. Automatic failure if there are insufficient or inadequate toilet facilities. **A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.**	Total compliance (15 points): • Toilet facilities should be available to all workers and visitors, while work is actively occurring. • At least one toilet per 20 workers should be provided, or if more stringent, as per prevailing national/ local guidelines. Toilet facility placement should be within ¼ mile or 5 minutes walking distance of where workers are located, or if more stringent, as per prevailing national/ local guidelines. A 5 minute drive is not acceptable, while farm work is actively occurring with groups of three or more workers. Where there are two or less workers present (e.g., spray activities, irrigation check) and workers have transportation that is immediately available to toilets within a 5 minute drive, it is acceptable to score as total compliance. Doors should not open directly into areas where food is exposed to airborne contamination, i.e. storage and growing areas. Use of double doors or having a positive airflow system is accepted. Minor deficiency (10 points) if: • The toilet facilities are not within ¼ mile or 5 minutes walking distance for crews of three or more. • The toilet facilities are not within a 5 minute driving distance for crews of two or less. • Operation has door(s) opening into the production areas, i.e. not located in the amenity area or office area and are self-closing (e.g., use a spring-loaded door). Major deficiency (5 points) if: • The operation is not meeting the 1 toilet per 20 workers criteria. • Operation has door(s) opening into the production areas, i.e. not located in the amenity area or office area and are not self-closing (e.g., use a spring-loaded door). **Automatic failure (0 points) if:** **• There are insufficient or inadequate toilet facilities.**
	3.08.01a new question	Are toilet facilities in a suitable location to prevent contamination to product, packaging, equipment, and growing areas?	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.	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. Minor deficiency (10 points) if: • Option for minor down score exists but at present, no known good examples exist. Major deficiency (5 points) if: • Toilet facilities pose a potential risk to product, packaging and equipment areas. Non-compliance (0 points) if: • Toilet facilities are located too close to the growing area or water source.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	3.08.01b new question	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. Minor deficiency (3 points) if: • Single observation of one of the waste holding tank(s) not designed or maintained improperly. • Single observation of 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.
	3.08.01c new question	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, parrtitions and doors should be made of a finish that can easily be cleaned.	Toilet facilities should be constructed of non-porous materials that are easy to clean and sanitize. The floors, walls, ceiling, parrtitions and doors should be made of a finish that can easily be 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: • Toilets are not constructed of non-porous materials.
	3.08.01d new question	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. Minor Deficiency (2 points) if: • Single/isolated instance of toilets not being constructed of light materials. Major Deficiency (1 point) if: • Numerous instances of toilets not being constructed of light materials. Non- compliance (0 points) if: • Toilets are not constructed of light materials.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	3.08.01e new question	Are toilets 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)?	Toilet paper should be provided in a suitable holder in each toilet facility. Toilet paper should be maintained properly (e.g., toilet paper rolls are not stored on the floor or in the urinals).	Total compliance (5 points): Toilet paper should be provided in a suitable holder in each toilet facility. Toilet paper should be maintained properly (e.g., toilet paper rolls are not stored on the floor, sink or in the urinals). Minor Deficiency (3 points) if: • Single/isolated instance of toilet paper rolls not being maintained properly (e.g., stored on the floor, sink or in the urinals). Major Deficiency (1 point) if: • Numerous instances of toilet paper rolls not being maintained properly (e.g., stored on the floor, sink or in the urinals). • One of the toilet facilities is out of toilet paper and has not been restocked. Non- compliance (0 points) if: • There was no toilet paper available at the time of the audit.
	3.08.01f new question	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 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. Minor Deficiency (3 points) if: • Single/isolated instance(s) of incomplete or missing details in the procedure. Major Deficiency (1 point) if: • Numerous instances of incomplete or missing details in the procedure. Non-compliance (0 points) if: • There is no documented procedure.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.08.01a	3.08.01g	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.
