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Operation: Harvest Crew      CB Registration No. PLC-PGFS-5873-6      PrimusGFS  
**Final Report (Certified)**      PrimusGFS ID #65576 – Cert:2      Version 2.1  
 Audit Report Summary      Audited by PrimusLabs

<b>Organization:</b>	<b>Roth Farms Inc</b> <b>Contact(s):</b> Allison Meharg, Ryan Roth, Amado Reyes <b>Address:</b> 27502 County Rd 880 33430 <b>Location:</b> Belle Glade, Florida, United States <b>Phone:</b> 5619962991
<b>Harvest Crew:</b>	<b>Lettuce Crew – Linked to Ranch Gladeview</b> <b>Contact:</b> Ryan Roth <b>Location:</b> 27502 C.R 880
<b>Shipper:</b> <b>Operation Type:</b>	Ray's Heritage LLC <b>Harvest Crew</b> Roth Farms' Lettuce Crew is led by Manuel Ortega, Crew Leader. Harvesters use hard plastic handled, stainless steel bladed knives carried in cleanable plastic scabbards. Blue gloves are used. Inferior (smaller) plants are cut and laid out in a line on the ground to create a barrier from the soil to be used for harvested lettuce and boxing material to sit upon. Leaf removal is minimal. Harvested Romaine lettuce is lined up on the fresh leaf barrier and the core base is sprayed with a 2ppm chlorine solution in potable water from a hand sprayer to rinse 'milk' created when single cut is made. Lettuce is immediately packed, the box is closed and boxes are hand delivered to a flatbed truck for transportation to the packinghouse for the cooling process. Truck is tarped.
<b>Audit Scope:</b>	
<b>Date Audit Started:</b>	12/16/2014 13:00
<b>Date Audit Finished:</b>	12/16/2014 14:30
<b>Product(s) Observed During Audit:</b>	Romaine Lettuce, Iceberg / Head Lettuce
<b>Similar Product(s) Not Observed:</b>	None Specified
<b>Product(s) Applied for but Not Observed:</b>	None Specified
<b>Auditor:</b>	<a href="#">Dwight Rockers</a> (PrimusLabs)
<b>Audit Percentage Score:</b>	95%
<b>Score after acceptance of corrective actions:</b>	<b>96%</b> <a href="#">Click here to see Corrective Action Activity</a>
<b>GPS Coordinates:</b>	<b>Latitude:</b> <b>Longitude:</b> 26° 40' 4"      80° 30' 20"
<b>Certificate Link:</b>	<a href="#">View Certificate</a>

Audit Scoring Summary	Pre-Corrective Action Review	Post-Corrective Action Review
Food Safety Management System Requirements	Score: 177 Possible Points: 199 Percent Score: <b>88%</b>	Score: 185 Possible Points: 199 Percent Score: <b>92%</b>
Good Agricultural Practices Requirements	Score: 547 Possible Points: 557 Percent Score: <b>98%</b>	Score: 547 Possible Points: 557 Percent Score: <b>98%</b>
<b>Total:</b>	Score: 724 Possible Points: 756 Percent Score: <b>95%</b>	Score: 732 Possible Points: 756 Percent Score: <b>96%</b>

Non-Conformance Summary By Count	Pre-Corrective Action Non-Conformances	Post-Corrective Action Non-Conformances (NC's without completed CA's)
Food Safety Management System Requirements	4	2
Good Agricultural Practices Requirements	2	2
<b>Total:</b>	6	4

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### Food Safety Management System Requirements

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### Good Agricultural Practices Requirements

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## FSMS – Management System

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.01.01	Is there a Food Safety Manual or other documented food safety management system covering the scope of business included in this audit and procedures/instructions for all food safety processes?	Total Compliance	5	5	Yes. The Food Safety Manual contains documents to cover the scope of the GAP and FSMS modules. Examples of materials contained in the manual include the Food Safety Review, the Food Safety Policy, organizational chart, SOP's, maps, internal audit documents, company policies and more.	
1.01.02	Is there a documented food safety policy detailing the company's commitment to food safety?	Major Deficiency	1	5	The food safety policy, titled Food Safety Review, was not posted in a public place. Copies are available in the Food Safety Manual. Document was signed by Ryan Roth.	
1.01.03	Is there an organizational chart of all employees who have food safety related activities?	Total Compliance	3	3	Yes. The organizational flow chart lists President Raymond Roth; Ryan Roth, Amado Reyes and Olga Lopez in Food Safety and Quality Control; Ryan Roth for Production Supervisor; Jesus Salinas in Shipping; and Jesus Salinas, Manuel Ortega and Juan Lara in Harvesting. Auditor did not confirm date on document which was signed and approved by Ryan Roth.	
1.01.04	Is there a food safety committee and are there logs of food safety meetings with topics covered and attendees?	Total Compliance	5	5	Yes. The committee is made up of Raymond Roth, Ryan Roth, Amado Reyes and Allison Meharg. Meeting dated September 8, 2014 and attended by Ryan, Amado and Allison was a review of the status of the preceding season system results. Topics included review of audit reports and impending PGFS audit, approval and updates of SOP's, Ray's Heritage recall procedures, goals for the new season and other relevant topics. Olga Lopez was mentioned as potential hire for food safety. Monthly meetings are a goal.	
1.01.05	Is there documented management verification of the entire food safety management system at least every 12 months?	Total Compliance	5	5	Yes. The management verification requirement was a function of the committee meeting in October 30, 2014 using the PGFS checklist and Food Safety Manual. System was reviewed. Roth Farms strives to continually update and verify the strengths or weaknesses of the system on a regular basis. See 1.01.04. Revision of the organizational chart added Ms. Lopez to the Food Safety and Quality Control function. Meeting attended by top management.	
1.01.06	Is there a documented analysis detailing resources required to implement and improve the food safety management system processes with documented commitment from management to provide these resources?	Total Compliance	5	5	Yes. Resources required to implement and improve the food safety management system processes are an important part of the food safety committee function. Records of meeting	

