

Part 3

HOUSE PACKING FACILITY

Part 3 of the Good Agricultural Practices and Good Handling Practices Audit is applicable to packing houses where the fresh product is first packed after harvesting. Generally this will be near the crop production area but in some cases where the product is transported in bulk it may be some distance away. This part of the audit should not be used in areas where the product is removed from a retail/wholesale package and replaced into a retail/wholesale package.

Receiving

	Questions	Points	YES	NO	N/A	Doc
3-1	Product delivered from the field which is held in a staging area prior to packing or processing is protected from possible contamination.	5				

Product which is delivered to the house packing facility may or may not be immediately processed depending on the operational capacity to process the product. In many cases, incoming product is kept in a staging area until it is ready to be sent through the packing house. This staging area may be a permanent structure such as a pole barn, or a designated area where the full bins of product are placed, usually in an area not directly in the sun so the product isn't damaged by sunburn or will build up field heat.

Auditors shall observe the staging area to determine if the product is being protected from sources of possible contamination and not placed under trees or other sources of potential contamination. Some acceptable scenarios may be pulling wagons under a pole barn, tarping the bulk bins, or keeping the product in an enclosed trailer.

	Questions	Points	YES	NO	N/A	Doc
3-2	Prior to packing, product is properly stored and/or handled in order to reduce possible contamination.	5				

Harvested product should be properly stored after delivery to the packing house. Product that will be packed in a short amount of time should be located or covered so as to prevent contamination from birds or other pests. Mesh type coverings discussed under question 3-1 are not considered adequate cover.

In addition, smaller operations have been observed to store bucket - harvested produce in the shade under trees. This is a prime source for contamination from roosting birds and is not acceptable unless the buckets or the trailer are covered.

Product that will be packed several hours to a day or more after harvest should be properly stored appropriate to the commodity to protect from contamination.

Auditors must review the storage of harvested and unloaded product while it is set aside or being stored before it is packed for market. This question cannot be answered as N/A.

Washing/Packing Line

	Questions	Points	YES	NO	N/A	Doc
3-3	Source water used in the packing operation is potable.	15				R

Source water used in the packing of fresh fruits and vegetables must be potable. Municipal water supplies are regulated by law and are required to be potable. Well water may or may not be potable. Auditors should examine water test results to determine if the well water is potable. Surface water is subject to various uncontrollable influences and is generally considered non-potable for use in a repacking operation.

Auditors must review documentation that indicates source water is potable and microbial presence is within guidelines (microbially safe). (To evaluate water quality, refer to the Water Quality Risk Sources and Testing Treatment in Part 1.) This question may be answered N/A when products are not washed.

	Questions	Points	YES	NO	N/A	Doc
3-4	If applicable, the temperature of processing water used in dump tanks, flumes, etc., is monitored and is kept at temperatures appropriate for the commodity.	10				D

For commodities which are susceptible to water infiltration, special attention to the water temperature in the dump tank and flumes and the temperature of the product is required. Water temperature should be maintained within 10 degrees F of incoming product pulp temperature to minimize water infiltration. If contaminated water infiltrates the product, it is very difficult if not impossible to remove the contamination. The water may need to be heated or cooled and/or the product heated or cooled to equalize the temperature. This question may be answered N/A when no water is used or the commodity being repacked is not susceptible to water infiltration.

Examples of commodities which are susceptible to water infiltration are Tomatoes, Cantaloupes, Peppers, Apples, Potatoes and Pears.

	Questions	Points	YES	NO	N/A	Doc
3-5	Processing water is sufficiently treated to reduce microbial contamination.	10				D

Water used during the post-harvest handling of fruits and vegetables often involves a high degree of water-to-produce contact. Although water is a useful tool for reducing potential contamination, it may also serve as a source of contamination or cross contamination.

Re-using processing water may result in the build-up of microbial loads, including undesirable pathogens.

