



## PrimusLabs Audit (350104) Ranch V07.04 Rev. 1

<b>Customer(s)</b>	<b>Dundee Citrus Growers Association</b> Contact: John Marshall Address: P.O. Box 1739 Dundee Florida 33838-1739 United States Phone Number: (863) 439-0720 Fax Number: (863) 439-2897 Email(s): <a href="mailto:john.marshall@dun-d.com">john.marshall@dun-d.com</a> ; <a href="mailto:cindy.brewer@dun-d.com">cindy.brewer@dun-d.com</a> ; <a href="mailto:greg.dunnahoe@dun-d.com">greg.dunnahoe@dun-d.com</a>
<b>Grower(s)</b>	<b>Raley Groves</b> Contact: <a href="mailto:Lindsay.Raley">Lindsay Raley</a> Address: P.O. Box 1112 Winter Haven Florida 33882 United States Phone Number: 863-439-0720 Fax Number: 863-439-2897 Email(s): <a href="mailto:john.marshall@dun-d.com">john.marshall@dun-d.com</a>
<b>Ranch(s)</b>	<b>Raley Groves – Dundee</b> Contact: <a href="mailto:John.Marshall">John Marshall</a> Address: 603 Camp Endeavor Blvd. Dundee Florida 33838 United States Phone Number: 863-439-0720 Email(s): <a href="mailto:john.marshall@dun-d.com">john.marshall@dun-d.com</a>
<b>Audit Type:</b>	Ranch
<b>Foreman or Contact Person (and email):</b>	John Marshall <a href="mailto:john.marshall@dund.com">john.marshall@dund.com</a>
<b>Location/City:</b>	Lake Hamilton
<b>State:</b>	Florida
<b>Country:</b>	United States
<b>Date Audit Started:</b>	02/13/2017 08:00
<b>Date Audit Finished:</b>	02/13/2017 17:00
<b>Commodity(ies):</b>	Citrus
<b>Auditor:</b>	<a href="#">Bob Gates</a> (Sub-Contract Auditors)
<b>Audit Percentage Score:</b>	100%
<b>Announced Audit?</b>	Yes
<b>Audit Scope:</b>	The Raley Groves is a 300 acre conventional citrus operation. Water is supplied from 5 wells. Adjacent land includes other groves, a campground, a lake,

and rural residences.

**Audit Entered By:**

Robert Gates

**Additional Report Links**

[Report and Corrective Action Summary](#)

[See The Result Comparison](#)

[See The Audited Entity History](#)

**Corrective Actions Response**

**Note: This link must be used in order to notify that you are taking action in the corrective measures for questions that were not in full compliance.**

**Sections:**

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[Irrigation/Water Use](#)

[Crop Protection](#)

[Employee Hygiene \(This applies to on-the-farm staff not the harvesting staff\)](#)

[Food Security](#)

**Self Inspection**

Question No.	Audit Question	Given Answer	Given Score	Possible Score	Recommendation	Auditor Comments	Audio/Picture
01.01	Have Good Agricultural Practices (GAP) manuals covering each growing area within the scope of this audit (e.g., growing operation, orchard, vineyard) been developed and are they available for review?	Yes	5	5		<b>Yes. GAP manuals including procedures, policies, and risk assessments have been developed for the operation and were available for review.</b>	
01.02	Have documented Good Agricultural Practices (GAP)self-audits been completed for each growing area that is within the scope of this audit (e.g. growing operation, orchard, vineyard)?	Yes	7	7		<b>Yes. A GAP self- audit was performed by John Marshall using the PrimusLabs checklist on 20 JAN 17.</b>	

**Traceability**

Question No.	Audit Question	Given Answer	Given Score	Possible Score	Recommendation	Auditor Comments	Audio/Picture
02.01	Is the growing area(s) adequately identified or coded to enable trace back and trace forward in the event of a recall?	Yes	15	15		<b>Yes. The specific grove is broken into blocks and this data are incorporated into the harvesting records.</b>	

**Ground History**

Question No.	Audit Question	Given Answer	Given Score	Possible Score	Recommendation	Auditor Comments	Audio/Picture
03.01	Were farming area(s) used for growing food crops for human consumption last season?	Yes	0	0		<b>Yes. The citrus grove is well established.</b>	