topics serve as documentation for resources required moving forward. Ryan Roth attends meetings showing top management commitment. Notes from meetings on September 8, October 22 and October 30, 2014 were reviewed.

<b>FSMS – Control of Documents and Records</b>						
Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.02.01	Is there a written document control procedure describing how documents will be maintained, updated and replaced?	<b>Total Compliance</b>	3	3	Yes. The document control procedure is titled Administration SOP #01–01 and dated November 5, 2012. Currently, Olga Lopez is training for the maintenance, update and replacement of documents. Allison Meharg currently serves to assist Olga in learning and managing the system.	
1.02.02	Are all records stored for a minimum period of 12 months or for at least the shelf life of product if greater than a year?	<b>Total Compliance</b>	5	5	Yes. Records requested and reviewed met this criteria. Policy is detailed in Administration – Document Control SOP #01–04 dated September 8, 2014.	
1.02.03	Are food safety related documents and records stored and handled in a secured manner?	<b>Total Compliance</b>	3	3	Yes. Storage and handling policy is described in SOP #01–02 and #01–03 and dated November 5, 2012. Master copy documents are stored in a secure area of the main office complex library. Logs created on a daily basis are accumulated and controlled by Olga Lopez.	
1.02.04	Are the records maintained in an organized and retrievable manner?	<b>Total Compliance</b>	3	3	Yes. Records were well organized and retrievable. Working documents are mostly hand written. Chemical labels and MSDS's are substantial, readily available and well organized. SOP's and company policies and procedures are available and digitally accessible in the main office complex and in hard copy.	

<b>FSMS – Procedures and Corrective Actions</b>						
Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.03.01	Are there documented instructions for the creation of Standard Operating Procedures?	<b>Total Compliance</b>	5	5	Yes. These various instructions are found in Administration – Creating a Standard Operating Procedure SOP #01–01 and Administration – Revision of an SOP #01–03. Both are dated November 5, 2012.	
1.03.02	Are the written procedures available to relevant users and is a master copy maintained in a central file?	<b>Total Compliance</b>	5	5	Yes. See 1.02.04.	
1.03.03	Is there a corrective action procedure that describes the requirements for handling deficiencies affecting food safety and prevention of future occurrences?	<b>Total Compliance</b>	5	5	Yes. The corrective action procedure is described in Corrective Actions SOP #10–01 and dated November 5, 2012. Corrective action procedures are part of and included near the end of each SOP document in the management system.	
1.03.04	Is there a daily incidents report, sometimes called a Notice(s) of Unusual Occurrence and Corrective Actions Log (NUOCA) ?	<b>Total Compliance</b>	5	5	Yes. The NUOCA log exists but no use was noted. Examples of potential uses were observed during review of daily logs where notes related to field observations were recorded by Food Safety & Quality Control employee Olga Lopez, on multiple dates.	

<b>FSMS – Internal and external inspections</b>						
Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.04.01	Is there documented program for internal audits to be performed at the operations, covering all processes impacting food safety and the related documents and records?	<b>Total Compliance</b>	3	3	Yes. Another function of the food safety committee is the internal audit requirement. Internal audits for farm and harvest crews used PGFS Ver. 2.1 and Ranch Ver. 7.04 checklists. Ver. 2.1 internal audit was recorded December 15, 2014. Full internal audits are scheduled as an annual event and prior to contracted 3rd party audit.	
1.04.02	Are there written procedures for handling regulatory inspections?	<b>Total Compliance</b>	3	3	Yes. This procedure is described in Regulatory Inspection SOP # 10–01 dated December 16, 2014, the most current food safety system improvement upgrade.	
1.04.03	Are there records of regulatory inspections and/or contracted	N/A	0	0	N/A. No regulatory inspections have been	

	inspections, company responses and corrective actions, if any?				required or conducted to date. Verbal by Amado Reyes.
1.04.04	Are there documented calibration procedures for measuring and monitoring devices used in the operations that are related to the safety of the product?	Minor Deficiency	7	10	Documented calibration procedures for fertilizer applicators not available for review. Crop sprayers are addressed in Pesticide Applications document SOP #06-01 dated November 5, 2012.

