MASSACHUSETTS DEPARTMENT OF AGRICULTURAL RESOURCES

Produce Safety Division

Compliance Criteria for Commonwealth Quality Program/Massachusetts Good Agricultural Practices and Inspections Under the Food Safety Modernization Act's Produce Safety Rule

For the prevention of foodborne outbreaks in the Commonwealth of Massachusetts.

Last Revised: May 19, 2021
Corresponds with CQP/mGAPs Checklist v7.1

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Program Overview

Introduction
The Massachusetts Department of Agricultural Resources (MDAR) Produce Safety Division has developed a combined third-party audit and inspectional program for the growing, harvesting, packing, and holding of fresh fruits and vegetables in the Commonwealth of Massachusetts. The mission of this program is to ensure the safe handling and distribution of fresh produce within the Commonwealth and preserve public health for consumers of these products.

Basis of Criteria
The Commonwealth Quality/Massachusetts Good Agricultural Practices (mGAPS) produce safety program was developed using a combination of pre-existing GAPs as well as the Food Safety Modernization Act's (FSMA) Produce Safety Rule (PSR). This program is unique in the respect that regulatory requirements under the PSR have been integrated into the pre-existing Commonwealth Quality third party audit program, necessitating only one (1) combined visit for market access certification and a regulatory compliance inspection. Massachusetts has adopted the PSR as state statute, making MDAR's inspectors the regulatory authority and compliance officers of the PSR within the Commonwealth. By design and default, farms that have completed a satisfactory Commonwealth Quality/mGAPs audit are compliant with the Produce Safety Rule.

Purpose
The purpose of this document is to communicate to producers, buyers, advocacy groups, and other interested parties the necessary criteria for compliance under the Commonwealth Quality/mGAPs produce safety standard, whether it be for those farms eligible for a regulatory inspection and/or those requiring a market access audit. The Compliance Criteria is matched up with the checklist tool that will be used in the field by produce safety inspectors/auditors. Each checklist item is articulated and further elaborated to provide an in-depth understanding of how the farm can comply with each requirement.

Scope of Compliance
Compliance under the Commonwealth Quality/mGAPs program is based on two (2) main facets: *Produce Safety* and *Environmental Standards*. The *Produce Safety Checklist* is home to any content specifically relating to the PSR as well as additional food safety requirements. This section annotates the farm's best practices as they relate to: Food Safety Planning and Documentation, Worker Training and Health and Hygiene, Soil Amendments, Wildlife and Animals, Agricultural and Post-Harvest Water, and Harvest/Post-Harvest Practices.

Annotation Key
Certain items throughout the checklist are noted with symbols and/or letters. These symbols help to identify certain activities that are necessary as well as supporting documentation for some activities. The following are as such:

§: This signifies a checklist item that is a requirement as part of the Produce Safety Rule and is always paired with a corresponding reference number. These items are requirements listed as part of the PSR; the reference numbers cite where the specific

requirement can be found. All eligible farms must satisfy this requirement as part of a regulatory inspection.

W: This indicates the necessity of a written standard operating procedure. These SOPs are more than likely critical to the operation's ability to implement an effective food safety program and a written procedure helps to ensure consistency and serve as a reference for all employees. This symbol also indicates when a written supporting document is necessary to satisfy a requirement (i.e. signage).

R: This indicates the requirement of a record or log that would need to be consistently used and updated including but not limited to training logs and cleaning logs. Records also include documentation such as water test results.

Produce Safety Checklist

Q #	Requirement	Compliance Criteria	
1	**Food Safety Plan(s) mGAPS**		
1.0.1	Is there a food safety plan in place based on the mGAPS and Produce Safety Rule requirements?	The written food safety plan will serve as a guide for the operation to identify the farm's activities and develop formal, food safety SOPs relevant to ensuring compliance with the Commonwealth Quality audit program and Produce Safety Rule.	W
1.0.2	Is a Farm Food Safety Manager identified?	**§112.23:** The assignment of a Farm Food Safety Manager must be included in the food safety plan and explicitly made known to all relevant farm staff.	§
1.0.3	Has the Farm Food Safety Manager received formal Produce Safety Alliance training?	**§112.22(c):** Farm Food Safety Manager must have attended and completed the Produce Safety Alliance Grower Training course. A copy of the certificate must be presented as verification of receipt of formal training.	§ R
1.0.4	Is the food safety plan reviewed annually at a minimum?	A dated coversheet indicating the most recent review of the food safety plan as well as listing of the reviewer would serve as verification of annual review.	R
1.0.5	Is there a farm map that identifies at a minimum: fields in cultivation, compost piles, livestock located on-farm or adjacent to farm, buildings, pesticide storage, septic systems, water sources, pumps, mains, withdrawal points, irrigation distribution (drip, overhead), and restrooms?	Farm map must include the relevant attributes listed in the corresponding checklist item. The map itself can take the form of Google Map printouts, hand drawn maps, NRCS maps, GIS, etc.	R
1.1	**Traceability/Recall**		
1.1.1	Is there a recall program?	A written program should be in place that outlines the operation's formal SOPs for conducting trace-back and trace-forward exercises in the event of an outbreak or knowledge of otherwise adulterated product. Program should include emergency contact information and basic guidance and instructions on what to do in the event of a potential recall.	W
1.1.2	Has a mock recall exercise been performed and documented within the last 12 months?	Operation must present a copy of a dated mock recall summary. Summary should include the partner participant and details on the effectiveness of the exercise, length of exercise, etc.	R