3.08.02		No change in v3.2	Bathrooms and lunchroom(s) 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.
3.08.03a		Are hand washing stations in working order (no leaks, free of clogged drains, etc.) and restricted to hand washing purposes only?	Hand washing stations should be used only for hand washing and be maintained in good working order with proper drainage or designed to capture rinse water.	No change in v3.2
	3.08.03b New Question	Are hand wash stations clearly visible (e.g., situated outside the toilet facility) and easily accessible to workers?	Hand wash stations should be clearly visible (i.e. situated outside the toilet facility) in order to verify hand washing activities, and easily accessible to workers.	Total compliance (5 points): Hand wash stations should be clearly visible (i.e. situated outside the toilet facility) in order to verify hand washing activities, and easily accessible to workers. Minor Deficiency (3 points) if: • Single/isolated instance of a hand wash station located inside a toilet facility. Major Deficiency (1 point) if: • Numerous instances of hand wash stations located inside the toilet facilities. Non- compliance (0 points) if: • All hand wash stations are located inside the toilet facilities.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	3.08.03c New Question	Are hand wash stations adequately stocked with unscented soap and paper towels?	All hand washing facilities should be properly stocked with liquid non-perfumed, neutral or antiseptic soap. Single use paper towels should be used and units properly located. There should be an adequate stock of soap and paper towels.	Total compliance (5 points): All hand washing facilities should be properly stocked with liquid unscented/non-perfumed, neutral or antiseptic soap. Single use paper towels should be used and units properly located. There should be an adequate stock of soap and paper towels. Minor Deficiency (3 points) if: • Single/isolated instance of a hand wash station out of soap and/or paper towels. Major Deficiency (1 point) if: • Numerous instances of hand wash stations out of soap and/or paper towels. Non- compliance (0 points) if: • There is no soap and/or paper towels available to workers.
	3.08.04 New Question	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://safewater.zendesk.com/hc/en-us/sections/202366208-Total-Coliforms 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: • Numerous instances 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
	3.08.04a New Question	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.
	3.08.04b New Question	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.
	3.08.04c New Question	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.
3.08.04	3.08.05	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
3.08.05	3.08.06	No change in v3.2	No change in v3.2	Total compliance (5 points): Secondary hand sanitation is required for items that may be “ready-to-eat” (e.g., herbs, stone fruit, tomatoes, citrus, edible flowers, etc.). Secondary hand sanitation (hand dips, gels or sprays) does not replace hand washing requirements (lack surfactant qualities). Secondary hand sanitation stations should be unscented/non-perfumed, have 60% to 95% ethanol or isopropanol (benzalkonium chloride is also acceptable) and conveniently located in traffic zones but should not be obstructive. Hand dips (if used) should contain a USDA approved food grade sanitizer at a determined concentration. Refer to hand sanitizer manufacturer label for dilutions. Hand dips should be regularly monitored (recorded anti-microbial strength checks) to ensure their effectiveness with corrective actions recorded (e.g. dip solution replenishment and anti-microbial additions). Hand gel and spray stations should be well stocked with a sanitizer approved for direct hand to food contact and regularly monitored (recorded checks) to ensure availability with corrective actions recorded (e.g. pack replenishment); use of a refill alert type dispenser is ideal practice. The auditor should check that gel pack type stations are stocked and have the auditee check the strength of anti-microbial chemicals in hand dips while touring the facility.
3.08.06	3.08.07	No change in v3.2	No change in v3.2	No change in v3.2
3.08.07	3.08.08	No change in v3.2	No change in v3.2	No change in v3.2
3.08.08	3.08.09	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 3.05.10 and score an automatic failure**.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.08.09	3.08.10	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
3.08.10	3.08.11	No change in v3.2	No change in v3.2	No change in v3.2
3.08.10a	3.08.11a	no change in v3.2	no change in v3.2	No change in v3.2
3.08.10b	3.08.11b	no change in v3.2	No change in v3.2	No change in v3.2
3.08.11	3.08.12	Are worker personal items being stored appropriately (i.e. not in the growing areas(s) or material storage areas)?	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 stored growing area(s) and material storage area(s) to prevent contamination and avoid food defense risks. Lockers or cubbies are ideal if maintained properly, mounted off the floor and with sloping tops and located outside growing and storage areas. Wire, see-through lockers are ideal.
3.08.12	3.08.13	no change in v3.2	No change in v3.2	no change in v3.2
3.08.13	3.08.14	no change in v3.2	no change in v3.2	no change in v3.2
3.08.13a	3.08.14a	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.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	3.08.16 New Question	Are there adequate trash cans placed in suitable locations?	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 toilets.	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. Minor deficiency (3 points) if: • Single/isolated instance of containers not being maintained. Major deficiency (1 point) if: • Numerous instances of containers not being maintained. Non-compliance (0 points) if: • Widespread failure to maintain containers to protect against potential contamination of the crop.
3.09.01		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.
3.09.01a		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
3.09.01b		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 3.05.10**
3.09.01d	3.09.01c	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
3.09.01e	3.09.01d	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
3.09.01f	3.09.01e	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.
3.09.02a		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
3.09.02b		No change in v3.2	No change in v3.2	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 3.05.10
3.09.02d	3.09.02c	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). 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
3.09.02e	3.09.02d	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
3.09.02f	3.09.02e	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 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.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.09.03		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
3.09.03a		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
3.09.03b		No change in v3.2	No change in v3.2	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 3.05.10
3.09.03d	3.09.03c	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). 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
3.09.03f	3.09.03d	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 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.
