DEFENSE LOGISTICS AGENCY
TROOP SUPPORT
700 ROBBINS AVENUE
PHILADELPHIA, PENNSYLVANIA 19111-5092

REPLY TO
ATTENTION OF

FTSB

10 May, 2012

SUBJECT: Defense Logistics Agency Troop Support Produce Quality Audit

[redacted].
123 Avenue
Any Town, USA

Dear [redacted],

This letter serves as notification of an upcoming DLA Troop Support Produce Quality Audit. This audit will cover all produce items listed in the contractor's catalog under contracts SPM300-[redacted].

Additionally, the DLA Troop Support Produce Quality Audit Team will review the Food Defense/Force Protection and Sanitation programs, at your Any Town, USA facility, as a part of the USDA-AMS Good Agricultural Practices (GAP)/Good Handling Practices (GHP)/Hazard Analysis Critical Control Point (HACCP –applicable to facilities with Fresh-Cut operations) Audits. The DLA Troop Support Produce Quality Audit Team will conduct the aforementioned GAP/GHP on 11 July, 2012; while the audit samples for the Produce Quality Audit will be pulled/selected by the USDA-AMS auditor. The Produce Quality Audit will be held at your Any Town, USA facility on 12 July, 2012. Schedule for the Produce Audit and GAP/GHP Audits will be as follows:

Wednesday, 11 July	-0830 AM- 0900- DLA Troop Support Quality Audit Team Meeting (Government personnel only)
	-0900-0930- In-Briefing
	-0930- 5:00- Selection of Commodity Samples and GAP/ GHP/HCCP Audit
Thursday, 12 July	-Arrive at 8:00 AM- Preparation of Samples
	-8:30 AM- 5:00 PM- Produce Quality Audit

The DLA Troop Support Produce Quality Audit Program covers all produce items listed in the contractor's catalog (fresh, fruits and vegetables, fresh-cut products, etc.) and functions as a Service and Quality Assurance check for DLA Troop Support customers to ensure customers are receiving safe produce of an optimum quality level. The audit objectives focus on the following:

1. Contractor's adherence to contractual requirements
2. Compliance with the specified US Grade or higher
3. The quality level of the products supplied is satisfactory and uniform.
4. There is no product misrepresentation or unapproved substitution.

The Produce Quality Audit objectives are accomplished utilizing the expertise of the USDA Agricultural Marketing Service (AMS) Fresh Products Branch personnel and DLA Troop Support Quality Auditors. Representatives from the above agencies form the DLA Troop Support Produce Quality Audit Team.

Selection of Samples: The DLA Troop Support Lead Auditor will provide a list of sample items upon arrival at the contractor's facility. **Two-case sample for each item will be selected.** An on-hand inventory quantity report (i.e. number of cases on hand) should be developed for each item after receipt of the list. Contractor should also identify those items on Hold/Not-Ready-To-Issue status or have a waiver/deviation approved by the Contracting Officer for Grade or other contractual requirement. Warehousing assistance will be required to pull and prepare samples for the audit. Assistance with moving samples from the storage areas to the audit area and also continuous removal of items after review will be required on audit days. Samples must be stored in appropriate conditions (dry, refrigerated, etc.) to protect from temperature abuse. Fruit and Vegetable commodities will consist of 8 samples **(2-cases/shipping container per item)** randomly selected per each commodity (13 samples if a commodity failed the last audit). Additional samples may be selected at the request of the Contracting Officer due to customer complaints.

Additional Information:

1. A copy of the Defense Logistics Agency Troop Support Defense Checklist is located at the following link: http://www.Defense Logistics Agency Troop Support.dla.mil/subs/fs_check.pdf; and a copy of the USDA-AMS GAP/GHP checklist can be found at http://www.ams.usda.gov/gapghp Any questions concerning this review or problems accessing the checklist should be addressed to the Lead Auditor as soon as possible.

2. Certification/Documentation - To avoid delays/questions during the audit, the contractor should ensure that ALL products intended for DLA Troop Support's customers are derived from Approved Sources and meet the Berry Amendment requirements (unless otherwise is excluded in the contract/FAR/DFAR or authorized by the Contracting Officer under the Domestic Non-availability Determination). The contractor must contact the Lead Auditor and submit the following information as soon as possible but**no later than 14 May 2012:** Whether a fresh-cut operation/processing takes place at this facility or if fresh-cut products are subcontracted If fresh-cut products are subcontracted, we need the list/name of suppliers/processors for each fresh-cut product and the actual/physical address of the facility where the fresh-cut operation/processing takes place. Please note that ALL fresh-cut products must be from an Approved Source (facility inspected by US Army Public Health Services Command/VETCOM) otherwise any product from an unapproved source will be rated Blue/Unacceptable during the audit.

Audit Attendance: It is strongly recommended that your suppliers, buyers and customers attend the audit. Please extend an invitation to these personnel to attend the Product Audit (2nd day) based on space availability at your facilities audit location.

Contractor Audit Preparation:

The contractor is responsible and will bear all costs for the facility and the equipment/supplies used during the audit. Immediately upon receipt of the audit notification, the contractor shall make arrangements to use their normal product cutting room/kitchen (if adequate) or find another facility for the audit. If there is no space available at the contractor facility or the space is inadequate other arrangements must be made by the contractor. Ideally the room must be equipped with running water. To ensure accurate weight of audited items, it is highly recommended that scales used during the audit are calibrated within the 60-day notification period and an applicable set of test weights are available to verify scale accuracy.

A digital scale capable of weighing small items and a scale capable of weighing full cases are required. Clean up of the cutting area/room and continuous clean up of equipment will be the contractor's responsibility. The contractor must contact the Lead Auditor to discuss the location, adequacy of the facility, equipment available, and whether a fresh-cut operation takes place at this facility, or if fresh-cut products are subcontracted as soon as possible but **no later than 14 MAY, 2012.** The following is the list of equipment/supplies needed:

(1) Storage area to store samples selected. (approximately 2 pallets)
(2) Chill storage area for samples that require refrigeration (approximately 2 pallets)
(3) Tables for conducting the audit and demonstration.
(4) Sinks/wash area equipped with sanitizing soap for cleaning knives and equipment.
(5) Water jet spray attachment for the sink
(6) Calibrated Scales/Test Weights: One small digital scale able to record product weights in both ounces and grams and capable of measuring down to the nearest hundredth is preferable and a set of test weights with a recommended weight range of 1.0 ounce to 1 pound; and, one scale able to record product weights for full cases with an approximate weight range of 0 -100 lb and capable of measuring down to the nearest tenth is preferable and a 25 lbs test weight.
(7) Cart to move samples around.
(8) Cutting boards (two or three)
(9) Large trash cans with bags.
(10) Power hook-up for 2 computers
(11) Access to a copy machine
(12) Miscellaneous supplies: Paper towels; large heavy-duty plastic trash bags; one box of large latex gloves; paper flip chart/easel with markers (RED, BLUE, YELLOW, GREEN, BLACK); cellophane tape; binder clips; and a stapler

Optional but considered highly desirable: Cloth towels and floor covering to maintain clean and sanitary floor areas.

Administrative Information: Please respond via email that you have received this notification and provide a [redacted], point of contact, audit location address, email, and phone/ fax numbers for future correspondence concerning this audit.

If you have any questions about the audit procedures, please contact the undersigned at 215-737-8161, Rhonda. Bell @dla.mil or Ana Sanders at 215-737-8656, ana.sanders@dla.mil.

Rhonda Bell
Produce Quality Audit Program Coordinator/
Certified Lead Quality Auditor
Quality Audits & Food Defense Branch
Subsistence Supplier Support Division

PRODUCE QUALITY AUDIT RATINGS (COLOR CODE RATING SYMBOLOGY)

ACCEPTABLE (GREEN) = Acceptable. No deviations from the contract or the item description stock number requirements.

MINOR NONCONFORMANCE (YELLOW) = Not fully acceptable. A Minor nonconformance is a deviation from the contract or the item description stock number requirements. This minor nonconformance is not likely to materially reduce the usability or serviceability of the item for its intended purpose and, depending on the defect, or affect is its condition and/or the continued storage of the item for further use. Products that meet the specified US Grade **but** exhibit product defects (decay, spoilage, skin breakdown, etc.) likely to continue affecting the condition of the product and continue deteriorating during storage and/or effecting good product if defective units are not removed from cases/containers. Examples of other minor nonconformances: Cataloging issues; Minor or workmanship/fabrication violations (fresh-cut products); Minor weight violations; Minor deviations from packing, packaging, labeling and marking requirements that would not necessitate a regulatory market suspension or affect DLA Troop Support's ability to recall the item. **ACTION REQUIRED**: Produce with defects (decay, spoilage, skin breakdown, etc.) that will continue deteriorating or condition/defects that will affect the condition of good product during storage requires attention from the contractor such as reworking and removing defective product while in-storage or prior to delivering to customers. Minor nonconformances that will not change or further deteriorate (scars, size, weight, etc.) while product is in-storage or when delivered to the customer may be tolerated by the customer for a short period of time (until the contractor receives a new product at OCONUS but for no more than 30 days at CONUS locations).

MAJOR NONCONFORMANCE (BLUE) = A major nonconformance, other than critical, is a deviation from the contract, the item description stock number and/or failure to meet the specified US Grade requirements. This major nonconformance is a deviation that materially affects or is likely to have a major affect on the serviceability, usability, condition and/or continued storage of an item for further use. Examples of major nonconformance's: Grade failures; Domestic source/regulatory/approved source violations; Wrong item; Major workmanship/fabrication violations (fresh pre-cut items); Major weight violations; Item shelf life/ expiration date violations; Not latest season pack/crop year violations; Items that exhibit temperature abuse, and/or other off condition that although not likely to result in hazardous or unsafe conditions, the defect and/or combination of defects materially affect the item serviceability for its intended purpose; and/or major deviations from packing, packaging, labeling and markings that would necessitate a regulatory market suspension or have a major affect on DLA Troop Support 's ability to recall the product. **ACTION REQUIRED:** The contractor is required to STOP ISSUE of the item immediately, unless otherwise approved by the Contracting Officer.

CRITIICAL NONCONFORMANCE (RED) = A critical nonconformance is a deviation that judgment and experience indicate consumption of the item is likely to result in hazardous or unsafe conditions for individuals. An item will receive a Red Rating if it contains a critical defect(s) that involve food safety issues such as wholesomeness, foreign material, contamination or adulteration issues that judgment and experience indicate consumption of the item is likely to

result in hazardous or unsafe conditions for individuals. Examples of critical nonconformance's: Items with food safety concerns are those items that exhibit contamination, foreign material, and/or other conditions that render an item unfit for human consumption. **ACTION REQUIRED:** Contractors are required to immediately STOP ISSUE of the product and notify DLA Troop Support customers to return or dispose of the product in question, and notify grower/supplier/distributor of the product (if applicable).

NOTES:

1/ MAJOR NONCONFORMANCE (BLUE) = In OCONUS locations only, the Contracting Officer may approve continue issue of the product because of location extenuating circumstances and on a case-by-case basis. This approval is depending on the type and severity of the deviation/defect, the DLA Troop Support Quality Lead Auditor (lead Auditor that performed the audit) recommendation, customer approval, and if the substitute of equal/higher quality is Not-in-Stock at OCONUS location. Continue issue of the item may require and include contractor screening/rework of the nonconforming product (removal of defective units) and follow-up Government inspection/audit to verify action taken by the contractor (at no cost to the Government for inspection/travel costs). At CONUS/OCONUS locations, only the Contracting Officer, **NOT** the customer or the Lead Auditor, has the authority to accept wrong items (not meeting item description cited in DLA Troop Support catalog or not meeting the specified US Grade cited in the contract, etc.). The Rating assigned to the item WILL NOT be changed by the Lead Auditor because of acceptance with a waiver/rework/repair of the product in question. The DLA Troop Support Food Safety Office at the request of the Contracting Officer, may issue a restricted (to DLA Troop Support customers only) a Hazardous Food Recall for all those items originating from an unapproved source and distributed to DLA Troop Support customers.

