



2018

An internationally recognized Global Food Safety Initiative (GFSI) food safety audit scheme

QUESTIONS & EXPECTATIONS

PrimusGFS v3.0

MODULE 3

INDOOR AGRICULTURE

Good Agricultural Practices Requirements



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Questions & Expectations

MODULE 3: INDOOR AGRICULTURE

(Sections 3.01 to 3.11)

GOOD AGRICULTURAL PRACTICES REQUIREMENTS

This Module should be completed for each one of the **indoor agriculture** operations in the scope of the organization's application.

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GENERAL			
Question No.	Question	Total Points	Expectation
3.01.01	Is there a designated person responsible for the operation's food safety program?	10	There should be a designated person/persons responsible for the operation's food safety program that has been trained accordingly (including to all state and federal requirements).
3.01.02	If the operation is growing under organic principles, is there written documentation of current certification by an accredited organic certification organization?	0	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.
3.01.03 (New Question)	Does the operation have a written food safety hygiene and health policy covering at least worker and visitor hygiene and health, infants and toddlers, animal presence in growing and storage areas, fecal matter, dropped product, blood and bodily fluids?	15	There should be written food safety policy rules regarding worker and visitor personal hygiene/GAPs/GMPs and health requirements. 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.

SITE			
3.02.01	Is there a map that accurately shows all aspects of the operation, including water sources and fixtures used to deliver water used in the operation?	5	There is a map or similar document (photograph, drawing) that accurately shows the growing area(s), 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.
3.02.02	Are growing areas adequately identified or coded to enable trace back and trace forward in the event of a recall?	15	Coding details (e.g. location name or reference code, blocks of the growing area(s), building code or number(s)) should be in sufficient detail to enable trace back and trace forward through the distribution system. Details of the coding need to be tied to the record keeping system (e.g., pesticide, fertilizer records, microbiological testing reports). There should be field maps available demonstrating the coding details used in the operation(s).

SITE (CONTINUED)			
Question No.	Question	Total Points	Expectation
3.02.03	Has a documented risk assessment been conducted at least annually for the operation?	10	A documented risk assessment of the growing area and surrounding areas should be performed and documented annually, and when any changes are made to the growing area or adjacent land. This should detail known or reasonable foreseeable risks/hazards, 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, water sources (chemical hazards e.g. heavy metals, perchlorate, etc. and microbial hazards e.g. <i>E. coli</i>), water use, fertilizers, crop protection chemicals, worker health and hygiene, equipment and tools used for harvest, storage, transportation and any other applicable areas.
3.02.03a	If any risk is identified, have corrective actions and/or preventative measures been documented and implemented?	10	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.
3.02.04	Are the external areas and vulnerable points (i.e. those that are not permanently locked) surrounded by security fencing or otherwise protected? Where there is no external storage and doors are permanently locked, score as N/A.	5	Where there is external storage and/or vulnerable (not kept locked) entry points, the operation should be surrounded by a continuous security fence or otherwise protected.
3.02.05	Is access to the facility controlled by locks, swipe cards, alarms or other devices?	5	The operation should have security systems in place to prevent intruders, deter intruders and ideally alert workers to the presence of intruders. These include swipe cards, key locks, pass codes on punch pads, biometrics like palm readers, other technologies and a combination of different systems. Security systems should be used correctly and part of the operation's discipline. The facility should be locked when not in use (e.g., overnight if there is no nightshift).
3.02.06	Are workers issued non-reproducible identification (e.g., badges, company ID cards, etc.)?	5	All visitors, including contractors, should be provided with identification that is valid only for the time that these visitors are on site. Companies with less than 20 workers are not expected to have an ID system.
3.02.07	Is the exterior area immediately outside the facility, including roads, yards and parking areas, free of litter, weeds and standing water?	5	Litter, waste, refuse, uncut weeds or grass and standing water within the immediate vicinity of the building may constitute an attractant or breeding place for rodents, insects or other pests, as well as microorganisms that may cause contamination.

