



Produce GAPs Harmonized Food Safety Standard USDA Checklist

AUDITEE INFORMATION

Company Name: BHPO LP, dba Gebbers Farms

Audited Location Address GPS (Optional): N/A

Street: 25985 State Highway 97 City, State, Zip: Brewster, Washington 98812

Multiple sites covered by this audit? (If Yes, provide details in Additional Comments) Yes No

Mailing/Business Address Same as above Federal Account Number: 3417551

Street: Po Box 735 City, State, Zip: Brewster, Washington 98812

Company Contact: Robert Grandy Contact Title: Director of Food Safety

Phone Number: (509) 689-3424 Fax Number: (509) 689-2997

E-Mail Address: grandyb@gebbersfarms.com

Company uses USDA GAP&GHP Logo on packaging or marketing materials? Yes No

Is this company currently subject to the Produce Safety Rule (21 CFR Part 112)? Yes No

AUDIT INFORMATION

Date and Time of Audit	Beginning	Date: <u>10/12/2021</u>	Time: <u>8:45 A.M.</u>
	Ending	Date: <u>10/12/2021</u>	Time: <u>11:30 A.M.</u>

Description of Operation: Fruit Orchards

Harvest Company Name (if applicable): N/A

Other Contractors: Blue Water Sanitation, Morgan & Sons, Herriman

Commodities Covered by Audit: Apples and Pears

Commodities Produced During Audit: Apples

Total Acres Covered by Audit: 6,751 Total Square. Feet Cover by Audit N/A

AUDITOR INFORMATION

United States Department of Agriculture Field Office: Brewster, Washington
 Agricultural Marketing Service
 Specialty Crops Program Auditor Name(s): Claudia Lozano-Saucedo
 Specialty Crops Inspection Division Auditor Signature(s): Signature on file.

AUDIT SCOPE: (Please check all scopes audited)

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

- Field Operations and Harvesting.....
- Post-Harvest Operations.....
- Logo Use
- Tomato Audit Protocol Open-field Production and Harvesting
- Tomato Audit Protocol Packinghouse
- Tomato Audit Protocol Greenhouse.....
- Tomato Audit Protocol Packing and Distribution

OTHER INFORMATION

Person(s) Interviewed:	Robert Grandy, Miguel Garcia, Brent Etzkorn, Alejandro Bautiz, Hilberto Castaba, Hermilo Perada, Juan Daniel Esquibel, David Gomez, Roberto Esquibel
Audit Requested by:	Robert Grandy
Distribute Audit Report to*(if known):	

*Supplying names of retail and food service buyers is not mandatory, however it is useful to know in the event the buyer requires USDA-AMS to send a copy of the audit report directly. No audit results are sent to a 3rd party without the written consent of the auditee.

ADDITIONAL COMMENTS

INTERNAL USE ONLY

Reviewing Official Name:	Dorene M. Choffel
Signature:	
Date:	11/24/2021
Audit Results Meets USDA Acceptance Criteria	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

AUDITOR COMPLETION INSTRUCTIONS

All questions on the Produce GAPs Harmonized Food Safety Standard - USDA Checklist shall be assessed according to the Verification Instructions outlined in the Produce GAPs Harmonized Food Safety Standard. Auditors shall have a copy of the Standard with them when performing audits to verify questions are assessed appropriately. All questions shall be assessed using one of the following:

Compliant (C) - The operation meets the requirements of the Produce GAPs Harmonized Food Safety Standard.

Corrective Action Needed (CAN) - The operation does not meet the requirement(s) of the Produce GAPs Harmonized Food Safety Standard, however the non-conformance is not considered to be an immediate food safety risk.

Immediate Action Required (IAR) - The operation does not meet the requirement(s) of the Produce GAPs Harmonized Food Safety Standard and the non-conformance is considered an imminent food safety risk. An imminent food safety risk is present when produce is grown, processed, packed or held under conditions that promote or cause the produce to become contaminated. Observation of employee practices (personal or hygienic) that jeopardize, or may jeopardize, the safety of the produce are considered an "IAR". The presence or evidence of rodents and an excessive amount of insects or pests are also considered an "IAR".

Not Applicable (N/A) - The question is not applicable to the operation.