2/ CRITICAL NONCONFORMANCE (RED) = The DLA Troop Support Food Safety Office will issue a Hazardous Food Recall for all critical nonconformance's involving items with food safety concerns that render an item unfit for human consumption or may present a health hazard for DLA Troop Support customers . If applicable, the Contracting Officer should suggest growers/suppliers of the item to review shipping documents to ensure the same item was not delivered to other DOD customers.

CONFIDENTIAL INFORMATION

[redacted]

SAMPLING LIST - FRUIT

NSN	ITEM DESCRIPTION	PART #
891501E210016	BANANAS, FRESH, GREENISH-YELLOW, #4, 1/40 LB CS	20340
891501E050735	APPLE MACINTOSH 125 CT 1/40 LB CS	14P59
891501E050796	FRUIT MIX GRAPE/CLOUPE/HDEW/ORANG 4/1 GL	17T13
891501E050467	ORANGE US#1 88 CT 1/35 LB CS	20663
891501E050216	PEAR D'ANJOU 120-138 CT 1/40LB CS	14F15
891501E051210	GRAPEFRUIT FANCY 1/35 LB CS	20443
8915005824071	LEMONS 140CT CASE	20543
891501E210339	KIWIFRUIT, FRESH, US#1, 39 CT, 1/10 LB	20520
ALTERNATE SAMPLES		
891501E050215	APPLES G/D 125-138 CT 1/40 LB CS	14F14
891501E050124	GRAPE GRN/WHT SDLS US#1 1/18 LB CS	20470
891501E050007	LIME US#1 48 CT 1/10 LB CS	14P07
891501E050184	ORANGE 113 CT 1/35 LB CS	14A02
891501E050002	CANTALOUPE US#1 1/35 LB CS	20582
891501E051059	APPLES, CHL, SL, GRINS, 100/2 OZ CO	15M92
891501E210207	PINEAPPLE CHL, CHUNKS, US#1, 1/10 LB CS	70296
891501E212420	GRAPEFRUIT, FRESH, PINK/RED, USF, 32 CT, 1/40 LB CS	20443
891501E212348	HONEYDEW MELON, CHL, CUBED, 2/5 LB CO	70294
891501E210284	APPLES, FRESH, RED DEL, USF, 88 CT, 1/40 LB CS	20206
891501E051602	TANGERINES, FRESH, 40 LB CASE	16Z47
891501E050123	GRAPES RED SDLS US#1 1/18 LB CS	14P36
891501E210187	PEARS, FRESH, BART/ANJOU, US#1, 90-110 CT, 1/44 LB CS	20741
891501E210807	APPLES GOLD 100CT CASE	20222

CONFIDENTIAL INFORMATION

[redacted]

SAMPLING LIST - VEGETABLES

NSN	ITEM DESCRIPTION	PART #
891501E212161	GREENS, KALE, FLOWERING, FRESH, US#1, 1/25 LB CS	10580
891501E050054	LETTUCE ROMAINE US#1 24 CT 1/35 LB CS	16P33
891501E212127	TOMATOES, GRAPE, FRESH, 12/1	11662
891501E212341	LEEKS, FRESH, 12 BUNCHES, 1/20 LB CS	10650
891501E210381	PEPPERS, SWT, FRESH, GREEN, 3" RD, US#1, 1/25 LB CS	10900
891501E210208	PLANTAINS 40LB CASE	20786
891501E210410	SQUASH, FRESH, GREEN, ZUCCHINI, US#1, 1/20 LB CS	11460
891501E210078	EGGPLANT, FRESH, US#1, 1/25 LB CS	10520
ALTERNATE SAMPLES		
891501E210707	SPINACH, FRESH, LEAF, US#1, 4/2.5 LB BGS	11340
891501E212189	ASPARAGUS, FRESH, STANDARD/LG, US#1, 1/11 LB CS	20470
8915011404612	MUSHROOM 10LB FANCY CASE	10680
891501E210158	ONIONS,GREEN,FRESH,US#1,48 CT,1/10 LB CS	11242
891501E212689	CAULIFLOWER, FRESH, 12 CT, 1/25 LB CS	10380
891501E210649	AVOCADOS	20323
8915002525954	POTATO SWEET #1 CASE	11500
891501E210505	CUCUMBERS, FRESH, SUPER SEL, US#1, 1/40 LB CS	10500
891501E210068	CILANTRO, FRESH, 1/10 LB CS	10475
891501E050232	BEAN GRN CHL CUT 1/10 LB CS	20206
891501E050126	SQUASH BUTTERNUT PEEL SEEDED 1/10 LB BG	16B53
891501E210253	SPROUTS, ALFALFA, FRESH, 6 LB	11360
891501E210344	LETTUCE, FRESH, ICEBERG, US#1, 24 CT, 1/35 LB CS	10600
891501E210398	POTATOES, WHITE, FRESH, US#1, 80 CT, 1/50 LB CS	11060

PRIME VENDOR'S CORRECTIVE AND PREVENTIVE ACTION PLAN (CPAP)	
Prime Vendor Name:	CPAP Due Date:
Product Rating:	Contract Officer:
Audit Date:	Product Stock Number:
Lead Auditor:	DLA Troop Support Product Nomenclature:
Pareto:	

The corrective and preventive action plan (CPAP) must address items 1 thru 5 for deficiencies noted during the Product Audit, on or before the due date indicated above. A copy of the CPAP must be submitted to the Contracting Officer identified above and DLA Troop Support-FTSB.

1. PRODUCT DEFICIENCY NOTED AT AUDIT, PV PART NUMBER, # OF CASES REMAINING IN STOCK, DOP, EXPIRATION DATE:

2. ROOT CAUSE OF THE DEFICIENCY:

3. ACTION TAKEN TO CORRECT THE DEFICIENCY:

4. ACTION TAKEN TO PREVENT RECURRENCE OF DEFICIENCY (ROOT CAUSE):

5. FINAL DISPOSITION OF PRODUCT (stop issue date, waiver provided by KO, destroyed, etc.):

6. PRIME VENDOR'S REPRESENTATIVE RESPONSIBLE FOR IMPLEMENTING AND VERIFYING EFFECTIVENESS OF CPAP (Date will be CPAP implementation/effective date):

REPRESENTATIVE PRINTED NAME _____ REPRESENTATIVE SIGNATURE _____ DATE _____

DISPOSITION OF CORRECTIVE ACTION - (AUDITOR ONLY)

IS PV'S CPAP SATISFACTORY? ○ YES ○ NO IF NO, NEW SUSPENSE DATE:

FOLLOW-UP AUDIT REQUIRED: ○ YES ○ NO

AUDITOR'S SIGNATURE: DATE:

FORWARD
DLA TROOP SUPPORT FOOD DEFENSE CHECKLIST
April 28, 2011

BACKGROUND INFORMATION: The original DLA Food Security Checklist was developed by FTSB in October 2001 and distributed along with a precautionary letter to all contractors/subcontractors manufacturing, re-packaging, assembling, distributing, transporting, or storing operational rations during the Research Development Associates (R&DA) Conference in October 17, 2001. This alert was issued as a precaution due to the heightened state of security awareness in the USA after the September 11, 2001 terrorist attacks. While the original DLA Troop Support FD Checklist was modified and used as a model to develop "other" FD Checklists by other Government entities and industry, the basic elements developed by DLA Troop Support are the same.

FOOD DEFENSE/SECURITY/FORCE PROTECTION PLAN (operational rations, Prime vendor, and others).
Currently, **all** DLA Troop Support Subsistence contracts have a requirement for the submission and implementation of some type of Food Defense at each contractor facility. Areas of concern listed in this checklist must be addressed in the plan. As a result of increased risk for the potential of intentional food tampering the plan shall describe (in general terms) the type of preventive measures that are taken or will be taken to reduce food defense vulnerabilities and to protect the food intended for DLA Troop Support's customers at CONUS and OCONUS locations. The plan must include preventive steps taken to safeguard product from intentional tampering/ contamination during all stages of receipt, production, storage, assembly, delivery, and shipment. If a Food Defense Plan (including Food Defense Plans Covered in QSP) was previously submitted to DLA Troop Support, identify the office, name of the person the plan was submitted to, date of submittal, and rating assigned. The following information may be covered in the Food Defense Plan or under other pertinent areas of the QSP, if a QSP is required for the facility. If some of the food defense information is covered in the QSP (e.g., receipt inspection, storage, warehousing, training, traceability, mock recalls, etc.) cross-reference the applicable Section/ Area of the QSP. If the plan is submitted with the QSP, a rating (separate from the QSP) of acceptable, marginally acceptable, or unacceptable will be assigned to the Food Defense/ Security/Force Protection Plan. Note: Points will be deducted for not responding to a question with a YES, No, N/A or for not providing the information requested (e.g., establishment registration information). Appendix A of the DLA Troop Support Quality Systems Audit Workbook I: Documented Quality Systems Plans (QSP) Evaluation Guideline, Revision 5, contains a copy of this Checklist.

This revision to the DLA/DLA Troop Support Food Defense Checklist contains the following changes:

1. The DLA Food Defense Checklist title was changed to "The DLA Troop Support Food Defense Checklist" since DLA Troop Support developed the original checklist and DLA vested all food defense responsibilities to FTSB during the FT reorganization in 2005. This change was made to clearly identify the office with "official" responsibility for food defense for all DLA Troop Support subsistence contractors and, to facilitate immediate changes should unexpected circumstances dictate the need for changes, based on DLA Troop Support audit results/site visits/risk assessments at contractors' facilities, and/or feedback from inspection agencies (e.g., USDA-AMS, USDC, US Army Food inspectors, etc.) supporting DLA Troop Support and/or changes in regulatory requirements. The goal is to clarify roles and responsibilities for food defense for all DLA Troop Support subsistence contracts and facilitate changes to food defense requirements in case of unexpected circumstances.

2. Food Defense was removed from Section V of the DLA Troop Support Quality Systems Audit Workbook I: Documented Quality Systems Plans (QSP) Evaluation Guideline and made into a stand alone document. The goal is to reduce duplication and contradictions of the checklists used by subsistence contractors and DLA Troop Support personnel.

3. This document serves three purposes: (1) To communicate to prospective contractors the information that is expected to be addressed/included in their Documented Food Defense Plan submitted with their Technical Proposals/Bids. To ensure contractors address issues and respond to questions deemed critical to food defense at production facilities, ration assembly/subassembly/packaging facilities, Prime Vendor facilities, and/or other type of food distribution/ storage facilities located at CONUS and OCONUS locations; (2) Used by FTSB's Lead Auditors to determine if prospective contractors have satisfactorily addressed/included information applicable to their type of facility (3) Used by FTSB's Lead Auditors during compliance quality audits, Quality Systems Management Visits, and/or reviews to determine compliance, and effectiveness of the plan in reducing identified vulnerabilities in the system/ facility.

To download a copy of the DLA Troop Support Food Defense Checklist go to http://www.dscp.dla.mil/subs/fs_check.pdf **or contact the applicable DLA Troop Support Contracting Officer or the Quality Audits & Food Defense Branch (FTSB) Beneficial comments (recommendations, additions, deletions) and any pertinent data which may be used in improving this document should be addressed to: DLA TROOP SUPPORT, Directorate of Subsistence, Bldg. 6ATTN: FTSB, 700 Robbins Street, Philadelphia, PA19111-5092. Fax (215) 737-0379 or Voice (215) 737-8656/3876.**

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DLA Troop Support FOOD DEFENSE CHECKLIST

REFERENCE: Operational Rations Contract/TDP Section E; USDA-FSIS Model Food Security Plans; USDA-FSIS Industry Self- Assessment Checklist for Food Security; FSIS Directive 5420.1, Revision 1 (Food Security Verification Procedures); FDA Guidance for Industry, Food Producers, Processors, and Transporters - Food Security Preventive Measures Guidance; and 2006 Joint Government Operational Rations Food Defense Vulnerability Assessment Summary.