SITE (CONTINUED)			
Question No.	Question	Total Points	Expectation
3.02.08	Are control measures being implemented for the outside storage of equipment, pallets, tires, etc. (i.e. out of the mud, stacked to prevent pest harborage, away from the building perimeter)?	5	Incorrectly stored pallets and equipment can provide areas for pest harborage and/or cross contamination. Equipment should be stored at least 4" (10 cm) off the ground and at least 24" (61 cm) away from the building perimeter. Workers should check the stored equipment (e.g., irrigation pipes) periodically to ensure that it has not become a pest harborage area or dirty due to rains. Inventory checks should occur in order to ensure that these storage areas do not become full of unnecessary items. Outside storage areas should be within the scope of the pest control program.
3.02.09	Is the area around the dumpster/cull truck/trash area clean?	3	The dumpster/cull truck/trash area should be located away from facility entrances, where traffic flow may be a source of cross contamination. The area around the dumpster/cull truck/trash area should be maintained in a clean condition. There should not be any spillage on the ground. There should not be any standing water or liquid seepage around the dumpster/cull truck/trash area and there should not be any foul odor present. The dumpster/cull truck/trash area should be cleaned on a regular basis.
3.02.10	Are outside garbage receptacles and dumpsters kept covered or closed?	5	All dumpsters and garbage receptacles should have a cover and be kept covered to prevent the attraction of insects, rodents and other pests. Fine mesh lids are acceptable. Just having the lids is not acceptable i.e. when not in use, the dumpsters and garbage receptacles should be closed. Dumpsters that are only used for dry non-food waste (e.g., paper, cardboard, etc.) are exempt from this requirement.
3.02.11	Where soil, substrates or fertilizer (e.g., compost) are stored or handled, are measures in place to ensure seepage and runoff is collected or diverted and does not reach growing areas, product, or any of the water sources? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	Soil, substrates and fertilizer (e.g., compost) are stored in a covered area to protect from pests and prevent run-off. Where run-off exists, there are barriers, soil berms, pits or lagoons to divert or collect run-off. Any observation of runoff reaching the growing area is an automatic failure.
3.02.12	Where there are fill stations for fuel or pesticides, is it evident that the location and/or use is not a risk of contamination to the product, water sources, growing areas, equipment, packaging materials, etc.?	15	Fill station area is not a risk of contamination to the product, water sources, production areas, equipment, packaging materials, etc.

PEST CONTROL			
Question No.	Question	Total Points	Expectation
3.03.01	Is there a written policy prohibiting animals in the facility, including the growing areas and any packaging or equipment storage areas?	10	Domestic and wild animals, including birds, are not permitted in the facility, including packaging and storage areas. There should be a written policy in place to affirm this.
3.03.02	Is there an effective pest control program in place? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	There should be an effective, proactive pest control program (in-house or contracted) to control rodents (also insects, reptiles and birds where necessary) and prevent infestation. Any down score will result in an automatic failure.
3.03.03	Is there a documented pest control program, detailing the scope of the program, target pests and frequency of checks, including a copy of the contract with the extermination company (if used), Pest Control Operator license(s)/training (if baits are used), and insurance documents?	15	There should be a documented pest control program in place detailing the scope of the program, target pests and frequency of checks. If performed in-house, the pest-control operators or equivalent should be registered, licensed or have documented formal training (if regulation does not require certification or registration). Note that the person's training and/or license should specify structural pest control or equivalent. Any substitute operator's license credentials should also be on file. If the service is contracted, the pest control contract service/company should be licensed in structural pest control, insured and the contract should be documented (quoting the scope of the program, types of pests it covers and frequency of visits).
3.03.04	Is there a schematic drawing/ <u>plan</u> of the facility, showing numbered locations of all pest monitoring devices (e.g., rodent traps, bait stations, insect light traps, etc.) both inside and outside the facility?	10	A schematic drawing or trap map is on file, current and details the internal and external traps. All devices (e.g., tin cats, Ketch-Alls, bait stations, glue boards, insect light traps, electronic fly killer units, etc.) should be numbered and clearly identified on the map. The numbers should match what is in the facility. The document should be accurate, dated and should show the type of device.
3.03.05	Are service reports created for pest control checks detailing inspection records, application records, and corrective actions of issues noted (in-house and/or contract)?	10	Service reports from the contract pest control company should be available for review if pest control is contracted out. In-house inspection records should be available for review if pest control is conducted in-house. Records should include services performed, date of service, chemicals used, signs of activity, corrective actions, and trend reports.
3.03.06	Are all entry points to growing areas, storage and packaging areas protected to prevent entry of rodents or birds?	10	The growing, storage and packaging areas should be adequately constructed to prevent entry of rodents or birds. Walls, windows and screens should be maintained, doors 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.