Auditor Comments: The auditor shall document the findings associated with any question answered "CAN" or "IAR" in the auditor comment section of the checklist. Auditors may also document observations associated with any question on the checklist whether or not the question is a non-conformity if the explanation clarifies why a question was answered compliant. The auditor shall write a comment for each question answered "N/A" addressing why the question was answered "N/A".

Tallying the Audit: Once the auditor finishes the audit, the score sheet shall be filled out by recording the number of C, CAN, IAR, and NA's for each section of the audit. The question number of any question answered as CAN or IAR for each section shall be noted in the last column of the score sheet.

Corrective Action Reports: The auditor shall fill out a Corrective Action Report for each question that has been answered "CAN" or "IAR".

Auditee Information

Auditees should download the complete Produce GAPs Harmonized Food Safety Standard which provides more complete & detailed information regarding the specific questions covered by this audit checklist. The complete Standard is available on the USDA website at www.ams.usda.gov/gapghp.

The acceptance criteria to meet USDA-AMS requirements are outlined on the USDA Acceptance Criteria page, however be aware that depending on who the client(s) requiring the audit are, their specific acceptance criteria may vary from the USDA-AMS criteria.

It is intended that the scopes of the audit selected are completed in their entirety and the audit not restricted to one specific section. However, at the auditee's request, the audit may be split to accommodate scheduling; however, if this is done, the audit is not complete and no certificate or web posting will be issued until the audit is finalized.

To schedule an audit, please go to the USDA-AMS website at www.ams.usda.gov/gapghp and review the "How to Request a GAP & GHP Audit". For auditees without internet access, please contact your local Federal or Federal-State Specialty Crops Inspection office, or the Audit Services Branch at 202-720-5021.

**USDA Acceptance Criteria for the
Harmonized GAP Audit**

1	No questions are assessed as an "IAR", Immediate Action Required.
2	Falsification of records is considered an "IAR".
3	Any question marked with a ● in the MAN column must be assessed as "compliant".
4	Operation must have performed all risk assessments, designated with an "A" in the DOC column, in the USDA Harmonized GAP Standard.
5	If the auditee has been audited against the USDA GAP Standard or the Produce GAPs Harmonized Food Safety Standard previously, the auditee must have addressed all associated CANs or IARs, following their established corrective action procedure.
6	In each major section (G, F, and P) of the audit, at least 80% of the questions not answered as "N/A" must be answered as compliant.

If an operation meets the acceptance criteria as outlined above, the operation will receive a certificate stating its conformance to the Harmonized GAP Standard as well as being posted to the USDA website. Corrective action reports will still be supplied to the auditee for all nonconformances.

If an operation does not meet the acceptance criteria as outlined above, a corrective action report form will be issued for each nonconformance noted on the audit. The operation has the opportunity to take measures to address the issue and schedule a new audit in order to show compliance to the acceptance criteria.

Audit Summary		Name of Auditee:			BHPO LP, dba Gebbers Farms		
		Date of audit:			10/12/2021		
Section	Questions	Total # in Section	# of C	# of CAN	# of IAR	# of NA	Question # of any CAN or IAR
G	General Questions	48	46	0	0	2	100.00%
G-1	Management Responsibility	3	3	0	0	0	
G-2	Food Safety Plan or Risk Assessment	3	3	0	0	0	
G-3	Documentation & Recordkeeping	3	3	0	0	0	
G-4	Worker Education & Training	3	3	0	0	0	
G-5	Sampling & Testing	4	4	0	0	0	
G-6	Traceability	2	2	0	0	0	
G-7	Recall Program	1	1	0	0	0	
G-8	Corrective Actions and Food Safety Incidents	2	2	0	0	0	
G-9	Self-Audits	1	1	0	0	0	
G-10	Worker Health/Hygiene and Toilet/Handwashing Facilities	22	20	0	0	2	
G-11	Waste Management	2	2	0	0	0	
G-12	Food Defense	2	2	0	0	0	
F	Field Operations and Harvesting	51	40	0	0	11	100.00%
F-1	Field History & Assessment	3	2	0	0	1	
F-2	Agricultural Chemicals/Plant Protection Products	5	4	0	0	1	
F-3	Water System Description	3	3	0	0	0	
F-4	Water System Risk Assessment	1	1	0	0	0	
F-5	Water Management Plan	6	3	0	0	3	
F-6	Animal Control	3	3	0	0	0	