	CONTRACTOR YES	NO	N/A	AUDITOR A	M	U
I. ESTABLISHMENT/FACILITY REGISTRATION: See FDA Fact sheets summarizing the rules and the rules at http://www.cfsan.fda.gov/dms/fsbtact.html. FDA electronic registration for food facilities, foreign and domestic is available online at http://www.cfsan.fda.gov/furls/ovffreg.html. Registration by Paper (Mail or FAX) - You must register using Form 3537. Forms are available for download. This PDF version of the form must be used for submission. Help for using PDF files and information on downloading free PDF readers is available at http://www.cfsan.fda.gov/frf/help2.html. You may also obtain a copy of this form by writing to the U.S. Food and Drug Administration, HFS-681, 5600 Fishers Lane, Rockville, MD 20857, or by requesting the form by phone at 800-216-7331 or 301-575-0156.						
A. Does the plan clearly indicate the facility/establishment is registered with FDA as per the CFR?						
B. Does the plan identify the establishment number and the date the facility was registered?						
II. FOOD DEFENSE MANAGEMENT PLAN AND POLICY: Does the plan identify/ include/ address the following?						
A. A policy statement concerning top management support for food defense and the integrity of food supplies.						
B. The risk management principles/guidelines used to develop and implement the plan (example FDA, USDA-FSIS, industry guidelines, etc.).						
C. Organizational charts clearly identifying management personnel (by position) involved with the company's Food Defense.						
D. Identify the Food Defense Manager/Coordinator or the responsible management official with the overall responsibility for: Reviewing the adequacy, implementation and effectiveness of plan; control and security of the plan and all copies; and determining whether a private firm is needed to assess risk or reduce food defense vulnerabilities.						
E. If a team concept is used for Food Defense, each member (by position) of the team and their specific assigned responsibilities must be identified.						
F. The frequency of review (i.e., adequacy of Food Defense Plan). The frequency should be at least annually to be in concert with DLA Troop Support's Quality audit schedule at the facilities and the requirement for QSP reviews/ internal audits.						
G. Responsibilities for monitoring and controlling each area identified in the plan.						
H. How the contractor maintains confidentiality of the plan and details that may compromise the security of the facility or the integrity of the plan.						
J. Identify personnel (by position) authorized to have copies of the plan. Identify who, where, and how copies are maintained, controlled and secured.						

DLA Troop Support FOOD DEFENSE CHECKLIST

REFERENCE: Operational Rations Contract/TDP Section E; USDA-FSIS Model Food Security Plans; USDA-FSIS Industry Self- Assessment Checklist for Food Security; FSIS Directive 5420.1, Revision 1 (Food Security Verification Procedures); FDA Guidance for Industry, Food Producers, Processors, and Transporters - Food Security Preventive Measures Guidance; and 2006 Joint Government Operational Rations Food Defense Vulnerability Assessment Summary.

	CONTRACTOR YES	NO	N/A	AUDITOR A	M	U
K. Indicate if employees performing monitoring activities are delegated authority to take immediate action if there are signs that may indicate a breach in security/problem?						
L. Are computer hardware, software, and paper records documenting food production controls backed -up, secure? If so, is access to these passwords controlled and are they changed periodically?						
III. PERSONNEL: Employees, visitors, contract workers and others.						
A. **Employees:** Under Federal law, food establishment operators are required to verify the employment eligibility of all new hires, in accordance with the requirements of the Immigration and Nationality Act, by completing the INS Employment Eligibility Verification Form (INS Form I-9). Completion of Form I-9 for new hires is required by 8 USC 1324a and nondiscrimination provisions governing the verification process are set forth at 8 USC 1324b. Note: screening procedures should be applied equally to all staff, regardless of race, national origin, religion, and citizenship or immigration status.						
1. Employee references/background checks. Does the plan identify/include/ address the following?						
- Employment references, addresses, and phone numbers supplied by employees on the application form are verified for ALL employees (i.e, seasonal, temporary, permanent, contract workers, etc.) prior to hiring.						
- If background checks are not required for ALL employees, does the plan identify employees (seasonal, temporary, permanent, and contract workers) by position, subjected to background checks before hiring?						
- Are employees hired prior to verification of employment references or background checks are completed.						
- Clearly identify the responsible official(s) with cognizance fro ensuring employment references, background checks and security clearances (i.e., Top Secret or Secret) if required are verified and up to date (i.e., current) and stipulate the required frequency (e.g., semi-annual, etc.) of these reviews.						
- If an external personnel agency is used are the recruitment methods utilized by said external personnel agency known?						

DLA Troop Support FOOD DEFENSE CHECKLIST

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	CONTRACTOR YES	CONTRACTOR NO	CONTRACTOR N/A	AUDITOR A	AUDITOR M	AUDITOR U
2. Control of employees. Does the plan identify/include/address the following?						
- Identify the procedure/method used (e.g., photo IDs with expiration dates, company badges, etc.) for controlling entry of employees into the plant during both working and non-working hours. Are these verified upon entrance at the facility?						
- Indicate if an updated list is maintained for plant personnel with open or restricted access to the establishment.						
- Identify the procedure/method used (e.g., color-coded uniforms or coded badges) to make it obvious when employees move to areas of the facility other than where they normally work.						
- Are only designated employees allowed in sensitive areas or areas where the product is open to contamination?						
- Is there a written procedure listing and enforcing a policy on what personal items are not allowed inside the plant?						
- Does each department keep a roster of employees working on any given day? Is the roster updated daily? Is the roster distributed to all plant supervisors?						
- Upon the termination of an employee, is there a procedure in place to immediately restrict access to the facility by this individual? How?						
3. Employee training. Does the plan identify/include/address the following?						
- If members of the Food Defense Team are trained, prior to their assignment, in the provisions of the plan and identify other food defense training received.						
- If ALL (new/current) employees are trained in the defense policies and procedures of the company. Does the training include instructions for employees to immediately report suspicious activity, external/internal threats, or if they suspect wrong doing or product tampering by other employees to their supervisor or other management personnel?						
B. Visitors/Guests/Contractors: Does the plan identify/include/address the following?						
1. If the visitor policy requirement and method used to control entry into the facility requires positive identification for ALL visitors (e.g., picture IDs, sign-in and sign-out at the gate, reception desk, etc.).						

DLA Troop Support FOOD DEFENSE CHECKLIST

REFERENCE: Operational Rations Contract/TDP Section E; USDA-FSIS Model Food Security Plans; USDA-FSIS Industry Self- Assessment Checklist for Food Security; FSIS Directive 5420.1, Revision 1 (Food Security Verification Procedures); FDA Guidance for Industry, Food Producers, Processors, and Transporters - Food Security Preventive Measures Guidance; and 2006 Joint Government Operational Rations Food Defense Vulnerability Assessment Summary.

	CONTRACTOR YES	NO	N/A	AUDITOR A	M	U
2. Procedure for examining/inspecting briefcases, backpacks, toolboxes and/or other containers prior to entering the facility.						
3. Procedure to control visitors (contractors, salespeople, truck drivers, etc.) movement to prevent them from accessing restricted areas such production. Are visitors escorted/accompanied at ALL times by an authorized plant representative while in the facility?						
4. Control of contractors and their workers:						
- Are controls in place for contract workers (e.g., sanitation crews, pest control, etc.,) to prevent intentional contamination of product?						
- Is access to the facility limited to only those areas of the plant relevant to their work? Are contract workers escorted by an authorized plant representative while performing work in the facility or when they must work in sensitive areas?						
- Is there a written procedure listing and enforcing a policy on what personal items may and may not be allowed inside the plant and within production areas?						
IV. SECURITY OF PERIMETER, BUILDINGS, DOCKS, AND RECEIVING/ SHIPPING AREAS:						
A. Perimeter. Does the plan identify/include/address the following:						
1. Is the plant perimeter monitored for signs of suspicious activity or unauthorized entry? How? Identify the measures in place (e.g., fencing or other barriers, "No Trespassing" signs, etc.) to prevent unauthorized access within the boundaries of the facility/buildings.						
2. Identify the measures in place to protect the facility/buildings from unauthorized entry during operation and non-operational hours. Identify if access points into the facility are controlled using a combination of the following: Fences, security guards, alarms, locking devices, lighting, surveillance cameras, emergency exits alarmed have self-locking doors that can be opened only from the inside, or other defense hardware consistent with national and local fire and safety codes.						
3. Is a procedure available identifying areas of concern and programs in place to monitor unauthorized access and prevent defense breaches of the following: Control panels, vents for air circulation lines, pipes, electrical lines/boxes, gas or pressure valves, doors, windows, roof openings, vent openings, trailer bodies, railcars, etc.						
4. Are outside storage tanks containing hazardous materials, potable water, and bulk storage tanks secured (e.g., locks, seals, sensors) at all times?						

DLA Troop Support FOOD DEFENSE CHECKLIST

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	CONTRACTOR YES	CONTRACTOR NO	CONTRACTOR N/A	AUDITOR A	AUDITOR M	AUDITOR U
5. Is access to central controls for airflow, water systems, electricity and gas restricted and controlled? Do your airflow systems include a provision for immediate isolation of contaminated areas or rooms?						
6. Identify procedures in place for inspecting trucks entering the facility boundaries. Are incoming and outgoing vehicles/trucks (both private and commercial) inspected for unusual cargo or activity?						
7. Are truck drivers required to possess and present upon request adequate identification prior to entering the facility/gate?						
8. Are deliveries verified against a roster of scheduled deliveries? Are unscheduled deliveries held outside the plant premises, if possible, pending verification of shipper and cargo?						
9. Is there a waiting room for drivers? Is access from the waiting room to other parts of the facility controlled? If so, how?						
10. Do you have parking areas for visitors situated at a safe distance from the main facility? Is the area segregated from production areas, storage, utilities, fuel tanks, etc. by adequate defense fencing or otherwise? Is this area monitored?						
11. Are vehicles of authorized visitors, guests, and employees clearly identifiable (placards, decals, etc.)?						
12. Have the normal routes for personnel entry to/exit from your facility been assessed? Are all points monitored or controlled?						
13. Are your emergency alert systems fully operational and tested and locations of controls clearly marked?						
B. Incoming/outgoing shipments: Does the plan/QSP identify/include/address the following as applicable?						
1. Review and Maintenance of Records. Are records reviewed and maintained for all delivery conveyances (e.g., tankers, railcars, ships, etc.) used to transport food products?						
2. Is there a policy for deliveries during non-operational hours to ensure prior notice of such deliveries and to require the presence of an authorized individual to verify and receive the shipment?						
3. Is there an advance notification (by phone, e-mail, fax, etc.) required for all incoming/outgoing deliveries, including pertinent details about the shipment and the name of the driver?						

DLA Troop Support FOOD DEFENSE CHECKLIST

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	CONTRACTOR YES	NO	N/A	AUDITOR A	M	U
4. Defense seals: Is there a requirement for incoming/outgoing shipments to be sealed with tamper-proof, numbered seals and that seal numbers be recorded on the Shipping documents/Bill of Lading? Are seal numbers verified prior to entry/ leaving the facility and registered/logged in per incoming/outgoing shipment? Are seal numbers inspected for possible tampering for incoming shipment?						
5. Are shipping documents with suspicious alterations thoroughly investigated and is there guidance for this type of incident?						
6. Are loading docks secured to avoid unverified or unauthorized deliveries? Are there procedures in place for handling deliveries to this area?						
7. Does the plan indicate how they ensure open trucks are not left unattended during off-loading and loading and sealed immediately after loading?						
8. Is there a capability for verification of driver location and load at any time?						
9. Have defense procedures been developed and implemented for drivers when docking or stopping for meals, gas, breakdowns, etc.? Is there a requirement that drivers keep trailers locked down at all times?						
10. Are there predetermined protocols for drivers when faced with suspicious circumstances? Are drivers required to immediately report suspicious activity and any instances of suspected adulteration or tampering with the shipment? Are drivers provided a list of telephone numbers of officials to contact during operational and non-operational hours?						
C. Mail Handling: Do you have a separate mail handling facility or room away from in plant food production/processing operations? Are your mail handlers trained to recognize and handle suspicious pieces of mail using U.S. Post Office guidelines?						
V. RECEIPT INSPECTION: Does the plan identify/include/address the following:						
A. Identify the procedure for inspecting for evidence of intentional tampering? Are tamper evident packaging features used when available for certain ingredients and supplies?						
B. Are receipt inspectors trained to look for obvious signs of shipment and/or product tampering and to verify the integrity of incoming shipments and products during their receipt inspection?						
C. Are all deliveries checked against orders made and is packaging/packing integrity inspected at the receiving dock for evidence of tampering prior to opening containers for signs of tampering or other anomalies?						