PEST CONTROL (CONTINUED)			
Question No.	Question	Total Points	Expectation
3.03.07	Are the growing and storage areas free of pest activity including rodents/birds/reptiles/mammals, or any evidence of them?	15	Growing and storage areas should be free of insects, rodents, birds, reptiles or mammals to prevent possible physical or microbiological contamination.
3.03.08	Is the area outside the facility free of evidence of pest activity?	10	All areas should be free of recurring/existing external pest activity. Evidence 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 building perimeter.
3.03.09	Are pest control devices located away from exposed raw materials (e.g., seeds, transplants, soil, media), finished goods and packaging, and poisonous rodent bait traps are not used within the facility?	10	Pest control devices should be located away from exposed food products, packaging materials or equipment to prevent any physical or microbial contamination. Poisonous rodent bait traps should not be located within the facility.
3.03.10	Are pest control devices maintained in a clean and intact condition and marked as monitored (or bar code scanned) on a regular basis?	5	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 (at least monthly) should be posted on the devices, as well as kept on file (unless barcode scanned).
3.03.11	Are interior and exterior building perimeter pest control devices adequate in number and location?	5	The distance between traps should be determined based on the activity and the needs of the operation. As a reference, the following guidelines can be used to locate traps. 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 traps 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).
3.03.12	Are all pest control devices identified by a number or other code (e.g. barcode) ?	5	All traps should be clearly identified (e.g. numbered) to facilitate monitoring and maintenance. All traps should be located with wall signs (that state the trap number and also that they are trap identifier signs).
3.03.13	Are all pest control devices effective and bait traps secured?	5	All traps should be correctly orientated with openings parallel with and closest to walls. Bait traps should be locked and tamper resistant in some way (e.g., locks, screws, etc.). Bait traps should be secured to prevent removal and only block bait (no pellets) should be used. If mounted on slabs or have integrated weight, then wall signs should be used to aid location.

GENERAL CHEMICALS			
Question No.	Question	Total Points	Expectation
3.04.01	Are there chemical inventory logs for chemicals, including pesticides, fertilizers and cleaning and sanitizing chemicals?	3	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 and a copy should be maintained separate from the chemical storage location(s).
3.04.02	Are copies of all Safety Data Sheets (detergents, sanitizers, pesticides, etc.) on file and fully accessible at all times with clear indexes?	5	Copies of Safety Data Sheets (SDS) should be available for all chemicals (e.g., pest control, cleaning, maintenance and sanitizing chemicals, etc.), used to keep workers informed about the chemicals used in the facility, and also be available in emergency situations.
3.04.03	Are all cleaning and maintenance chemicals (pesticides, sanitizers, detergents, lubricants, etc.) stored securely, safely and are they labeled correctly?	15	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. 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.
3.04.04	Are "food grade" and "non-food grade" chemicals used appropriately, according to the label and stored in a controlled manner?	10	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 entrusted with the correct use of chemicals.
3.04.05	Does the operation use the appropriate test strips, test kits or test probes for verifying the concentrations of anti-microbial chemicals (e.g., dip stations, etc.) being used, are they in operational condition and are they being used correctly?	15	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. If the ORP meter controls the pumps that are injecting the anti-microbial and/or buffer, there should be an independent calibrated ORP probe or other method (e.g., test strip papers, titration) in order to verify injector readings.