### FSMS – Rejection and release of product

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.05.01	Is there a written procedure for handling on hold or rejected products?	Total Compliance	5	5	Yes. This procedure is described in Hold and Release Procedure, SOP #11-01 and dated November 5, 2012.	
1.05.02	Are there records of the handling of on hold or rejected products kept on file?	N/A	0	0	N/A. To date, no products have required on hold or rejected product procedures to be activated.	
1.05.03	Is there a documented product release procedure available?	Total Compliance	5	5	Yes. The product release procedure is titled Hold and Release Procedure SOP #11-1 and dated November 5, 2012.	
1.05.04	Are there records of product releases kept on file?	Total Compliance	5	5	Yes. Records of product release consist of picking tickets which are matched with records of packinghouse receipt of goods. Acceptance of product at the packinghouse indicates acknowledgment of product release. Tickets are kept on file in the main office.	
1.05.05	Is there a documented system for dealing with customer and buyer food safety complaints/feedback along with records and company responses, including corrective actions?	Total Compliance	10	10	Yes. This system is documented in Buyer and Consumer Complaints and Feedback dated September 8, 2014. Farm uses system from Ray's Heritage packinghouse to address buyer and consumer complaints.	

### FSMS – Supplier Control

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.06.01	Are there current written food safety related specifications for all raw products, ingredients, materials and services purchased?	Total Compliance	5	5	Yes. Multiple examples of food safety related specifications were reviewed and are current. Fertilizer specifications were reviewed and accompanied by COA and LOA from Wedgeworth for fertilizer dated October 30, 2014. Crop care materials sourced from Helena Chemical were supported by label and LOA dated October 29, 2014. Vegetable seed sourced from Siegers Seed Co. was supported by LOA dated November 4, 2014. Other services and products specifications were on file for review including sanitation services.	
1.06.02	Is there a written procedure detailing how suppliers are evaluated, approved and monitored?	Total Compliance	5	5	Yes. The evaluation, approval and monitoring of suppliers is described in Supplier Approval and Monitoring SOP #12-01 and dated December 12, 2014.	
1.06.03	Is there a list of approved suppliers?	Total Compliance	5	5	Yes. The list included suppliers Siegers, Crop Protection Services, The Anderson's, Paramount Seeds, Henderson's Sani-Service and others. The list is called Approved Suppliers and appeared to be current in conjunction with review of documents for materials and services provided.	
1.06.04	Does the organization have documented evidence to ensure that all products, ingredients or materials and services suppliers comply with the approval requirements and that they are being monitored as defined in the procedure?	Total Compliance	15	15	Yes. See 1.06.01 and 1.06.02. Labels, COA's, LOA's, LOG's and professional relationships with vendors.	
1.06.05	If the organization is outsourcing any processes that may affect food safety, are there control procedures over such processes?	Total Compliance	15	15	Yes. Sanitation services are outsourced to Henderson's Sani-Services of Belle Glade Florida and the processes are guided by specifications of performance from the company. Performance is checked and recorded daily by Olga Lopez. Aerial application of crop sprays on radish are monitored by real time reports from Glades AG Service Inc. Material use information and flight conditions are quickly provided verbally or in electronic form.	
1.06.06	If tests and/or analysis within scope to food safety are performed by external laboratories, are they licensed/accredited (e.g. ISO 17025 or equivalent, National Regulations, State Department, etc.)?	Total Compliance	5	5	Yes. Water testing for irrigation, spray water, drinking water and water used to spray lettuce in the field pack is conducted by PrimusLabs of Belle Glade Florida. Certification is valid to	

FSMS – Traceability and Recall						
Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.07.01	Is there is a document that indicates how the company product tracking system works, thereby enabling trace back and trace forward to occur in the event of a potential recall issue?	Total Compliance	10	10	Yes. See 1.05.04. Tracking information from the field is complete. Identification and Traceability procedures are described in Ray's Heritage Section 4.1.2.1 dated October 13, 2008. Data gathered includes date harvested, crop and variety, block #, plant # (which is specific to row in bed and date planted), bed #, equipment used if applicable and/or harvest crew and size of load.	
1.07.02	Does the organization have a documented recall program including procedures, recall team roles and contact details, external contact listings and explanation of different recall classes?	Total Compliance	15	15	Yes. The recall program uses the recall program provided by Roth Farm's owned packinghouse Ray's Heritage. Document is titled Identification and Traceability Rev. A Section 4.1.2.1 and dated October 13, 2008.	
1.07.03	Is testing of recall procedures (including trace back) performed and documented at least every six months? Can the company identify where affected product was sent?	Non-Compliance	0	10	Documentation for the six-month testing frequency of recall procedures was not available for review.	

FSMS – Food Defense						
Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.08.01	Does the company have a documented food defense policy based on the risks associated with the operation?	Non-Compliance	0	5	Food defense policy not available for review.	
1.08.02	Is there a current list of emergency contact phone numbers for management, law enforcement and appropriate regulatory agencies?	Total Compliance	3	3	Yes. Emergency contact phone numbers were observed on sign at shop and sign at gate.	
1.08.03	Are visitors to the company operations required to adhere to food defense policies?	Total Compliance	3	3	Yes. Auditor was required to sign in and state purpose of visit.	