Consider practices that will ensure and maintain water quality. Such practices may include:

- Perform periodic water sampling and microbial testing.
- Change water as necessary to maintain sanitary conditions.
- Consider developing SOPs (standard operating procedures or sanitary operating plans), including water change schedules.
- For all processes that use water; clean and sanitize water contact surfaces, such as dump tanks, flumes, wash tanks, and hydro coolers, as often as necessary to ensure the safety of produce.
- Install backflow devices and legal air gaps, as needed, to prevent contamination of clean water with potentially contaminated water (such as between potable water fill lines and dump tank drain lines).
- Routinely inspect and maintain equipment designed to assist in maintaining water quality, such as chlorine injectors, filtration systems, and backflow devices, to ensure efficient operation.

Auditors must review documentation that shows water is treated to reduce microbial populations that could be present. When water is re-used in the repacking process this question cannot be

answered N/A.

	Questions	Points	YES	NO	N/A	Doc
3-6	Water-contact surfaces, such as dump tanks, flumes, wash tanks and hydro coolers, are cleaned and/or sanitized on a scheduled basis.	10				D

Operations with poor sanitation in the packing environment can significantly increase the risk of contaminating fresh produce and water used on produce. Pathogenic microorganisms may be found on the floors and in the drains in the packing facility and on the surfaces of sorting, grading, and packing equipment. Without good sanitary practices, any of these surfaces that come in contact with fresh produce could be a potential source of microbial contamination.

Packers should employ good sanitation practices as a standard operating procedure to maintain control throughout the packing operation. Clean packing areas at end of each day. As necessary, clean and sanitize the washing, grading, sorting, and the packing lines to reduce the potential for microbial contamination of fresh produce.

Auditors must review operator procedures, procedural documents and records in order to determine if there is a program and that it is being followed. This question may only be answered N/A when water is not used in the packing process.

	Questions	Points	YES	NO	N/A	Doc
3-7	Water treatment (strength levels and pH) and exposure time is monitored and the facility has demonstrated it is appropriate for product.	10				D

Prevention of contamination is preferred over corrective action(s) once contamination has occurred. However, antimicrobial chemicals in processing water are useful in reducing microbial build-up in water and may reduce microbial load on the surface of produce. Thus, antimicrobial chemicals may provide some assurance in minimizing the potential for microbial contamination.

The effectiveness of an antimicrobial agent depends on its chemical and physical state, treatment conditions (such as water temperature, acidity [pH], and contact time), resistance of pathogens, and the nature of the fruit or vegetable surface. Chlorine is commonly added to water for post-harvest treatment of fresh produce at 50 to 200 parts per million total chlorine, at a pH of 6.0 to 7.5, with a contact time of 1 or 2 minutes.

Ozone has been used to sanitize wash and flume water in packing house operations. Ultraviolet radiation may also be used to disinfect processing water. Chlorine dioxide, trisodium phosphate, and organic acids (such as lactic and acetic acids) have been studied for use as antimicrobial agents in produce wash water, although more research needs to be done. Operators should consider options for water sanitation most appropriate for their individual operations.

The strength and acidity of the treated water must be appropriate for the commodity. If these are not, the process may not be effective in reducing the microbe population or may create problems for the produce, such as burning. Although there has been a lot of research on this aspect of packing, not all commodities have established and recommended levels. The following chart is reprinted from academic literature and is a guide for most commodities when the treatment is with chlorine.

Crop	Chlorine Strength (Total Titratable Chlorine)
General	50-500 Parts Per Million
Apples	100-150 Parts Per Million
Asparagus	125-250 Parts Per Million

Cantaloupe, Honey Dew Melons	100-150 Parts Per Million
Lettuce, Cabbage, Leafy Greens	100-150 Parts Per Million
Tomatoes, Potatoes, Peppers	200-350 Parts Per Million

Auditors must review all appropriate documents and records in order to determine if the operator is effectively monitoring and maintaining the water quality. Auditors must also observe and question operators who are responsible to complete the monitoring and adjusting functions.

In some cases, the job of maintaining processing water quality will be contracted to an outside water quality management firm. In this case, auditors must review documentation showing the frequency of monitoring in order to determine that this is completed. Documentation may include an on-site log, monthly bills/invoices or other documents that show the process is being completed. If a water quality technician is present at the time of the audit, the technician should be interviewed to determine if the water treatment meets company specifications.