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F-7	Soil Amendments	2	1	0	0	1	
F-8	Vehicles, Equipment, Tools and Utensils	7	7	0	0	0	
F-9	Preharvest Assessment	1	1	0	0	0	
F-10	Water/Ice Used in the Harvesting and Postharvest Operations	5	3	0	0	2	
F-11	Containers, Bins and Packaging Materials	4	4	0	0	0	
F-12	Field Packaging and Handling	7	4	0	0	3	
F-13	Post-harvest Handling and Storage (Field Prior to Storage or Packinghouse)	2	2	0	0	0	
F-14	Equipment Sanitation & Maintenance	2	2	0	0	0	
P	Post-Harvest Operations	64	0	0	0	0	0.00%
P-1	Produce Sourcing	1	0	0	0	0	
P-2	Agricultural Chemicals	3	0	0	0	0	
P-3	Facility	6	0	0	0	0	
P-4	Pest and Animal Control	3	0	0	0	0	
P-5	Equipment, Tools and Utensils	5	0	0	0	0	
P-6	Maintenance and Sanitation	11	0	0	0	0	
P-7	Post-Harvest Water/Ice	11	0	0	0	0	
P-8	Containers, Bins and Packaging	9	0	0	0	0	
P-9	Storage	9	0	0	0	0	
P-10	Transportation (Packinghouse to Customer)	6	0	0	0	0	

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L	Logo Use	10	0	0	0	0	0.00%
L-1	Food Safety Plan or Quality Manual	2	0	0	0	0	
L-2	Traceability and Recall Programs	1	0	0	0	0	
L-3	Approved Suppliers	3	0	0	0	0	
L-4	GAP & GHP Logo Approved Use	4	0	0	0	0	
T	Tomato Audit Protocol	17	0	0	0	0	0.00%
TOF	Open-Field Production & Harvesting	17	0	0	0	0	
T	Tomato Audit Protocol	24	0	0	0	0	0.00%
TPH	Packinghouse	24	0	0	0	0	
T	Tomato Audit Protocol	25	0	0	0	0	0.00%
TGH	Greenhouse	25	0	0	0	0	
T	Tomato Audit Protocol	27	0	0	0	0	0.00%
TPD	Repacking and Distribution	27	0	0	0	0	

C, Compliant with requirement; CAN, Corrective action needed to address nonconformance; IAR, Immediate action required because of imminent food safety risk; N/A, not applicable or not needed.

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Date of Audit:				10/12/2021				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
General Questions								
G-1	Management Responsibility							
G-1.1	A food safety policy shall be in place.	WP	•	✓				
G-1.2	Management has designated individual(s) with roles, responsibilities and resources for food safety functions.	WP	•	✓				
G-1.3	There is a disciplinary policy for food safety violations.			✓				
G-2	Food Safety Plan or Risk Assessment							
G-2.1.	There shall be a written Food Safety Plan. The plan shall cover the Operation. The Operation and products covered shall be defined.	WP	•	✓				
G-2.2	The Food Safety Plan shall be reviewed at least annually.	R		✓				Food safety plan reviewed by Robert Grandy on April 1, 2021.
G-2.3	Operation has an Approved Supplier program for all incoming materials, including packaging.	R	•	✓				Approved supplier list and policy reviewed.

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G-3	Documentation and Recordkeeping							
G-3.1	Documentation shall be kept that demonstrates the food safety plan is being followed.	R	•	✓				
G-3.2.	Documentation shall be readily available for inspection.		•	✓				Documentation maintained at food safety office in Brewster Washington, 98812.
G-3.3.	Documentation shall be retained for a minimum period of two years, or as required by prevailing regulation.	R	•	✓				Documentation retained for a minimum of 2 years.
G-4	Worker Education and Training							
G-4.1.	All personnel shall receive food safety training, appropriate to their job responsibilities.	R	•	✓				Employees are trained upon hire and as needed.
G-4.2.	Personnel with supervisory food safety responsibilities shall receive training sufficient to their responsibilities.		•	✓				
G-4.3.	Contracted personnel are held to the relevant food safety standards as they would be as employees.	R	•	✓				
G-5	Sampling and Testing							