03.02	Has the growing area(s) been used for any non-agricultural functions? If No, go to 3.03	No	7	7		No. Citrus grove.
03.02a	If the land had been used previously for non-agricultural functions have soil tests been conducted showing soil was negative or within an appropriate regulatory agency's approved limits for contaminants?	N/A	0	0		N/A
03.03	Has the growing area(s) been used for animal husbandry or grazing land for animals? If No, go to 3.04	No	7	7		No. Citrus grove.
03.03a	If the land was used previously for animal husbandry or grazing land for livestock, has a risk evaluation been performed?	N/A	0	0		N/A
03.04	Is there any evidence of animal activity in the crop that is a potential food safety risk?	No	20	20		No. There was no evidence of animal activity in the crop that is a potential food safety risk
03.05	Has flooding from uncontrolled causes occurred on the growing area(s) since the previous growing season? If No, go to 3.06	No	0	0		No, no flooding has occurred.
03.05a	If the growing area(s) and product was affected from the flood waters, is there documented evidence that corrective measures were taken to affected land and product?	N/A	0	0		N/A
03.05b	Have soil tests been conducted on the flooded area(s) showing soil was negative or within an appropriate regulatory agency's approved limits for contaminants?	N/A	0	0		N/A
03.06	Is the growing operation under organic principles? If No, go to 3.07	No	0	0	Definition for "organic principles": A system that relies on ecosystem management rather than external agricultural inputs. <a href="http://www.fao.org/ORGANICAG/frame11-e.htm">http://www.fao.org/ORGANICAG/frame11-e.htm</a>	No, conventional.
03.06a	Is current certification by an accredited	N/A	0	0		N/A

organic certification organization on file and available for review?

03.07	If the growing area(s) is a new purchase or lease, has a documented risk assessment been undertaken?	N/A	0	0		N/A – established grove.
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### Adjacent Land Use

Question No.	Audit Question	Given Answer	Given Score	Possible Score	Recommendation	Auditor Comments	Audio/ Picture
04.01	Is the adjacent land to the growing area a possible source of contamination from intensive livestock production (e.g. feed lots, dairy operations, poultry houses, meat rendering operation)? If No, go to 4.02	No	10	10		<b>No. The adjacent lands are largely in food crop production. Some areas are residential or hobby farms.</b>	
04.01a	Have appropriate measures been taken to mitigate this possible contamination source onto the growing area (e.g. buffer areas, physical barriers, fences, ditches, etc.)?	N/A	0	0		N/A	
04.02	Are, or is there evidence of domestic animals, wild animals, grazing lands (includes homes with hobby farms, and non commercial livestock) in proximity to growing operation? If No, go to 4.03	No	10	10		<b>No, there were no adjacent land use issues.</b>	
04.02a	Have physical measures been put in place to restrain domestic animals, grazing lands, (includes homes with hobby farms, and non commercial livestock) and their waste from entering the growing area (e.g. vegetative strips, wind breaks, physical barriers, berms, fences, diversion ditches.)?	N/A	0	0			
04.02b	Is there a written policy supported by visual evidence that domestic, livestock, or wild animals are not allowed in the growing area? Note: This includes any packaging or equipment storage areas.	Yes	10	10			
04.02c	Are measures in place to reduce or limit the animal intrusion (i.e., monitoring field perimeter for signs of intrusion)?	N/A	0	0			
04.03	Are untreated animal manure piles, compost, biosolids, or nonsynthetic amendment stored and/or applied on adjacent land? If No, go to 4.04	No	10	10		<b>No. None seen.</b>	
04.03a	Have physical measures been taken to secure untreated animal manure piles, compost, biosolids, or nonsynthetic amendment stored and/or applied on adjacent land?	N/A	0	0		N/A	
04.03b	If biosolids are stored and/or applied on adjacent land, has the adjacent landowner supplied paperwork confirming the biosolids meet prevailing guidelines, governmental, or local standards?	N/A	0	0		N/A	
04.04	Is the growing area situated in a higher risk location where contamination could occur from nearby operations or functions (e.g. leach fields, runoff or potential flooding from sewers, toilet systems, industrial facilities, labor camps)? If No, go to 4.05	No	10	10		<b>No, no nearby functions likely to cause a risk.</b>	
04.04a	Have appropriate measures been taken to mitigate risks related to nearby operations?	N/A	0	0		N/A	
04.05	Is there a documented and implemented policy that infant or toddler aged children are not allowed in the growing area? NOTE: This includes any packaging	Yes	10	10		<b>Yes. The no children policy is in effect.</b>	

or equipment storage areas.