DLA Troop Support FOOD DEFENSE CHECKLIST

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	CONTRACTOR YES	NO	N/A	AUDITOR A	M	U
D. Are "Accept" and "Reject" criteria for all incoming materials well understood by personnel signing for or receiving products, including courier packages of minor ingredients or laboratory materials?						
E. Does incoming materials have clear, legible lot codes for traceability? Are all lot codes for incoming ingredients, processing aids and packaging materials identified on production records to ensure that products are traceable from receipt, production to finished products?						
VI. WAREHOUSING AND STORAGE: Does the plan identify/include/address the following:						
A. **Warehousing/Storage:**						
1. The person in charge of warehousing/storage, receiving, and authorizing the release of finished goods for shipment and ingredients/materials for use in production, clearly identified (by positions)?						
2. The procedure for storing product adequate to control access and minimize or eliminate the possibility of product adulteration/tampering? NOTE: The plan must identify all internal/external/contracted storage facilities used to store ingredients/ products/materials intended for DLA Troop Support customers.						
3. Do you have an emergency plan that identifies all areas in which products and ingredients are handled and stored (e.g., off-site warehouses, product chillers, and storage facilities)?						
4. Are restricted areas inside the plant clearly marked, secured and how access is controlled?						
5. Do you have updated plant layout schematics available at strategic and secured locations in the plant?						
6. Are there procedures for handling damaged and/or returned products and are these inspected for evidence of possible tampering before salvage or use in rework? Are records kept if these products are used?						
7. Is an inventory kept of product in the warehouse (including location)? Are you maintaining an accurate inventory of finished products to allow detection of unexplained additions to or withdrawals from existing stock?						
8. Are stored product/ingredients segregated by manufacturer and lot number to expedite isolation, inspection, or recall capability?						
9. Are labels held in a secure area to prevent label theft and misuse? Is there a plan in place to identify and contain mislabeled products?						

DLA Troop Support FOOD DEFENSE CHECKLIST

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	CONTRACTOR YES	NO	N/A	AUDITOR A	M	U
10. Do you have accountability programs, such as "sign-off sheets" for all restricted ingredients? Is there a list of personnel authorized to handle highly restricted ingredients?						
11. Is controlled access maintained for all product and ingredient storage areas? Is an access log maintained?						
B. Control of hazardous material:						
1. Are procedures and physical barriers (e.g., locks, keyed access by authorized personnel only) in place to restrict access to hazardous compounds such as nitrite, cleaning and sanitizing chemicals, pesticides, etc? Are these materials properly labeled?						
2. Is a daily inventory and material usage log maintained of hazardous chemicals or other products and are all discrepancies investigated immediately? Are Material Data Safety Sheets up to date, readily available, and accessible in case of emergency?						
3. Is there a procedure to ensure cleaning and sanitizing chemicals, lubricants, paints, pesticides and other non-food chemicals are stored away from food processing areas, under controlled access and with documented inventory?						
4. Is storage areas constructed and safely vented in accordance with national or local building codes?						
5. Are comprehensive and validated defense and disposal procedures in place, particularly for the control of agents, hazardous materials and live cultures of pathogenic bacteria?						
VII. PRODUCTION AREAS: Does the plan identify/include/address the following?						
A. Control of personal items and equipment issue:						
1. Is there a procedure listing and enforcing a policy on what personal items are not allowed inside the production areas?						
2. Are utensils such as hand- held dial thermometers, knives, and/or other potentially dangerous equipment/utensils distributed and accounted for on a daily basis?						
B. Water/ice:						
1. Water Source: Does the plan identify all sources of water used in the facility (both potable and non-potable sources) and are defense measures associated with each source of water?						

DLA Troop Support FOOD DEFENSE CHECKLIST

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	CONTRACTOR YES	NO	N/A	AUDITOR A	M	U
2. If a municipal water supply is used, is there a procedure to immediately notify local municipal/health officials in the event of any abnormalities or if the water supply in the facility is compromised ?						
3. Water Testing: If municipal water is used, has the supply system procedure been reviewed and samples taken at several locations within the plant? Identify frequency of water testing to verify microbiological and chemical safety? Does the testing also include testing potable water with respect to federal/state/local water quality standards? Is the defense of well systems reviewed at least monthly and samples taken at several locations within the plant for microbiological checks? Does the plan identify an established schedule for chemical analysis and analysis for parasites? Identify the frequency.						
4. Do you inspect the potable and non-potable water lines in food processing areas periodically for possible tampering? Identify the frequency.						
5. Does your in-plant ice-making equipment and ice storage facilities monitored and have controlled access?						
C. Ingredient Safety:						
1. Are procedures in place to monitor the operation of pieces of equipment (blenders, choppers, poultry chill tanks, etc.) to prevent product tampering?						
2. Does the plan indicate if projected and actual use of restricted ingredients is verified at the end of each day, by someone other than the employee who logs the ingredient?						
3. Does the plan indicate if the integrity of packaging materials of all spices and restricted ingredients (including premixes prepared in the plant) are verified prior to use?						
D. Batching/Mixing:						
1. Is access to product production or holding areas restricted to plant employees and authorized inspection personnel only?						
2. What types of controls are in place during mixing/batching of product or ingredients to prevent employee tampering, especially in areas where employees are by themselves without supervision or a coworker present??						
3. Have points where clandestine access to product is possible been identified? Are these points monitored? How?						
4. Are areas in which large amounts of product are exposed, (e.g., vats, kettles, tanks, chillers, cooler, etc.) restricted?						

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	CONTRACTOR YES	NO	N/A	AUDITOR A	M	U
5. Is traceability for all ingredient components, oxygen scavengers, packaging materials (that come in direct contact with food), etc, used in the production of finished products recorded and maintained in case of a recall?						
6. Are there specific procedures that define how product is to be reworked during processing? Are products to be reworked and related records/documentation properly identified and handled securely?						
7. Does the plan identify procedures to follow in the event an intentional contamination occurs during the production process?						
8. Are protocols in place for segregating unprocessed products from processed products? Is there a plan that addresses the deliberate mixing of processed and unprocessed product (e.g., retort by pass)?						
9. Are processing systems, including automatic control systems, secure? Are individuals with access to control systems identified?						
E. Laboratory Control: 1. Is access to in-plant laboratory facilities strictly controlled?						
2. Are all positive pathogen culture controls kept locked?						
3. Are mercury thermometers accounted for on a daily basis?						
4. Do you ensure only sample collection laboratory materials are permitted on the manufacturing floor?						
5. Do you maintain an up-to-date inventory of all hazardous laboratory chemicals and solvents and are these materials securely locked?						
VIII. EMERGENCY PROCEDURES: Does the plan/QSP identify/include/address the following?						
A. Coordination with DLA Troop Support, Local, State, or Federal Authorities. If a breach of security or suspicious activity does occur, timely notification and cooperation with local/state/federal authorities and public health and/other local officials as appropriate is crucial. In addition to alerting the aforementioned officials, DLA Troop Support requires that, in addition to other reporting, product contamination/adulteration or that presents any other health or safety hazard to DLA Troop Support customers whether accidental or intentional be immediately reported to the applicable Contracting Officer so that immediate action be taken by DLA Troop Support under the DoD Hazardous Food and Nonprescription Drug Recall Reporting Program.						

DLA Troop Support FOOD DEFENSE CHECKLIST

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	CONTRACTOR YES	NO	N/A	AUDITOR A	M	U
1. Does the plan identify a specific procedure for the immediate notification of the aforementioned officials and for handling and investigating food defense situations such as internal/external threats, suspicious activity, actual or potential cases of tampering or other malicious, criminal, or terrorist actions against any facility producing/assembling/storing, product or shipments intended for DLA Troop Support Customers?						
2. Does your plan have a current list of local, State and Federal Government Homeland Defense contacts, public health officials and applicable DLA Troop Support personnel? How often is this list updated? Is this list distributed to company's personnel and copies maintained at the facility and of site?						
3. Have procedures been established with community emergency personnel to assure proper access to the facility during an emergency while still preventing public access? Are specially designated entry points for emergency personnel identified in the plan?						
4. Are there provisions in the plan to deal with onlookers or media representatives that may be present during an emergency situation?						
5. Does the plan include an evacuation plan for each facility if necessary (bomb threat, fire, flood, chemical spill, etc.) and include provisions to prevent product tampering during the evacuation process?						
6. Food Defense exercise/drills: Are these conducted to verify key provisions of the plan? At what frequency? Are results reviewed and changes made to the plan if deemed necessary?						
7. Are employees trained and instructed to immediately report any sign of possible product tampering or break in the food defense system? Note: It is imperative that all employees are reminded that timely notification is essential to any perceived or potential threat.						
B. **Communication:** Does the plan identify and/or address the following:						
1. A policy to ensure employees and truck drivers are frequently reminded to keep a low profile and not share information regarding products intended for the military/DLA Troop Support customers: Quantities, criticality of products being produced or shipped to the military, customer routes, and/or discussed other information concerning the facility or shipments.						
2. Are truck drivers provided/have communication devices and emergency telephone numbers in the event of an emergency during operation/nonoperation hours?						

DLA Troop Support FOOD DEFENSE CHECKLIST						
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	CONTRACTOR			AUDITOR		
	YES	NO	N/A	A	M	U
C. Recall strategy:						
1. Does the plan identify the person responsible (appropriate backups) for investigating and proper handling and disposition of recalled product, identifying customer contacts, addresses and phone numbers.						
2. Is there a program in place to ensure the timely identification and segregation of all products involved in the event of deliberate product contamination? Does this program identify the corrective action plan for product tampering to ensure adulterated and/or potentially injurious products do not enter commerce and the immediate recall of adulterated products from trade and consumer channel?						
3. Does the plan identify a procedure for the safe handling and disposal of products contaminated with chemical or biological agents)?						
4. Do you have a relationship established with appropriate analytical laboratories (Government and/or private) for possible assistance in the investigation of product-tampering cases?						
5. Product Mock recalls: Are these conducted to verify key provisions of the plan If so at what frequency? **Note:** The DLA Troop Support Quality Audits & Food Defense Branch (FTSB) conduct unannounced product mock recalls periodically of actual products delivered to DLA Troop Support customers and/or ingredients/materials used in the production and packaging of food products. Operational ration contractors, Prime Vendors, and other subsistence contractors must be able to account for raw ingredients used in the production of food products, oxygen scavengers, and packaging (material that come in direct contact with food) and/or products shipped to DLA Troop Support customers within 24-hours of first contact. During DLA Troop Support Mock recalls contractors must able to identify quantity received/used/in-storage at their facility and quantity shipped to each DLA Troop Support customer, etc.						
6. Are you performing a defense inspection of all storage facilities (including temporary storage vehicles) regularly, and logging the results? If so at what frequency?						
7. Does the plan identify a procedure to ensure the trace-back and trace-forward of all raw materials and finished products?						
IX. SUBCONTRACTORS/SUPPLIERS: Does the plan identify/include/address the following:						
A. If the contractor verifies suppliers/subcontractors' compliance with FDA's establishment registration requirement as per the CFR? Is a current list of suppliers, establishment numbers, items produced, and date of registration maintained for each supplier?						