PRODUCTION FACILITY			
Question No.	Question	Total Points	Expectation
3.05.01	Is there a written cleaning schedule (Master Sanitation Schedule) that shows what and where is to be cleaned and how often?	10	A master sanitation program should be in place that covers all areas of the facility, including growing areas, storage areas, break areas, restrooms, maintenance and waste areas. Within these areas, areas such as walls, floors, light covers, overhead pipes, etc. should be included. List should include equipment (food contact and non-food contact), pallet jacks, fork lifts, carts, floor scrubbers, cooling equipment (evaporators, cooling coils, drip pans, etc., lift trucks and company owned trailers, etc.) The master sanitation schedule should include a detailed list of areas and equipment to be cleaned as well as the frequency.
3.05.02	Are there written cleaning and sanitation procedures (Sanitation Standard Operating Procedures) for the facility and all equipment?	10	The facility areas (floors, walls, overheads, etc.), all equipment (food contact, non-food contact, cooling equipment, etc.), internal transport vehicles and in-house owned trailers should be cleaned and sanitized on a regularly scheduled basis, based on written Sanitation Standard Operating Procedures (SSOPs). There should be SSOPs covering the cleaning and sanitizing operations noted in the master sanitation schedule. Procedures should detail what, who, how and when, including chemical details, solution temperature, water pressure, dwell times, any disassembly/reassembly instructions and cleaning verification procedures.
3.05.03	Are cleaning and sanitation logs on file that show what was done, when and by who?	10	Sanitation logs should be on file that cover all areas of the facility (e.g., production areas, storage areas, break areas, restrooms, maintenance, etc.), detailing walls, floors, overhead and all equipment (e.g., production equipment (food contact and non-food contact), pallet jacks, forklifts, carts, floor scrubbers, cooling equipment, lift trucks, company owned trailers, etc.). Logs should include: date, list of areas/equipment that were cleaned and sanitized, and the individual accountable who signed-off for each completed task. Logs should cover sanitation operations as noted in the master sanitation schedule.
3.05.04	Are there records showing filters in air conditioning, ventilation and air filtration units are regularly cleaned and replaced?	5	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.
3.05.05	Are there records showing cooling units are maintenance serviced and cleaned at least every 12 months or more frequently as required?	10	Records should be available to verify that the cooling units are serviced and cleaned on a scheduled basis. Cooling units should be cleaned and sanitized at least every 12 months or more frequently to prevent harmful pathogens from growing. Maintenance servicing ensures that coolers are working properly and efficiently. Records might include in-house sanitation records, maintenance records and/or contractor records/invoices.

PRODUCTION FACILITY (CONTINUED)			
Question No.	Question	Total Points	Expectation
3.05.06	If fans or other blowing equipment are used, are they operated in a manner that minimizes the potential for contaminating product, equipment, or packaging materials?	5	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.
3.05.07	Is there a documented glass and brittle plastic management procedure (including company glass and brittle plastic policy, glass breakage procedure and where necessary a glass register)?	10	There should be a documented site glass management procedure including company glass and brittle plastic policy, glass 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 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 breakage should indicate what equipment to use and include boot and tool checks/decontamination procedures to ensure broken glass is not unintentionally transported out of the area.
3.05.08	Has the operation eliminated or adequately controlled any potential metal, glass or hard plastic contamination issues?	10	All foreign material risks must be either removed and/or accounted for and controlled. Examples include glass, lights, hard plastic from any source, staples, metal filings, etc.
3.05.09	Are all lights in the facility that could potentially contaminate raw materials (e.g. seeds, transplants, soil, media), product, equipment or packaging shielded, coated or otherwise shatter resistant to protect product from contamination in the event of a breakage?	15	All glass lights in the facility that can potentially contaminate finished products, raw materials (e.g. seeds, transplants, soil, media), equipment, or packaging should be shielded, coated or manufactured of shatter-resistant materials to protect product from contamination in the event of breakage. This includes, but is not limited to items such as light bulbs, emergency lights, truck loading lights (dock lamps), insect trap lights, forklift lights, lights in bathrooms or maintenance shops that open into the growing area, etc. End piece fittings on tube lights should be secure. Precautions should be taken to prevent glass contamination in the event of glass breakage.
3.05.10	Is the facility fully enclosed?	15	The facility should be enclosed (walls and roof) with doors either closed or pest protected in some way (e.g., strip curtains, air curtains, speed doors, etc.). Walls can be solid, fine mesh or any other pest proof material, with openings that should be no greater than 1/8 inch (3 mm) or smaller. Growing areas should be physically separated from storage areas.