## Fertilizer/Crop Nutrition

Question No.	Audit Question	Given Answer	Given Score	Possible Score	Recommendation	Auditor Comments	Audio/Picture
05.01	Is untreated human sewage sludge used in the growing cycle? If this question is answered Yes, automatic failure of this audit will result.	No	20	20		<b>No. Untreated human sewage sludge is not used.</b>	
05.02	Is compost produced from animal derived materials used by the grower? If No, go to 5.03	No	0	0		<b>No. Compost is not used.</b>	
05.02a	Are compost applications incorporated into the soil prior to planting or bud burst for tree crops and not applied during the growing season?	N/A	0	0		N/A	
05.02b	Are there compost use records available for each growing area, including application records which shows that the interval between application and harvest was not less than 45 days?	N/A	0	0		N/A	
05.02c	Are there Certificate(s) of Analysis (CoA) from the compost supplier(s) that covers pathogen and heavy metal testing (plus any other legally/best practice required testing) and does the grower have relevant letters of guarantee regarding SOP's and logs?	N/A	0	0		N/A	
05.03	Are biosolids used? If No, go to 5.04. NOTE: Special attention to commodity specific guidelines rules (e.g., Californian Leafy Greens) which ban the use of biosolids, see 5.03d	No	0	0		<b>No. Biosolid material is not used.</b>	
05.03a	Are biosolids incorporated into the soil prior to planting or bud burst for tree crops and not applied during the growing season?	N/A	0	0		N/A	
05.03b	Are the grower's biosolids use records available for each growing area, especially application records?	N/A	0	0		N/A	
05.03c	Are there a Certificate(s) of Analysis (COA) from the biosolid supplier(s) certifying compliance with prevailing national/ local standards and guidelines? If this question is answered No, automatic failure of this audit will result.	N/A	0	0		N/A	
05.03d	Are biosolids being applied to crops where the country of production regulations/guidelines ban the use such materials e.g. Leafy Green Commodity Specific Guidelines in California? If this question is answered Yes, automatic failure of this audit will result.	N/A	0	0		N/A	
05.04	Is untreated animal manure used? If No, go to 5.05. NOTE: Special attention to commodity specific guidelines rules (e.g., Californian Leafy Green Commodity Specific Guidelines) which ban the use of untreated animal manures. See 5.04d	No	15	15		<b>No. Animal manure is not used.</b>	
05.04a	Is untreated animal manure incorporated into the soil prior to planting or bud burst for tree crops and not applied during the growing season?	N/A	0	0		N/A	
05.04b	Are there untreated animal manure records available for each growing area including application records which shows that the interval between application and harvest was not less than 120 days (unless more stringent laws or guidelines exist)?	N/A	0	0		N/A	
05.04c	Are there Certificate(s) of Analysis (COA), specification or some other document available for review provided by the untreated animal manure supplier stating the components of the material?	N/A	0	0		N/A	

05.04d	Are untreated animal manures being applied to crops where the country regulations/guidelines ban the use such materials (e.g., Californian Leafy Green Commodity Specific Guidelines)? If this question is answered Yes, automatic failure of this audit will result.	N/A	0	0		N/A
05.05	Are other nonsynthetic crop treatments used (e.g. compost teas, fish emulsions, fish meal, blood meal,"bio fertilizers")? If No, go to 5.06	No	0	0		No.
05.05a	Are nonsynthetic treatments that contain animal products or animal manures applied to the edible portions crops?	N/A	0	0		N/A
05.05b	Are nonsynthetic crop treatment records available for each growing area including application records demonstrating the interval between application and harvest was not less than 45 days?	N/A	0	0		N/A
05.05c	Are there Certificate(s) of Analysis available from the nonsynthetic crop treatment suppliers that covers pathogen and heavy metal testing (plus any other legally/best practice required testing)?	N/A	0	0		N/A
05.06	Are any soil amendments (except inorganic nutrients/fertilizers) used that do not contain animal products and/or animal manures? If No, go to 5.07	No	0	0		No, only conventional.
05.06a	Are the grower's soil amendment (except inorganic nutrients/fertilizers that do not contain animal products and/or animal manures) records available for review including application records?	N/A	0	0		N/A
05.06b	Are there Certificate(s) of Analysis (COA) and/or letters of guarantee stating that the materials used are free from animal products and/or animal manures?	N/A	0	0		N/A
05.07	Are inorganic fertilizers used? If No, go to 5.08	Yes	0	0		Yes.
05.07a	Are the grower's inorganic fertilizer records available for review including application records?	Yes	10	10		Yes. The records are maintained by the farm manager.
05.07b	Are there Certificate(s) of Analysis (COA), letters of guarantee or some other documents from the inorganic fertilizer supplier(s) that specifies the source of all the ingredients including inert materials?	N/A	0	0		Yes. Growers Fertilizer Corp. supplied the COA with the appropriate information.
05.08	If fertilizers and/or fertilizer containers are stored on the property, are they stored in a manner to prevent contamination to the growing area(s) or any of water sources?	N/A	0	0		N/A – not kept in the grove.