DLA Troop Support FOOD DEFENSE CHECKLIST

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	CONTRACTOR YES	NO	N/A	AUDITOR A	M	U
B. If the contractor is purchasing from a list of certified, qualified or approved suppliers, contracted suppliers and/or if they also buy products from the open market?						
C. If consideration is giving to assure the integrity of food defense measures in the selection of all suppliers (meat, non-meat ingredients, compressed gas, packaging materials and labels, etc.)? Does the plan indicate if new suppliers are investigated for their food defense programs and are the programs of existing suppliers known and acceptable?						
D. Are food defense controls and issues discussed with suppliers and are suppliers made aware of DLA Troop Support's Food Defense/Force Protection requirements and the DLA Troop Support Food Defense Checklist location on the Web?						
E. With respect to farm practices, have your suppliers instituted food defense programs to address potential risks on the farm?						
F. The type and extent of control exercised by the contractor over their suppliers regarding food defense and measures that should be taken to protect the ingredients/materials used in the production of finished products, finished products, and shipments intended for DLA Troop Support customers?						
CAUTION NOTES: **1/ DLA Troop Support:** The Quality Audits Food Defense Branch (FTSB) is the only DLA/DLA Troop Support office authorized to receive, review and approve Food Defense/Force Protection plans. ALL Food Defense/Force Protection plans and QSPs are maintained and secured by FTSB. All FTSB's auditors reviewing Food Defense Plans possess and maintain, as a minimum, a Secret Clearance prior to re viewing said plans.						
2/ Government Quality Assurance Representatives (GQARs) : GQARs (military and civilian) performing Government Source inspection at Operational Rations fa cilities shall **NOT** be provided a copy of the Food Defense Plan nor be allowed to remove copies of the plan from the area where the plan is secured at the contractor's facility. Prior to the contractor authorizing the review of the plan by the supervisory GQAR assigned to the facility, the GQAR must sign a confidentiality/nondisclosure agreement and only be allowed to review the plan in a private area under the over sight of a member of the Company's Food Defense Team. GQARs are required to call DSCP-FTSB if they have questions/concerns regarding the contractor's food defense plan.						
3/Securing the Food Defense Plan: If a contractor (operational rations) is producing under the Higher-Level Contract Quality requirements (require a QSP), remove the Food Defense Plan from the QSP when the QSP is submitted to the Government Inspection offices/GQAR. Copies of the Food Defense/Force Protection Plan **shall not** be provided or mailed to Government visitors or to other unauthorized personnel. Discussing specific details or allowing unauthorized personnel (contractor/Government/other) to review the Food Defense Plan may compromise the integrity of the plan and/or the security of the facility and the products produced. Contractors shall immediately contact the applicable DLA Troop Support Contracting Officer and FTSB if a copy of the plan is requested by unauthorized personnel or for questions/concerns regarding DLA Troop Support contract requirements for food defense/force protection.						

United States Department of Agriculture
Agricultural Marketing Service
Fresh Products Branch

Good Agricultural Practices Good Handling Practices Audit Verification Program Scoresheet

www.ams.usda.gov/gapgh

Facility Name (Print) as it should appear on Certificate			
Street Address (Print):	City (Print):	State (Print):	ZIP (Print):
e-mail address (Print):	fax number:	Date Audit Requested:	
		Date of Previous Audit:	
Date Audit Began:	Date Audit Completed:	USDA Commodity Procurement Audit?	
Time Audit Began:	Time Audit Completed:	Circle one Yes	No

EVALUATION ELEMENTS

Scopes Req.	Element	Possible Points	Less N/A Points	Adjusted Points	Passing Score	Facility Score	Pass/ Fail	Date Passed	General Questions	Reviewing Official	Un-announced	
	General Questions	180										
	Part 1- Farm Review	190										
	Part 2- Field Harvesting & Field Packing Activities	185										
	Part 3- House Packing Facility	290										
	Part 4- Storage & Transportation	250										
	Part 6 Wholesale Distribution Center/ Terminal Warehouse	410										
	Part 7- Preventative Food Defense Procedures	180										

** A Passing Score of 80% of the Possible Points or the Adjusted Points, if adjustments are necessary, with no "automatic unsatisfactory" conditions is required for certification.

Commodities Reviewed (Print):									
	Commodity:								
	Acres:								

Send completed GAP&GHP Certificate to: (choose one) Inspection office: (list office) Directly to auditee above:

Lead Auditor Name (Print): _____ Duty Station: _____ Signature & Date: _____

Facility Representative signature: _____ Date: _____ All Scopes Completed: _____

By signing this form, the facility representative agrees to have company information posted to the USDA website. A company will only be listed on the website when all scope audited receive a passing score

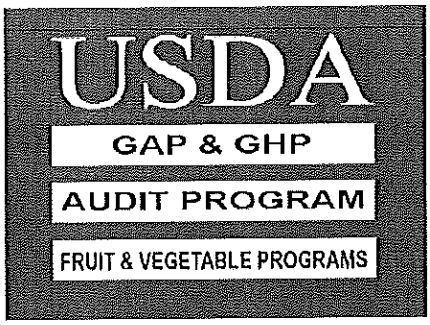
For USDA HQ use:

Reviewing Official Name (Print): _____ Signature: _____

Date Received: _____ Date Certificate Mailed: _____ Date Posted to Website: _____

To verify a company's continued good standing in the USDA GAP&GHP Program, please visit http://www.ams.usda.gov/gapghp

USDA Good Agricultural Practices & Good Handling Practices
Audit Verification Checklist



This program is intended to assess a participant's efforts to minimize the risk of contamination of fresh fruits, vegetables, nuts and miscellaneous commodities by microbial pathogens based on the U.S. Food and Drug Administration's *"Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables."*

Firm Name: _____

Contact Person: _____

Audit Site(s): _____

Main Address: _____

City: _____ State: _____ Zip: _____

Telephone No: _____ Fax: _____

E-mail: _____

Auditor(s): (list all auditors with the lead listed first) _____

_____

USDA or Fed-State Office performing audit: _____

Date & Time Arrived: _____ Date & Time Departed: _____

Travel Time: _____ Code: _____

Person(s) Interviewed: (use back of sheet if necessary to list all persons interviewed) _____

_____

_____

Did the auditee participate in GAP & GHP training?
Yes ☐ No ☐

Is there a map that accurately represents the farm operations?
Yes ☐ No ☐ N/A ☐

Legal Description/GPS/Lat.-Long. of Location: _____

Are all crop production areas located on this audit site?
Yes ☐ No ☐ N/A ☐

Total acres farmed (Owned, leased/rented, contracted, consigned): _____

Does the company have more than one packing facility?
Yes ☐ No ☐ N/A ☐

Is there a floor plan of the packing house facility(s) indicating flow of product, storage areas, cull areas, employee break rooms, restrooms, offices?
Yes ☐ No ☐ N/A ☐

Is any product commingled prior to packing?
Yes ☐ No ☐

Audit Scope: (Please check all scopes audited)

General Questions (All audits must begin with and pass this portion)

Part 1 – Farm Review.....☐

Part 2 - Field Harvesting and Field Packing Activities .....☐

Part 3 - House Packing Facility .....☐

Part 4 – Storage and Transportation .....☐

Part 5 – (Not Used)

Part 6 – Wholesale Distribution Center/Terminal Warehouses.....☐

Part 7 – Preventive Food Defense Procedures.....☐

Products: _____

_____

Auditors' Signature(s):_____

_____

_____

Conditions Under Which an Automatic "Unsatisfactory" Will be Assessed

- An immediate food safety risk is present when produce is grown, processed, packed or held under conditions that promote or cause the produce to become contaminated.
- The presence or evidence of rodents, an excessive amount of insects or other pests in the production area during packing, processing or storage.
- Observation of employee practices (personal or hygienic) that jeopardize or may jeopardize the safety of the produce.
- Falsification of records.
- Answering of Questions P1 or P2 as "NO".

Auditor Completion Instructions

- For clarification and guidance in answering these questions, please refer to the Good Agricultural Practices & Good Handling Practices Audit Verification Program Policy and Instruction Guide.
- Place the point value for each question in the proper column (Yes, No, or N/A).
- Gray boxes in the "N/A" column indicate that question cannot be answered "N/A".
- Any "N/A" or "No" designation must be explained in the comments section.
- The "Doc" column-
  - A "D" indicates that a document(s) is required to show conformance to the question. A document may be a combination of standard operating procedures outlining company policy as well as a record indicating that a particular action was taken.
  - A "R" indicates that a record is required to be kept showing an action was taken.
  - A "P" indicates that a policy/standard operating procedure (SOP) must be documented in the food safety plan in order to show conformance to the question.

General Questions

Implementation of a Food Safety Program

	Questions	Points	YES	NO	N/A	Doc
P-1	A documented food safety program that incorporates GAP and/or GHP has been implemented.					D
P-2	The operation has designated someone to implement and oversee an established food safety program. Name _____					D

Traceability

	Questions	Points	YES	NO	N/A	Doc
G-1	A documented traceability program has been established.	15				D
G-2	The operation has performed a "mock recall" that was proven to be effective.	10				R

Worker Health & Hygiene

	Questions	Points	YES	NO	N/A	Doc
G-3	Potable water is available to all workers.	10				R
G-4	All employees and all visitors to the location are required to follow proper sanitation and hygiene practices.	10				P
G-5	Training on proper sanitation and hygiene practices is provided to all staff.	15				D
G-6	Employees and visitors are following good hygiene/sanitation practices.	15				
G-7	Employees are washing their hands before beginning or returning to work.	15				
G-8	Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work.	10				
G-9	All toilet/restroom/field sanitation facilities are clean. They are properly supplied with single use towels, toilet paper, and hand soap or antibacterial soap and potable water for hand washing.	15				

	Questions	Points	YES	NO	N/A	Doc
G-10	All toilet/restroom/field sanitation facilities are serviced and cleaned on a scheduled basis.	10				R
G-11	Smoking and eating are confined to designated areas separate from where product is handled.	10				P
G-12	Workers with diarrheal disease or symptoms of other infectious disease are prohibited from handling fresh produce.	15				P
G-13	There is a policy describing procedures which specify handling/disposition of produce or food contact surfaces that have come into contact with blood or other body fluids.	15				P
G-14	Workers are instructed to seek prompt treatment with clean first aid supplies for cuts, abrasions and other injuries.	5				P
G-15	Company personnel or contracted personnel that apply regulated pre-harvest and/or post harvest materials are licensed. Company personnel or contracted personnel applying non-regulated materials have been trained on its proper use.	10				R

COMMENTS:

Total points earned for General Questions = _____.

Total Possible	= 180	*The total number of points possible for this section.*
Subtract "N/A"	-____	*Enter the additive number of N/A points (+ points) here.*
Adjusted Total	=____	*Subtract the N/A points from the Total possible points.*
X .8 (80%)		*Multiply the Adjusted Total by .8 and show it as the Passing Score.*
Passing Score	____	

(please circle one) Pass / Fail

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Part 1 – Farm Review

Water Usage

(1-1) What is the source of irrigation water? (Pond, Stream, Well, Municipal, Other) please specify

_____

(1-2) How are crops irrigated? (Flood, Drip, Sprinkler, Other) please specify

_____

Water Quality Risks

	Questions	Points	YES	NO	N/A	Doc
1-3	A water quality assessment has been performed to determine the quality of water used for irrigation purposes on the crop(s) being applied.	15				D
1-4	A water quality assessment has been performed to determine the quality of water used for chemical application or fertigation method.	15				D
1-5	If necessary, steps are taken to protect irrigation water from potential direct and non-point source contamination.	15				

Sewage Treatment

	Questions	Points	YES	NO	N/A	Doc
1-6	The farm sewage treatment system/septic system functions properly and there is no evidence of leaking or runoff.	15				
1-7	There is no municipal/commercial sewage treatment facility or waste material landfill adjacent to the farm.	10				

Animals/Wildlife/Livestock

	Questions	Points	YES	NO	N/A	Doc
1-8	Crop production areas are not located near or adjacent to dairy, livestock, or fowl production facilities unless adequate natural or physical barriers exist.	15				
1-9	Manure lagoons located near or adjacent to crop production areas are maintained to prevent leaking or overflowing, or measures have been taken to stop runoff from contaminating the crop production areas.	10				
1-10	Manure stored near or adjacent to crop production areas is contained to prevent contamination of crops.	10				

	Questions	Points	YES	NO	N/A	Doc
1-11	Measures are taken to restrict access of livestock to the source or delivery system of crop irrigation water.	10				
1-12	Crop production areas are monitored for the presence or signs of wild or domestic animals entering the land.	5				R
1-13	Measures are taken to reduce the opportunity for wild and/or domestic animals from entering the crop production areas.	5				R

Manure and Municipal Biosolids

Please choose one of the following options as it relates to the farm operation:

_____ Option A. Raw manure or a combination of raw and composted manure is used as a soil amendment.

_____ Option B. Only composed manure/treated municipal biosolids are used as a soil amendment.

_____ Option C. No manure or municipal biosolids of any kind are used as a soil amendment.

Only answer the following manure questions (questions 1-14 to 1-22) that are assigned to the Option chosen above. DO NOT answer the questions from the other two options. The points from the manure and municipal biosolids are worth 35 of a total 155 points, and answering questions from the other two options will cause the points to calculate incorrectly.