Use of water and water treatments are not required of packing operations, but are used voluntarily. Some commodities are not normally washed at all before packing (berries). This question shall be answered N/A when water is not used in the packing process, or when operation does not reuse the water (Le. single use).

	Questions	Points	YES	NO	N/A	Doc
3-8	Food contact surfaces are in good condition; cleaned and/or sanitized prior to use and cleaning logs are maintained.	15				D

Many operations have located stainless steel tables or benches upon which packing processes are completed. Other operations may have established a mechanized system.

Brushes may be a part of the packing system to clean the product. Conveyors, such as belts, are very commonly used to move product through the packing system. These parts of the system can be easily contaminated from produce, workers or from other equipment in the packing system. Brushes or conveyors that physically touch the produce should be regularly cleaned, as needed. Conveyors that transport containers of packed product should be reasonably clean, but there is less possibility of contamination from this source.

Auditors should observe the operation and food contact surfaces to determine the condition and cleanliness of the surfaces. Operations must have a regular cleaning schedule. It is important for the auditor to recognize that different commodities may require different cleaning and/or sanitizing schedules (daily, weekly, etc.) than others due to the conditions in which the product is harvested and the nature of the product.

Auditors should review documentation and/or records showing that an established schedule is being followed. This question may be answered N/A when the product is packed directly from one container to another and the product does not come into contact with any surface other than the container.

	Questions	Points	YES	NO	N/A	Doc
3-9	Product flow zones are protected from sources of contamination.	10				

The flow zone is that area through which the product moves from unloading to the storage and from storage to that point where it is loaded again for further shipment. As product moves through flow zone areas, it can become contaminated by substances not intended to be put on the product. Areas of possible contamination would include open mesh steel cat-walks, motors without shields,

overhead dripping/leaking pipes or ceilings from condensation, box conveyors to second floor storages/palletizing areas, etc. Product in flow zones running under these mentioned areas could be subject to contamination from dirty shoes (catwalks), dripping lubricants (non-food grade in motors), cobwebs or dust hanging from ceilings or on light fixtures, etc.

Auditors must observe the flow of the product through the system and look up (or down) to determine if there is a possibility of contamination of product from overhead sources. Where possible and practical, operators should shield the flow zone or keep the area free of contaminants. This question cannot be answered N/A.

	Questions	Points	YES	NO	N/A	Doc
3-10	The water used for cooling and/or making ice is potable.	15				R

Ice or cold water (hydro-cooling) is often used by some commodity packers to reduce product temperature. Source water for this procedure should be potable to reduce the risk of food contamination.

Auditors must investigate the source of the *water/ice* and review records to *verify* that there is no indication of microbial contamination of the water source. In some cases, ice may be manufactured on-site. In other cases, it may be provided by another entity. In either case, the water must be potable. If water is not potable this question must be answered NO. If ice or cooling water is not used, this question may be answered N/A.

	Questions	Points	YES	NO	N/A	Doc
3-11	Any ice used for cooling produce is manufactured, transported and stored under sanitary conditions.	10				R

Ice making facilities may be located on the site of the operation or may be contracted out and supplied by another operation. In either case, the facility must provide records that indicate there is a regular schedule to sanitize the ice production and storage facility and any means of transportation to reduce the microbial population. This would include augurs, conveyors and shovels used to transport the ice from one part of the facility to another.

Worker Health and Personal Hygiene

	Questions	Points	YES	NO	N/A	Doc
3-12	Employee facilities (locker rooms, lunch and break areas, etc.) are clean and located away from packing area.	10				

Facilities used by employees to take breaks, prepare to go to work, eat lunches, etc. must be clean and separate from the packing area. Some operators will have a separate room designed and identified for eating, others will identify an area in a corner of the packing house building or somewhere outside of the immediate packing area and supply it with tables. All of these are acceptable. The intent is that workers do not eat or take breaks within the packing area.