## Irrigation/Water Use

Question No.	Audit Question	Given Answer	Given Score	Possible Score	Recommendation	Auditor Comments	Audio/ Picture
06.01	Does the growing operation practice dryland farming? If No, go to 6.02.	No	0	0	This refers to crop production that relies only on direct rainfall.	No.	
06.01a	If the growing operation practices dryland farming, are there water systems used in the growing operation to supply for crop needs such as crop protection/fertilizer applications, and frost or freeze prevention program? If No, go to 6.02	N/A	0	0			
06.01b	Are microbiological tests, including Generic E.coli conducted on water used for crop protection/fertilizer applications,	N/A	0	0			

	and frost or freeze prevention program? If No, go to 6.01d.					
06.01c	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0		
06.01d	Do written procedures (SOPs) exist covering proper sampling protocols which include how samples should be identified?	N/A	0	0		
06.01e	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0		
06.01f	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0		
06.02	Is the water used for the growing operation sourced from Municipal or District water pipeline systems? If No, go to 6.03	No	0	0	(No recommendation)	No.
06.02a	Are microbiological tests, including Generic E.coli conducted on water used for crop protection/fertilizer applications, and frost or freeze prevention program? If No, go to 6.02c.	N/A	0	0		
06.02b	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0		
06.02c	Do written procedures (SOPs) exist covering proper sampling protocols?	N/A	0	0		
06.02d	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0		
06.02e	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0		
06.02f	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0		
06.02g	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0		
06.02h	Are the crops irrigated by flood irrigation or a furrow system?	N/A	0	0		
06.02i	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0		
06.03	Is the water used in the growing operation sourced from wells? If No, go to 6.04	Yes	0	0		Yes.
06.03a	Are all well heads an adequate distance from untreated manure?	N/A	0	0		N/A. No untreated manure was observed.
06.03b	Is the well designed to prevent contamination?	Yes	10	10		Yes, the well heads were in good shape, and the pump houses locked.
06.03c	Is it evident that the well(s) is free from contamination issues and are measures	Yes	10	10		Yes, there were no nearby contamination

	taken to minimize contamination of wells?				<b>issues seen.</b>
06.03d	Are records kept for periodic inspections and treatment of wells (if performed) available for review?	<b>Yes</b>	7	7	<b>Yes, daily when in use.</b>
06.03e	Are microbiological tests, including Generic E.coli conducted on water used for irrigation, crop protection/fertilizer applications, and frost or freeze prevention program? If No, go to 6.03g	<b>Yes</b>	20	20	<b>Yes, last tested by Test America lab on 31 JAN 17 using SM9223B, with acceptable results for TC and EC.</b>
06.03f	Are the microbiological tests current and conducted at the required and/or expected frequencies?	<b>Yes</b>	15	15	<b>Yes. Tests are performed annually.</b>
06.03g	Do written procedures (SOPs) exist covering proper sampling protocols?	<b>Yes</b>	10	10	<b>Yes. This is documented in SOP 05--01.</b>
06.03h	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	<b>Yes</b>	10	10	<b>Yes, as defined in SOP 05-01.</b>
06.03i	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	<b>N/A</b>	0	0	<b>N/A – none have occurred since the previous audit.</b>
06.03j	Are the crops irrigated by a micro irrigation or drip system?	<b>Yes</b>	0	0	<b>Yes, microdrip.</b>
06.03k	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	<b>No</b>	0	0	<b>No, not used.</b>
06.03l	Are the crops irrigated by flood irrigation or a furrow system?	<b>No</b>	0	0	<b>No, not used.</b>
06.03m	Are the crops sub irrigated (also known as seepage irrigation)?	<b>No</b>	0	0	Information gathering question. Reducing contact with edible portion of the crop is believed to reduce microbial risk. <b>No, not used.</b>
06.04	Is the water used in the growing operation sourced from ponds, reservoirs, watersheds or other surface water source? If No, go to 6.05	<b>No</b>	0	0	<b>No, well water is used.</b>
06.04a	Is surface water in adequate distance from untreated manure?	<b>N/A</b>	0	0	<b>N/A</b>
06.04b	Do animals (domestic, livestock, or wild) have access to the water source?	<b>N/A</b>	0	0	<b>N/A</b>
06.04c	Is it evident that the water source is free of contamination issues and are measures taken to minimize contamination of the water source?	<b>N/A</b>	0	0	<b>N/A</b>
06.04d	Are records kept for the periodic visual inspections and disinfection treatments (if used) available for review?	<b>N/A</b>	0	0	<b>N/A</b>
06.04e	Are microbiological tests, including Generic E.coli conducted on water used for irrigation, crop protection/fertilizer applications, and frost or freeze prevention program? If No, go to 6.04g	<b>N/A</b>	0	0	<b>N/A</b>