PRODUCTION FACILITY (CONTINUED)			
Question No.	Question	Total Points	Expectation
3.05.11	Are raw materials (e.g. seeds, transplants, soil, media), finished goods and food contact packaging within accepted tolerances for spoilage and free from adulteration? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	15	Raw materials, finished goods, food contact packaging and food contact surfaces should be free from spoilage, adulteration and/or gross contamination (21 CFR 110.3g). If legislation exists, then the contamination should be viewed against this legislation (e.g., USDA Grading Standards often include decay tolerances). Spoilage and adulteration would include any physical, chemical or biological contamination including blood and bodily fluids. Measures should be taken to prevent any known or reasonably foreseeable hazard (e.g., Clostridium botulinum in mushrooms). This question is designed to allow an auditor to halt an audit when finding gross contamination issues.
3.05.12	Are materials (commodities, processing aids, work in progress, etc.) properly marked with rotation codes (receipt dates, manufacture dates, etc.)?	5	All materials should be properly marked with receipt dates and/or tracking information (lot numbers, code dating) for traceability/recall and stock rotation purposes. This coding should be understood by all workers, in order to ensure FIFO and effective traceback/recall procedures.
3.05.13	Are materials (commodities, processing aids, work in progress, etc.) rotated using FIFO policy?	5	All materials should be rotated using First in First Out (FIFO) policy to ensure items are used in the correct order they are received and within their allocated shelf-life. Materials should be clearly marked or labeled with some kind of rotation coding that is understood by all workers, in order to ensure FIFO and effective traceback/recall procedures. Proper rotation of materials can prevent stock losses due to pest infestation, decomposition, mold and other problems associated with prolonged storage.
3.05.14	Does the process flow, facility layout, worker control, utensil control, internal vehicle use, etc. ensure that finished goods are not contaminated by raw materials (e.g., seeds, transplants, soil, media)?	15	Incoming raw materials (e.g. seeds, transplants, soil, media) should not be a source of contamination to the growing area and/or finished goods. Raw materials should not come into contact with packaged products. There should be plenty of space and separation to help avoid cross contamination issues. Workers who handle raw materials should not then handle packaged products without first ensuring that they are free of raw material contaminants.
3.05.15	Are all exposed materials (product, packaging, etc.) protected from overhead contamination (e.g. ladders, motors, condensation, lubricants, walkways, loose panels, degrading insulation, etc.)?	15	Ceilings and/or any overhead fixtures above storage are free from condensation or dust. Ladders or walkways (catwalks) above exposed product or packaging material have kick plates at least 3.5 inches high and are covered in some way that protects the product underneath. Drips or condensate (e.g. from roof, fixtures, ducts, pipes, etc.) should not contaminate food, food contact surfaces or packaging material. Adequate measures should be in place to protect from condensate.