GAP – Harvesting Inspections, Policies and Training						
Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.11.01	Have self-audits been completed for this harvest crew?	Yes	5	5	Yes. Harvest crew self audit was conducted on December 15, 2014 using both the PGFS V 2.1 checklist and the Ver. 07.04 checklist.	
2.11.02	Was a pre-harvest inspection performed on the block being harvested and was the block cleared for harvest? If No, go to 2.11.03.	Yes	5	5	Yes. The pre-harvest inspection is part of the Pre-Operations Inspection Log and was conducted for December 16, 2014. The harvest block was cleared for romaine lettuce harvest in C-9 block. See 2.11.03.	
2.11.02a	Where pre-harvest inspections have discovered issues, have buffer zones been clearly identified and at the time of the audit, are these buffer zones being respected?	N/A	0	0	N/A. No issues were noted on log.	
2.11.03	Are there records of daily pre-operation inspections that check key aspects of equipment hygiene, personal hygiene, etc.?	Yes	5	5	Yes. Daily pre-operation inspections are recorded on a log titled Daily Pre-Operations Inspection. Week of December 15, 2014. Previous log sheets were reviewed. Areas checked off included equipment hygiene, personal hygiene and others, for the lettuce crew.	
2.11.04	Is there a documented and implemented policy that when commodities are dropped on the ground they are discarded? (Non-applicable for commodities such as tubers, root crops, etc.)	Yes	5	5	Yes. This policy is described in Food Safety Policy, Sec. #5. All product is discarded if dropped or comes into contact with the ground.	
2.11.05	Is there a food safety hygiene training program covering new and existing employees and are records of these training events?	Yes	15	15	Yes. See 2.10.05 of GAP audit for Gladeview Farm. Amado Reyes trains new and existing employees in food safety hygiene, including harvest crew personnel, using the Food Safety Policy training materials. Employee Manual Ortega, of the lettuce harvest crew was trained on November 11, 2014 and December 10, 2014.	
2.11.06	Is there a documented and implemented policy stating what happens when harvesters find evidence of animal intrusion e.g. fecal material?	Yes	5	5	Yes. Supervisor is contacted. Harvest buffer is established. Corrective action is taken. Document is titled Animal Intrusion SOP #03-03.	

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

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.12.01	Does the harvesting operation have written and implemented policies and procedures regarding employees with open sores and/or wounds and for dealing with employees who appear to be physically ill, or who become ill while working?	Yes	5	5	Yes. The general policies addressing health, illness and hygiene in the harvest crew are contained in the Food Safety Policy document of the Food Safety Manual. Amado Reyes uses the document as a main training tool for all employees and applies to all employees.	
2.12.02	Are any employees eating and drinking (other than water) in active harvest areas, areas yet to be harvested, near harvested product or storage areas?	No	5	5	No. None were observed.	
2.12.03	Does the harvesting operation have written and implemented policies and procedures covering employees using tobacco products in active harvest areas, areas yet to be harvested, near harvested product or storage areas? Spitting is not allowed in any areas?	Yes	5	5	Yes. This policy is found in the Food Safety Policy Sec. #20 and includes requirement that spitting is not allowed.	
2.12.04	Is it evident the clothing harvesters are wearing is not posing a cross contamination risks?	Yes	5	5	Yes. The clothing does not pose a cross contamination risk. Clothing was appropriate.	
2.12.05	Is it evident that employees are free of exposed jewelry (except for a single plain wedding band) and other items that may be a source of foreign contamination issue ?	Yes	5	5	Yes. No exposed jewelry or other items of this nature were noted.	
2.12.06	Where gloves are required to be used by the auditee, are they appropriate for the type of harvesting (e.g., not using cotton gloves for harvesting a product such as lettuce) and are they in good working order?	Yes	5	5	Yes. Gloves are required and were being worn by all harvesters and product handlers.	
2.12.06a	Where gloves are used, are they latex-free?	Yes	0	0	Yes. Blue gloves were latex free and available to all harvest crew members.	
2.12.07	If any protective clothing is used by the auditee (e.g., gloves, aprons, sleeves) are they removed prior to using restrooms, going on breaks, etc?	N/A	0	0	N/A. Protective clothing is not used by romaine lettuce crew.	
2.12.07a	Are secondary hand sanitation stations (e.g., hand dip, gel or spray stations) adequate in number and location? Are the stations maintained properly? NOTE: Secondary hand sanitation does not replace hand washing requirements (lack surfactant qualities).	N/A	0	0	N/A. Not observed.	
2.12.08	Are there operational toilet facilities provided? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT. If No, go to 2.12.09	Yes	20	20	Yes. Toilet #DS-242 was operational.	
2.12.08a	Are toilet facilities located in a suitable area and within ¼ mile or 5 minutes walking distance of all employees?	Yes	10	10	Yes. Toilet location met this criteria.	
2.12.08b	Are toilet facilities in a suitable location to prevent contamination to product, packaging, equipment, and growing areas?	Yes	15	15	Yes. Toilet was suitably located to prevent contamination to product, equipment and growing area.	
2.12.08c	Are separate toilet facilities provided for men and women in groups larger than 5 employees?	N/A	0	0	N/A. Only men worked this harvest.	
2.12.08d	Is a minimum of one toilet facility provided for each group of 20 employees?	Yes	10	10	Yes. This criteria was met.	
2.12.08e	Do toilet facilities have visuals or signs, written in the appropriate languages, reminding employees to wash their hands before returning to work?	Yes	5	5	Yes. Signage encouraging the washing of hands is located on the inside bulkhead of each individual unit. Language is appropriate for workers.	
2.12.08f	Are toilets supplied with toilet paper and is the toilet paper maintained properly (e.g. toilet paper rolls not stored on the floor or in the urinals)?	Yes	5	5	Yes. Supplies were topped off and toilet paper was in its' place in the dispenser.	
2.12.08g	Are the toilets maintained in a clean condition?	Yes	10	10	Yes. The toilets are clean.	
2.12.08h	Are toilets constructed of materials that are easy to clean?	Yes	2	2	Yes. The toilets are of an industrial design, common in the industry, well built and easy to clean.	
2.12.08i	Are the toilet's construction materials of a light color allowing easy evaluation of cleaning performance?	Yes	2	2	Yes. The color of the unit is conducive to cleaning and evaluation of cleaning performance.	
2.12.08j	Is there a documented and implemented policy that if portable toilets are used, waste is disposed of properly and the units are cleaned in an appropriate location?	Yes	5	5	Yes. Service specifications supplied by Henderson's Sani-Service are specific for waste disposal. Waste is hauled to a West Palm Beach treatment facility.	
2.12.08k	Are there toilet cleaning records and for portable toilets, are there servicing records?	Yes	2	2	Yes. Records of cleaning and servicing are logged in the inside bulkhead of the toilet units. Last servicing was December 15, 2014.	
2.12.08l	If used, are catch basins of the toilets designed and maintained to prevent contamination (e.g. free from leaks and cracks)?	Yes	5	5	Yes. The unit is of an industrial design, strong and common to the industry. No leaks were observed.	
2.12.08m	Are the toilet catch basins emptied properly?	N/A	0	0	N/A. Not observed.	
2.12.09	Is there evidence of human fecal contamination in the harvesting area? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	No	20	20	No. Human fecal contamination was not observed or detected in the harvesting area or any surrounding area.	
2.12.10	Are operational hand washing facilities provided? If No, go to 2.12.11. A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Yes	20	20	Yes. Wash facilities were in place and operational at testing. Wash stations are part of the toilet/wash station combination.	
2.12.10a	Are the hand washing facilities placed within ¼ mile or 5 minutes walking distance of all employees?	Yes	15	15	Yes. This criteria was met.	
2.12.10b	Are hand wash stations clearly visible (e.g. situated outside the toilet facility) and easily accessible to workers?	Yes	2	2	Yes. The wash stations are clearly visible.	