	Option A: Raw Manure	Points	YES	NO	N/A	Doc
1-14	When raw manure is applied, it is incorporated at least 2 weeks prior to planting and a minimum of 120 days prior to harvest.	10				R
1-15	Raw manure is not used on commodities that are harvested within 120 days of planting.	10				R
1-16	If both raw and treated manure are used, the treated manure is properly treated, composted or exposed to reduce the expected levels of pathogens.	10				R
1-17	Manure is properly stored prior to use.	5				

	Option B: Composted Manure	Points	YES	NO	N/A	Doc
1-18	Only composted manure and/or treated biosolids are used as a soil amendment.	10				R
1-19	Composted manure and/or treated biosolids are properly treated, composted, or exposed to environmental conditions that would lower the expected level of pathogens.	10				D
1-20	Composted manure and/or treated biosolids are properly stored and are protected to minimize recontamination.	10				
1-21	Analysis reports are available for composted manure/treated biosolids.	5				R
	Option C: No Manure/Biosolids Used					
1-22	No animal manure or municipal biosolids are used.	35				P

Soils

	Questions	Points	YES	NO	N/A	Doc
1-23	A previous land use risk assessment has been performed.	5				R
1-24	When previous land use history indicates a possibility of contamination, preventative measures have been taken to mitigate the known risks and soils have been tested for contaminants and the land use is commensurate with test results.	10				R
1-25	Crop production areas that have been subjected to flooding are tested for potential microbial hazards.	5				R

Traceability

1-26	Each production area is identified or coded to enable traceability in the event of a recall.	10				R

COMMENTS:

Total points earned for PART I = _____.

Total Possible	= 190	*The total number of points possible for this section.*
Subtract "N/A"	-____	*Enter the additive number of N/A points (+ points) here.*
Adjusted Total	=____	*Subtract the N/A points from the Total possible points.*
X .8 (80%)		*Multiply the Adjusted Total by .8 and show it as the Passing Score.*
Passing Score	____	

(please circle one) Pass / Fail

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Part 2 - Field Harvest and Field Packing Activities

Field Sanitation and Hygiene

	Questions	Points	YES	NO	N/A	Doc
2-1	A documented pre-harvest assessment is made on the crop production areas. Risks and possible sources of crop contamination are noted and assessed.	15				D
2-2	The number, condition, and placement of field sanitation units comply with applicable state and/or federal regulations.	10				
2-3	When question 2-2 is answered "N/A" (sanitation units are not required), a toilet facility is readily available for all workers.	10				
2-4	Field sanitation units are located in a location that minimizes the potential risk for product contamination and are directly accessible for servicing.	10				
2-5	A response plan is in place for the event of a major spill or leak of field sanitation units or toilet facilities.	10				P

Field Harvesting and Transportation

	Questions	Points	YES	NO	N/A	Doc
2-6	All harvesting containers and bulk hauling vehicles that come in direct contact with product are cleaned and/or sanitized on a scheduled basis and kept as clean as practicable.	10				D
2-7	All hand harvesting equipment and implements (knives, pruners, machetes, etc.) are kept as clean as practical and are disinfected on a scheduled basis.	10				D
2-8	Damaged containers are properly repaired or disposed of.	5				
2-9	Harvesting equipment and/or machinery which comes into contact with product is in good repair.	10				
2-10	Light bulbs and glass on harvesting equipment are protected so as not to contaminate produce or fields in the case of breakage.	10				

	Questions	Points	YES	NO	N/A	Doc
2-11	There is a standard operating procedure or instructions on what measures should be taken in the case of glass/plastic breakage and possible contamination during harvesting operations.	5				P
2-12	There is a standard operating procedure or instructions on what measures should be taken in the case of product contamination by chemicals, petroleum, pesticides or other contaminating factors.	5				P
2-13	For mechanically harvested crops, measures are taken during harvest to inspect for and remove foreign objects such as glass, metal, rocks, or other dangerous/toxic items.	5				
2-14	Harvesting containers, totes, etc. are not used for carrying or storing non-produce items during the harvest season; and farm workers are instructed in this policy.	5				P
2-15	Water applied to harvested product is microbially safe.	15				R
2-16	Efforts have been made to remove excessive dirt and mud from product and/or containers during harvest.	5				
2-17	Transportation equipment used to move product from field to storage areas or storage areas to processing plant which comes into contact with product is clean and in good repair.	10				
2-18	There is a policy in place and has been implemented that harvested product being moved from field to storage areas or processing plants are covered during transportation.	5				P
2-19	In ranch or field pack operations, only new or sanitized containers are used for packing the product.	10				D
2-20	Packaging materials used in ranch or field pack operations are properly stored and protected from contamination.	10				
2-21	Product moving out of the field is uniquely identified to enable traceability.	10				D

COMMENTS:

Total points earned for PART 2 = _____.

Total Possible	**= 185**	*The total number of points possible for this section.*
Subtract "N/A"	**-____**	*Enter the additive number of N/A points (+ points) here.*
Adjusted Total	**=____**	*Subtract the N/A points from the Total possible points.*
X .8 (80%)		*Multiply the Adjusted Total by .8 and show it as the Passing Score.*
Passing Score	**____**	

(please circle one) Pass / Fail

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Part 3 - HOUSE PACKING FACILITY

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				
3-2	Prior to packing, product is properly stored and/or handled in order to reduce possible contamination.	5				

Washing/Packing Line

	Questions	Points	YES	NO	N/A	Doc
3-3	Source water used in the packing operation is potable.	15				R
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
3-5	Processing water is sufficiently treated to reduce microbial contamination.	10				D
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
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
3-8	Food contact surfaces are in good condition; cleaned and/or sanitized prior to use and cleaning logs are maintained.	15				D
3-9	Product flow zones are protected from sources of contamination.	10				
3-10	The water used for cooling and/or to make ice is potable.	15				R
3-11	Any ice used for cooling produce is manufactured, transported and stored under sanitary conditions.	10				R

Packing House Worker Health & 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				
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
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

Packing House General Housekeeping

Questions		Points	YES	NO	N/A	Doc
3-15	Only food grade approved and labeled lubricants are used in the packing equipment/machinery.	10				R
3-16	Chemicals not approved for use on product are stored and segregated away from packing area.	10				
3-17	The plant grounds are reasonably free of litter and debris.	5				
3-18	The plant grounds are reasonably free of standing water.	5				
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				
3-20	Packing facilities are enclosed.	5				
3-21	The packing facility interior is clean and maintained in an orderly manner.	5				
3-22	Floor drains appear to be free of obstructions.	5				
3-23	Pipes, ducts, fans and ceilings which are over food handling operations are clean.	5				
3-24	Glass materials above product flow zones are contained in case of breakage.	10				
3-25	Possible wastewater spillage is prevented from contaminating any food handling area by barriers, drains or a sufficient distance.	10				
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
3-27	Only new or sanitized containers are used for packing the product.	10				D

	Questions	Points	YES	NO	N/A	Doc
3-28	Pallets and containers are clean and in good condition.	5				
3-29	Packing containers are properly stored and protected from contamination (birds, rodents, and other pests).	10				

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
3-31	There is an established pest control program for the facility.	10				D
3-32	Service reports for the pest control program are available for review.	5				R
3-33	Interior walls, floors and ceilings are well maintained and are free of major cracks and crevices.	5				

Traceability

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

COMMENTS:

Total points earned for Part 3 = _____.

Total Possible	**= 290**	*The total number of points possible for this section.*
Subtract "N/A"	**-_____**	*Enter the additive number of N/A points (+ points) here.*
Adjusted Total	**=____**	*Subtract the N/A points from the Total possible points.*
X .8 (80%)		*Multiply the Adjusted Total by .8 and show it as the Passing Score.*
Passing Score	**____**	

(please circle one) Pass / Fail

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Part 4 – STORAGE AND TRANSPORTATION

Product, Containers & Pallets

	Questions	Points	YES	NO	N/A	Doc
4-1	The storage facility is cleaned and maintained in an orderly manner.	5				
4-2	Bulk storage facilities are inspected for foreign material prior to use and records are maintained.	5				R
4-3	Storage rooms, buildings, and/or facilities are maintained and sufficiently sealed or isolated to be protected from external contamination.	10				
4-4	Storage grounds are reasonably free of litter and debris.	5				
4-5	Floors in storage areas are reasonably free of standing water.	5				
4-6	Possible wastewater spillage is prevented from contaminating any food handling area by barriers, drains, or a sufficient distance.	10				
4-7	There is a policy describing procedures which specify handling/disposition of finished product which is opened, spilled, or comes in contact with the floor.	15				P
4-8	Packing containers are properly stored and sufficiently sealed to be protected from contamination (birds, rodents, pests and other contaminants).	10				
4-9	Pallets, pallet boxes, totes, bags, bins, cellars, storage rooms, etc. are clean, in good condition and do not contribute foreign material to the product.	5				
4-10	Product stored outside in totes, trucks, bins, other containers or on the ground in bulk is covered and protected from contamination.	10				
4-11	Non-food grade substances such as paints, lubricants, pesticides, etc., are not stored in close proximity to the product.	10				

	Questions	Points	YES	NO	N/A	Doc
4-12	Mechanical equipment used during the storage process is clean and maintained to prevent contamination of the product.	5				D

Pest Control

	Questions	Points	YES	NO	N/A	Doc
4-13	Measures are taken to exclude animals or pests from storage facilities.	10				D
4-14	There is an established pest control program for the facility.	10				D
4-15	Service reports for the pest control program are available for review.	5				R
4-16	Interior walls, floors and ceilings are well maintained and are free of major cracks and crevices.	5				

Ice & Refrigeration

	Questions	Points	YES	NO	N/A	Doc
4-17	The water used for cooling/ice is potable.	10				R
4-18	Manufacturing, storage and transportation facilities used in making and delivering ice used for cooling the product have been sanitized.	10				R
4-19	Climate controlled rooms are monitored for temperature and logs are maintained.	5				D
4-20	Thermometer(s) are checked for accuracy and records are available for review.	5				D
4-21	Refrigeration system condensation does not come in contact with produce.	10				
4-22	Refrigeration equipment (condensers, fans, etc.) is cleaned on a scheduled basis.	10				D
4-23	Iced product does not drip on pallets of produce stored below.	10				

Transportation

	Questions	Points	YES	NO	N/A	Doc
4-24	Prior to the loading process, conveyances are required to be clean, in good physical condition, free from disagreeable odors, from obvious dirt/debris.	10				P
4-25	Produce items are not loaded with potentially contaminating products.	10				P
4-26	Company has a written policy for transporters and conveyances to maintain a specified temperature(s) during transit.	10				P
4-27	Conveyances are loaded to minimize damage to product.	5				P

Worker Health and Personal Hygiene

4-28	Employee facilities (locker rooms, lunch and break areas, etc.) are clean and located away from storage, shipping and receiving areas.	10				
4-29	When there is a written policy regarding the use of hair /beard nets in the storage and transportation areas, it is being followed by all employees and visitors.	5				P
4-30	When there is a written policy regarding the wearing of jewelry in the storage and transportation areas, it is being followed by all employees and visitors.	5				P

Traceability

4-31	Records are kept recording the source of incoming product and the destination of outgoing product which is uniquely identified to enable traceability.	10				D

COMMENTS:

Total points earned for PART 4 = _____.