PRODUCTION FACILITY (CONTINUED)			
Question No.	Question	Total Points	Expectation
3.05.16	Does the facility layout ensure separation of raw materials (e.g. seeds, transplants, soil, media), products and packaging?	15	All raw materials, products and packaging should be stored off the ground (i.e., on racks, pallets, shelves, etc.). Materials should be properly protected during storage to prevent contamination. Raw materials, finished product and packaging materials should be stored in separate areas to prevent cross contamination. When separate room storage is not possible, the auditor should assess the risks, especially with respect to cross contamination.
3.05.17	Are all growing areas clean and well maintained; especially lights, ducts, fans, floor areas by walls and equipment, and other hard to reach areas?	10	All areas should be maintained in a clean and sanitary condition.
3.05.18	Are single service containers used for their intended purpose only so that potential cross contamination is prevented?	5	Single service containers are used for their intended purpose only (food contact use, not to hold nuts, bolts, trash or other miscellaneous items) and should not be re-used. Returnable plastic containers (RPCs) (e.g., CHEP, IFCO) should be treated like single service containers and only used for product. If a single service container is used for any other reason than the storage and distribution of food, it should be clearly differentiated as such (e.g., painted another color and labeled).
3.05.19	Are re-usable containers cleanable or used with a liner and clearly designated for the specific purpose (finished product, trash, etc.) such that cross contamination is prevented?	5	Identification of reusable containers (visually or in the language understood by the workers) helps to minimize contamination of products. 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), ingredients, finished goods or packaging of these items should be stored to ensure that they remain clean and uncontaminated (e.g., covered clean).
3.05.20	Are all utensils, hoses, and other items not being used, stored clean and in a manner to prevent contamination?	10	All utensils, hoses and other items not being used are stored clean and in a manner to prevent contamination (off ground, dedicated areas, etc.). Hoses should be stored coiled, off the floor and ideally used in such a manner that ground contact is avoided.
3.05.21	Do floor drains flow in a manner that prevents contamination (e.g., from high to low risk areas, from high risk directly to drain system), are they covered, appear clean, free from odors and are well maintained?	5	Floor drains should flow in a manner that prevents contamination, be cleaned on a frequent basis to remove residues, prevent growth of harmful bacteria and allow for proper drainage. Drains should be covered, and sides and bases should be made of a smooth material that does not trap debris. N/A if there are no drains.

PRODUCTION FACILITY (CONTINUED)

Question No.	Question	Total Points	Expectation
3.05.22	Are internal transport vehicles (e.g., forklifts, bobcats, pallet jacks, carts, floor cleaners, etc.), clean, do not emit toxic fumes and are being used in a sanitary manner?	5	Internal transport vehicles (e.g., forklifts, bobcats, pallet jacks, trolleys, floor cleaners, etc.) should be part of the sanitation program, maintained clean and not allowed to be a vector of cross contamination. Vehicles used in food areas should not be gasoline or diesel powered. Propane (LPG) powered vehicles are acceptable, while electric powered are ideal.

INSPECTION

3.06.01	Is there documented evidence of the internal audits performed, detailing findings and corrective actions?	15	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, detail 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 growing area, storage area, worker amenities, external areas, worker practices, etc. No downscore if another audit checklist is used, as long as all areas are covered. See 1.04 regarding internal audit schedule.
3.06.02	Is there a daily inspection log, including but not limited to, checking worker hygiene, housekeeping of bathrooms, break area, growing area, and storage area?	10	Operations are inspected daily. This should be a start-up check of all potential issues.

TRAINING			
Question No.	Question	Total Points	Expectation
3.07.01	Is there a food safety hygiene training program covering new and existing workers and are there records of these training events?	15	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 and then at some topics covered at least quarterly, but ideally monthly. These trainings should cover food safety and hygiene, the importance of detecting food safety and/or hygiene issues with co-workers and visitors, and all food safety or hygiene issues in which they are responsible. 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.
3.07.02	Is there a documented training program with training logs for the sanitation workers, including best practices and chemical use details?	5	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.
3.07.03	Are there written and communicated procedures in place that require food handlers to report any cuts or grazes and/or if they are suffering any illnesses that might be a contamination risk to the products being produced, and return to work requirements? (In countries with health privacy/confidentiality laws, e.g. USA, auditors can check procedure/policy but not the actual records).	10	There should be documented procedures that are communicated (e.g., worker signature on a training log) to food handlers, requiring them to report any cuts, grazes and/or any illnesses that might be a food safety cross contamination risk. Procedures to note return to work requirements for affected workers. Procedures should cover recording requirements, but auditors should not request to review records where countries have laws covering privacy/confidentiality of health records.
3.07.04	Are there worker food safety non-conformance records and associated corrective actions (including retraining records)?	3	There should be records covering when workers are found systematically not following food safety requirements. These records should also show corrective actions and evidence that retraining has occurred (where relevant).