Applicable portions of 29 CFR, Part 1910.141 state:

(3) Housekeeping. (i) All places of employment shall be kept clean to the extent that the nature of the work allows.

(ii) The floor of every workroom shall be maintained, so far as practicable, in a dry condition. Where wet processes are used, drainage shall be maintained and false floors, platforms, mats, or other dry standing places shall be provided, where practicable, or appropriate waterproof footgear shall be provided.

(iii) To facilitate cleaning, every floor, working place, and passageway shall be kept free from protruding nails, splinters, loose boards, and unnecessary holes and openings.

This question cannot be answered as N/A.

	Questions	Points	YES	NO	N/A	Doc
3-13	When there is a written policy regarding the use of hair nets/beard nets in the production area, it is being followed by all employees and visitors.	5				P

Hair nets and beard nets are worn in order to keep stray hair from entering the food and food containers being packed. In addition, wearing of hairnets when the hair is very long reduces the risk of catching hair in machinery.

Operations that have a written policy must follow the policy. Auditors must review the policy and observe to determine if it is being followed. This question may be answered N/A when there is no written policy.

	Questions	Points	YES	NO	N/A	Doc
3-14	When there is a written policy regarding the wearing of jewelry in the production area, it is being followed by all employees and visitors.	5				P

Jewelry can be both a safety and a food safety hazard. It can become dislodged from the person wearing it and fall into the food item or the container. It can get caught on machinery and injure the worker.

Operations that have a written policy must follow the policy. Auditors must review the policy and observe to determine if it is being followed. This question may be answered N/A when there is no written policy.

Packing House General Housekeeping

Operations with poor sanitation in the packing environment can significantly increase the risk of contaminating fresh produce and water used on produce. Pathogenic microorganisms may be found on the floors and in the drains in the packing facility and on the surfaces of sorting, grading, and packing equipment. Without good sanitary practices, any of these surfaces that come in contact with fresh produce could be a potential source of microbial contamination. Packers should employ good sanitation practices as a standard operating procedure to maintain control throughout the packing operation.

	Questions	Points	YES	NO	N/A	Doc
3-15	Only food grade approved and labeled lubricants are used in the packing equipment/machinery.	5				P

Food grade approved lubricants should be used in areas where lubricating agents may come into contact with produce. Containers are normally marked. Auditors should ask to see containers of the food grade lubricants that are being used. If the lubricant is indeed food grade, the label is normally so marked. The container may also include a reference to meeting the applicable standards for FDA or other government agencies, regarding food grade lubricants.

If the auditor is not shown either the containers of food grade lubricants being used, or recent receipts for the food grade lubricants, this question must be answered NO. In some cases, operators will use food grade lubricants for equipment that is located over the flow zone and non-food grade lubricants in other areas. This practice will be cause for answering this question NO. In addition, if the auditor sees any evidence that nonfood grade lubricants are being used in the packing area (for example: WD-40, Liquid Wrench, etc.) then the question must be answered NO. In facilities that have no mechanized equipment used for packing this question may be answered N/A.

	Questions	Points	YES	NO	N/A	Doc
3-16	Chemicals not approved for use on product are stored and segregated away from packing area.	10				

Non-food grade chemicals may be used in the packing operation. Non-food grade approved chemicals must be stored outside the packing area or be physically separated by storage in a room or behind a physical barrier. This is to reduce the possibility of chemical contamination of the produce.

Food grade and non-food grade lubricants/chemicals should be stored separately from each other, either in separate rooms or separated and segregated within the same room. The intent is that the two are sufficiently separated and prominently marked in order to prevent cross-contamination or misuse of non-food grade for food grade.

This question must be answered NO if the auditor feels that there is not sufficient segregation to prevent cross-contamination or non-food grade approved chemicals are not properly stored in the packing area. This question may be answered as N/A when no chemicals are in use.

	Questions	Points	YES	NO	N/A	Doc
3-17	The plant grounds are reasonably free of litter and debris	5				

Grounds in the immediate vicinity of all packing areas should be kept clear of waste, litter and improperly stored garbage. Keep all grasses cut to discourage the breeding, harboring and feeding of pests, such as rodents and reptiles.