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Q #	Requirement	Compliance Criteria	
1.1.3	Is the name and address of the farm prominently displayed on any food package labeling or at the point(s) of sale?	**§112.6(b):** When a food packaging label is required, the name and the complete business address of the farm and where the produce was grown must be included prominently and conspicuously on the food packaging label. When a food packaging label is not required or present, this information must be displayed prominently at at the point(s) of purchase on a label, poster, sign, placard, or paper or electronic notice. The complete business address includes: the street address or post office box, city, state, and zip code.	§ W
1.2	**Farm Security**		
1.2.1	Are security measures in place to mitigate malicious acts to product, property, and personnel?	Security measures are specific to the operation, but can include fencing, signage, video monitoring, and sign-in sheets among other activities as necessary.	
2	**Training, Worker Hygiene, and Health**		
2.0	**Training**		
2.0.1	Is there a documented training policy in place including schedules, multi-lingual support, and training curriculums?	**§112.22:** Personnel must receive training on principles of food hygiene and food safety, the importance of health and personal hygiene for all personnel and visitors, identifying and isolating produce that may be contaminated, cleaning and sanitizing of equipment and relevant buildings/surfaces, inspecting harvest containers and equipment to ensure they are not a source of contamination, and incidences of blood or bodily fluid first aid and cleanup. Additional training topics may be necessary depending on the scope of the operation. Training should be adequate and appropriate to the employee's job function.	§ W
2.0.2	Have trainings been completed and documented?	**§112.21, §112.30:** Documentation for training shall include date, topics covered in training, training officer, and name and signature of trainees.	§ R
2.0.3	Are trainings conducted upon hire and annually thereafter or as needed?	**§112.21**: Trainings should be conducted pre or early season for all employees and at least annually for full-season or returning employees. If new employees are brought on after the initial training or mid-season, they must also be trained, and that training documented. Employees may also receive follow up trainings as necessary.	§

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Q #	Requirement	Compliance Criteria	
2.0.4	Does the farm have hygiene requirements/instructions that are visibly displayed for all workers and visitors to the farm, and, if applicable, posted in other languages spoken on the farm?	Instructions or signage should serve as a present reminder to employees and as a resource for visitors or other individuals that may not be as intimately aware of the operation's formal SOPs regarding food safety.	W
2.0.5	Are contracted/business partners and visitors held to the same food safety standards as trained farm personnel?	**§112.33(a):** External partners and visitors must be made aware of policies and procedures to protect covered produce and food contact surfaces from contamination and take all steps reasonably necessary to ensure that visitors comply with such policies and procedures.	§
2.1	**Sanitary Facilities**		
2.1.1	Are all employee toilet facilities regularly maintained and in clean and sanitary condition?	**§112.129(b)(1)(2)(3):** Toilet facilities must be maintained to prevent contamination of covered produce, food contact surfaces, and product flow zones. They must be serviced and cleaned at a frequency sufficient to ensure suitability of use and regularly supplied with toilet paper. Toilet facilities must also be used properly and in a way that will not result in the contamination of covered produce, food contact surfaces, surface water sources, etc.	§
2.1.2	Are records in place that indicate when facilities and restrooms are cleaned and stocked?	At a minimum, cleaning logs should include date, time, name of individual that serviced restroom facility, and what was done. If a contracted entity services restroom facilities, these records must still be made available.	R
2.1.3	Are toilet facilities designed appropriately and are they located for minimal contamination risk?	**§112.129(b)(1)(2)(c):** Toilet facilities must be designed and located to prevent contamination of covered produce, food contact surfaces, and product flow zones. They must also be directly accessible for servicing.	§
2.1.4	Are toilet facilities easily accessible to employees and visitors and of an adequate number?	**§112.129(a), §112.33(b):** Personnel must be provided with adequate, readily accessible toilet facilities, including toilet facilities readily accessible to growing areas during harvest activities. Accessibility must conform to OSHA requirements.	§
2.1.5	Is signage requiring hand washing posted?	Signage mandating handwashing and handwashing instructions must be visibly present at all handwashing stations (and in additional languages if necessary).	W