06.04f	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0	N/A
06.04g	Do written procedures (SOPs) exist covering proper sampling protocols?	N/A	0	0	N/A
06.04h	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0	N/A
06.04i	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	N/A
06.04j	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0	N/A
06.04k	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0	N/A
06.04l	Are the crops irrigated by flood irrigation or a furrow system?	N/A	0	0	N/A
06.04m	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0	N/A
06.05	Is the water used in the growing operation sourced from canals, rivers, ditches, or other open flowing water systems? If No, go to 6.06	No	0	0	No.
06.05a	Is surface water in adequate distance from untreated manure?	N/A	0	0	
06.05b	Is the water source under the direction of a water authority or district?	N/A	0	0	
06.05c	Do animals (domestic, livestock, or wild) have access to the water source?	N/A	0	0	
06.05d	Is it evident that the water source is free of contamination issues and are measures taken to minimize contamination of the water source?	N/A	0	0	
06.05e	Are records kept for periodic visual inspection and disinfection (if occurring) of the water source and available for review?	N/A	0	0	
06.05f	Are microbial tests, including Generic E.coli conducted on water used for irrigation, crop protection/fertilizer applications, and frost or freeze prevention program? If No, go to 6.05h	N/A	0	0	
06.05g	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0	
06.05h	Do written procedures (SOPs) exist covering proper sampling protocols?	N/A	0	0	
06.05i	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0	
06.05j	If unsuitable or abnormal results have been detected, have documented	N/A	0	0	

	corrective measures been performed?				
06.05k	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0	
06.05l	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0	
06.05m	Are the crops irrigated by flood irrigation or furrow system?	N/A	0	0	
06.05n	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0	
06.06	Is reclaimed water used in the growing operation? NOTE: This refers to wastewater that has gone through a treatment process. If No, go to 6.07.	No	0	0	No.
06.06a	Is the reclamation process under the direction of a water reclamation management or authority?	N/A	0	0	
06.06b	Are microbial control measures for reclaimed water utilized?	N/A	0	0	
06.06c	Are microbial tests, including Generic E.coli conducted on water used for irrigation, crop protection/fertilizer applications, and frost or freeze prevention program? If No, go to 6.06e	N/A	0	0	
06.06d	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0	
06.06e	Do written procedures (SOPs) exist covering proper sampling protocols?	N/A	0	0	
06.06f	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0	
06.06g	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	
06.06h	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0	
06.06i	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0	
06.06j	Are the crops irrigated by flood irrigation or a furrow system?	N/A	0	0	
06.06k	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0	
06.07	Are tail water (run off water) systems used in the growing operation? If No, go to 6.08.	No	0	0	No.
06.07a	Is tail water in adequate distance from untreated manure?	N/A	0	0	

06.07b	Do animals (domestic, livestock, or wild) have access to the tail water systems?	N/A	0	0	
06.07c	Is it evident that the water source is free of contamination issues and are measures taken to minimize contamination of the tail water system?	N/A	0	0	
06.07d	Are records kept for periodic visual inspection and disinfection (if occurring) of the water source and available for review?	N/A	0	0	
06.07e	Are microbial tests conducted, including Generic E.coli on water used for irrigation, crop protection/fertilizer applications, and frost or freeze prevention program? If No, go to 6.07g	N/A	0	0	
06.07f	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0	
06.07g	Do written procedures (SOPs) exist covering proper sampling protocols?	N/A	0	0	
06.07h	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0	
06.07i	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	
06.07j	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0	
06.07k	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0	
06.07l	Are the crops irrigated by flood irrigation or furrow system?	N/A	0	0	
06.07m	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0	
06.08	Are check valves, anti-siphon devices, or other back flow prevention systems in use when and where necessary?	Yes	10	10	Yes, on every well.
06.09	Is irrigation equipment not in use free from pest contamination and stored clean off the ground?	Yes	10	10	Yes, in the pump house.