It would be impractical for auditors to expect to see absolutely no debris at all. If the auditor feels that the amount or type of debris represents a possible risk of microbial contamination or is sufficient to attract pests to the area, this question should be answered NO.

Piles of wood, such as pieces of broken pallets, garbage or waste collected or scattered along the grounds, food products, food wrappers, cigarette butts or soda or drink containers scattered across the grounds, are all examples of possible reasons to answer this question NO. This question cannot be answered as N/A.

	Questions	Points	YES	NO	N/A	Doc
3-18	The plant grounds are reasonably free of standing water.	5				

Maintain adequate surface drainage to reduce breeding places for pests. Auditors should consider weather conditions (rain vs. dry) and standing water incident to receiving or storage operations when answering this question. These conditions would not be considered as detrimental unless there is indication that the water will not properly drain.

Auditors must judge such things as recent rain fall in the area which may have left a puddle or water which dripped from a recently used hose which was not completely shut off as excusable examples of standing water and answer this question YES. If the standing water does not look relatively fresh, such as being greenish from algae growth; or the operator has not taken any proactive action to drain or dry up the source, this question must be answered NO. This question cannot be answered N/A.

	Questions	Points	YES	NO	N/A	Doc
3-19	Outside garbage receptacles/dumpsters are closed or are located away from packing facility entrances and the area around such sites is reasonably clean.	5				

Open garbage receptacles/dumpsters attract pests such as birds, vermin, flies and wildlife because of odors and discarded food products. All containers with lids should be kept closed whenever they are not in use or should be so located that they are a reasonable distance from the storage facility entrances in order that pests will not be drawn to the facility. They should be emptied regularly. This question must be answered NO when open or un-lidded receptacles or dumpsters are close to the facility entrances and it is likely pests will enter the facility.

The area surrounding the dumpsters or garbage receptacles needs to be maintained in a clean and orderly manner. Auditors must keep in mind that there may be a small amount of garbage spilled on the outside area surrounding the garbage receptacle or dumpster because of how it may be

dumped. This is normal. When the garbage is allowed to sit or accumulate or there is no action being taken to clean the spillage, this question must be answered NO. This question can only be answered N/A when no outside receptacles or dumpsters are present.

	Questions	Points	YES	NO	N/A	Doc
3-20	Packing facilities are enclosed.	5				

Not all facilities will be fully enclosed to keep out pests. Some facilities are open pole barns with no walls; others may be closed on three sides, but have an open side or have four perimeter walls, but the bottom portion of several walls is open to facilitate cleaning and washing the floors.

Buildings that are fully enclosed can easily exclude or reduce the possibility of contamination by most pests. Enclosed means that all doorways are capable of being closed or shut and will effectively exclude pests, especially during non-work hours. Any doors that are open during packing operations for passage of fork lift traffic, employee entrance, etc., should be considered as a part of the packing operation and the question will be answered YES. In some operations that are fully enclosed, there may be doors that are always left open, regardless of usage or there are doorways that have had the door removed. None of these would meet the test of being enclosed and the question must be answered NO. This question cannot be answered N/A.

	Questions	Points	YES	NO	N/A	Doc
3-21	The packing facility interior is clean and maintained in an orderly manner.	5				

Remove as much as practicable all visible debris, soil, dirt and unnecessary items from product storage areas on an ongoing basis. These areas must be cleaned on a regularly scheduled and "as needed" basis and steps taken to minimize free-floating dust and other airborne contaminants.

For some commodities such as onions, it may not be possible to maintain the area at the same level of cleanliness as it would be for a fruit or a leafy vegetable commodity. Auditors must consider the product when assessing this question.

When it appears that there is no proactive effort to keep the storage area reasonably clean and orderly, this question must be answered NO. This question cannot be answered N/A.

	Questions	Points	YES	NO	N/A	Doc
3-22	Floor drains appear to be free of obstructions.	5				

Operators should maintain adequate surface drainage to reduce breeding places for pests and to reduce product contamination. Auditors must look into the drain (or lift a drain cover if applicable) to see if there is any debris or are obstacles impeding the flow through the drain. A build-up of fruits or vegetables, sludge or dirt or anything else that may be considered as an obstruction will cause this question to be answered NO. This question can only be answered N/A when no floor drains are present.