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Q #	Requirement	Compliance Criteria	
2.1.6	Are all handwashing facilities equipped with potable water, soap, and single use towels? Are there proper receptacles present for the disposal of single use towels and other appropriate waste?	**§112.130, §112.44(a)(4):** Personnel must be provided with adequate, readily accessible hand-washing facilities outfitted with soap, potable water, and single use towels (or electric hand dryers). Antiseptic hand rubs may not be used as a substitute for soap and water. Proper waste bins must be present to prevent single use towels and other waste from becoming a source of contamination.	§
2.1.7	Are handwashing facilities located directly adjacent to toilet facilities or any other potential source of contamination?	All handwashing facilities should be directly adjacent to any toilet facilities, whether inside the restroom or outside a potable toilet unit, so as to minimize the time and risk of contamination between the use of such facility and the washing of hands. Other scenarios where hands may become a source of contamination, i.e. petting zoos, should also have handwashing stations adjacent or in adequate proximity to prevent cross-contamination.	
2.1.8	Do farm personnel wash their hands at any time when their hands may be a source of contamination?	**§112.32(b)(3):** Examples include: before starting work, before putting on gloves, after using the toilet, upon return to the work station after any break or other absence from the work station, as soon as practical after touching animals or animal waste, or at any other time when the hands may have become exposed in a manner that is reasonably likely to lead to contamination of produce or food contact surfaces.	§
2.2	**Worker Hygiene**		
2.2.1	Are clothing, footwear, and protective gear effectively maintained, adequate for its use, and worn in a way that minimizes the risk of product contamination?	**§112.32(a)(b)(1):** Clothing should be clean to start the day when applicable, changed throughout the day when becoming a potential source of contamination, and overall, worn in a way that maintains personal cleanliness and hygiene.	§
2.2.2	If gloves are worn in the handling of covered produce or food contact surfaces, is there a written policy, and are the gloves maintained intact and in a sanitary condition or replaced when they become a potential source of contamination?	**§112.32(b)(4):** If gloves are used on the farm in any capacity, there must be a SOP in place. Gloves must be maintained and in an intact and sanitary condition when handling covered produce or food contact surfaces; they must be replaced when it is no longer possible to maintain these standards.	§ W
2.2.3	Are gloves, aprons, or other equipment removed prior to using restrooms or while on breaks?	**§112.32(a)(b)(1):** Equipment or protective clothing must be removed prior to using restroom facilities to minimize the risk of contamination, especially if said equipment/clothing is used directly or directly adjacent to produce or food contact surfaces.	§

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Q #	Requirement	Compliance Criteria	
2.2.4	If jewelry is worn during the handling of covered produce or food contact surfaces, is there a policy in place, and is the jewelry maintained in a sanitary condition that prevents it from becoming a potential source of contamination?	**§112.32(b)(5):** Personnel must use hygienic practices while on duty to the extent necessary to protect against such contamination. If jewelry is worn, removing or covering hand jewelry that cannot be adequately cleaned and sanitized during periods in which covered produce is manipulated by hand is necessary.	§
2.2.5	Is there a hair covering or containment policy in place, and if so, is it being adhered to?	**§112.32(a):** Personnel must use hygienic practices while on duty to the extent necessary to protect against such contamination. Hair and hair coverings must be worn in a way that complies with this ideal. If a formal policy regarding hair or hair coverings is in place, ensure that it is being followed.	§
2.2.6	Is smoking, chewing, eating, drinking (other than water), urinating, defecating, or spitting explicitly forbidden in growing/packing/harvest/storage areas?	**§112.32(b)(6):** Ensure that smoking, chewing, and eating are done in designated employee break areas and away from product flow. Urinating and defecating are only permissible in proper restroom facilities.	§
2.2.7	Are break areas and visitor access areas located away from product flow zones and storage?	Break areas should be specifically designated and sited away from produce acreage or product flow zones to reduce the potential for cross contamination.	
2.2.8	Is potable drinking water available to all field employees?	The availability of drinking water to field employees reduces the necessity for personnel to repeatedly exit and reenter production acreage, which would increase the potential for cross contamination.	
2.2.9	When appropriate, are racks/containers or designated storage areas provided for employee belongings, protective gear, and tools, and are they located away from product flow zones?	**§112.123(b)(2):** Employee belongings, protective gear, and tools should be located in a way that reduces the exposure to potential contamination. Additionally, these designated areas should be located away from produce or product flow zones to prevent potential cross-contamination.	§
2.3	**Worker Health**		
2.3.1	Are personnel with exposed cuts, sores, or lesions restricted from handling product?	**§112.31:** Employees are to be excluded from activities that may result in contamination of covered produce or food contact surfaces when the person is shown to have, or appears to have, an applicable health condition. Personnel must notify their supervisor(s) if they have an applicable health condition.	§