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G-5.1	Where laboratory analysis is required in the Food Safety Plan, testing shall be performed by a GLP laboratory using validated methods.	R		✓				Operation utilizes Eurofins and Pacific Agricultural Labs for all testing.
G-5.2	Where microbiological analysis is required in the Food Safety Plan, samples shall be collected in accordance with an established sampling procedure and prevailing regulations.	WP		✓				
G-5.3	Testing, tests, results and actions taken must be documented.	R		✓				Reviewed food safety plan under Global GAP, MRL test results and water test results were reviewed.
G-5.4	All required testing shall include test procedures and actions to be taken based on the results.	WP	•	✓				
G-6	Traceability							
G-6.1	A documented traceability program shall be established.	WP, R	•	✓				
G-6.2	A trace back and trace forward exercise shall be performed at least annually.	R		✓				A mock recall was performed on March 8, 2021.

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G-7	Recall Program							
G-7.1.	A documented recall program, including written procedures, shall be established.	WP, R	•	✓				
G-8	Corrective Actions and Food Safety Incidents							
G-8.1	The Operation shall have documented corrective action procedures.	WP, R	•	✓				
G-8.2	Non-conforming product on hold for food safety is clearly identified and segregated from other products and packaging materials.	WP R	•	✓				
G-9	Self-Audits							
G-9.1.	The Operation shall have documented self-audit procedures.	R		✓				Self audit performed on September 14, 2021.
G-10	Worker Health/Hygiene and Toilet/Handwashing Facilities							
G-10.1	Operation shall have a policy for toilet, handwashing, hygiene, and health.	WP	•	✓				

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G-10.2	Employees and visitors shall be made aware of and follow all personal hygiene practices as designated by the Operation.		•	✓				Bulletin boards with hygiene instructions are posted in orchards at fill stations. Confirmed by interviewing employees.
G-10.3	Toilet facilities and restrooms shall be designed, constructed, and located in a manner that minimizes the potential risk for product contamination and are directly accessible for servicing.		•	✓				
G-10.4	Toilet facilities shall be of adequate number, easily accessible to employees and visitors and in compliance with applicable regulations.		•	✓				Field sanitation units are in compliance with local regulations.
G-10.5	The practice of disposing of used toilet tissue on the floor, in trash receptacles, or in boxes is prohibited except in situations where waste systems are not capable of handling toilet paper.		•	✓				

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G-10.6	Toilet and wash stations shall be maintained in a clean and sanitary condition.	R	•	✓				Field sanitation units are cleaned and serviced once a week or more if required by Blue Water Sanitation, Morgan and Sons and Herriman.
G-10.7	A response plan is in place for major spills or leaks of field sanitation units.	WP		✓				
G-10.8	Personnel shall wash their hands at any time when their hands may be a source of contamination.		•	✓				
G-10.9	Signage requiring handwashing is posted.			✓				
G-10.10	Clothing, including footwear, shall be effectively maintained and worn so as to protect product from risk of contamination.		•	✓				
G-10.11	If gloves are used, the Operation shall have a glove use policy.		•				✓	Gloves are not used at this operation.

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G-10.12	If protective outer garments are worn in product handling areas, they shall be handled in a manner to protect against contamination. When appropriate, racks and/or storage containers or designated storage area for protective clothing and tools used by employees shall be provided.			✓				
G-10.13	The wearing of jewelry, body piercings and other loose objects (e.g. false nails) shall be in compliance to company policy and applicable regulation.			✓				
G-10.14	The use of hair coverings shall be in compliance to company policy and applicable regulation.						✓	Hair nets are not used in this operation.
G-10.15	Employees' personal belongings shall be stored in designated areas.			✓				Personal belongings are stored in vans, buses and personal vehicles away from production areas.