WORKER HYGIENE			
Question No.	Question	Total Points	Expectation
3.08.01	Are toilet facilities adequate in number and location and are they adequately stocked (e.g., toilet paper, disposable towels, soap, etc.)?	15	At least one stall per 15 workers. Toilet facilities are available to all workers and visitors and should not open directly into growing or storage areas. Restrooms should be stocked with toilet paper, unscented/non-perfumed soap and towels.
3.08.01a	Are toilet facilities and hand washing stations clean?	15	Toilet facilities should be cleaned and sanitized at least daily. Servicing records (either contracted or in-house) should be available for review showing toilet cleaning, servicing and stocking is occurring regularly. Toilet paper should be available at each toilet location and maintained in a hygienic manner (held on rolls, not be placed in urinals or on the floor). Soiled tissue should be flushed down the toilet/placed in the holding tank (not placed in trash cans and/or on the floor).
3.08.02	Is hand washing signage posted appropriately?	5	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 (visual signs are allowed). The visuals or signs should be permanent and placed in key areas where workers can easily see them.
3.08.03	Are hand washing stations adequate in number and appropriately located for worker access and monitoring usage?	15	Enough hand washing stations, in working order, should be provided to ensure efficient worker flow (1 per 15 people on site), and be available to all workers and visitors. Hands free is an optimum system. Hand washing stations should be located within close proximity of toilet facilities and lunchroom.
3.08.03a	Are hand washing stations in working order, have water of suitable temperature and pressure, adequately stocked (e.g., disposable towels, soap, etc.) and restricted to hand washing purposes only?	15	Hand washing stations should be used only for hand washing, have water of suitable temperature and pressure and be maintained in good working order with proper drainage. They should be properly stocked with liquid non-perfumed, neutral or antiseptic soap. Single use paper towels should be used and units properly located; hot air driers are acceptable if properly located. There should be an adequate stock of soap and paper towels.
3.08.04	Are workers washing and sanitizing their hands before starting work each day, after using the restroom, after breaks, before putting on gloves and whenever hands may be contaminated?	15	Worker conformance to hand washing and sanitizing procedures should be assessed as washing hands is the first step in avoiding food contamination. Workers should be observed washing their hands prior to beginning work, after breaks, after using the toilets, before putting on gloves, and whenever hands may have become a source of contamination (e.g., after eating, after using a handkerchief or tissue, smoking, drinking, etc.).

WORKER HYGIENE (CONTINUED)			
Question No.	Question	Total Points	Expectation
3.08.05	Are secondary hand sanitation stations (e.g., touch-free dispensers) adequate in number and location, and are the stations properly maintained?	5	Secondary hand sanitation is required for items that may be “ready-to-eat” (e.g., herbs, tomatoes, 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 non-perfumed, have 60% to 95% ethanol or isopropanol and conveniently located in traffic zones but should not be obstructive. Strength checks do not need to be performed for commercially purchased sanitizers that have been purchased already mixed.
3.08.06	Are foot baths, foamers or dry powdered sanitizing stations provided at entrances to growing areas (where appropriate), and are the stations maintained properly?	3	Foot (boot) stations (foamers, foot dip mats, baths, sprays) should be located in areas when crossing into a “clean” zone from an area of potential contamination (e.g., from outside into the growing area) for some crops (mushrooms, aeroponics). Stations should be checked and replenished as necessary to ensure effectiveness. This question should be scored based on auditor discretion, considering the risk of the products/processes. N/A where there are no foot baths, foamers or dry powdered sanitizing stations when it is not a requirement for the operation.
3.08.07	Are workers’ fingernails clean, short and free of nail polish?	5	Fingernails can harbor dirt and debris and can be a source of cross contamination. Therefore, nails should be clean and short to reduce the risk of cross contamination. Fingernail polish and false nails should not be worn, even when gloves are worn.
3.08.08	Is there no sign of any worker with boils, sores, open wounds or exhibiting signs of foodborne illness working directly or indirectly with food?	10	Workers who have exposed boils, sores, exposed infected wounds, foodborne illness or any other source of abnormal microbial contamination should not be allowed to work in contact with the product, packaging or food contact surfaces.
3.08.09	Is jewelry confined to a plain wedding band and watches are not worn?	5	Workers are not observed wearing jewelry (including earrings, necklaces, bracelets, rings with stones, rings or studs in nose, lip and eyebrow, watches) in the facility. Plain wedding bands are the only exception. Other examples of foreign items maybe a source of foreign material contamination include studs, false finger nails and finger nail polish, false eye lashes, eye lash extensions and badges.
3.08.10	Are all workers wearing protective outer garments suitable for the operation (e.g. clean clothes, smocks, aprons, sleeves and non-latex gloves)?	5	Suitable clothing is required for workers handling products that are potentially ready-to-eat (e.g., tomatoes, leafy greens, etc.). Where dedicated protective clothing is not required/worn, it must be clear that outer street clothes are clean and not a potential source of contamination. Workers should not wear personal clothes with sequins, pom-poms, fur, etc. No sleeveless tops without an over garment.