2.12.10c	In the event of running out of toilet materials (e.g., water, soap, toilet tissue, hand paper towels) are there extra supplies readily available so that toilets can be restocked quickly?	Yes	5	5	Yes. These materials are kept at the main shop complex, a short distance away. Units are checked daily by Roth Farms Personnel.
2.12.10d	Is soap made available at all hand washing facilities? If No, go to 2.12.10f.	Yes	10	10	Yes. Soap was available.
2.12.10e	Is non-perfumed soap available?	Yes	5	5	Yes. Non-perfumed.
2.12.10f	Are single-use towels available at all hand washing facilities and trash cans for them?	Yes	10	10	Yes. Towels are single use. Trash can are placed adjacent to wash station.
2.12.10g	Are the hand wash stations designed and maintained properly (e.g. ability to capture or control rinse water to prevent contamination onto product, packaging, and growing area, free of clogged drains, etc)?	Yes	5	5	Yes. The wash station is part of a complete unit. See 2.12.10.
2.12.10h	Are the employees washing their hands prior to beginning work? Score NA if this discipline is not observed at the time of the audit.	N/A	0	0	N/A. Not observed.
2.12.10i	Are the employees washing their hands after break periods? Score NA if this discipline is not observed at the time of the audit.	N/A	0	0	N/A. Not observed. Harvest underway.
2.12.10j	Are the employees washing their hands after using the toilet facilities? Score NA if this discipline is not observed at the time of the audit.	N/A	0	0	N/A. Not observed.
2.12.10k	Is it evident that corrective action is taken when employees fail to comply with hand washing guidelines?	N/A	0	0	N/A. Not required.
2.12.11	Is fresh potable drinking water readily accessible to employees.? If No, go to 2.12.12.	Yes	7	7	Yes. Employees are responsible to bring their own or may use the potable water well at the main shop.
2.12.11a	Are the water containers maintained in a clean condition?	Yes	5	5	Yes. Containers in the crew leader truck were clean.
2.12.11b	Are single use cups provided (unless a drinking fountain is used) made available near the drinking water?	Yes	7	7	Yes. Single use cups are available at the truck.
2.12.12	Are first-aid kits available and is the inventory maintained properly?	Yes	5	5	Yes. Harvest crew presented a first aid kit. Condition is fair, yet adequate. Unable to verify expiration date.
2.12.13	If observed, are all commodities that come in contact with blood and/or other bodily fluids destroyed? A NO ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	N/A. Not observed.
2.12.13a	Does the harvesting operation have written and implemented policies and procedures in place for all commodities that come in contact with blood and other bodily fluids, stating that they must be destroyed? Are these policies and procedures available to harvest crew workers?	Yes	5	5	Yes. Policy is to destroy contaminated product and policy is communicated in training sessions using the Food Safety Policy. Field Sanitation Blood Policy, SOP #07-04 and dated November 5, 2012.
2.12.14	Is garbage disposed of properly in the harvesting areas?	Yes	10	10	Yes. Area was clean.
2.12.15	Are garbage containers provided in the field for the disposal of food and beverage containers, cups, and paper towels? If No, go to 2.12.16	Yes	5	5	Yes. The crew leader accumulates cups and trash in trash bag in truck.
2.12.15a	Are garbage containers constructed and maintained (e.g. bags, lids) to protect against pre harvest or post harvest contamination of the crop?	Yes	5	5	Yes. Trash cans were covered and heavy mil trash bags are used.
2.12.16	Have any potential metal, glass, or plastic contamination issues been controlled?	Yes	5	5	Yes. No metal, glass or plastic contamination issues were observed.
2.12.17	Are there any infant or toddler aged children observed in active harvest areas, areas yet to be harvested, near harvested product or storage areas?	No	10	10	No Children are not allowed and none were seen. Food Safety Policy item.