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Q #	Requirement	Compliance Criteria	
2.3.2	Is there a written blood and bodily fluids policy and SOP regarding the handling and cleanup of contaminated areas?	Written policy will serve as a guide for what to do in the event of a situation where blood or bodily fluids may result in the contamination of covered produce, food contact surfaces, or other potential sources for contamination. Refer to Chapter 3, Section 1, Part e. of the *Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption: Guidance for Industry*.	W
2.3.3	Are up to date first aid kits accessible to all personnel (including field personnel)?	First aid kits should be available at all permanent sites and for transport when required. Kits should be updated and restocked as necessary and appropriate for relevant activities on the farm.	
2.3.4	Are employees (including field personnel) who show signs of illness restricted from direct contact with produce, product flow zones, and food-contact surfaces?	**§112.31:** Employees are to be excluded from activities that may result in contamination of covered produce or food contact surfaces when the person is shown to have, or appears to have, an applicable health condition. Personnel must notify their supervisor(s) if they have an applicable health condition.	§
2.3.5	Are records kept for employees that were restricted (due to illness or injury) from direct contact with produce, product flow zones, and food contact surfaces?	Records should indicate when a serious injury or illness (resulting in an employee's inability to directly handle produce or food contact surfaces) has occurred as a form of trace-back in the event of an outbreak. A specific log for injury and illnesses is not necessary, and such instances may be included in a general log of significant occurrences and corrective actions.	R
3	**Soil Amendments**		
3.0.1	Have relevant farm personnel been trained in BSAAO handling?	**§112.21(a)(b), §112.52:** Training must be provided to personnel handling Biological Soil Amendments of Animal Origin (BSAAO). This training includes the potential routes of cross contamination, utensil handling and sanitation, protective equipment limitations and requirements (such as designated boots for compost activities), handwashing, and other methods put in place to minimize the potential for contamination.	§
3.0.2	Are records in place that indicate the type and time of application of soil amendments?	Application records for untreated soil amendments help verify compliance with the 90/120 application intervals (further elaborated on in item **3.1.1**). Application records for properly processed and treated soils amendments provide a method of trace-back in the event that the soil amendment was contaminated after treatment or the letter of compliance from a third-party supplier was delinquent, resulting in an outbreak.	R

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Q #	Requirement	Compliance Criteria	
3.0.3	Are there SOPs for cleaning and sanitizing equipment that contacts animal-based soil amendments?	**§112.52, §112.123(d)(2)(e):** If personnel and/or equipment present the possibility of cross-contamination, detailed cleaning and sanitizing steps shall be in place in regard to any tools or equipment used to treat, transport, apply etc. BSAAO, and any relevant personnel should be properly trained on these activities.	§
3.0.4	If soil amendments purchased from a third party are used, is there a letter of guarantee that assures the contents and/or processes are not a source of possible microbial contamination?	**§112.60(b):** For treated biological soil amendments of animal origin (BSAAO) that are supplied from a third party, documentation is required at least once per year that certifies that the BSAAO was properly treated, handled, transported, and stored.	§ R
3.0.5	Are soil amendments stored properly, away from produce harvesting, packing, and storage locations?	**§112.52:** Soil amendments (treated and untreated) must be handled and stored in a manner and location such that they do not become a potential source of contamination to covered produce, food contact surfaces, areas used for a covered activity, water sources, water distribution systems, and other soil amendments. Possible runoff from rain or another source, dust, or vehicle/foot traffic should be taken into consideration.	§
3.0.6	If human waste is being used, does it meet the EPA regulations for biosolids of 40 CFR part 503?	**§112.53:** For human waste soil amendments, you are required to obtain documentation once per year that certifies that the waste was properly treated according to the EPA regulations for biosolids of 40 CFR part 503.	§ R
3.1	**Untreated Soil Amendments**		
3.1.1	Is the application of untreated soil amendments used in produce production areas avoided within two (2) weeks of planting or within 120 days of harvest for produce that has direct soil contact (90 days no direct soil contact)?	**§112.51, §112.56(a):** An untreated soil amendment is any amendment that has not been processed to completion to adequately reduce microorganisms of public health significance including raw manure, vegetative waste, etc. Application intervals for such amendments are to conform to the 90/120 windows of application. Application records should show adherence to the necessary intervals and include dates of application, type of soil amendment, and location of application; the pre-harvest interval should correspond with application date and harvest records for those fields.	§ R
3.2	**Compost**		