WORKER HYGIENE (CONTINUED)			
Question No.	Question	Total Points	Expectation
3.08.10a	Do workers remove protective outer garments (e.g., smocks, aprons, sleeves, and gloves) when on break, before using the toilets and when going home at the end of their shift?	5	When worn, protective clothing (e.g., aprons, smocks, sleeves and gloves) should be removed when workers leave the work area (e.g., when they go to the toilet facility, lunchroom, outside, etc.). Workers cannot smoke, eat, go outside the building or use the restroom while wearing these garments.
3.08.10b	Is there a designated area for workers to leave protective outer garments (e.g., smocks, aprons, sleeves, and gloves) when on break and before using the toilets?	5	There should be a designated area for workers to leave protective clothing when they are worn (e.g., aprons, smocks, sleeves and gloves). Workers are observed using the designated area when they leave the work area (e.g., when they go to the toilet facility, lunchroom, outside, etc.).
3.08.11	Worker personal items are not being stored in the growing area(s) or material storage area(s)?	5	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 security risks.
3.08.12	Is smoking, eating, chewing and drinking confined to designated areas, and spitting is prohibited in all areas?	5	Smoking, chewing tobacco, chewing gum, drinking and eating is permitted in designated areas that are away from growing and storage areas. Spitting should be prohibited in all areas. Smoking should not be permitted in eating and drinking areas. Potable water should be provided for drinking, following local and national laws.
3.08.13	Is fresh potable drinking water readily accessible to workers?	10	Fresh potable water meeting the quality standards for drinking water should be available for workers on-site to prevent dehydration. The term "potable" meaning that the water is of drinking water quality (e.g., the EPA Drinking Water Standard or equivalent). If water containers are used, they should be maintained in a clean condition, free from residues and contamination to ensure workers are not adversely affected by contaminated water from unclean containers.
3.08.13a	Are single use cups provided (unless a drinking fountain is used) and made available near the drinking water?	5	Water should be provided so that cross contamination issues are avoided from person to person. Examples include single-use paper cups, drinking fountains, etc.
3.08.14	Are all items removed from garment (shirt, blouse, etc.) top pockets, and unsecured items are not worn (e.g., pens, glasses on top of head, Bluetooth devices, etc.)?	3	There should be no items stored in workers' top pockets. Items in pockets and otherwise unsecured have the potential to fall into the product.

WORKER HYGIENE (CONTINUED)			
Question No.	Question	Total Points	Expectation
3.08.15	Are first aid kits adequately stocked and readily available?	5	First aid kit(s) should be adequately supplied to reflect the kinds of injuries that occur (including any chemicals stored on-site) and should be stored in an area where they are readily available for emergency access. Date-coded materials should be within dates of expiration. Gloves should be worn over all band aids on hands.

SEE FERTILIZER, WATER & PESTICIDE TABLES FOR THOSE SECTIONS

WHERE LAWS, COMMODITY SPECIFIC GUIDELINES AND/OR BEST PRACTICE RECOMMENDATIONS EXIST AND ARE DERIVED FROM A REPUTABLE SOURCE, THEN THESE PRACTICES AND PARAMETERS SHOULD BE USED. AUDIT USERS SHOULD ALLOW A DEGREE OF RISK ASSOCIATION IF LAWS, GUIDELINES, BEST PRACTICES, ETC., HAVE NOT BEEN DOCUMENTED.