	Questions	Points	YES	NO	N/A	Doc
3-23	Pipes, ducts, fans and ceilings which are over food handling operations are clean.	5				

Pipes, ducts, fans, and ceilings over the food handling or storage operation need to be clean. In addition, paint chips, loose screws, exposed insulation, or anything that stands out as a possible contamination factor must also be considered. Operations are not intended or expected to be meticulously clean. However, any readily noticeable build up of dust, dirt, debris, cobwebs or other contaminants that could fall onto product being packed is sufficient to answer this question NO. This question cannot be answered N/ A.

	Questions	Points	YES	NO	N/A	Doc
3-24	Glass materials above product flow zones are contained in case of breakage.	10				

This question pertains to glass light-bulbs and any other glass-made products that may be located above the product flow zone. Overhead lighting, regardless of height above the product that may be susceptible to breakage should be protected from falling onto conveyor lines or into product containers such as bins or final packages. Other glass items, either in whole or broken form, must be contained or prevented from falling into product.

In the case of lighting equipment (fluorescent, incandescent, krypton vapor, etc.), there are many commercially available products and lighting equipment/types that may be used. In some cases, lighting fixtures may cover or enclose the bulb; in other cases, the bulbs may be coated with some medium that retards breakage and shattering; in other cases shields to cover the fixture are available.

Operators must take preventive measures to effectively prevent glass, broken or whole, from falling into the flow of product. Auditors must observe the lighting or other glass being used in the operation and determine whether or not it is possible that falling pieces may contaminate the produce. This question can only be answered as N/A when there is no glass located over all flow zones.

	Questions	Points	YES	NO	N/A	Doc
3-25	Possible wastewater spillage is prevented from contaminating any food handling area by barriers, drains or a sufficient distance.	10				

Waste water from toilets and hand washing sinks or other sources not intended to be used to wash or rinse product must not be permitted to run into the packing or storage area if a spill occurs.

Waste water spillage sources that are a reasonable distance from the packing area and product flow zone are acceptable. Drains which are in place must drain away from the packing and storage area. Sanitary sewer lines and drains should not leak.

This question must be answered NO when it is observed that potential spillage of nonprocessing water is likely to run into and contaminate the production or storage area or the product. This question cannot be answered N/A.

	Questions	Points	YES	NO	N/A	Doc
3-26	There is a policy describing procedures which specify handling/disposition of finished product which is opened, spilled or comes into contact with the floor.	15				P

Auditors should review the SOPs for the facility to identify if there is a procedure in place which identifies how product that spilled or comes in contact with the floor is handled. Spilled product that comes in contact with the floor can become contaminated and should not be used without

some sort of corrective action such as washing or disposing of the product. This question cannot be answered as N/A.

	Questions	Points	YES	NO	N/A	Doc
3-27	Only new or sanitized containers are used for packing the product.	10				D

Packers that use new containers to package products are taking the highest possible means to reduce microbial contamination. The use of new containers eliminates the possibility of cross contamination of produce from used containers. Some operations are packing directly into reusable plastic containers (RPC) to meet buyer specifications. These containers are meant to be reused. In the case of RPCs, they should be sanitized prior to each reuse in the field. A cleaning log or record from either the producer or RPC Management Company shall be reviewed to verify they have been sanitized. This question cannot be answered as N/A.

	Questions	Points	YES	NO	N/A	Doc
3-28	Pallets and containers are clean and in good condition.	5				

Auditors must review the condition of pallets and containers being used and those stored for future use. Auditors must question the operator to determine what is done with broken or dirty pallets or containers. When operators use dirty or broken pallets and containers or do not clean and/or repair pallets and containers the answer to this question is NO.