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Q #	Requirement	Compliance Criteria	
3.2.1	Has the composting process on farm been scientifically validated (aerated static composting, turned composting, other)?	**§112.54(b)(1)(2):** Scientifically validated composting methods that would be permissible for a 0 day application interval include *1) static composting that maintains aerobic (i.e., oxygenated) conditions at a minimum of 131 °F (55 °C) for 3 consecutive days and is followed by adequate curing*; *2) turned composting that maintains aerobic conditions at a minimum of 131 °F (55 °C) for 15 days (which do not have to be consecutive), with a minimum of five turnings, and is followed by adequate curing*. Additional methods of properly treating and processing soil amendments and microbial standards for said processes can be referenced in PSR parts **§112.54(a)(b)** and **§112.55** respectively.	§
3.2.2	Are there records in place for monitoring composting and are times of turning, core temperatures, and other indicators logged on a routine basis?	**§112.60(b)(2):** For a treated biological soil amendment of animal origin produced on farm, documentation that process controls (for example, time, temperature, and turnings) are necessary to validate the processes and microbial standards approved for **3.2.1**.	§ R
4	**Animals**		
4.0.1	Is animal activity monitored routinely?	**§112.83:** An SOP should be developed for assessing relevant areas for evidence of potential contamination. Specific personnel should be assigned to conduct the monitoring, and they should be properly trained for this task.	§
4.1	**Wildlife**		
4.1.1	Is there a proper SOP for the documentation and isolation of produce areas and operations in the event of a significant wildlife incursion?	**§112.83(b), §112.112:** In the event where an animal incursion may pose a significant risk of contamination, a formal SOP must be in place to identify the area, isolate the area from harvest, and log the incursion. Similar to **2.3.5**, a specific log for animal incursions is not necessary, and such instances may be included in a general log of significant occurrences and corrective actions.	§ R
4.1.2	Are measures implemented (fencing, trapping, etc.) to limit and/or exclude wildlife from areas where resulting crop damage exists?	In the event of a significant wildlife incursion, any measures must be appropriate to minimize the potential of contamination and comply with any local, state, or federal regulations as they relate to animals and animal control. Per **§112.84** of the PSR, the "taking" of threatened or endangered species is not authorized.	
4.2	**Farm Animals (On Farm or Adjacent Neighboring Properties)**		

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Q #	Requirement	Compliance Criteria	
4.2.1	Are all farm animals/livestock restricted from and sited in a way to minimize the risk of microbial contamination of production/harvest areas, equipment, storage, and product flow zones?	**§112.83(b), §112.134:** If farm animals or livestock are present on the farm, ensure that their location(s) take into consideration adjacent produce acreage and product flow zones. Examples of protective measures include implementing features to control runoff of animal waste (i.e. ditches, mounds, diversion berms, vegetative buffer strips, or animal waste containment structures).	§
4.2.2	Are SOPs developed regarding working farm animals if utilized on the farm (hand washing, separate equipment, etc.)?	**§112.83(b):** If working farm animals are used on the farm, there must be formal SOPs in place that ensure the adequate cleanliness of personal hygiene, worker clothing/footwear, tools, and equipment including change-out of equipment, clothing or footwear between produce/animal activities and cleaning of equipment. Additionally, if working animals are used in the production fields, ensure that their use and presence in the fields complies with item **3.1.1**.	§
4.2.3	Are petting zoos properly sited, and is signage posted instructing workers and visitors to wash their hands after touching animals?	**§112.33(b), §112.83(b):** If the farm has a petting zoo, ensure that the location takes into consideration adjacent produce production acreage and product flow zones. There should be special consideration in educating and informing visitors on relevant and proper health and hygiene techniques in relation to the rest of the operation and signage to support these requirements. A handwashing station should be appropriately close to any petting zoos or animals.	§ W
4.2.4	Is manure from petting zoos stored and handled in in a way that minimizes the risk of microbial contamination?	**§112.52(a)(c), §112.134:** See items **3.0.1, 3.0.2, and 3.0.5**.	§
4.3	**Domestic Animals**		
4.3.1	Are pets restricted from growing, harvesting, pack, and storage areas and their excreta controlled to minimize the risk of contamination?	**§112.127, §112.134:** Pets must be restricted from fully enclosed buildings where there is product flow (i.e. washing, packing, and storage of produce, packing material, or harvest bins). Pets must also be restricted from the immediate production acreage. A system must be in place to properly ensure that any animal excreta is controlled and not a source of contamination. Guard or properly trained service dogs can be exceptions in some instances.	§
4.3.2	Is there signage in place to communicate the restriction of pets entering growing, harvesting, and pack areas for visitors and neighbors of the operation?	Signage is necessary to inform others of the operation's policy on pets in product flow zones. Where relevant, signage should dictate areas where domestic animals are not permissible. Where animals are permitted, signage should stipulate rules and guidelines for ensuring such animals do not pose a risk of contamination.	W