## GAP – Harvest Practices

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.13.01	Is there evidence of animal presence and/or animal activity in the harvesting area? If answer is NO, go to Q 2.13.02.	No	15	15	No. There was no evidence of animal presence or animal activity. This area provides poor habitat for animals seeking permanent residence.	
2.13.01a	Is the evidence of animal presence and/or animal activity found, in the form of fecal contamination? If answer is NO, go to Q 2.13.02.	N/A	0	0		
2.13.01b	Is the fecal matter found in the audited area, a systematic event (not sporadic)? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0		
2.13.02	Is the product harvested and transported to a facility for additional handling and/or final packing?	Yes	0	0	Yes. Romaine lettuce is transported to the packing house for further handling and cooling.	
2.13.03	Is the product packed in the final packing unit in the field? If No, go to 2.13.04.	Yes	0	0	Yes. Product is packed into cardboard boxes.	
2.13.03a	Is packing material (e.g. cartons, bags, clamshells, sacks, RPCs) intended for carrying product used for that purpose only?	Yes	5	5	Yes. Boxes were being used only for purpose intended in the harvest of Romaine lettuce as determined by Roth Farms.	
2.13.03b	Is packing material free from evidence of pest activity, foreign materials and other signs of hazardous materials? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Yes	20	20	Yes. Boxes were clean, fresh, bundled and were free of pest activity or contamination.	
2.13.03c	Is packed product free from evidence of pest activity, foreign materials, hazardous materials and any adulteration issues? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Yes	20	20	Yes. Packed product observed was free from evidence of pest activity or any obvious adulteration issues. Product was handled appropriately.	
2.13.03d		Yes	5	5		

	Is product and packing material free from exposure to the ground and or any handling contamination?				Yes. Leaves of inferior (smaller) plants are placed on the ground in a row to act as protective barriers separating harvested product and packing boxes from the ground. The leaf barriers are created before cutting commenced to fill the next box.
2.13.03e	Does the operation inspect packaging prior to use and is packed product inspected after packing; where contamination issues are found is corrective action taken and record?	Yes	5	5	Yes. The crew leader was continually observing the packing of the boxes in the field as the crew stayed very close together during the harvest. Boxes are inspected during their construction on the trailer. Product is inspected as each individual lettuce unit is placed in the box. No corrective action was required.
2.13.03f	If packing material is left in the field overnight is it secured and protected?	N/A	0	0	N/A. Packing material is not left in the field overnight.
2.13.03g	Does finished product packaging display information to enable proper storage and use of the product within the food supply chain?	N/A	0	0	N/A. Not observed.
2.13.04	Are grading and packing tables used? If No, go to 2.13.05.	No	0	0	No.
2.13.04a	Does the surface allow for easy sanitation?	N/A	0	0	
2.13.04b	Are grading and packing tables subject to a documented cleaning program including stating the frequency of cleaning and cleaning procedures? If No, go to 2.13.05.	N/A	0	0	
2.13.04c	Is an anti-microbial solution (e.g. chlorinated or equivalent) used to sanitize the grading and packing tables after cleaning has occurred?	N/A	0	0	
2.13.04d	Are records of grading and packing tables equipment cleaning being maintained?	N/A	0	0	
2.13.05	Are re-useable containers (e.g. buckets, field totes, lugs, bins) used in the harvesting operation? If No, go to 2.13.06.	No	0	0	No.
2.13.05a	Are re-useable containers made of easy to clean materials?	N/A	0	0	
2.13.05b	Are re-useable containers subject to a documented cleaning program including stating the frequency of cleaning and cleaning procedures? If No, go to 2.13.05e.	N/A	0	0	
2.13.05c	Is an anti-microbial solution (e.g. chlorinated or equivalent) used to sanitize the re-useable containers after cleaning has occurred?	N/A	0	0	
2.13.05d	Are records of re-useable containers cleaning being maintained?	N/A	0	0	
2.13.05e	Are re-useable containers free from any handling contamination?	N/A	0	0	
2.13.06	Are tools (e.g. knives, clippers, scissors, etc.) used in harvesting? If No, go to 2.13.07.	Yes	0	0	Yes. Knives are used.
2.13.06a	Are harvest tools (e.g. knives, coring rings, holsters) being used, made of non corrosive and easy to clean materials (e.g. no wood or fabric parts)?	Yes	5	5	Yes. Knives are of an industrial grade common to industry use. Handles are hard plastic and blades are stainless steel. Scabbards are plastic and easy to clean.
2.13.06b	Are harvest tools not being taken into break or toilet areas or used for any other purpose other than product harvesting?	N/A	0	0	N/A. Not observed.
2.13.06c	Are harvest tools free from exposure to the ground and or any handling contamination?	Yes	5	5	Yes. Handling of knives was appropriate and none were seen to hit the ground.
2.13.06d	Is there an equipment and utensil (e.g. knives) storage and control procedures when not in use?	Yes	5	5	Yes. Knives are returned to and controlled after harvest event by Olga Lopez, Food Safety Coordinator. Olga distributes cleaned and sanitized knives to each crew leader prior to harvest event. Verbal by Olga Lopez.
2.13.06e	Are harvest tools subject to a documented cleaning program including stating the frequency of cleaning and cleaning procedures? If No, go to 2.13.06h.	Yes	5	5	Yes. Knives are pressure cleaned and chlorine sanitizer is used after every harvest day. A bucket with solution is available during harvest should a knife hit the ground. See 2.13.06d.
2.13.06f	Is an anti-microbial solution (e.g. chlorinated or equivalent) used to sanitize the harvesting tools after cleaning has occurred?	Yes	5	5	Yes. Policy is to prepare a 200ppm chlorine solution for sanitizing knives.
2.13.06g	Are records of harvesting tools cleaning being maintained?	Yes	5	5	Yes. Cleaning records were recorded on log titled Knife Sanitation Container. Record reviewed was for the week of December 15, 2014.
2.13.06h	Are harvesting tool dips being maintained properly in terms of anti-microbial solution strength and are records of the solutions checks being maintained? AUDITORS SHOULD REQUIRE A TEST AT THE TIME OF THE AUDIT.	N/A	0	0	N/A. Auditor did not test. Policy is 200ppm chlorine solution in potable water. See 2.13.06e.
2.13.07	Is machinery used in the harvesting process? If No, go to 2.13.08.	No	0	0	No.
2.13.07a	Are all food contact surfaces on the machinery used in the harvest process constructed of food grade materials or stainless steel?	N/A	0	0	
2.13.07b	Does the packing surface allow for easy sanitation?	N/A	0	0	
2.13.07c	Is the harvesting equipment subject to a documented cleaning program including stating the cleaning frequency and cleaning procedures? If No, go to 2.13.07f.	N/A	0	0	
2.13.07d	Is an anti-microbial solution (e.g. chlorinated or equivalent) used to sanitize the harvesting equipment after cleaning has occurred?	N/A	0	0	
2.13.07e	Are records of harvesting equipment cleaning being maintained?	N/A	0	0	
2.13.07f	Is equipment designed and used properly to minimize product contamination (e.g. drip pans utilized, lights protected)?	N/A	0	0	
2.13.07g	Are only food grade lubricants used on the critical parts of the harvesting machinery that have the potential to contaminate product?	N/A	0	0	