Total Possible	**= 250**	*The total number of points possible for this section.*
Subtract "N/A"	**-____**	*Enter the additive number of N/A points (+ points) here.*
Adjusted Total	**=____**	*Subtract the N/A points from the Total possible points.*
X .8 (80%)		*Multiply the Adjusted Total by .8 and show it as the Passing Score.*
Passing Score	**____**	

(please circle one) Pass / Fail

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Part 6 – Wholesale Distribution Center/Terminal Warehouses

Receiving

	Questions	Points	Yes	NO	N/A	Doc
6-1	All companies that supply fresh produce are required to have passed a third party audit verification of GAP and/or GHP.	15				D
6-2	Upon receiving, conveyances are required to be clean, in good physical condition and free from obvious objectionable odors, dirt and/or debris at time of unloading.	10				P
6-3	Company does not accept produce items that are loaded with or not protected from potentially contaminating products.	10				P
6-4	Refrigerated commodities are monitored for temperatures at time of receiving.	5				R
6-5	The company has a written policy regarding the disposition of product when temperatures are not within the company's guidelines at time of receiving.	5				P

Storage Facility/Temperature Control

	Questions	Points	YES	NO	N/A	Doc
6-6	The facility is clean and maintained in an orderly manner.	5				
6-7	Refrigerated rooms are monitored for temperature and logs are maintained.	5				D
6-8	Thermometer(s) are checked for accuracy and records are available.	5				D
6-9	Refrigeration system condensation does not come in contact with produce.	10				
6-10	Refrigeration equipment (condensers, fans, etc.) is cleaned on a scheduled basis.	10				D
6-11	Iced product does not drip on pallets of produce stored below.	10				
6-12	The water used for cooling/ice is potable.	10				R
6-13	Manufacturing, storage and transportation facilities used in making and delivering ice used for cooling the product are sanitized on a scheduled basis.	10				D
6-14	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

	Questions	Points	YES	NO	N/A	Doc
6-15	Product flow zones are protected from sources of contamination.	10				
6-16	Glass materials above product flow zones are contained in case of breakage.	10				
6-17	The grounds are reasonably free of litter and debris.	5				
6-18	The grounds are reasonably free of standing water.	5				
6-19	Outside garbage receptacles/dumpsters are closed or are located away from facility entrances and the area around such sites is reasonably clean.	5				
6-20	The facility is enclosed.	5				
6-21	Floor drains appear to be free of obstructions.	5				
6-22	Pipes, ducts, fans and ceilings in the facility are reasonably clean.	5				
6-23	Possible wastewater spillage is prevented from contaminating any food storage or handling area by barriers, drains or a sufficient distance.	10				
6-24	Non-food grade substances such as paints, lubricants, pesticides, etc., are not stored in close proximity to the product.	10				

Pest Control

	Questions	Points	YES	NO	N/A	Doc
6-25	Measures are taken to exclude animals or pests from the facility.	10				D
6-26	There is an established pest control program for the facility.	10				D
6-27	Service reports for the pest control program are available for review.	5				R
6-28	Interior walls, floors and ceilings are well maintained and free of major cracks and crevices.	5				

Repacking/Reconditioning

(6-29) Does the facility repack and/or recondition product? YES NO (circle one)

If the answer to question 6-29 is YES, answer questions 6-30 through 6-41. If the answer is NO, then questions 6-29 through 6-41 are answered N/A.

	Questions	Points	YES	NO	N/A	Doc
6-30	Repacking/reconditioning processes are confined to an established location in the facility.	5				P
6-31	Food contact surfaces are in good condition; cleaned and/or sanitized prior to use and cleaning logs are maintained.	15				D
6-32	Source water used in the repacking operation is potable.	15				R
6-33	Processing water is sufficiently treated to reduce microbial contamination of the product.	10				D
6-34	Water treatment (strength levels and pH) and exposure time is monitored and is appropriate for product.	10				D
6-35	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
6-36	Any ice used for cooling produce is manufactured, transported and stored under sanitary conditions.	10				R
6-37	Water used for chilling and/or to make ice is potable.	15				R
6-38	Only food grade approved and labeled lubricants are used in the repacking equipment/machinery.	10				D
6-39	Only new or sanitized containers are used for product repacking.	10				P
6-40	Pallets and other containers are clean and in good condition.	5				
6-41	Packing containers are properly stored and protected from contamination (birds, rodents, and other pests, etc.)	10				

Worker Health and Personal Hygiene

6-42	Employee facilities (locker rooms, lunch and break areas, etc.) are clean and located away from repack and storage area.	10				
6-43	When there is a written policy regarding the use of hair nets/beard nets in the facility, it is being followed by all employees and visitors.	5				P
6-44	When there is a written policy regarding the wearing of jewelry in the facility, it is being followed by all employees and visitors.	5				P

Shipping/Transportation

	Questions	Points	YES	NO	N/A	Doc
6-45	Prior to the loading process, conveyances are required to be clean, in good physical condition, free from disagreeable odors, from obvious dirt/debris.	10				P
6-46	Produce items are not loaded with potentially contaminating products.	10				P
6-47	Company has a written policy for transporters and conveyances to maintain a specified temperature(s) range during transit.	10				P

Traceability

6-48	Records are kept recording the source of incoming product and the destination of outgoing product which is uniquely identified to enable traceability.	10				D

COMMENTS:

Total points earned for PART 6 = _____.

Total Possible	= 410	*The total number of points possible for this section.*
Subtract "N/A"	-____	*Enter the additive number of N/A points (+ points) here.*
Adjusted Total	=____	*Subtract the N/A points from the Total possible points.*
X .8 (80%)		*Multiply the Adjusted Total by .8 and show it as the Passing Score.*
Passing Score	____	

(please circle one) Pass / Fail

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Part 7 – Preventive Food Defense Procedures

Based on the U.S. Food and Drug Administration's Food Producers, Processors, and Transporters: Food Security Preventive Measures Guidance for Industry.

Secure Employee/Visitor Procedures

	Questions	Points	YES	NO	N/A	Doc
7-1	The company has a documented food defense plan and a person has been designated to oversee it. Name: _____	5				D
7-2	Food defense training has been provided to all employees.	5				D
7-3	Employees are aware of whom in management they should contact about potential security problems/issues. Name of management representative: _____	5				
7-4	Visitors are required to check in (showing proof of identity) and out, when entering/leaving the facility.	5				D
7-5	The purpose of visitation to site is verified before admittance to the facility.	5				D
7-6	Visitors are prohibited from the packing/storage areas unless accompanied by an employee.	5				D
7-7	Incoming and outgoing employee and visitor vehicles to and from the site are subject to inspection.	5				D
7-8	Parked vehicles belonging to employees and visitors display a decal or placard issued by the facility.	5				
7-9	Staff is prohibited from bringing personal items into the handling or storage areas.	5				D
7-10	Staff access in facility is limited to the area of their job function and unrestricted areas.	5				D
7-11	Management is aware of which employee should be on the premises, and the area they are assigned to.	5				D
7-12	A system of positive identification of employees has been established and is enforced.	5				

Secure Facility Procedures

Questions		Points	YES	NO	N/A	Doc
7-13	Uniforms, name tags, or identification badges are collected from employees prior to the termination of employment.	5				D
7-14	The mailroom is located away from the packing/storage facilities.	5				
7-15	Computer access is restricted to specific personnel.	5				D
7-16	A system of traceability of computer transactions has been established.	5				
7-17	A minimum level of background checks has been established for all employees.	5				D
7-18	Routine security checks of the premises are performed for signs of tampering, criminal or terrorist action.	5				D
7-19	Perimeter of facility is secured by fencing or other deterrent.	5				
7-20	Checklists are used to verify the security of doors, windows, and other points of entry.	5				D
7-21	All keys to the establishment are accounted for.	5				D
7-22	The facility has an emergency lighting system.	5				
7-23	The facility is enclosed.	5				
7-24	Storage or vehicles/containers/trailers/railcars that are not being used are kept locked.	5				
7-25	Delivery schedules have been established.	5				
7-26	The off-loading of incoming materials is supervised.	5				
7-27	The organization has an established policy for rejecting deliveries.	5				D
7-28	Unauthorized deliveries are not accepted.	5				D
7-29	The company does not accept returned (empty) containers for packing of product unless they are sanitized containers intended for reuse.	5				D
7-30	The facility has a program in place to inspect product returned to the facility for tampering.	5				D
7-31	The company has identified the individual(s), with at least one backup, who are responsible for recalling the product.	5				D
7-32	The operation has performed a "mock recall" that was proven to be effective.	5				D

	Questions	Points	YES	NO	N/A	Doc
7-33	Product imported from outside the United States is segregated from domestic product.	5				D
7-34	Allergens handled by the facility are segregated from products to avoid cross contamination.	5				D
7-35	Floor plans, product flow plans, and/or segregation charts are in a secure location.	5				D
7-36	The organization has registered with the FDA and has been issued a registration number (do not record the number on checklist).	5				D

COMMENTS:

Total Points Part 7_____

Total possible = 180 Less Justified "N/A"_____

Adjusted Total _____ Passing Score _____
X .8 (80%) USDA

For further information regarding the USDA GAP & GHP Program Please contact:

USDA Fruit and Vegetable Programs, Fresh Products Branch, at 800-560-7956

APPENDIX D
HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) VERIFICATION SURVEY

The questions on HACCP listed below are to be evaluated based on the facility's HACCP plan. For a facility to pass this survey, all questions must have a "YES" response. Any "NO" response results in a "Critical" rating.			YES	NO	RATING: If "No" rate as Critical.
1.		Does management have a written HACCP plan?			
	1a.	Is the HACCP plan implemented?			
	1b.	Is there evidence of management commitment and are the appropriate personnel aware of their responsibilities for the implementation and maintenance of the company's HACCP plan?			
2.		Does the HACCP plan have a written hazard analysis which lists and evaluates the hazards associated with the commodity and process under consideration by this survey?			
3.		Does the HACCP plan address the application of one or more critical control point(s) (CCP) which is/are essential to prevent, eliminate, or reduce each identified potential food safety hazard?			
4.		Does the HACCP plan address the establishment of critical limits within which CCP(s) must be controlled to prevent, eliminate, or reduce each identified potential food safety hazard?			
5.		Does the HACCP plan address the application of monitoring procedures to assess whether CCP(s) is/are under control to prevent, eliminate, or reduce each identified potential food safety hazard?			
	5a.	Are monitoring procedures followed?			
6.		Does the HACCP plan address the establishment of corrective action(s)?			
	6a.	Are corrective actions taken when there is a deviation from established critical limits?			
7.		Does the HACCP plan address the application of verification procedures to confirm that the systems are operating according to the plan?			
	7a.	Are verification procedures followed?			
8.		Does the HACCP plan address the establishment of record-keeping and documentation procedures for the HACCP plan?			
9.		Are applicable "Good Manufacturing Practices" (GMP) and prerequisite programs addressed by management?			
	9a.	Are documented Standard Sanitation Operating Procedures (SSOPs) addressed?			
	9b.	Are documented supplier control procedures addressed?			
	9c.	Are documented specifications for ingredients, products, and packaging materials addressed?			
	9d.	Are documented receiving, storage, and shipping procedures addressed?			
	9e.	Are documented pest control program and procedures addressed?			
	9f.	Are documented traceability and recall procedures addressed?			
	9g.	Are documented chemical control procedures addressed?			
	9h.	Are documented personal hygiene procedures addressed?			
	9i.	Are documented employee training program for GMPs, HACCP, and sanitation addressed?			

File Code 159-A-1
March 2009

DEFICIENCIES			
QUESTION NUMBER	DESCRIPTION	PROPOSED CORRECTIVE ACTION DATE	DATE CORRECTED

Total Points Part 7_____

Total possible = 180 Less Justified "N/A"_____

Adjusted Total _____ Passing Score _____
X .8 (80%) USDA

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USDA Fruit and Vegetable Programs, Fresh Products Branch, at 800-560-7956

File Code 159-A-1
March 2009

Compliance Guidelines for Appendix D - Hazard Analysis and Critical Control Point (HACCP) Verification Survey

NOTE – Apply compliance guidelines to determine appropriate response to the questions.

Reference Number	Questions	Compliance Guidelines
1.	Does management have a written HACCP plan?	Review HACCP plan documentation which should, at least, include the following: ▪ Organizational chart with assigned responsibilities; ▪ Summary of hazard analysis; ▪ Description of product, its distribution, intended use, etc.; ▪ Product flow diagram; ▪ HACCP plan which identifies hazard(s), and describes the critical control points, critical limits, monitoring procedures, corrective actions, verification procedures, record-keeping and documentation procedures; ▪ HACCP plan summary table; ▪ Support documentation such as validation records; and ▪ Records generated by implementation of the HACCP plan.
1a.	Has the HACCP plan been implemented?	Implementation involves the continual application of the monitoring, record-keeping, corrective action, verification procedures, and other activities described in the HACCP plan. Observe plant activity and review records for evidence of this.
1b.	Is there evidence of management commitment and are the appropriate personnel aware of their responsibilities for the implementation and maintenance of the company's HACCP plan?	HACCP plan implementation is facilitated by commitment from top management. This commitment provides facility personnel with a sense of the importance of producing safe product. Observe plant activity and review records for evidence of this. Interviewing certain plant personnel may be necessary.
2.	Does the HACCP plan have a written hazard analysis which lists and evaluates the hazards associated with the commodity and process under consideration by this survey?	Review the written hazard analysis to determine if it addresses the product and process designated for consideration by this survey.
3.	Does the HACCP plan address the application of one or more critical control point(s) (CCP) which is/are essential to prevent, eliminate, or reduce each identified potential food safety hazard?	Review written HACCP plan to determine if CCPs are identified.

4.	Does the HACCP plan address the application of critical limits which must be controlled at a CCP(s) to prevent, eliminate, or reduce each potential food safety hazard?	Review written HACCP plan to determine if critical limits are established.
5.	Does the HACCP plan address the application of monitoring procedures to assess whether CCP(s) is/are under control to prevent, eliminate, or reduce each potential food safety hazard?	Review written HACCP plan to determine if monitoring procedures for each CCP are identified and described.
5a.	Are monitoring procedures followed?	Review written HACCP plan and the appropriate records to determine if monitoring procedures are followed. Also observe plant activity for evidence of this.
6.	Does the HACCP plan address the establishment of corrective actions?	Review written HACCP plan to determine if corrective actions are established and described.
6a.	Are corrective actions taken when there is a deviation from established critical limits?	Review written HACCP plan and the appropriate records to determine if corrective actions were taken as described in the plan. Also observe plant activity for evidence of this.
7.	Does the HACCP plan address the application of verification procedures to confirm that the systems are operating according to the plan?	Review written HACCP plan to determine if verification procedures are identified and described.
7a.	Are verification procedures followed?	Review written HACCP plan and the appropriate records to determine if verification procedures are followed.
8.	Does the HACCP plan address the establishment of record-keeping and documentation procedures for the HACCP plan?	Review written HACCP plan to determine if record-keeping and documentation procedures are identified and described.
9.	Are applicable "Good manufacturing Practices" (GMP) and prerequisite programs addressed by management?	Obtain information from management, review appropriate documents, and observe operations to assess whether the GMPs and prerequisite programs are addressed by management.
9a.	Are documented Standard Sanitation Operating Procedures (SSOPs) addressed?	Review written applicable HACCP plan and facility documentation to determine if SSOPs are identified and described.
9b.	Are documented Supplier Control Procedures (SCPs) addressed?	Review written applicable HACCP plan and facility documentation to determine if SCPs are identified and described.
9c.	Are documented specifications for ingredients, products, and packaging materials addressed?	Review written applicable HACCP plan and facility documentation to determine if applicable specifications for ingredients, products, and packaging materials are identified and described.
9d.	Are documented receiving, storage, and shipping procedures addressed?	Review written applicable HACCP plan and facility documentation to determine if procedures are identified and described for receiving, storage, and shipping procedures.

9e.	Are documented pest control program and procedures addressed?	Review written applicable HACCP plan and facility documentation to determine if applicable pest control program and procedures are identified and described.
9f.	Are documented traceability and recall procedures addressed?	Review written applicable HACCP plan and facility documentation to determine if traceability and recall procedures are identified and described.
9g.	Are documented chemical control procedures addressed?	Review written applicable HACCP plan and facility documentation to determine if chemical control procedures are identified and described.
9h.	Are documented personal hygiene procedures addressed?	Review written applicable HACCP plan and facility documentation to determine if personal hygiene procedures are identified and described.
9i.	Are documented employee training programs for GMPs, HACCP, and sanitation addressed?	Review written applicable HACCP plan and facility documentation to determine if the applicable training programs are identified and described.

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10/28/08:11/20/08:11/21/08:1/8/09:1/14/09:1/16/09:1/25/09:1/26/09:2/6/09:2/19/09:3/9/09:3/11/09:
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FDA Food Safety Modernization Act (FSMA)

Backgrounder

About 48 million people (1 in 6 Americans) get sick, 128,000 are hospitalized, and 3,000 die each year from foodborne diseases, according to recent data from the Centers for Disease Control and Prevention. This is a significant public health burden that is largely preventable.

The FDA Food Safety Modernization Act (FSMA), signed into law by President Obama on Jan. 4, 2011, enables FDA to better protect public health by strengthening the food safety system. It enables FDA to focus more on preventing food safety problems rather than relying primarily on reacting to problems after they occur. The law also provides FDA with new enforcement authorities designed to achieve higher rates of compliance with prevention- and risk-based food safety standards and to better respond to and contain problems when they do occur. The law also gives FDA important new tools to hold imported foods to the same standards as domestic foods and directs FDA to build an integrated national food safety system in partnership with state and local authorities.

Building a new food safety system based on prevention will take time, and FDA is creating a process for getting this work done. Congress has established specific implementation dates in the legislation. Some authorities will go into effect quickly, such as FDA's new authority to order companies to recall food, and others require FDA to prepare and issue regulations and guidance documents. The funding the Agency gets each year, which affects staffing and vital operations, will also affect how quickly FDA can put this legislation into effect. FDA is committed to implementing the requirements through an open process with opportunity for input from all stakeholders.

The following are among FDA's key new authorities and mandates. Specific implementation dates specified in the law are noted in parentheses:

Prevention

For the first time, FDA will have a legislative mandate to require comprehensive, science-based preventive controls across the food supply. This mandate includes:

Mandatory preventive controls for food facilities:
Food facilities are required to implement a written preventive controls plan. This involves: (1) evaluating the hazards that could affect food safety, (2) specifying what preventive steps, or controls, will be put in place to significantly minimize or prevent the hazards, (3) specifying how the facility will monitor these controls to ensure they are working, (4) maintaining routine records of the monitoring, and (5) specifying what actions the facility will take to correct problems that arise. *(Final rule due 18 months following enactment)*

Mandatory produce safety standards:
FDA must establish science-based, minimum standards for the safe production and harvesting of fruits and vegetables. Those standards must consider naturally occurring hazards, as well as those that may be introduced either unintentionally or intentionally, and must address soil amendments (materials added to the soil such as compost), hygiene, packaging, temperature controls, animals in the growing area and water. *(Final regulation due about 2 years following enactment)*

Authority to prevent intentional contamination:
FDA must issue regulations to protect against the intentional adulteration of food, including the establishment of science-based mitigation strategies to prepare and protect the food supply chain at specific vulnerable points. *(Final rule due 18 months following enactment)*

Inspection and Compliance

The FSMA recognizes that preventive control standards improve food safety only to the extent that producers and processors comply with them. Therefore, it will be necessary for FDA to provide oversight, ensure compliance with requirements and respond effectively when problems emerge. FSMA provides FDA with important new tools for inspection and compliance, including:

Mandated inspection frequency:
The FSMA establishes a mandated inspection frequency, based on risk, for food facilities and requires the frequency of inspection to increase immediately. All high-risk domestic facilities must be inspected within five years of enactment and no less than every three years thereafter. Within one year of enactment, the law directs FDA to inspect at least 600 foreign facilities and double those inspections every year for the next five years.

Records access:
FDA will have access to records, including industry food safety plans and the records firms will be required to keep documenting implementation of their plans.

Testing by accredited laboratories:
The FSMA requires certain food testing to be carried out by accredited laboratories and directs FDA to establish a program for laboratory accreditation to ensure that U.S. food testing laboratories meet high-quality standards.
(Establishment of accreditation program due 2 years after enactment)

Response

The FSMA recognizes that FDA must have the tc to respond effectively when problems emerge ,pite preventive controls. New authorities include:

Mandatory recall:
The FSMA provides FDA with authority to issue a mandatory recall when a company fails to voluntarily recall unsafe food after being asked to by FDA.

Expanded administrative detention:
The FSMA provides FDA with a more flexible standard for administratively detaining products that are potentially in violation of the law (administrative detention is the procedure FDA uses to keep suspect food from being moved).

Suspension of registration:
FDA can suspend registration of a facility if it determines that the food poses a reasonable probability of serious adverse health consequences or death. A facility that is under suspension is prohibited from distributing food. *(Effective 6 months after enactment)*

Enhanced product tracing abilities:
FDA is directed to establish a system that will enhance its ability to track and trace both domestic and imported foods. In addition, FDA is directed to establish pilot projects to explore and evaluate methods to rapidly and effectively identify recipients of food to prevent or control a foodborne illness outbreak. (*Implementation of pilots due 9 months after enactment*)

Additional recordkeeping for high risk foods:
FDA is directed to issue proposed rulemaking to establish recordkeeping requirements for facilities that manufacture, process, pack, or hold foods that the Secretary designates as high-risk foods. (*Implementation due 2 years after enactment*).

Imports

The FSMA gives FDA unprecedented authority to better ensure that imported products meet U.S. standards and are safe for U.S. consumers. New authorities include:

Importer accountability:
For the first time, importers have an explicit responsibility to verify that their foreign suppliers have adequate preventive controls in place to ensure that the food they produce is safe. *(Final regulation and guidance due 1 year following enactment)*

Third party certification:
The FSMA establishes a program through which qualified third parties can certify that foreign food facilities comply with U.S. food safety standards. This certification may be used to facilitate the entry of imports.
(Establishment of a system for FDA to recognize accreditation bodies is due 2 years after enactment)

Certification for high risk foods:
FDA has the authority to require that high-risk imported foods be accompanied by a credible third party certification or other assurance of compliance as a condition of entry into the U.S.

Voluntary qualified importer program:
FDA must establish a voluntary program for importers that provides for expedited review and entry of foods from participating importers. Eligibility is limited to, among other things, importers offering food from certified facilities.
(Implementation due 18 months after enactment)

Authority to deny entry:
FDA can refuse entry into the U.S. of food from a foreign facility if FDA is denied access by the facility or the country in which the facility is located.

Enhanced Partnerships

The FSMA builds a formal system of collaboration with other government agencies, both domestic and foreign. In doing so, the statute explicitly recognizes that all food safety agencies need to work together in an integrated way to achieve our public health goals. The following are examples of enhanced collaboration:

State and local capacity building:
FDA must develop and implement strategies to leverage and enhance the food safety and defense capacities of State and local agencies. The FSMA provides FDA with a new multi-year grant mechanism to facilitate investment in State capacity to more efficiently achieve national food safety goals.

Reliance on inspections by other agencies:
FDA is explicitly authorized to rely on inspections of other Federal, State and local agencies to meet its increased inspection mandate for both domestic and foreign facilities. The FSMA also allows FDA to enter into interagency agreements to leverage resources with respect to the inspection of seafood facilities, both domestic and foreign, as well as seafood imports.

Additional partnerships are required to develop and implement a national agriculture and food defense strategy, to establish an integrated consortium of laboratory networks, and to improve foodborne illness surveillance.

For more information about the new law, check out these resources:
http://www.fda.gov/fsma
Submit FSMA questions to: FSMA@fda.hhs.gov