## Crop Protection

Question No.	Audit Question	Given Answer	Given Score	Possible Score	Recommendation	Auditor Comments	Audio/ Picture
07.01	Is there a documented policy and/or procedures for the mixing/loading of crop protection materials?	Yes	5	5		Yes. The process is documented according to the product label requirements.	
07.01a	Is mixing, loading, or the dilution of crop protection materials performed safely and within a distance where the growing area and water sources are not affected?	N/A	0	0		N/A. Mixing and loading of crop protection chemicals was not observed during the audit	

07.02	Is there a documented policy and/or procedures for the rinsing and cleaning of crop protection equipment?	Yes	5	5	inspection. Yes. The process is specified according to the product label.
07.02a	Is rinsing and cleaning of crop protection equipment performed safely and within a distance where land and water sources are not affected?	N/A	0	0	N/A. Rinsing and cleaning of crop protection equipment was not observed during the audit.
07.03	Is there documentation that shows the individual(s) making decisions for crop protection are qualified?	Yes	10	10	Yes. Lindsay Raley holds a currently valid pesticide applicator license issued by the State of Florida.
07.04	Is there documentation that shows employees who handle crop protection materials are trained or are under the supervision of a trained individual?	Yes	15	15	Yes. The sprayer training records were available for the current season.
07.05	Does the growing operation follow a pesticide application recording program? If No, go to 7.06 If this question is answered No, automatic failure of this audit will result.	Yes	20	20	Yes, electronically recorded.
07.05a	Are crop protection application records up to date and available for review?	Yes	15	15	Yes, the last application was on 6 FEB 17 for Danitol 2.4 EC.
07.06	Are crop protection materials registered in the country of use for the target crop where official registration is in place? If this question is answered Yes, skip to question 7.07. If no official registration system is utilized answer this question N/A and go to 7.06a. Where a system exists, but a crop protection chemical being used is not registered for the target crop either "in country" or by extrapolation (see 7.06a), the response to this question is No. If this question is answered No, automatic failure of this audit will result.	Yes	20	20	Yes, all chemicals checked were approved for use in Florida on citrus products.
07.06a	Does the country of production allow the use of crop protection materials that are registered for the target crop in another country, as long as the use of this material does not contravene any prevailing national and local laws in the destination country (e.g. maximum residue limit, banned lists, etc.)? If this question is answered No, automatic failure of this audit will result.	N/A	0	0	N/A, all used are EPA approved.
07.07	Are crop protection applications restricted by the guidelines established by the product label, manufacturer recommendation, or by prevailing national/ local standards and guidelines? If this question is answered No, automatic failure of this audit will result.	Yes	20	20	Yes, the records were reviewed for REI, PHI, per and annual application rate, and all were in compliance with the published requirements.
07.08	Where harvesting is restricted by pre-harvest intervals (as required on the crop protection chemical product labels, manufacturer recommendations and/or by prevailing national/ local standards) is the grower adhering to these pre-harvest interval time periods? If this question is answered No, automatic failure of this audit will result.	Yes	20	20	Yes, the REI for the most recent application was 24 hours, and the PHI was 1 day.
07.09	Are employee re-entry intervals established as required by the pesticide label, manufacturer	Yes	10	10	Yes, the label requirements are

	recommendation, or by prevailing national/ local standards and guidelines?					<b>followed.</b>
07.10	When crop protection applications occur, does posting take place on area of treatment according to prevailing national/ local standards and guidelines?	<b>Yes</b>	10	10		<b>Yes, a sign is placed at the entrance to the grove.</b>
07.11	To avoid drift, are crop protection applications restricted when gusts are excessive?	<b>Yes</b>	10	10		<b>Yes, calm conditions are preferred.</b>
07.12	If crop protection containers are stored on the property (even temporarily), are they stored in a manner to prevent contamination and disposed of responsibly?	<b>N/A</b>	0	0		<b>N/A, none stored in the grove.</b>
07.13	Have documented policies and/or procedures been developed for the monitoring of crop protection application equipment (e.g. calibration procedures, inspections, replacement)?	<b>Yes</b>	10	10		<b>Yes. This is documented in SOP 06–03 Calibration. An Equipment Calibration Log showing calibration records was available.</b>
07.13a	Is it evident that the equipment used for crop protection applications is in good working order?	<b>Yes</b>	10	10		<b>Yes. The air blast sprayer appeared to be in good condition.</b>