3.09.04		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
3.09.04a		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
3.09.04b		No change in v3.2	No change in v3.2	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 3.05.10
3.09.04d	3.09.04c	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). 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
3.09.04e	3.09.04d	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
3.09.04f	3.09.04e	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 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.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.09.05		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
3.09.05a		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
3.09.05b		No change in v3.2	No change in v3.2	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 3.05.10.
3.09.05c		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). 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
3.09.06		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
3.09.06a		No change in v3.2	No change in v3.2	Removed "Only fertilizer approved for that specific crop should be used."
3.09.06c		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). 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.
3.10.01		Is municipal/district water used in the operation?	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.10.01a		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.
3.10.01b		no change in v3.2	There should be documented procedures in place detailing how water samples are taken in the growing area, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.	There should be documented procedures in place detailing how water samples are taken in the growing area, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution
3.10.01c		No change in v3.2	No change in v3.2	Non-compliance (0 points) if: • There 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
3.10.01e		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, 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.	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/isolate 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.
3.10.01f		Are there records for periodic visual inspection of the water source with corrective actions (where necessary)?	"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
3.10.02a		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.
3.10.02b		no change in v3.2	There should be documented procedures in place detailing how water samples are taken in the growing area, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.	Total compliance (10 points): There should be documented procedures in place detailing how water samples are taken in the growing area, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.
3.10.02c		No change in v3.2	No change in v3.2	Non-compliance (0 points) if: • There 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
3.10.02e		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, 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.	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/isolate 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.
3.10.02f		Are there records for periodic visual inspection of the water source with corrective actions (where necessary)?	"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
3.10.03a		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.
3.10.03b		no change in v3.2	There should be documented procedures in place detailing how water samples are taken in the growing area, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.	Total compliance (10 points): There should be documented procedures in place detailing how water samples are taken in the growing area, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.
3.10.03c		No change in v3.2	No change in v3.2	Non-compliance (0 points) if: • There 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
3.10.03e		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, 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.	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/isolate 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.
3.10.03f		Are there records for periodic visual inspection of the water source with corrective actions (where necessary)?	"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
3.10.04a		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.
3.10.04b		no change in v3.2	There should be documented procedures in place detailing how water samples are taken in the growing area, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.	Total compliance (10 points): There should be documented procedures in place detailing how water samples are taken in the growing area, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.
3.10.04c		No change in v3.2	No change in v3.2	Non-compliance (0 points) if: • There 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
3.10.04e		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, 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.	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/isolate 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.
3.10.04f		Are there records for periodic visual inspection of the water source with corrective actions (where necessary)?	"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
3.10.05		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.
3.10.05a		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.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.10.05b		no change in v3.2	There should be documented procedures in place detailing how water samples are taken in the growing area, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.	Total compliance (10 points): There should be documented procedures in place detailing how water samples are taken in the growing area, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.
3.10.05c		No change in v3.2	No change in v3.2	Non-compliance (0 points) if: • There 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.
3.10.05e		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, 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.	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/isolate 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.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.10.05f		Are there records for periodic visual inspection of the water source with corrective actions (where necessary)?	"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.
3.10.06a		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.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.10.06b		no change in v3.2	There should be documented procedures in place detailing how water samples are taken in the growing area, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.	Total compliance (10 points): There should be documented procedures in place detailing how water samples are taken in the growing area, including stating how samples should be identified i.e. clearly naming the location that the sample was taken, the water source and the date (this is important in order to be able to calculate geometric means). Samples should be taken at a point as close to the point of use as possible where water contacts the crop, so as to test both the water source and the water distribution system.
3.10.06c		No change in v3.2	No change in v3.2	Non-compliance (0 points) if: • There 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.
3.10.06e		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, 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.	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/isolate 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.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.10.06f		Are there records for periodic visual inspection of the water source with corrective actions (where necessary)?	"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.
3.10.07		Question removed		
3.10.08	3.10.07	No change in v3.2	No change in v3.2	
3.10.09	3.10.08	No change in v3.2	No change in v3.2	

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
3.11.01	3.11.01	Are there up-to-date records of all pesticides applied during the growth cycle (including soil and substrate pre-plant treatments)? **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 information (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
3.11.02	3.11.02	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 3.11.05) 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 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 3.11.05) 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
3.11.03	3.11.03	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.
3.11.04	3.11.04	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
3.11.05	3.11.05	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.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).	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
3.11.06	3.11.06	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 major 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
3.11.07	3.11.07	Is there a documented procedure for the pesticide applications, considering mixing and loading, applying, and equipment cleaning?	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.
3.11.10	3.11.08	Is there documentation that shows the individual(s) making decisions for pesticide applications is competent?	No change in v3.2	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
3.11.11	3.11.09	No change in v3.2	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