2.13.07h	Are all glass issues on harvesting machines, in-field trucks, and tractors protected in some manner?	N/A	0	0	
2.13.07i	Are all platforms above product, packaging, or food contact surfaces (e.g. belts) on the harvest machinery, in-field trucks fitted with protection to prevent product contamination?	N/A	0	0	
2.13.08	Is water used directly on product contact( e.g. re-hydration, core in field)? If No, go to 2.13.09.	Yes	0	0	Yes. A chlorine bleach solution with a strength of 2ppm free chlorine is used to rinse the 'milk' at cut location at the lettuce core base using Water Boy 1, which is a hand held sprayer. Rinse to core base is applied prior to placement in box. Not used for re-hydration or washing of product.
2.13.08a	Are microbial tests conducted including Generic E.coli on water used for washing, hydrating, etc. harvested crops (e.g. re-hydration, core in field) ? If No, go to 2.13.08c.	Yes	10	10	Yes. Water was tested for Generic E.coli from the water source, a drinking water well at the shop complex. Water was analyzed on November 24, 2014 and source is tested monthly. Readings have been consistently < 1 MPN/100ml.
2.13.08b	Are the microbiological tests current and conducted at the required and/or expected frequencies?	Yes	10	10	Yes. Tests of the water source prior to mixing with the chlorine solution requirement are current and at the expected frequency. See 2.13.08a.
2.13.08c	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	Yes	10	10	Yes. These procedures are described in document Disinfecting Well Water – Shock Chlorination, a University of Georgia extension publication from the Household Water Quality Series 2012.
2.13.08d	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	N/A. No unsuitable or abnormal results have been reported.
2.13.08e	Are the anti-microbial parameters clearly documented and correct for the type anti-microbial being used?	Yes	10	10	Yes. Water meets U.S. EPA or WHO microbial standards for drinking water.
2.13.08f	Are anti-microbial checks being performed on a routine basis?	Yes	10	10	Yes. See 2.13.08b.
2.13.08g	Are corrective actions recorded where anti-microbial results are less than the stated minimum criteria?	N/A	0	0	N/A. Not required to date.
2.13.09	Is the harvested product 'in-field processed' or 'In-field semi-processed' (e.g. core in field, top & tail, florets)? If No, go to 2.13.10.	No	0	0	No.
2.13.09a	Does the process flow, machine layout, employee control, utensil control, etc. ensure that processed products are not contaminated by unprocessed products?	N/A	0	0	
2.13.09b	Do all employees that come in contact with the product being harvested wear clean protective outer garments (e.g. hairnets, plastic gloves, sleeves and aprons)?	N/A	0	0	
2.13.09c	Do all employees that wear protective outer garments remove and keep them in a clean and secure area during breaks or when using the toilet facilities?	N/A	0	0	
2.13.09d	Are all plastic bin liners closed immediately after harvest to avoid contamination of the harvested product?	N/A	0	0	
2.13.10	Is there any post-harvest treatment performed to the product in the field? If No, go, 2.14.01	No	0	0	No. Harvested and hauled only.
2.13.10a	Are there up to date records of all crop protection products applied in the field to the harvested product? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	
2.13.10b	Are there plant protection products registered and/or authorized by a government agency for use in the post-harvest period to the target crops in the country of production? If No, go to 2.13.10e.	N/A	0	0	
2.13.10c	Has the growing operation have the information available for the plant protection products registered and/or authorized for use in the post-harvest period for the target crops in the country of production? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	
2.13.10d	Are applications or treatments to the harvested product restricted by the guidelines established by the product label, manufacturer recommendation, or by prevailing national/ local standards and guidelines? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	
2.13.10e	If applicable, for those plant protection products that are not registered for use in the post-harvest period on target crops in the country of production, if the country has no or a partial legislative framework to cover plant protection products, can the grower show that they have registration information, label information, MRL tolerances, etc. for the country of destination? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	
2.13.10f	Is there evidence available that the grower is taking all the necessary measures to comply with the country(ies) of destination expectations regarding the post-harvest treatments used (e.g. registration information, label information, MRL tolerances or any other guidelines applicable)? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	N/A	0	0	

### GAP – Transportation and Tracking

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.14.01	Are the vehicles transporting fresh produce from field to facility limited to this function only and maintained in proper condition?	Yes	5	5	Yes. Clean and tarped flatbed truck is used for the purpose of moving fresh Romaine from the field to the packinghouse. Maintenance is recorded on the Farm Equipment Inspection & Maintenance Log.	
2.14.02	Is there a system in place to track product from the farm? If No, go to 2.15.01.	Yes	20	20	Yes. Romaine lettuce leaving the harvest area in the hauler is accompanied by a harvest ticket with information including date harvested, crop #, block#, plant #, load #, bed # and harvester number.	
2.14.02a	If product is being packed in the field, are the cartons, boxes, RPC's or any other packaging material used, identified with the harvesting date and growing location information on them? This question does not apply for raw material/bulk product destined for further handling in a packinghouse or processor facility.	N/A	0	0	N/A. Destined for further handling and cooling.	
2.14.02b	If product is being packed in the field and individual packing units are used (e.g., clamshells, bags, baskets or others), are these individual units identified with the harvesting date and growing location information on them? This question does not apply for raw material/bulk product destined for further handling in a packinghouse or processor facility.	N/A	0	0	N/A. Destined for further handling and cooling.	

### GAP – On site storage

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.15.01	Is there an on site storage for items and/or equipment used in the harvest process (e.g., packing material, cartons, clamshells, re-usable containers, disinfectants, grading/packing tables, RPCs, harvesting equipment, etc)? If No, skip the rest of the questions in this section.	Yes	0	0	Yes. Packing material is kept in the shop area complex.	
2.15.02	Are packaging, containers, and harvesting equipment stored to prevent cross contamination (this includes RPCs, cartons, clamshells, bins, and other harvesting type of containers that are single use or reusable, etc. )?	Yes	5	5	Yes. Storage area is specific for packing material, building is sealed, secured, organized and clean. Materials are stored up of the floor.	
2.15.03	Is the storage area under a sanitation program?	Yes	5	5	Yes. The program is titled Roth Farms Loading Dock and Storage Area Checklist. Last inspection recorded was on December 8, 2014. A corrective action had been recorded which required some clean up activity.	
2.15.04	Has the operation implemented a pest control program in the storage area? If answer is NO, skip the rest of the subquestions.	Yes	20	20	Yes. The program is the 2013–2014 Roth Farms Rodent Control and Monitor Station Inspection Record. Weekly inspections are recorded on the log.	
2.15.04a	Are pest control devices (inc. rodent traps and electrical fly killers) located away from items and/or equipment used in the harvest process (e.g., packing material, cartons, clamshells, re-usable containers, disinfectants, grading/packing tables, RPCs, harvesting equipment, etc)? Poisonous rodent bait traps are not used inside the storage areas?	Yes	5	5	Yes. Pest control devices were located away from the packing materials being stored there. Four sticky traps are being used in the interior and 8 bait stations are positioned on the exterior of the storage space.	
2.15.04b	Are pest control devices maintained in a good working condition and marked as monitored (or bar code scanned) on a regular basis?	Yes	5	5	Yes. Devices were being maintained. 4 sticky traps on the interior; 8 bait stations on the exterior.	
2.15.04c	Are pest control devices adequate in number and location?	No	0	5	No. There are no sticky traps along the west wall, interior. Map concurs.	
2.15.04d	Are all pest control devices identified by a number or other code (e.g. barcode) ?	Yes	5	5	Yes. The map is clear as to location of devices. The storage unit is not large.	
2.15.04e	Are all pest control devices properly installed and secured?	No	0	5	No. Baits were observed loose and lying outside of several traps on the exterior west wall. Design does not allow for traps to be locked. Exterior bait stations are secure to the ground and parallel to the wall.	
2.15.04f	Is there a schematic drawing of the plant showing numbered locations of all traps and bait stations, both inside and outside the storage area?	Yes	5	5	Yes. The map was available for review and was marked accurately.	
2.15.04g	Are service reports created for pest control checks detailing inspection records, application records, and corrective actions (if issues were noted) (in-house and/or contract)?	Yes	5	5	Yes. Good records of trap pest control checks are being kept. Information on trap or station activity is detailed. Work is performed in-house. Checks are weekly.	