### **Employee Hygiene (This applies to on–the–farm staff not the harvesting staff)**

Question No.	Audit Question	Given Answer	Given Score	Possible Score	Recommendation	Auditor Comments	Audio/ Picture
08.01	Does the growing operation have a documented and implemented policy for dealing with employees who appear to be physically ill, or become ill while working?	<b>Yes</b>	10	10		<b>Yes. This is outlined in the worker's handbook.</b>	
08.02	Does the growing operation have a documented and implemented policy regarding employees with open sores and wounds?	<b>Yes</b>	10	10		<b>Yes. This is outlined in the worker's handbook.</b>	
08.03	Does the growing operation have a documented and implemented procedure in place requiring for all commodities that come in contact with blood to be destroyed? If this question is answered No, automatic failure of this audit will result.	<b>Yes</b>	20	20		<b>Yes. This is documented in SOP 08--01.</b>	
08.04	Does the growing operation have documented and implemented policies prohibiting eating, drinking (including gum chewing) using tobacco in the growing area?	<b>Yes</b>	10	10		<b>Yes. This is documented in SOP 08--01.</b>	
08.05	Is there a food safety hygiene training program covering new and existing employees and are there records of these training events?	<b>Yes</b>	15	15		<b>Yes. All new employees are trained, and the training is recorded in a training log.</b>	
08.06	Are there operational toilet facilities provided? If NO, go to 8.07. If this question is answered No, the audit will result in an automatic failure.	<b>Yes</b>	20	20		<b>Yes, there was toilet facilities in the main barn.</b>	
08.06a	Are the toilet facilities placed within ¼ mile or 5 minutes walking distance of all employees?	<b>Yes</b>	10	10		<b>Yes, within the barn itself.</b>	
08.06b		<b>Yes</b>	15	15			

	Are toilet facilities in a suitable location to prevent contamination to the growing area?				<b>Yes, the barn is not located at the grove.</b>
08.06c	Is a minimum of one toilet facility provided for each group of 20 employees?	<b>Yes</b>	5	5	<b>Yes, five workers and one toilet.</b>
08.06d	Do toilet facilities have visuals or signs, written in the appropriate languages, reminding employees to wash their hands before returning to work?	<b>Yes</b>	2	2	<b>Yes, in English and Spanish.</b>
08.06e	Are the toilets maintained in a clean and sanitary condition and are there records showing toilet cleaning, servicing and stocking is occurring regularly?	<b>Yes</b>	10	10	<b>Yes, the toilet was maintained in a clean and sanitary condition</b>
08.06f	Are the catch basins of the toilets designed and maintained to prevent contamination in the field (e.g. free from leaks and cracks)?	<b>N/A</b>	0	0	<b>N/A, plumbed.</b>
08.06g	Is there is a documented and implemented procedure for emptying the catch basin in a hygienic manner and also in a way that prevent product, packaging, equipment and water system contamination?	<b>N/A</b>	0	0	<b>N/A, plumbed.</b>
08.07	Is there evidence of fecal contamination in proximity to the growing area or any storage areas? (This refer to a single account of human or domestic animal fecal matter and/or systematic discoveries of wild animal manure) If this question is answered Yes, automatic failure of this audit will result.	<b>No</b>	20	20	<b>No, none seen.</b>
08.08	Are there operational hand washing facilities provided? If No, go to 8.09	<b>Yes</b>	15	15	<b>Yes, indoor plumbing was available for handwashing.</b>
08.08a	Are the hand washing facilities placed within ¼ mile or 5 minutes walking distance of all employees?	<b>Yes</b>	10	10	<b>Yes, directly in the barn.</b>
08.08b	Are hand wash stations clearly visible (e.g. situated outside the toilet facility) and easily accessible to workers?	<b>No</b>	0	0	So employee's hand washing activities can be verified, hand wash stations should be clearly visible (i.e. situated outside the toilet facility) and easily accessible to workers. <b>No. The hand washing stations are not outside the toilets.</b>
08.08c	Are hand wash stations properly stocked with soap, paper towels and trash can?	<b>Yes</b>	5	5	<b>Yes. The hand washing station had soap, paper towels and a trash can.</b>
08.08d	Are the hand wash stations designed and being maintained to prevent contamination onto the growing area ( i.e. spent water does not go straight to the ground)?	<b>Yes</b>	5	5	<b>Yes, indoor plumbing was available for the sink.</b>
08.08e	Does the growing operation have a documented and implemented policy and procedure in place requiring employees to wash their hands (e.g. prior to beginning work, after breaks, after toilet use)?	<b>N/A</b>	0	0	<b>Yes. This is documented in SOP 08--01.</b>
08.09	Is fresh potable drinking water provided for workers? If No, go to 8.10	<b>Yes</b>	10	10	<b>Yes, drinking water was available.</b>

