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**Farm GAP Policy Manual
(for compliance with Primus Labs GAP Audit version 07.04 Rev.1)**

RE: SOP's and Farm Policies

SOP 02.01 POLICY. Traceability requires the following: For traceback, there must be a current Map of the Growing Areas with sections delineated by a unique code. Traceback will be achieved by each box or bag of product being labeled with the farm name, farm location, product, product quantity, date of harvest, and field of harvest. For traceforward, a Buyer Log must be filled out with contact information of all buyers to allow for a recall. Additionally, in case of a recall, a log or duplicate invoice should be kept to allow for rapid identification of product, product quantity, date of harvest, and field of harvest, of each item sold.

SOP 04.02b POLICY. Domestic animals, livestock, or wild animals are **not allowed** in the growing areas, or the packaging and equipment storage areas.

SOP 04.05 POLICY. Infants or Toddler-aged Children are **not allowed** in the growing areas, packaging areas, or chemical and equipment storage areas.

Fertilizer/Crop Nutrition SOPs for Aquaponics Operations:

SOP 05.05a POLICY. Fish effluent for crop treatment. Water containing fish effluent **shall not** come in contact with the edible portion of the crop at any time.

SOP 05.05b POLICY. Application records. Water containing fish effluent will be pumped continuously into the growing area, and will not come into contact with the edible portion of the crop at any time. Fish effluent will not be applied to the crop at any time. Fish production water will only be sourced from potable water sources – no ditches, reservoirs, or catchment water.

SOP 05.05c POLICY. Water testing. Live healthy fish do not produce pathogens or heavy metals, and cannot be tested for a Certificate of Analysis. To ensure healthy fish, fish production water will only be sourced from potable water sources. Following the best agricultural practices, *source water* will be tested annually for pathogens, and heavy metals. Additionally, to ensure the safety of the production system, *fish production water* will be tested annually for pathogens, and total coliforms and *E. coli*.

Fertilizer/Crop Nutrition SOPs for Hydroponics Operations:

SOP 05.07a POLICY. Application records for inorganic fertilizers. Water containing inorganic nutrients will not come into contact with the edible portion of the crop at any time. Fertigation on this farm is done on a _____ basis (e.g. constant, daily, every two days, every three days, weekly). The fertilizer formulation is:

<u>Product name</u>	<u>Percent of total blend</u>
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- 1)
- 2)
- 3)

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Irrigation/Water Use SOPs:

06.01xx – Dryland; 06.02xx - Municipal water; 06.03xx – Wells; 06.04xx – Ponds, reservoirs, watersheds, or other surface water; 06.05xx – Canals, rivers, ditches, or other open flowing systems; 06.06xx – Reclaimed water; 06.07xx – Tail water (run-off water).

SOP 06.01d, 06.02c, 06.03g, 06.04g, 06.05h, 06.06e, 06.07g: SOP: Water Sampling. Water used on the farm **shall be** sampled and tested for total and fecal coliforms at least once per year. Water Samples will be collected in a sterile collection vials and handled per instructions provided by the testing laboratory. If multiple sources of water are used on the farm, water from each source (ex. well) is to be tested. Samples should be identified by the date of collection, the farm name, and source of water.

SOP 06.01e, 06.02d, 06.03h, 06.04h, 06.05i, 06.06f, 06.07h: SOP: Corrective actions for unsuitable or abnormal water testing results. In the event that water testing results indicate total coliform and/or fecal coliform concentrations unsuitable for intended use on the farm and in packing operations, 1) the affected produce in the harvest, storage, packing and distribution chain shall be isolated and held, 2) the water shall be re-tested to verify results and 3) if unacceptable water testing results are confirmed, the product will not be released to the market to prevent possible exposure of consumer to contaminated product, 4) the reason for the water contamination will be determined and corrected, and 5) a means of effectively reducing the microbiological contamination shall be selected. IF water has pathogens and is used as produce wash water a sanitizing product **shall be** used to disinfect the water. Follow the directions on the label of the sanitizing product.

SOP 07.01 SOP: Mixing of Crop Protection Chemicals **shall be** done per label instructions and away from growing areas, produce washing areas, produce and packing materials to prevent the possibility of contamination of water, soil, produce and packing materials.

SOP.07.02 SOP: Cleaning Crop Protection Equipment **shall be** done away from growing areas, produce washing areas, produce and packing materials to prevent the possibility of contamination of water, soil, produce and packing materials.

SOP 07.03 SOP: Competent to read directions and apply chemicals, this farm **shall have** a person in authority that can read English for chemical labelers or that the authority will seek application advice from a known authority.

SOP 07.11 SOP: To avoid pesticide drift, crop protection application **shall not be** done when wind gusts are excessive.

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SOP 07.12 SOP: Crop Protection containers **shall be stored** in a locked, secure location with limited access (ex. pesticide shed) to prevent contamination. Empty containers **shall be** triple washed (away from growing, packing and storage areas), punctured and disposed of in a sanitary landfill.

SOP 07.13 SOP: Crop Protection Equipment Monitoring. All equipment used for the mixing and application of crop protection chemicals **shall be** inspected for leaks prior to use by applicator. **At no time shall** leaking or improperly functioning equipment be used to apply crop protection chemicals.

SOP 08.01 POLICY: Employee Health. Employees who are sick **shall** report to their supervisors. **At no time shall** sick employees work in areas of the company where there is a possibility of food or food contact surface contamination. Supervisors shall monitor worker health and maintain record on Harvest Crew and Packing Crew GAP Records.

SOP 08.02 POLICY: Employees with Open Wounds and Skin Infections. Employees with open wounds and skin infections **shall** report to their supervisors. **At no time shall** employees with open wounds and skin infections work in areas of the company where there is a possibility of food or food contact surface contamination. Employees **shall be** instructed to properly clean and disinfect the open wounds and skin infections, and seek medical attention for severe conditions. Supervisors **shall** monitor workers for open wounds and skin infections.

SOP 08.03 POLICY: Contamination of Produce or Food Contact Surfaces with Blood. Employees **shall** report all incidents of blood contamination to their supervisors immediately. All produce and packing materials that come in contact with blood **shall be** immediately removed from the food growing, packing and storage areas, put in plastic bags and disposed of without further contamination. All other food contact surfaces (ex. knives, tools, tables, scales, etc.) **shall be** immediately cleaned and disinfected before further use.

SOP 08.04 POLICY: Eating, drinking, chewing gum (tobacco, or betal nut), or smoking tobacco is **not allowed** in the growing areas, produce packing or storage areas.

SOP 08.05 SOP: Food Safety Hygiene Training. **All employees shall** watch the training video such as *“Do It Right”* at least once and report to their supervisor that they have viewed the video and understand the lessons regarding proper hand washing and protection of food from microbial pathogen contamination. A training record shall be maintained including the date, name of employee and signature that viewing the training video occurred.

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SOP 08.06c, 08.06f, 08.06g POLICY: Placement, maintenance and emptying toilet catch basins. Portable toilets shall be placed, maintained and emptied to prevent contamination to product, packaging and equipment. Toilets catch basins on small portable units shall be emptied at the end of each day of use by proper removal of catchment unit (unit removed and sealed) for disposal in an approved state/City and County sanitary system. Handling toilet catch basins shall be done with elbow length nitrile gloves, and proper hand washing shall be done prior to returning to work. A catch basin (unit) shall be made of approved materials and inspected for cracks or defects during every emptying.

If a portable restroom is used, servicing shall be done by a State approved/certified company with proper working pumping equipment at the appropriate servicing interval for number of usages. Portables should be inspected routinely by servicing company for cracks, leaks or other means of contamination. Records from servicing company shall be available for inspection.

SOP 08.08d POLICY: Emptying sink catch base. Used wash water **shall not** be allowed into production areas. Used water **shall be** diverted into a hedgerow, drain, holding pond, or other approved disposal system.

SOP 08.08e POLICY: All company personnel shall properly wash hands before handling produce and food contact surfaces to prevent contamination (including before beginning, after returning to work, after eating, using the toilet, touching unsanitary surfaces).

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SOP 8.07 POLICY: Animal fecal contamination in proximity to growing area or any processing or storage areas shall be monitored daily. While it is not possible to completely exclude all animal life from all fresh produce production areas (including fields, greenhouses/shadehouses, orchards, raised beds, etc.) and storage and packing areas, proactive measures are being taken to protect crops from animal damage/contamination.

Exclude domestic animals from growing areas. Dogs, cats, goats, sheep, cows, horses, lamas, fowl, etc. are kept away from fresh produce production areas, processing areas and storage areas during the growing season to the extent possible. This farm does not allow **domestic animals** or pets to roam free in crop production areas, especially close to harvest time. Daily surveillance and pick-up of manures is done and a daily manure pick-up log is used if domestic animals happen to get into a production area.

Discourage wild animals from growing areas to the extent possible. The farm operation makes every reasonable effort to limit access of wild animals within production areas and storage areas. Methods include trapping, or redirecting wildlife to areas with crops that are not destined for the fresh produce market, placing barriers around fields, or using noise or other devices to scare away wild animals. At no time are wild animals purposely fed by the farm personnel.

Keep harvesting equipment (tractors, carts, wheel barrows, baskets, etc.) free from manure. All equipment is checked and cleaned before put into use and entering a packing area.

Minimize cull piles to decrease the presence of vector attractants within or near the production field. Cull piles are covered or buried on a timely basis.

Produce that has come into direct contact with fecal material is not to be harvested. A "no harvest zone" approx. 5ft (1.5 m) radius will be implemented around the crop that is in direct contact with fecal matter unless or until adequate mitigation measures have been considered. If evidence of animal activity is found that is not fecal related (feathers, tracks, etc.), a food safety assessment will be conducted by qualified personnel.

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should be conducted by qualified personnel.

Food Defense

SOP 09.06 POLICY: All staff members **shall** report trespassers or suspicious activities to their supervisor immediately.

SOP 09.08 POLICY: All equipment **shall be** checked for tampering prior to use.

SOP 09.09 POLICY: All company supervisors shall undergo documented farm security training (USDA Pre-harvest Security 2006). A record of training shall be kept.

SOP 09.12 POLICY: All personal items **shall be** kept away from the harvest and packing operation.