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Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
G-10.16	Smoking, chewing, eating, drinking (other than water), chewing gum, spitting, urinating, defecating, and using tobacco, shall be prohibited except in clearly designated areas.		•	✓				
G-10.17	Operation shall have a written policy that break areas are located so as not to be a source of product contamination.	WP		✓				
G-10.18	Drinking water shall be available to all employees.	R		✓				
G-10.19	Workers and visitors who show signs of illness shall be excluded from direct contact with produce or food-contact surfaces.	WP	•	✓				
G-10.20	Personnel with exposed cuts, sores or lesions shall not be engaged in handling product.		•	✓				
G-10.21	Operation shall have a blood and bodily fluids policy.	WP	•	✓				
G-10.22	First aid kits shall be accessible to all personnel.			✓				

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G-11	Waste Management							
G-11.1	Operation has implemented a waste management plan.			✓				
G-11.2	Trash shall not come in contact with produce.		•	✓				
G-12	Food Defense							
G-12.1	Operation shall assess the potential for unauthorized access to growing and/or packing areas and its impact on food safety.	A	•	✓				
G-12.2	Operation shall develop an emergency response plan.	WP R		✓				

Code Key: A=Assessment of Risk; WP = Written Policy/Procedure/Plan; R = Record

Additional Auditor Comments:

Name of Auditee:				BHPO LP, dba Gebbers Farms				
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Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
Field Operations and Harvesting								
F-1 Field History and Assessment								
F-1.1	The food safety plan shall, initially and at least annually thereafter, evaluate and document the risks associated with land use history and adjacent land use including equipment and structures.	A	•	✓				Annual field history risk assessment reviewed on April 1, 2021.
F-1.2	For indoor growing and field storage buildings, building shall be constructed and maintained in a manner that prevents contamination of produce.		•				✓	There is no indoor growing or field storage buildings at this operation.
F-1.3	Sewage or septic systems are maintained so as not to be a source of contamination.		•	✓				
F-2 Agricultural Chemicals/Plant Protection Products								
F-2.1	Use of agricultural chemicals shall comply with label directions and prevailing regulation.	R	•	✓				

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F-2.2	If product is intended for export, agricultural chemical use, including post-harvest chemicals, shall consider requirements in the intended country of destination.						✓	Destination of product is not known at this stage of production.
F-2.3	Agricultural chemicals shall be applied by trained, licensed or certified application personnel, as required by prevailing regulation.	R		✓				
F-2.4	Water used with agricultural chemicals shall not be a potential source of product or field contamination.	R		✓				
F-2.5	Agricultural chemical disposal shall not be a source of product or field contamination.	R		✓				
F-3	Water System Description							
F-3.1	A water system description shall be available for review.	WP	•	✓				

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F-3.2	The water source shall be in compliance with prevailing regulations.			✓				
F-3.3	Water systems shall not be cross-connected with human or animal waste systems.		•	✓				
F-4	Water System Risk Assessment							
F-4.1	An initial risk assessment shall be performed and documented that takes into consideration the historical testing results of the water source, the characteristics of the crop, the stage of the crop, and the method of application.	A	•	✓				
F-5	Water Management Plan							
F-5.1	There shall be a water management plan to mitigate risks associated with the water system on an ongoing basis.	WP	•	✓				

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F-5.2	Water testing shall be part of the water management plan, as directed by the water risk assessment and current industry standards or prevailing regulations for the commodities being grown.	WP	•	✓				
F-5.3	The testing program shall be implemented consistent with the water management plan.	R	•	✓				
F-5.4	If water is treated to meet microbiological criteria, the treatment is approved and effective for its intended use and is appropriately monitored.	R	•				✓	Treated water is not used.
F-5.5	If post-harvest handling is used to achieve microbial criteria, Operation has documentation supporting its use.	R	•				✓	There is no post-harvest water application by this operation.

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F-5.6	If Operation uses an alternative approach to regulatory microbiological testing, Operation has scientific data or information to support the alternative.	R	•				✓	No alternative approach is used.
F-6	Animal Control							
F-6.1	The Operation has a written risk assessment on animal activity in and around the production area.	A	•	✓				
F-6.2	The Operation routinely monitors for animal activity in and around the growing area during the growing season.	R		✓				
F-6.3	Based on the risk assessment, there shall be measures to prevent or minimize the potential for contamination from animals, including domesticated animals used in farming operations.	WP, R	•	✓				