08.09a	If used, are water containers maintained in a clean condition?	<b>N/A</b>	0	0	<b>N/A, not in use.</b>
08.10	Are first-aid kits available and is the inventory maintained properly?	<b>Yes</b>	5	5	<b>Yes.</b>
08.11	Are there trash cans available on the farm placed in suitable locations?	<b>Yes</b>	5	5	<b>Yes. Trash cans with lids and liners were available.</b>
08.12	Are there any foreign material issues observed that are or could be potential risks to the product in the growing area (e.g. jewelry)?	<b>No</b>	5	5	<b>No, none seen.</b>

## Food Security

Question No.	Audit Question	Given Answer	Given Score	Possible Score	Recommendation	Auditor Comments	Audio/ Picture
09.01	Are measures taken to control vehicle access to the growing area? (specified access roads, furrows, etc)?	<b>Yes</b>	5	5		<b>Yes, there were designated access roads.</b>	
09.02	Are postings such as "No Trespassing" and/or "Restricted Entry" used appropriately?	<b>Yes</b>	5	5		<b>Yes, warning signs were posted.</b>	
09.03	Are entrances to ranch-level roads restricted by gates, chains, guard stations, etc.?	<b>No</b>	0	5	<a href="http://www.usda.gov/documents/PreHarvestSecurity_final.pdf">http://www.usda.gov/documents/PreHarvestSecurity_final.pdf</a>	<b>No, the roads were not restricted.</b>	
09.04	Are wells or other water sources secured and designed to prohibit tampering?	<b>Yes</b>	5	5		<b>Yes, the well areas are locked and secured.</b>	
09.05	Are grounds and facilities monitored by either in house or contracted personnel?	<b>Yes</b>	5	5		<b>Yes, by in house personnel.</b>	
09.06	Are staff members instructed to note and report suspicious activity?	<b>Yes</b>	5	5		<b>Yes, all have received training.</b>	
09.07	Are high risk areas (e.g. spray equipment, equipment shops, sheds) monitored?	<b>Yes</b>	5	5		<b>Yes, by nearby in house personnel.</b>	

09.08	Is equipment examined for tampering prior to use?	Yes	5	5	Yes, a pre-flight inspection is performed prior to use.
09.09	Are company supervisors required to undergo documented security training with attendance records?	Yes	5	5	Yes, included in the annual training.
09.10	Is education material related to security made available?	Yes	5	5	Yes, at the packinghouse.
09.11	Are inventory records of agricultural chemicals maintained? If No, go to 9.12	Yes	5	5	Yes, they are update when used and inventoried quarterly.
09.11a	Are the inventory records periodically reconciled with inventory?	Yes	5	5	Yes, quarterly.
09.12	Are all personal materials kept away from the harvest and packaging of the harvesting operation?	Yes	5	5	Yes, none noted during the inspection.

Audit Scoring Summary		
 Self Inspection	Score	12
	Possible Points	12
	Percent Score	100%
 Traceability	Score	15
	Possible Points	15
	Percent Score	100%
 Ground History	Score	34
	Possible Points	34
	Percent Score	100%
 Adjacent Land Use	Score	60
	Possible Points	60
	Percent Score	100%

 Fertilizer/Crop Nutrition	Score	45
	Possible Points	45
	Percent Score	100%
 Irrigation/Water Use	Score	102
	Possible Points	102
	Percent Score	100%
 Crop Protection	Score	180
	Possible Points	180
	Percent Score	100%
 Employee Hygiene (This applies to on-the-farm staff not the harvesting staff)	Score	207
	Possible Points	207
	Percent Score	100%
 <b>Total</b>	<b>Score</b>	<b>655</b>
	<b>Possible Points</b>	<b>655</b>
	<b>Percent Score</b>	<b>100%</b>