	Questions	Points	YES	NO	N/A	Doc
3-29	Packing containers are properly stored and protected from contamination (birds, rodents, and other pests).	10				

Packing containers and other packing materials that are not ready for immediate use should be stored in a way that protects them from contamination by any source (pests, rodents, dirt, and water condensation, etc.) Packing containers stored outside should be covered in some manner to protect against contamination. Using the top container in a pile is not sufficient.

Auditors should observe where and how packing containers are stored. Containers which are stored in a manner that may lead to contamination by any reasonable means will result in a NO answer for this question.

Pest Control

	Questions	Points	YES	NO	N/A	Doc
3-30	Measures are taken to exclude animals or pests from packing and storage facilities.	10				D

All packing and storage facilities should establish a pest control program to reduce the risk of contamination by rodents and other animals, including pets. This program should include regular and frequent monitoring of affected and treated areas to accurately assess the program's effectiveness.

The auditee should consider the use of screens, wind curtains, bird deterrent tape and traps to minimize risk of product contamination. Pet dogs, cats or other animals should not be allowed in the packing and storage facilities.

Auditors must review the facilities' SOPs to determine if there is a proactive effort to exclude animals and pests from the facility. When guide dogs or similar animals are present, SOP's must include corrective measures. This question cannot be answered N/A.

	Questions	Points	YES	NO	N/A	Doc
3-31	There is an established pest control program for the facility.	10				D

A pest control log must be maintained that includes inspection dates, inspection reports, and procedures implemented to eliminate any problems. Frequent monitoring of affected and treated areas must take place to determine the effectiveness of the treatment applied. Generally, all traps and bait stations will be marked and flagged by numbers or some type of coding system. It is likely that there will also be a map of the premises that shows the location of such bait stations and traps.

All bait stations containing poison attractants must be located outside the facility. Traps or other non-poison methods should be the only control program located within a structure.

Auditors should be aware of and look for an organized method of pest detection and elimination. This question cannot be answered N/A.

	Questions	Points	YES	NO	N/A	Doc
3-32	Service reports for the pest control program are available for review.	5				R

Generally, traps and bait stations will be regularly checked and have documentation showing when this was completed. This documentation may consist of a report or inspection log for all stations or may be a sticker or other marking on individual stations throughout the facility.

Auditors must review documentation and records that pertain to the pest control program. In some cases, it may be necessary to obtain this information from an independent pest control company contracted to provide these services. This question can only be answered as N/A when the answer to Question 3-31 is NO.

	Questions	Points	YES	NO	N/A	Doc
3-33	Interior walls, floors and ceilings are well maintained and are free of major cracks and crevices.	5				R

Potential entryways for pests into the facility must be eliminated by blocking/repairing areas such as holes in walls, doors, flooring, vents, etc. To assess this question, auditors must look closely at the inside walls, doors, floors and ceilings of an operation. Small cracks or crevices incident to structure age should be disregarded, unless it is obvious that pests are in the area. Cracks and crevices do not necessarily need to lead to the outdoors for infestation to occur. Certain pests can easily use areas inside walls as a living space and the food products within the facility provide a food source.

The facility should be well maintained to repair or eliminate problem areas. There should be no loose insulation materials protruding from the walls or hanging from the ceiling. This question must be answered NO when the facility is not well maintained and cracks or crevices may harbor pests or provide access. This question cannot be answered N/A.

	Questions	Points	YES	NO	N/A	Doc
3-34	Records are kept recording the source of incoming product and the destination of outgoing product which is uniquely identified to enable traceability.	10				D

The Bioterrorism Act of 2002 requires certain handlers of foods to keep records that allow the handler to keep trace of produce "one step forward" and "one step back" within the food chain. For packing facilities, storage and transportation facilities and wholesale distribution/terminal warehouses, record keeping that keeps trace of the source of incoming produce and the destination of outgoing produce is a critical component of a documented traceability program. Traceability markings shall be at the container/master container level, and shall include other identifying marks as outlined in the company's traceability program.

Auditors must explain all questions for which a NO or N/A answer was noted.

Any additional comments pertaining to individuals or to observations made during the audit should be made here. Auditors must be specific when making comments about YES answers to questions, as an additional statement here may indicate that the question might be better answered NO instead.