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Q #	Requirement	Compliance Criteria	
5	**Agricultural Water**		
5.0.1	Are initial (pre-season) risk assessments performed and documented, taking into consideration the water source history, characteristics/stage of crop, and the method of application?	**§112.42, §112.50(b)(1):** At the beginning of each growing season, and at least once annually, the agricultural water systems must be inspected to identify conditions that are reasonably likely to introduce hazards or contaminants into or onto covered produce or food contact surfaces. Factors that should be taken into consideration: type of water source, ability to control water source, degree of protection of each agricultural water source, use of adjacent and nearby land, and the likelihood of a contaminant being introduced prior to the water entering the operation's distribution system. A water managed system should be in place reflective of the results of the risk assessments.	§ R
5.1	**Pre-Harvest Water**		
5.1.1	Is the water used for pre-harvest use equal or less than 126 CFU per 100ml of generic E. coli?	**§112.41, §112.44(b):** Water tests should not exceed 126 CFU or less per 100ml (generic E. coli) for pre-harvest/agricultural water. Pre-harvest includes but is not limited to activities such as: irrigation, spraying, and frost protection. If agricultural water does meet this criteria, any alternative and/or treatments should comply with PSR parts **§112.43 and §112.45.**	§ R
5.2	**Post-Harvest Water**		
5.2.1	Is the water and ice used in post-harvest activities and hand washing free of generic E. coli?	**§112.44(a):** Any water used for post-harvest activities that comes into direct contact with produce, food contact surfaces, or is used for handwashing must be free of generic E. coli (0 CFU per 100 ml). Water tests and/or documentation must be present for validation. If post-harvest water does meet this criteria, any alternative and/or treatments should comply with PSR parts **§112.43 and §112.45.**	§ R
5.2.2	If a dunking method or re-circulated water is utilized, is there a water change-out schedule SOP?	**§112.48(a):** For dunk tanks or other re-circulated water, water-change schedules must be established to maintain its safety and adequate sanitary quality and minimize the potential for contamination (for example, hazards that may be introduced into the water from soil adhering to the covered produce).	§

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Q #	Requirement	Compliance Criteria	
5.2.3	Dependent upon what type of wash system is utilized, is water temperature or turbidity monitored?	**§112.48(b)(c):** Water must be visually monitored for buildup of organic material and indications of necessitating a change. Depending on commodity, temperature should be monitored to prevent infiltration of microorganisms.	§
5.2.4	If sanitizer(s) are used in rinse/wash water, are they approved for food contact use and is the use monitored appropriately and documented?	**§112.43:** The use of sanitizing agents is not required, but if such agents are used in post-harvest/washing activities, ensure that the sanitizer is approved for this specific purpose and that usage reflects the instructions on the product label.	§ R
5.2.5	Is waste/wash/cooling water disposed in a manner that will minimize the risk of contamination?	**§112.130(c), §112.133(b)(c)(d):** Waste/wash/cooling water should be discharged in a way that minimizes the risk of contamination. Discharge water should not pool outside and should be sited in a way that would not run off into active production acreage.	§
5.2.6	If water tanks are utilized, are there SOPs and records regarding the frequency and method of cleaning?	**§112.123(a)(d)(1):** Water tanks must be adequate for use, maintained, and cleaned/sanitized as frequently as reasonably necessary to protect stored water from contamination. There must be corresponding records that indicate when, who, and how tanks were cleaned and sanitized.	§ W R
5.3	**Water Testing**		
5.3.1	Does the water testing laboratory utilized for the above testing perform the FDA approved methodology for generic E. coli testing consistent with PSR requirements?	**§112.151:** The lab(s) should be listed on the MDAR Produce Safety Program list of approved water testing facilities.	§
5.3.2	Are all surface water sources, including those that are not routinely utilized, tested (3) three times a year in line with mGAPS program requirements?	Surface water includes ponds, lakes, rivers, brooks, etc. These tests should be spaced out pre-season/early season, mid-season, and late season to get a wide sample of water quality. Whether or not the water comes into direct with the edible portion of the crop will factor into testing frequency.	R
5.3.3	Are surface water source test results properly identified (per farm map) and recorded?	**§112.50(b)(2):** The location where the water sample(s) have been taken should be identified on the farm map. Water source test results should be centrally located and easily accessible for review.	§ R
5.3.4	Are all ground water sources, including those that are not routinely utilized, tested (2) two times a year in line with mGAPS program requirements?	Well tests should be spaced evenly to get a wide sample of water quality. Whether or not the water comes into direct with the edible portion of the crop will factor into testing frequency. If well water is being used for post-harvest activities, the frequency must remain at twice annually at a minimum.	R

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Q #	Requirement	Compliance Criteria	
5.3.5	Are ground water source test results properly identified (per farm map) and recorded?	**§112.50(b)(2):** The location where the water sample(s) have been taken should be identified on the farm map. Water source test results should be centrally located and easily accessible for review.	§ R
5.3.6	Are municipal water source test results properly identified and recorded (municipal reporting of water quality)?	**§112.46(a), §112.50(b)(7):** For municipal water, the proper report/certification from the corresponding municipality is required for water quality verification. A copy of this report/certification should be kept with any additional surface or ground water source tests. While not required, it is considered a best practice to independently test municipal water for validation of the report's findings. If agricultural water does meet this criteria, any alternative and/or treatments should comply with PSR parts **§112.43 and §112.45.**	§ R
6	**Harvest and Post-Harvest**		
6.0	**Harvest Practices**		
6.0.1	Is there a policy that indicates visibly contaminated, adulterated, damaged, or decayed produce is not harvested or is culled?	**§112.112; §112.114:** Immediately prior to and during harvest activities, all reasonable measures necessary must be taken to identify and not harvest produce that is likely to be contaminated with a known or reasonably foreseeable hazard. **"**Dropped produce" must also not be distributed.	§
6.0.2	Is non-covered produce kept separate from covered produce?	**§112.111(a):** Keep "covered" produce separate from "non-covered" produce, except when covered and excluded produce are placed in the same container for distribution (such as a CSA basket). Exceptions include scenarios where "non-covered" produce is treated and handled as "covered" produce.	§
6.0.3	Is there an SOP to clean and sanitize shared (covered and non-covered crops) food contact surfaces between uses?	**§112.111(b):** Adequately clean and sanitize, as necessary, any food contact surfaces that contact non-covered produce before using such surfaces for covered activities on covered produce.	§
6.1	**Harvest Containers**		
6.1.1	Are harvest containers (including wooden bins) properly used, stored, and inspected to minimize the risk of contamination?	**§112.123(a)(b)(c)(d)(1):** Harvest containers must be stored and maintained to protect covered produce from being contaminated with known and reasonably foreseeable hazards and to prevent the attraction and harborage of pests.	§

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Q #	Requirement	Compliance Criteria	
6.1.2	Are field harvesting bins and containers specifically identified and used for this purpose?	**§112.123(a):** Harvest containers should be specifically used for this purpose in an effort to avoid any potential for cross contamination (i.e. using the same bins for harvest, culls, and carrying harvest tools without cleaning and sanitizing between uses).	§
6.1.3	Are there SOPs indicating when and how harvest containers/bins are cleaned and sanitized?	**§112.123(d)(1), §112.140:** Harvest bins and containers must be cleaned and appropriately sanitized as frequently as reasonably necessary to protect against contamination. Factors that would affect frequency of such activities include commodity type, storage location of containers, animal incursion, etc. There must be corresponding records that indicate when, who, and how bins were cleaned/sanitized. In lieu of a specific record, a SOP containing the information above and a strict sanitizing schedule may be used in tandem with a daily equipment checklist.	§
6.1.4	If direct to box harvesting is conducted, are boxes new and are they kept away from direct soil contact during harvest?	**§112.113, §112.116(a)(1)(2):** If field packing is conducted, the packing material must not come in direct contact with the ground. Exposure to the ground poses a risk of cross-contamination, which can be spread if boxes are stacked or stored in the same location as washed/packed produce.	§
6.1.5	Are workers trained to identify problems with harvest containers or equipment and to report such problems to a supervisor?	**§112.22(b)(3):** Workers must be able to correct problems with harvest containers or equipment or report such problems to a supervisor or other responsible party.	§
6.2	**Packaging Materials**		
6.2.1	Are the food packing/packaging materials approved for food contact use?	**§112.116(a)(b):** If food packing or packaging is constructed from a material that is considered single use and not cleanable or easily sanitized (i.e. cardboard, wax boxes, plastic bags), it must be new and not reused. Packing and packaging material must also be adequate and approved for a food contact surface. If food-packing material is reused, adequate steps must be taken to ensure that the food contact surfaces are clean, such as using a clean liner.	§
6.2.2	Is produce susceptible to *Clostridium botulinum* packaged in a manner that prevents this hazard?	**§112.115:** Covered produce must be packaged in a manner that prevents the formation of *Clostridium botulinum* toxin if such toxin is a known or reasonably foreseeable hazard (such as for mushrooms).	§

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Q #	Requirement	Compliance Criteria	
6.2.3	Is packaging maintained and stored in a way that minimizes the risk of contamination?	**§112.123(b)(2):** Food packing and packaging material storage must be sited in a way reduces the possibility of exposure (i.e. away from soil amendments, domesticated animals, or pest incursions). If packing or packaging material appears to be adulterated or in bad condition, it should be discarded.	§
6.3	**Post-Harvest**		
6.3.1	Are there SOPs and records that indicate when pack-room equipment and vehicles are inspected, cleaned, and sanitized?	**§112.123(d)(1)(2)(e), §112.140:** Pack-room equipment must be inspected, maintained, and cleaned/sanitized as frequently as reasonably necessary to protect against contamination. There must be corresponding records that indicate when, who, and how equipment was cleaned/sanitized. Examples of pack-room equipment that directly or indirectly contacts produce include: brush washers, dunk tanks, hydro-coolers, pallet jacks, forklifts, etc. In lieu of separate records for each piece of equipment, SOPs containing the information above and strict sanitizing schedules may be used in tandem with a daily equipment checklist.	§ R
6.3.2	Are equipment, vehicles, and other tools used in pack operations that come into contact with produce in good repair and not a source of contamination?	**§112.123(a)(b)(1)(2)(c), §112.125:** Equipment or tools that come in contact with produce must be designated for this purpose, in good working and sanitary condition, and stored in a way that minimizes the risk of contamination. Vehicles used to transport produce must also be adequately clean and maintained for this purpose.	§
6.3.3	Instruments or controls that are used to measure, regulate, or record temperatures, pH, sanitizer efficacy, or other conditions in order to control or prevent the growth of microorganisms are: accurate/precise, adequately maintained, and adequate in number?	**§112.124:** If such instruments are used, proper maintenance is necessary to ensure their effectiveness and accuracy of said tools. Depending on the scale of the operation, ensuring availability of the proper amount of is critical to determine effective measurements in a timely manner.	§
6.4	**Facilities/Pest Control**		

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Q #	Requirement	Compliance Criteria	
6.4.1	Is building size, construction, and design (for indoor growing, packing, cold storage, dry storage, etc.) adequate for the prevention of produce contamination (including drains, pipes, floors, walls, fixtures, and ceilings)?	**§112.126:** The building should have enough room for covered activities to be conducted without allowing for cross-contamination between produce or food contact surfaces and building materials, non-food contact surfaces, or clothing. The placement of equipment and other materials in the building should allow for maintenance and sanitation. The design should consider the separation of operations to reduce potential cross contamination. Buildings are to be constructed in a way that facilitates maintenance of sanitary conditions. Windows, doors, and roofs of fully enclosed buildings should be constructed in a way that prevents leaks, entry of dirt, dust, debris, and pests. Consideration of the potential for contamination of produce and food contact surfaces from floors, walls, ceilings, fixtures, ducts, pipes, drips, or condensate. Measures should be taken to facilitate proper drainage to ensure that pooled water is not left standing for long periods.	§
6.4.2	Are facilities and product flow zones kept in a tidy and orderly condition?	**§112.132:** The conveyance, storage, and disposal of trash, litter, and waste must be performed in a way that minimizes the potential for being an attractant or harborage of pests. It must be done in a way that protects against contamination of produce, food contact surfaces, areas used for a covered activity, or water sources.	§
6.4.3	Are workshop/maintenance areas located in multi-use buildings clearly identified and secured when possible and not a source of contamination?	**§112.126(a)(1):** The potential for contamination must be reduced by effective building design including the separation of operations in which contamination is likely to occur. Maintenance areas should be located in a manner that protects produce from cross-contamination.	§
6.4.4	Are lights located in product flow zones protected or shatterproof (including insect lights)?	Shatterproof or covered lights should be in the packing area, dry storage, coolers, and loading docks. Equipment that has potential sources of glass contamination in the event of breakage should be taken into consideration.	
6.4.5	Are sewage systems located and maintained in a manner that prevents contamination of produce or food contact surfaces?	**§112.131:** Disposal of sewage must be into an adequate system and maintained in a manner that prevents the potential for cross-contamination; leaks and spills must be handled in a similar manner. After any significant event that could negatively impact a sewage/septic system, appropriate steps must be taken to ensure that the system continues to operate in a way that does not contribute to contamination.	§

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Q #	Requirement	Compliance Criteria	
6.4.6	Is organic waste (cull piles, scraps from packing, etc.) handled and sited in a manner that reduces pest incursions and cross contamination?	**§112.132:** The storage, transport, and disposal of culls/scraps must be performed in a way that minimizes the potential for being an attractant or harborage of pests. It must also be done in a way that protects against contamination of produce, food contact surfaces, areas used for covered activities, or water sources.	§
6.4.7	Are the outdoor grounds, parking lots, and building perimeters maintained and free of debris, refuse, pest harborage, and adequately drained?	Outside premises shall be free of conditions, including but not limited to, idle equipment or vehicles for long periods of time, litter, waste, and tall grass or weeds that may provide harborage or attractants for pests.	
6.4.8	Is there a pest control program in place, and are control measures and practices implemented adequate to control targeted pest populations?	**§112.128:** The pest control program can be formal or informal depending on the operation and evidence of pest incursions; specification or necessity are on a case-by-case basis. When necessary, the operation shall take appropriate measures to control and reduce pest populations, including proper trapping, sealing buildings, removing potential sites for pest harborage, etc.	§
6.4.9	Is the pest control program managed in-house, and is there a SOP for evaluating and maintaining the necessary control measures?	If pest control is managed in-house, the program should be operated by management or specifically trained personnel. When present, any traps or stations should be numbered and marked with adequate signage to highlight its location. These traps/baits stations should also be identified on a map.	