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F-7	Soil Amendments							
F-7.1	The food safety plan shall address soil amendment risk, preparation, use, and storage.	A, R	•	✓				
F-7.2	If a soil amendment containing raw or incompletely treated manure is used, it shall be used in a manner so as not to serve as a source of contamination of produce.	R	•				✓	No raw or incompletely treated manure is used at this operation.
F-8	Vehicles, Equipment, Tools and Utensils							
F-8.1	Equipment, vehicles, tools utensils and other items or materials used in farming operations that may contact produce are identified.	R		✓				
F-8.2	Equipment, vehicles, tools and utensils used in farming operations which come into contact with product are in good repair and are not a source of contamination of produce.	WP, R		✓				

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F-8.3	Vehicles, equipment, tools and utensils shall be controlled so as not to be a source of chemical hazards.	WP		✓				
F-8.4	Vehicles, equipment, tools and utensils shall be controlled so as not to be a source of physical hazards.			✓				
F-8.5	Cleaning and sanitizing procedures do not pose a risk of product contamination.			✓				
F-8.6	Water tanks are cleaned at a sufficient frequency so as not to be a source of contamination.	WP	•	✓				
F-8.7	All cleaning agents shall be approved for their intended use on food contact surfaces.			✓				
Harvesting								
F-9	Preharvest Assessment							
F-9.1	A preharvest risk assessment shall be performed.	A	•	✓				Pre-harvest risk assessment performed on April 1, 2021.

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F-10	Water/Ice Used in the Harvesting and Postharvest Operations							
F-10.1	Operation has procedures for water used in contact with product or food contact surfaces.	WP, R	•	✓				
F-10.2	Water use SOPs address the microbial quality of water or ice that directly contacts the harvested crop or is used on food-contact surfaces.	R	•	✓				
F-10.3	If water is re-used, SOPs address antimicrobial treatment.	R	•				✓	Water is not re-used.
F-10.4	Water use SOPs address condition and maintenance of water-delivery system.	R	•	✓				
F-10.5	If applicable to the specific commodity, water use SOPs address control of wash water temperature.	R					✓	Operation does not use wash water.
F-11	Containers, Bins and Packaging Materials							
F-11.1	Operation has written policy regarding storage of harvesting containers.	WP		✓				

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Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-11.2	Operation has written policy regarding inspection of food contact containers prior to use.	WP		✓				
F-11.3	Operation has written policy regarding acceptable harvesting containers.	WP		✓				
F-11.4	Operation has written policy prohibiting use of harvest containers for non-harvest purposes.	WP	•	✓				
F-12	Field Packing and Handling							
F-12.1	Operation shall have a written policy that visibly contaminated, damaged or decayed produce is not harvested, or is culled.	WP	•	✓				
F-12.2	Product that contacts the ground shall not be harvested unless the product normally grows in contact with the ground.	WP	•	✓				
F-12.3	Harvest procedures shall include measures to inspect for and remove physical hazards.			✓				

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F-12.4	Cloths, towels, or other cleaning materials that pose a risk of cross-contamination shall not be used to wipe produce, unless risk mitigation procedures are in place.			✓				Cloths, towels or other cleaning materials are not used at this operation.
F-12.5	Packaging materials shall be appropriate for their intended use.		•				✓	Packing materials are not used in this operations.
F-12.6	Packaging shall be stored in a manner that prevents contamination.						✓	Packing materials are not used in this operations.
F-12.7	Operation has written policy regarding whether packaging materials are permitted in direct contact with the soil.	WP					✓	Packing materials are not used in this operations.
F-13	Postharvest Handling and Storage (Field Prior to Storage or Packinghouse)							
F-13.1	Harvested produce is handled in a manner such that it is not likely to become contaminated.		•	✓				
F-13.2	Materials that come in contact with the produce shall be clean and in good repair.		•	✓				Harvesting bags are clean and in good repair.
	Transportation (Field to Storage or Packinghouse)							

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F-14	Equipment Sanitation and Maintenance							
F-14.1	The Operation shall have a policy, written procedures, and a checklist to verify cleanliness and functionality of shipping units (e.g., trailer).	WP, R	•	✓				
F-14.2	Loading/unloading procedures and equipment shall minimize damage to and prevent contamination of produce.			✓				

Code Key: A=Assessment of Risk; WP = Written Policy/Procedure/Plan; R = Record

Additional Auditor Comments: