

CALIFORNIA DEPARTMENT OF PUBLIC HEALTH
FOOD AND DRUG BRANCH
EMERGENCY RESPONSE UNIT

Environmental Investigation of an *Escherichia coli*
O157:H7 Outbreak in October 2013 Associated with Pre-
Packaged Salads

EXHIBIT A
Ratto Bros. Leafy Greens Marketing
Agreement (LGMA) Audit



Food Safety Audit Report

ID#: [REDACTED]

Audit Date: 07/11/13

Handler: Ratto Brothers, Inc.



AUDIT SUMMARY

ID #	[REDACTED]
Handler Name	Ratto Brothers, Inc.
Grower Name	Ratto Bros
Ranch Name	#9
Status	LGMA Final
CAP Required	No
Audit Type	Unannounced
CAP Due Date	
CAP due in 5 days	

SUMMARY OF FINDINGS

Section	Audit Checkpoints	Minor Infractions	Minor Deviations	Major Deviations	Flagrant Violations	Total
Water Use (UA 01/01A)	2	-	-	-	-	0
Soil Amendments (UA 01B-E)	4	-	-	-	-	0
Environmental Factors (UA 02)	5	-	-	-	-	0
Work Practices (UA 03)	10	1	-	-	-	1
Field Sanitation (UA 04)	6	-	-	-	-	0
General Requirements (UA 05)	9	-	-	-	-	0
Total	36	1	0	0	0	1

DETAILS ON CITATIONS AND CORRECTIVE ACTIONS

Question	Details	Level	Verified on Re-Audit	Handler Response
UA 03i - No other observations of improper work practices?	1) Auditor observed Harvester sanitation unit #58 had the sink plugged with the water not moving. Action taken at time of audit with foreman unplugging sink. 2) Auditor observed Grower sanitation unit #7 had no soap in the soap dispenser, the hand wash water holding tank (fresh water) had no cap, and there is no signage to instruct employees to wash hands after using of restrooms. Action taken at time of audit by replacing the sanitation unit. Auditor verified replacement unit #5 at time of audit.	Minor Infraction		

Findings Jul 15, 2013 [REDACTED]
Comments Thanks,
[REDACTED]
LGMA Compliance Officer



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AUDIT DETAILS

Note: On the audit checklist a "Yes" answer indicates compliance, while a "No" may indicate a citation.

ID #	[REDACTED]
Date Created	Jul 11, 2013
Last Modified	Jul 18, 2013
Status	LGMA Final
Originator	[REDACTED]
Audit Type	Unannounced
Assigned Auditor	[REDACTED]
Audit Scheduled Date	Jul 11, 2013
Audit Start Date	Jul 11, 2013
Audit Completed Date	Jul 11, 2013
Handler Name	Ratto Brothers, Inc.
Handler Last Audit Date	Apr 19, 2013
Grower Name	Ratto Bros
Grower Last Audit Date	
Ranch Name	#-9
Ranch Last Audit Date	
UA 01 - From visual inspection, there is no evidence that the water sources and distribution systems may pose a contamination risk (damage, inadequately maintained, evidence of animal activity, connection with effluent systems)?	Yes
UA 01 Comment	
UA 01a - No other observations of improper use of water?	Yes
UA 01a Comment	There are 3 water sources in Ranch 9. Well at field 3 & well at field 4. Also, there is a gate at the ranch that comes from canal (Modesto Irrigation District). Any of these 3 water sources can irrigate field 4, valve 6.
UA 01b - No evidence of undocumented use of soil amendments?	Yes
UA 01b Comment	Handler food safety stated only synthetic soil amendments are applied to Ranch 9.
UA 01c - No evidence of improperly applied soil amendments?	Yes
UA 01c Comment	
UA 01d - No evidence of improperly stored soil amendments?	Yes
UA 01d Comment	
UA 01e - No other observations of improper use of soil amendments?	Yes
UA 01e Comment	
UA 02 - No evidence of fecal contamination in the field?	Yes
UA 02 Comment	
UA 02a - No evidence of animals of significant risk in the field?	Yes
UA 02a Comment	
UA 02b - No evidence of non-compliance with distances as outlined in the Environmental Assessment?	Yes
UA 02b Comment	
UA 02c - No evidence that remedial actions such as animal barriers (fences, gates, grates, etc) are not in good repair and operational?	Yes
UA 02c Comment	
UA 02d - No other observations of environmental risk factors?	Yes
UA 02d Comment	Auditor asked Foreman:



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	<p>"How do you assess the ranch prior to start of harvest, and what do you look for?" Foreman stated he walks the block, and looks for animal tracks, fecal matter, trash, and presence of animals.</p> <p>Foreman stated the 5 animals of significant risk correctly.</p>
UA 03 - No employees eating, drinking (except water), chewing tobacco or smoking in crop production actively harvested areas?	Yes
UA 03 Comment	
UA 03a - All employees observed to have washed their hands after restroom usage, work breaks, or any returning to work occasion?	Yes
UA 03a Comment	
UA 03b - No evidence that sanitary facilities are not routinely clean and operational?	Yes
UA 03b Comment	
UA 03c - No evidence that worker hygiene rules have been violated during the crop cycle?	Yes
UA 03c Comment	
UA 03d - No evidence that Sanitary facilities are not adequately stocked with disposable supplies?	Yes
UA 03d Comment	<p>Auditor asked Foreman: "If you run out of sanitation unit supplies, what is your procedure?" Foreman stated he carries extra sanitation supplies on the bus. Auditor verified extra supplies at time of audit.</p> <p>Auditor asked Foreman: "If you run out of hand wash water in the sanitation unit, what is your procedure?" Foreman stated the water is from the well on ranch 3, and will take 5 minutes to more hand wash water. Handler food safety stated the water is lab tested.</p>
UA 03e - No improperly stored personal items observed in the field?	Yes
UA 03e Comment	
UA 03f - No evidence or observations that employees are not using the restrooms?	Yes
UA 03f Comment	
UA 03g - No employees with uncovered wounds, boils or cuts?	Yes
UA 03g Comment	
UA 03h - No employees with symptoms of infection or contagious disease?	Yes
UA 03h Comment	<p>Auditor asked Foreman: "How do you assess your employees, and what do you look for prior to starting work each day?" Foreman stated he looks at the employees to make sure they are not sick, or have open wounds.</p>
UA 03i - No other observations of improper work practices?	No
UA 03i Comment	<p>1) Auditor observed Harvester sanitation unit #58 had the sink plugged with the water not moving.</p>



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	Action taken at time of audit with foreman unplugging sink.
	2) Auditor observed Grower sanitation unit #7 had no soap in the soap dispenser, the hand wash water holding tank (fresh water) had no cap, and there is no signage to instruct employees to wash hands after using of restrooms. Action taken at time of audit by replacing the sanitation unit. Auditor verified replacement unit #5 at time of audit.
UA 04 - No evidence of excessive non-vegetative debris in the field?	Yes
UA 04 Comment	
UA 04a - No evidence of open and/or unsupervised chemicals in the field?	Yes
UA 04a Comment	
UA 04b - No evidence of leaks and spills on equipment in the field?	Yes
UA 04b Comment	
UA 04c - No evidence of the use of non-sanitized farm equipment that may have come in contact with raw manure, untreated compost, waters of unknown quality, wildlife or domestic animals?	Yes
UA 04c Comment	
UA 04d - No evidence of other cross-contamination potential of product and/or product contact surfaces?	Yes
UA 04d Comment	
UA 04e - No other evidence of improper field sanitation?	Yes
UA 04e Comment	
UA 05 - Is a specific individual assigned the food safety responsibility for harvesting?	Yes
UA 05 Comment	[REDACTED]
UA 05a - Is a documented daily food safety harvest assessment available for review?	Yes
UA 05a Comment	
UA 05b - Is the assessment dated?	Yes
UA 05b Comment	7-11-2013
UA 05c - Is the individual who conducted the assessment identified?	Yes
UA 05c Comment	[REDACTED] crew #1
UA 05d - Are the specific growing blocks associated with the assessment clearly identified?	Yes
UA 05d Comment	Field 4, row 6 (chard)
UA 05e - Is the Harvester name and contact information documented?	Yes
UA 05e Comment	Ratto Harvest
UA 05f - Does it require a visual assessment for intrusion into the field for animals of significant risk?	Yes
UA 05f Comment	
UA 05g - All chemical storage containers are labeled appropriately?	Yes



Food Safety Audit Report

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Audit Date: 07/11/13

Handler: Ratto Brothers, Inc.



UA 05g Comment

UA 05h - Use of containers only as intended?

Yes

UA 05h Comment

- end of report -

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EXHIBIT B
Ratto Bros. [Redacted] Audit

[Ver en Español](#)

Operation: Ranch
Final Audit Report
Audit Report Summary

Audited by

Version 1.6 – Feb 10

Organization:

RATTO BROS., INC.

Contact(s):

Address: 6312 Beckwith Road 95358

Location: Modesto, CA

Phone: 209-545-4445

Ranch:

RBI Ranch #6 & RBI #9 & RBI #10

Contact:

Location: 95358 Modesto, California, United States

Shipper:

Ratto Bros., Inc.

Operation Type:

Ranch

The scope covers RBI ranches 6,9 These ranches are under the same management, share the same water source and are on contiguous grounds. The surface of all the ranches is 270 acres of conventional Spinach, Romaine, Kale, Cilantro, Red Leaf, Green Leaf, Butter, Endive, Anise, Bok Choy, Beets, Cabbage, Onions, Mustard, Napa, Radicchio, Chard, Collard, Escarole, Mint, Turnip, Dill, Dandelions, Basil, Leek, Savoy, Chard, Rainbow, Radish, Daikon, Parsley, Italian, Kohlrabi, Parsley Green, Chinese Mustard, Celery, Root, Dill-Baby, Turnip Poly, Yul Moo, Put Bae Choo, Chong Gak Moo, Lo Bok for human consumption. The audit was based upon a sampling review of food safety documentation and a field survey of the ranch operation and surrounding grounds. Well water and canal water are used in this ranches.

Audit Scope:

Date Audit Started:

08/08/2013 09:00

Date Audit Finished:

08/08/2013 10:00

Product(s):

Spinach, Romaine Lettuce, Kale, Cilantro, Red Leaf Lettuce, Green Leaf Lettuce, Butter Lettuce, Endive, Anise, Bok Choy, Baby Bok Choy, Beets, Green Cabbage, Onions, Greens Mustard, Napa Cabbage, Radicchio, Red Cabbage, Greens Turnips, Collard Greens, Escarole, Mint, Red Chard, Green Chard, Dill, Dandelions, Basil, Leek, Savoy Cabbage, Cactus, Rainbow Chard, Daikon Radish, Italian Parsley, Kohlrabi, Color Kale, Parsley Green, Chinese Mustard, Root Celery, Dill-Baby, Turnip Poly, Yul Moo, Put Bae Choo, Chong Gak Moo, Lo Bok

Auditor:

Audit Percentage Score:

95.91%

Score after acceptance of corrective actions:

99.32%

[Click here to see Corrective Action Activity](#)

Certificate Link:

[View Certificate](#)

Audit Scoring Summary	Pre-Corrective Action Review	Post-Corrective Action Review
Food Safety Management System Requirements	Score: 202 Possible Points: 202 Percent Score: 100.00%	Score: 202 Possible Points: 202 Percent Score: 100.00%
Good Agricultural Practices Requirements	Score: 783 Possible Points: 825 Percent Score: 94.91%	Score: 818 Possible Points: 825 Percent Score: 99.15%
Total:	Score: 985 Possible Points: 1027 Percent Score: 95.91%	Score: 1020 Possible Points: 1027 Percent Score: 99.32%

Non-Conformance Summary By Count	Pre-Corrective Action Non-Conformances	Post-Corrective Action Non-Conformances (NC's without completed CA's)
Food Safety Management System Requirements	0	0
Good Agricultural Practices Requirements	4	0
Total:	4	0

Sections:

Food Safety Management System Requirements

[Management System](#)

[Records Requirements](#)

[Procedures and Corrective Actions](#)

[Internal and external inspections](#)

[Rejection and release of product](#)

[Supplier Monitoring](#)

[Traceability and Recall](#)

[Product Labeling](#)

Good Agricultural Practices Requirements

[General GAP](#)

[Site Identification](#)

[Ground History](#)

[Adjacent Land Use](#)

[Fertilizer/Croton Nutrition](#)

[Irrigation/Water Use](#)

[Crop Protection](#)

[Field Employee Hygiene \(Applies to on the farm or greenhouse workers not the harvest workers\)](#)

FSMS – Management System

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.01.01	Is there a documented food safety policy detailing the company's commitment to food safety?	Total Compliance	5	5	Yes. There was a food safety policy in place detailing the company's commitment to food safety. It is called "Our Mission & Vision Statement." It was signed by Ron Ratto on March 1, 2013.	
1.01.02	Is there a food safety manual or other documented food safety management system covering the scope of business included in this audit and procedures/instructions for all food safety processes?	Total Compliance	5	5	Yes. There was a food safety manual covering the scope of the ranch and harvest (Module 1 and 2). For example, there were SOP's for water, pesticides, calibration and sanitation. The food safety manual is called "Food Safety Management System/Module 1 & 2."	
1.01.03	Is there a detailed organizational structure chart of all employees whose activities affect food safety?	Total Compliance	3	3	Yes. There was an organization flow chart describing the activities related to food safety. It is called "Organization Structure."	
1.01.04	Is there a food safety committee and are there logs of food safety meetings with topics covered and attendees?	Total Compliance	5	5	Yes. There was a food safety committee and there were logs available for review on the day of the audit. It is called "Food Safety Committee Notes." The last food safety committee meeting was held on July 24, 2013, June 6, 2013 and January 12, 2013. Ron Ratto, [redacted] were present in the meetings.	
1.01.05	Is there documented management verification of the entire food safety management system on at least an annual basis?	Total Compliance	5	5	Yes. There was a documented management verification available for review on the day of the audit. It is called "Verification of Food Safety Management System." It was signed by Ron Ratto on March 1, 2013.	
1.01.06	Is there a documented analysis detailing resources required to implement and improve the food safety management system processes with documented commitment from senior management to provide these resources?	Total Compliance	5	5	Yes. There was a documented analysis detailing resources required to implement and improve the food safety program. It is called "Food Safety Resources Analysis." It was signed by Ron Ratto on March 1, 2013.	

FSMS – Records Requirements

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.02.01	Are all records free of "correction fluid" (white out), pencil text and erasable ink text? If using computerized records, is there a system that shows record amendments (data history) if the records are changed after initial entry?	Total Compliance	3	3	Yes. Yes, all records reviewed were free of correction fluid on the day of the audit. For example, records of sprayer calibration, fertilizer applications, and sanitation records ect. The document is called "Records Free From Adulteration."	
1.02.02	Are all monitoring and process control records stored for a minimum period of a year or for at least the shelf life of product if greater than a year?	Total Compliance	3	3	Yes. Yes, all records from the past years were available for review. The document is called "Control of Records/ Documents & Record Keeping Guideline."	
1.02.03	Are the written procedures available to relevant users and is a master copy maintained in a central file?	Total Compliance	5	5	Yes. SOP's were available to relevant users and there was a master copy maintained in a central file. According to [REDACTED] hard copies were given to the employees.	

FSMS – Procedures and Corrective Actions

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.03.01	Are there written Standard Operating Procedures (SOPs) that detail work instructions for food safety related activities performed in the field operations?	Total Compliance	5	5	Yes. There were written standard operation procedures (SOP's) that detailed work instructions for food safety related activities that were performed in the field operations. For example, the SOP's of fertilizer/crop nutrition, crop protection, irrigation and harvesting were available for review in the day of the audit. The document is called "Standard Operating Procedures Development & Approving Policy."	
1.03.02	Are there written Standard Operating Procedures (SOPs) that detail work instructions for food safety related activities in the facility operations?	N/A	0	0	N/A. No facility operation.	
1.03.03	Is there a corrective action procedure that describes the requirements for follow up and prevention of future occurrences?	Total Compliance	5	5	Yes. There were written SOP's called "Corrective Action & Preventive Action Plan Guidelines."	

FSMS – Internal and external inspections

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.04.01	Is there a program for periodic self-inspections of the field operations covering any process impacting food safety and are records maintained detailing corrective actions? For Field (GAP option) this includes the growing and harvesting practices and all the relate documentation and records generated.	Total Compliance	10	10	Yes. Programs for periodic self-inspections of the field operation were in place. It is called "Internal Audit Policy." Records of the inspections were available on the day of the audit. The last self-inspection was on July 23, 2013 by [REDACTED]	
1.04.02	Is there a program for periodic self-inspections of the facility operations covering any process impacting food safety and are records maintained detailing corrective actions? For Facility (GMP option) includes the observation of the facility practices and all the relate documentation and records generated.	Total Compliance	10	10	N/A. No facility operation.	
1.04.03	Are there written procedures for handling regulatory inspections?	Total Compliance	3	3	Yes. Yes, there were written procedures for regulatory inspections in place. It is called "Guidelines for Handling Regulatory and Independent Inspections."	
1.04.04	Are there records of regulatory inspections and/or contracted inspections, company responses and corrective actions, if any?	Total Compliance	5	5	Yes. There were records of regulatory inspection available for review during the audit. The last inspections was on October 8, 2012 by Primuslabs. Corrective actions were in place and available for review during the audit.	
1.04.05	Are there documented policies and/or procedures for the calibration for measuring and monitoring devices used in the field operations such as fertilizer and crop protection application equipment, and other equipment related to the safety of the product?	Total Compliance	10	10	Yes. There were documented policies and/or procedures for the calibration. The SOP is called "Fertilizer/Pesticide Application Machinery/Calibration."	
1.04.06	Are there documented policies and/or procedures for the calibration for measuring and monitoring devices used in the facility operations such as chemical application equipment, thermometers, metal detectors, ORP meters, pH meters and other equipment related to the safety of the product	N/A	0	0	N/A. No facility operation.	

FSMS – Rejection and release of product

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.05.01	Is there a written procedure for handling on hold or rejected products?	Total Compliance	10	10	Yes. There were procedures for handling product on hold/rejected on file. It is called "Hold/Release & Rejection Policy."	
1.05.02	Are product release procedures implemented (e.g. lot signed out, when a product lot sample is undergoing an analysis, etc.) and are records available for review?	Total Compliance	5	5	Yes. There were procedures implemented in place. It is called "Hold Tag Procedures."	
1.05.03	Is there a documented system for dealing with customer complaints and buyer food safety complaints and are those on file, along with company responses, including corrective actions?	Total Compliance	10	10	Yes. There was a documented system for dealing with customer complaints and buyer food safety complaints. It is called "System for Dealing With Customer complaints."	

FSMS – Supplier Monitoring

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.06.01	Are there current written specifications for all ingredients, materials, products and services purchased &/or provided that relate to product safety, are they easily accessed and there is a review process in place for the specifications?	Total Compliance	5	5	Yes. There were specifications for all ingredients, materials, products and services. The SOP's are called "Current Written Specifications for Materials, Products & Services." The specification was easily accessible to users.	
1.06.02	Is there a list of approved suppliers?	Total Compliance	5	5	Yes. There was a list of approved suppliers. It is called "Supplier List." For example, [REDACTED] were included in the approved supplier list.	
1.06.03	Is there a written procedure detailing the selection, evaluation, approval and monitoring process of approved suppliers?	Total Compliance	5	5	Yes. There was a written procedure detailing the selection, evaluation, and approval of the suppliers. It is called "Approved Supplier Procedures."	
1.06.04	Does the organization have documented evidence to ensure that raw material, processing aids and ingredients suppliers comply with specifications, regulatory requirements and best practice guidelines?	Total Compliance	15	15	Yes. There were letters of guarantee by [REDACTED] on July 1, 2013. It was signed by [REDACTED]. The letters of guarantee state that they were complying with the established specifications, regulatory requirements and best practice guidelines.	
1.06.05	Does the organization have documented evidence to ensure that packaging, materials and services suppliers comply with specifications, regulatory requirements and best practice guidelines?	N/A	0	0	N/A. This question is not applicable to the organization.	
1.06.06	Are appropriate supplier controls in place (e.g. results of pesticide multi-residue analysis) to ensure product pesticide residues of raw material/ingredients do not exceed published MRLs?	Total Compliance	5	5	N/A. According to [REDACTED] suppliers did not provide raw materials or ingredients.	

FSMS – Traceability and Recall

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.07.01	Is there a documented account that indicates how the company product tracking system works, thereby enabling trace back and trace forward to occur in the event of a potential recall issue?	Total Compliance	10	10	Yes. There were documented traceability procedures indicating the code used to aid in accurate and timely traceability of product for possible recall. It is called "Product Tracking System Traceability & Recall."	
1.07.02	Does the organization have a documented recall program including: procedures, recall team roles and contact details, external contact listings, explanation of different types (classes) of recalls?	Total Compliance	15	15	Yes. Yes, the organization had a recall program that included: procedures, recall team, roles and contact details, external contact listings, and an explanation of different types (classes) of recalls. These SOP's were called "Traceback Recall Policy/Recall Classification Categories."	
1.07.03	Is testing of recall procedures (including trace back) performed and documented annually? Can the company identify where affected product was sent?	Total Compliance	10	10	Yes. The mock recall was conducted on October 7, 2013 by Ratto Bros. The reason for recall was that the organization found a knife in a box of romaine lettuce. The organization was able to locate 100% of the effected product in a timely manner. The mock recall summary and the supporting documentation were in place and available for review during the audit. The documentation also included the lessons learned by doing the mock recall.	
1.07.04	Is there a daily incidents report, sometimes called a Notice(s) of Unusual Occurrence and Corrective Actions Log (NUOCA) ?	Total Compliance	5	5	Yes. There was a NUOCA available for review on the day of the audit. It is called "Notice(s) of Unusual Occurrence and Corrective Actions Log."	

FSMS – Product testing

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
1.08.01	Based on risk assessment, is there scheduled testing program for raw materials, work in progress, packaging and finished goods?	Total Compliance	5	5	Yes. Tests for raw materials were not necessary according to the risk assessment (Risk Assessment Product Testing) provided for review.	
1.08.02	If test are necessary from the risk assessment, is there evidence of the test results for raw materials, work in progress, packaging and finished goods, at the scheduled frequencies and with follow-up for identified deviations?	Total Compliance	5	5	Yes. Tests for raw materials were not necessary according to the risk assessment (Risk Assessment Product Testing) provided for review.	
1.08.03	Are testing and analysis performed by licensed/accredited laboratories (e.g. ISO 17025 or equivalent, National Regulations, State Department, etc.)?	Total Compliance	5	5	Yes. [redacted] performed the product and water testing for this organization.	

GAP – General GAP

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.01.01	Is there a designated person responsible for the food safety program in the field?	Yes	10	10	Yes. [redacted] is responsible for the food safety program in the field.	

GAP – Site Identification

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.02.01	Is the growing area(s) adequately identified or coded to enable trace back and trace forward in the event of a recall?	Yes	15	15	Yes. The growing areas are identified with ranch names and block numbers.	

GAP – Ground History

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.03.01	Were farming area(s) used for growing food crops for human consumption last season?	Yes	0	0	Yes. The growing areas were used for food crops for human consumption.	
2.03.02	Has the growing area(s) been used for any non-agricultural functions? If No, go to 2.03.03	No	7	7	No. The growing area was not used for any non-agricultural functions.	
2.03.02a	If the land had been used previously for non-agricultural functions have soil tests been conducted showing soil was negative or within an appropriate regulatory agency's approved limits for contaminants?	N/A	0	0		
2.03.03	Has the growing area(s) been used for animal husbandry or grazing land for animals? If No, go to 2.03.04	No	7	7	No. The growing areas were not used for animal husbandry or for grazing.	
2.03.03a	If the land was used previously for animal husbandry or grazing land for livestock, has a risk evaluation been performed?	N/A	0	0		
2.03.04	Is there evidence of animal presence and/or animal activity in audited area? If answer is NO, go to 2.03.05	Yes	0	15	Yes. There was evidence of animal presence (birds on block #2 Ranch 6) in the audited area during the audit.	
2.03.04a	Is the evidence of animal presence and/or animal activity found, in the form of fecal contamination? If answer is NO, go to 2.03.05	No	20	20	No. The evidence of animal presence found in the audit area was not in form of fecal contamination.	
2.03.04b	Is the fecal matter found in the audited area, a systematic event (not sporadic)? IF THIS QUESTION IS ANSWERED YES, AUTOMATIC FAILURE OF THIS AUDIT WILL RESULT.	N/A	0	0		
2.03.05	Has flooding from uncontrolled causes occurred on the growing area(s) since the previous growing season? If No, go to 2.03.06	No	0	0	No. There was no flooding from uncontrolled causes in the growing area. This was verbally confirmed by [redacted]	
2.03.05a	If the growing area(s) and product was affected from the flood waters, is there documented evidence that corrective measures were taken to affected land and product?	N/A	0	0		
2.03.05b	Have soil tests been conducted on the flooded area(s) showing soil was negative or within an appropriate regulatory agency's approved limits for contaminants?	N/A	0	0		
2.03.06	Is the growing operation under organic principles? If No, go to 2.03.07	No	0	0	No. The growing operation is not under organic principles.	
2.03.06a	Is current certification by an accredited organic certification organization on file and available for review?	N/A	0	0		
2.03.07	If the growing area(s) is a new purchase or lease, has a documented risk assessment been undertaken?	N/A	0	0	N/A. The growing areas are not a new purchase.	

GAP – Adjacent land use

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.04.01	Is the adjacent land to the growing area a possible source of contamination from intensive livestock production (e.g. feed lots, dairy operations, poultry houses, meat rendering operation)? If No, go to 2.04.02	No	10	10	No. There were no intensive livestock activities on the adjacent land.	
2.04.01a	Have appropriate measures been taken to mitigate this possible contamination source onto the growing area (e.g. buffer areas, physical barriers, foundation, fences, ditches, etc.)?	N/A	0	0		
2.04.02	Are, or is there evidence of domestic animals, wild animals, grazing lands (includes homes with hobby farms, and non commercial livestock) in proximity to growing operation? If No, go to 2.04.03	Yes	0	10	Yes. There was evidence of domestic animals (three dogs) in the adjacent land.	
2.04.02a	Have physical measures been put in place to restrain domestic animals, grazing lands, (includes homes with hobby farms, and non commercial livestock) and their waste from entering the growing area (e.g. vegetative strips, wind breaks, physical barriers, berms, fences, diversion ditches.)?	Yes	15	15	Yes. There were physical measures that were put in place to restrain domestic animals (dogs) from entering the growing area. For example, a fence, buffer zone and a ditch.	
2.04.02b	Is there a written policy supported by visual evidence that domestic, livestock, or wild animals are not allowed in the growing area? Note: This includes any packaging or equipment storage areas.	Yes	10	10	Yes. There was a written policy that domestic, livestock, or wild animals are not allowed in the growing area. It is called "Adjacent Land/Source of Contamination."	
2.04.02c	Are measures in place to reduce or limit the animal intrusion (i.e., monitoring field perimeter for signs of intrusion)?	Yes	15	15	Yes. Measures were in place to reduce or limit animal intrusion. The ranch supervisor monitored the field perimeters for signs of intrusion. This was verbally confirmed by [REDACTED]	
2.04.03	Are untreated animal manure piles, compost, biosolids, or nonsynthetic amendment stored and/or applied on adjacent land? If No, go to 2.04.04	No	10	10	No. There was no untreated animal manure piles, compost, biosolids, or nonsynthetic amendment stored or applied on the adjacent land at the time of the audit.	
2.04.03a	Have physical measures been taken to secure untreated animal manure piles, compost, biosolids, or nonsynthetic amendment stored and/or applied on adjacent land?	N/A	0	0		
2.04.03b	If biosolids are stored and/or applied on adjacent land, has the adjacent landowner supplied paperwork confirming the biosolids meet prevailing guidelines, governmental, or local standards?	N/A	0	0		
2.04.04	Is the growing area situated in a higher risk location where contamination could occur from nearby operations or functions (e.g. leach fields, runoff or potential flooding from sewers, toilet systems, industrial facilities, labor camps)? If No, go to 2.04.05	No	10	10	No. The growing areas were not located in a high risk area.	
2.04.04a	Have appropriate measures been taken to mitigate risks related to nearby operations?	N/A	0	0		
2.04.05	Is there evidence of human fecal matter in the adjacent land to the audited area? If NO, go to 2.05.01	No	15	15	No. There were no evidence of human fecal contamination in the adjacent land during the audit.	
2.04.05a	Does the human fecal matter found in the adjacent area, represents a high risk to the crop for potential of contamination due to conditions as: lack of access controls (barriers), closeness to the growing area and equipment, crop type and maturity, land condition, and others?	N/A	0	0		

GAP – Fertilizer/Crop Nutrition

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.07.01	Is untreated human sewage sludge used in the growing cycle? IF THIS QUESTION IS ANSWERED YES, AUTOMATIC FAILURE OF THIS AUDIT WILL RESULT.	No	20	20	No. No human sewage sludge was used. This was verbally confirmed by [REDACTED]	
2.07.02	Is compost produced from animal derived materials used by the grower? If No, go to 2.07.03	No	0	0	No. No compost produced from animal was used. This was verbally confirmed by [REDACTED]	
2.07.02a	Are compost applications incorporated into the soil prior to planting or bud burst for tree crops and not applied during the growing season?	N/A	0	0		
2.07.02b	Are there compost use records available for each growing area, including application records which shows that the interval between application and harvest was not less than 45 days?	N/A	0	0		
2.07.02c	Are there Certificate(s) of Analysis (CoA) from the compost supplier(s) that covers pathogen testing (plus any other legally/best practice required testing) and does the grower have relevant letters of guarantee regarding SOP's and logs?	N/A	0	0		
2.07.02d	Are there Certificate(s) of Analysis (COA), letters of guarantee or some other documents from the compost supplier(s) that covers heavy metal testing?	N/A	0	0		
2.07.03	Are biosolids used? If No, go to 2.07.04. NOTE: Special attention to commodity specific guidelines rules (e.g., Californian Leafy Greens) which ban the use of biosolids, see 2.07.03d	No	0	0	No. No biosolids were used. This was verbally confirmed by [REDACTED]	
2.07.03a	Are biosolids incorporated into the soil prior to planting or bud burst for tree crops and not applied during the growing season?	N/A	0	0		
2.07.03b	Are the grower's biosolids use records available for each growing area, especially application records?	N/A	0	0		

2.07.03c	Is there a Certificate(s) of Analysis (COA) from the biosolid supplier(s) certifying compliance with prevailing national/ local standards and guidelines? IF THIS QUESTION IS ANSWERED NO, AUTOMATIC FAILURE OF THIS AUDIT WILL RESULT.	N/A	0	0	
2.07.03d	Are there Certificate(s) of Analysis (COA), letters of guarantee or some other documents from the biosolid supplier(s) certifying compliance with prevailing national/ local standards and guidelines (heavy metal test analysis)?	N/A	0	0	
2.07.03e	Are biosolids being applied to crops where the country of production regulations/guidelines ban the use such materials e.g. Leafy Green Commodity Specific Guidelines in California? IF THIS QUESTION IS ANSWERED YES, AUTOMATIC FAILURE OF THIS AUDIT WILL RESULT.	N/A	0	0	
2.07.04	Is untreated animal manure used? If No, go to 2.07.05. NOTE: Special attention to commodity specific guidelines rules (e.g., Californian Leafy Green Commodity Specific Guidelines) which ban the use of untreated animal manures. See 2.07.04d	No	15	15	No. No untreated animal manure was used. This was verbally by [REDACTED]
2.07.04a	Is untreated animal manure incorporated into the soil prior to planting or bud burst for tree crops and not applied during the growing season?	N/A	0	0	
2.07.04b	Are there untreated animal manure records available for each growing area including application records which shows that the interval between application and harvest was not less than 120 days (unless more stringent laws or guidelines exist)?	N/A	0	0	
2.07.04c	Are there Certificate(s) of Analysis (COA), specification or some other document available for review provided by the untreated animal manure supplier stating the components of the material?	N/A	0	0	
2.07.04d	Are untreated animal manures being used where the country regulations/guidelines ban the use such materials (e.g., Californian Leafy Green Commodity Specific Guidelines)? IF THIS QUESTION IS ANSWERED YES, AUTOMATIC FAILURE OF THIS AUDIT WILL RESULT.	N/A	0	0	
2.07.05	Are other nonsynthetic crop treatments used (e.g. compost teas, fish emulsions, fish meal, blood meal, "bio fertilizers")? If No, go to 2.07.06	No	0	0	No. No Non-synthetic crop treatments were used. This was verbally confirmed by [REDACTED]
2.07.05a	Are nonsynthetic treatments that contain animal products or animal manures applied to the edible portions crops?	N/A	0	0	
2.07.05b	Are nonsynthetic crop treatment records available for each growing area including application records demonstrating the interval between application and harvest was not less than 45 days?	N/A	0	0	
2.07.05c	Are there Certificate(s) of Analysis available from the nonsynthetic crop treatment suppliers that covers pathogen testing (plus any other legally/best practice required testing)?	N/A	0	0	
2.07.05d	Are there Certificate(s) of Analysis (COA), letters of guarantee or some other documents from the nonsynthetic crop treatment suppliers that covers heavy metal testing?	N/A	0	0	
2.07.06	Are any soil or substrate amendments (except inorganic nutrients/fertilizers) used that do not contain animal products and/or animal manures? If No, go to 2.07.07	No	0	0	No. No soil or substrate amendments were used. This was verbally confirmed by [REDACTED]
2.07.06a	Are the grower's soil or substrate amendment (except inorganic nutrients/fertilizers that do not contain animal products and/or animal manures) records available for review including application records?	N/A	0	0	
2.07.06b	Are there Certificate(s) of Analysis (COA) and/or letters of guarantee stating that the materials used are free from animal products and/or animal manures?	N/A	0	0	
2.07.07	Are inorganic fertilizers used? If No, go to 2.07.08	Yes	0	0	Yes. Inorganic synthetic fertilizers were used.
2.07.07a	Are the grower's inorganic fertilizer records available for review including application records?	Yes	10	10	Yes. The grower application records were available for review detailing date, area treated, application method, and amount applied.
2.07.07b	Are there Certificate(s) of Analysis (COA), letters of guarantee or some other documents from the inorganic fertilizer supplier(s) that specifies the source of all the ingredients including inert materials?	Yes	7	7	Yes. There was a letter of guarantee from [REDACTED] July 1, 2013) signed by [REDACTED] The letters of guarantee stated that they were complying with the established specifications, regulatory requirements and best practice guidelines.
2.07.08	If fertilizers and/or fertilizer containers are stored on the property, are they stored in a manner to prevent contamination to the growing area(s) or any of water sources?	N/A	0	0	N/A. Fertilizers and/or fertilizer containers were not stored on the property during the audit.

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.08.01	Does the growing operation practice dryland farming? If No, go to 2.08.02.	No	0	0	No. Dryland farming is not practiced.	
2.08.01a	If the growing operation practices dryland farming, are there water systems used in the growing operation to supply for crop needs such as crop protection/fertilizer applications, and frost or freeze prevention program? If No, go to 2.08.02	N/A	0	0		
2.08.01b	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.01d	N/A	0	0		
2.08.01c	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0		
2.08.01d	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	N/A	0	0		
2.08.01e	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0		
2.08.01f	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0		
2.08.02	Is the water used for the growing operation sourced from Municipal or District water pipeline systems? If No, go to 2.08.03	No	0	0	No. No district water was used.	
2.08.02a	Are microbiological tests, including Generic E.coli conducted on water used for crop protection/fertilizer applications, and frost or freeze prevention program? If No, go to 2.08.02c	N/A	0	0		
2.08.02b	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0		
2.08.02c	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	N/A	0	0		
2.08.02d	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0		
2.08.02e	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0		
2.08.02f	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0		
2.08.02g	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0		
2.08.02h	Are the crops irrigated by flood irrigation or a furrow system?	N/A	0	0		
2.08.02i	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0		
2.08.03	Is the water used in the growing operation sourced from wells? If No, go to 2.08.04	Yes	0	0	Yes. The irrigation water was sourced from a well.	
2.08.03a	Are all well heads an adequate distance from untreated manure?	N/A	0	0	N/A. There was no manure of any kind observed in proximity to the water source.	
2.08.03b	Is the well designed to prevent contamination?	Yes	10	10	Yes. The wells is designed to prevent contamination.	
2.08.03c	Is it evident that the well(s) is free from contamination issues and are measures taken to minimize contamination of wells?	Yes	10	10	Yes. It is evident that well is free from contamination issues during the audit.	
2.08.03d	Are records kept for periodic inspections and treatment of wells (if performed) available for review?	N/A	0	0	Yes. There were records were available for review. It is called "Irrigation Sanitary Assessment." The last well inspection was performed on October 7, 2013 by [REDACTED]	
2.08.03e	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.03g	Yes	20	20	Yes. Testing was performed on an Monthly basis or as needed. This was verbally confirmed by [REDACTED] performs the microbiological testing for E.coli, on the water source. The last result was on July 9, 2013. No unsuitable or abnormal results were detected this was verbally confirmed by [REDACTED]	
2.08.03f	Are the microbiological tests current and conducted at the required and/or expected frequencies?	Yes	15	15	Yes. Testing is performed monthly or as need it. It was verbally confirmed [REDACTED]	
2.08.03g	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	Yes	10	10	Yes. The written procedures were available for review. The SOP is called "Irrigation/Water Use."	
2.08.03h	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	Yes	10	10	Yes. The written procedures (SOPs) included corrective actions in case of abnormal water results. The SOP is called "Corrective Action for Unsuitable/Abnormal Testing Result SOP."	
2.08.03i	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	N/A. No unsuitable or abnormal results were detected. This was verbally confirmed by [REDACTED]	
2.08.03j	Are the crops irrigated by a micro irrigation or drip system?	Yes	0	0	Yes. Micro irrigation and drip system were used.	
2.08.03k	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0	N/A. No overhead irrigation was used.	

2.08.03l	Are the crops irrigated by flood irrigation or a furrow system?	N/A	0	0	N/A. Furrow system was not used for the crop.
2.08.03m	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0	N/A. The crops were not sub irrigated.
2.08.04	Is the water used in the growing operation sourced from ponds, reservoirs, watersheds or other surface water source? If No, go to 2.08.05	No	0	0	No. No reservoirs were used as a water source.
2.08.04a	Is surface water in adequate distance from untreated manure?	N/A	0	0	
2.08.04b	Do animals (domestic, livestock, or wild) have access to the water source?	N/A	0	0	
2.08.04c	Is it evident that the water source is free of contamination issues and are measures taken to minimize contamination of the water source?	N/A	0	0	
2.08.04d	Are records kept for the periodic visual inspections and disinfection treatments (if used) available for review?	N/A	0	0	
2.08.04e	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.04g	N/A	0	0	
2.08.04f	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0	
2.08.04g	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	N/A	0	0	
2.08.04h	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0	
2.08.04i	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	
2.08.04j	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0	
2.08.04k	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0	
2.08.04l	Are the crops irrigated by flood irrigation or a furrow system?	N/A	0	0	
2.08.04m	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0	
2.08.05	Is the water used in the growing operation sourced from canals, rivers, ditches, or other open flowing water systems? If No, go to 2.08.06	Yes	0	0	Yes. Water from canals was used.
2.08.05a	Is surface water in adequate distance from untreated manure?	N/A	0	0	N/A. There was no manure of any kind observed in proximity to the water source.
2.08.05b	Is the water source under the direction of a water authority or district?	Yes	5	5	Yes. The water source is under the direction of a water authority.
2.08.05c	Do animals (domestic, livestock, or wild) have access to the water source?	Yes	0	7	Yes. Animals have access to the water source.
2.08.05d	Is it evident that the water source is free of contamination issues and are measures taken to minimize contamination of the water source?	No	0	10	No. The water source was not free from contamination there was vegetation.
2.08.05e	Are records kept for periodic visual inspection and disinfection (if occurring) of the water source and available for review?	Yes	7	7	Yes. There were records were available for review. It is called "Irrigation Sanitary Assessment." The last well inspection was performed on October 7, 2013 by [REDACTED]
2.08.05f	Are microbial tests, including Generic E.coli conducted on water used for irrigation, crop protection/fertilizer applications, and frost or freeze prevention program? If No, go to 2.08.05h	Yes	20	20	Yes. Testing was performed on an Monthly basis or as needed. This was verbally confirmed by [REDACTED] performs the microbiological testing for E.coli on the water source. The last result was on July 9, 2013. No unsuitable or abnormal results were detected this was verbally confirmed by [REDACTED]
2.08.05g	Are the microbiological tests current and conducted at the required and/or expected frequencies?	Yes	15	15	Yes. Testing is performed monthly or as need it. It was verbally confirmed [REDACTED]
2.08.05h	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	Yes	10	10	Yes. The written procedures were available for review. The SOP is called "Irrigation/Water Use."
2.08.05i	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	Yes	10	10	Yes. The written procedures (SOPs) included corrective actions in case of abnormal water results. The SOP is called "Corrective Action for Unsuitable/Abnormal Testing Result SOP."
2.08.05j	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	N/A. No unsuitable or abnormal results were detected. This was verbally confirmed by [REDACTED]
2.08.05k	Are the crops irrigated by a micro irrigation or drip system?	Yes	0	0	Yes. Micro irrigation and drip system were used.
2.08.05l	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0	N/A. No overhead irrigation was used.
2.08.05m	Are the crops irrigated by flood irrigation or furrow system?	N/A	0	0	N/A. Furrow system was not used for the crop.
2.08.05n	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0	N/A. The crops were not sub irrigated.
2.08.06	Is reclaimed water used in the growing operation? NOTE: This refers to wastewater that has gone through a treatment process. If No, go to 2.08.07.	No	0	0	No. No reclaimed water was used.
2.08.06a	Is the reclamation process under the direction of a water reclamation management or authority?	N/A	0	0	

2.08.06b	Are microbial control measures for reclaimed water utilized?	N/A	0	0	
2.08.06c	Are microbial tests, including Generic E.coli conducted on the water? If No, go to 2.08.06e	N/A	0	0	
2.08.06d	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0	
2.08.06e	Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?	N/A	0	0	
2.08.06f	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0	
2.08.06g	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	
2.08.06h	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0	
2.08.06i	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0	
2.08.06j	Are the crops irrigated by flood irrigation or a furrow system?	N/A	0	0	
2.08.06k	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0	
2.08.07	Are tail water (run off water) systems used in the growing operation? If No, go to 2.08.08.	No	0	0	No. Tail water was not used.
2.08.07a	Is surface water in adequate distance from untreated manure?	N/A	0	0	
2.08.07b	Do animals (domestic, livestock, or wild) have access to the tail water systems?	N/A	0	0	
2.08.07c	Is it evident that the water source is free of contamination issues and are measures taken to minimize contamination of the tail water system?	N/A	0	0	
2.08.07d	Are records kept for periodic visual inspection and disinfection (if occurring) of the water source and available for review?	N/A	0	0	
2.08.07e	Are microbial tests conducted, including Generic E.coli on water used for irrigation, crop protection/fertilizer applications, and frost or freeze prevention program? If No, go to 2.08.07g	N/A	0	0	
2.08.07f	Are the microbiological tests current and conducted at the required and/or expected frequencies?	N/A	0	0	
2.08.07g	Do written procedures (SOPs) exist covering proper sampling protocols and are the SOPs being implemented? NOTE: Irrespective of water source, samples for microbial testing should be taken at a point as close to the point of use as practical, so as to test both the water source and the water distribution system.	N/A	0	0	
2.08.07h	Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	N/A	0	0	
2.08.07i	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	N/A	0	0	
2.08.07j	Are the crops irrigated by a micro irrigation or drip system?	N/A	0	0	
2.08.07k	Is overhead irrigation used to irrigate the crop or as part of a frost or freeze prevention program? NOTE: "Irrigating the crop" refers to irrigation during the mature growing cycle. This does not include pre-planting or just after planting to create a stand.	N/A	0	0	
2.08.07l	Are the crops irrigated by flood irrigation or furrow system?	N/A	0	0	
2.08.07m	Are the crops sub irrigated (also known as seepage irrigation)?	N/A	0	0	
2.08.08	Are check valves, anti-siphon devices, or other back flow prevention systems in use when and where necessary?	Yes	10	10	Yes. Check valves were used in the system.
2.08.09	Is irrigation equipment that is not in use free from pest contamination and stored clean off the ground?	N/A	0	0	N/A. No irrigation equipment was observed during the audit.

GAP - Crop Protection

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.09.01	Is there a documented policy and/or procedures for the mixing/loading of crop protection materials?	Yes	5	5	Yes. The grower had documented policy and procedures for the mixing/loading of crop protection materials for the food safety manual. It is called "Crop Protection/ Mixing and Loading Crop Protection Materials."	
2.09.01a	Is mixing, loading, or the dilution of crop protection materials performed safely and within a distance where the growing area and water sources are not affected?	N/A	0	0	N/A. This activity was not observed during the audit.	
2.09.02	Is there a documented policy and/or procedures for the rinsing and cleaning of crop protection equipment?	Yes	5	5	Yes. The grower had documented procedures for the rinsing and cleaning of crop protection equipment. It is called "Crop Protection/ Rinsing and Cleaning of Crop Protection."	
2.09.02a	Is rinsing and cleaning of crop protection equipment performed safely and within a distance where land and water sources are not affected?	N/A	0	0	N/A. This activity was not observed during the audit.	
2.09.03	Is there documentation that shows the individual(s) making decisions for crop protection are qualified?	Yes	10	10	Yes. [REDACTED] is the PCA. License # [REDACTED] It is valid until December 31, 2013.	
2.09.04	Is there documentation that shows employees who handle crop protection materials are trained or are under the supervision of a trained individual?	Yes	15	15	Yes. [REDACTED] is responsible for crop protection. This was verbally confirmed by [REDACTED]	

2.09.05	Does the growing operation follow a pesticide application recording program of all plant protection products (including soil and substrate pre-plant treatments)? If No, go to 2.09.06. IF THIS QUESTION IS ANSWERED NO, AUTOMATIC FAILURE OF THIS AUDIT WILL RESULT.	Yes	20	20	Yes. Grower application records were available for review.
2.09.05a	Are crop protection application records up to date and available for review?	Yes	15	15	Yes. The crop protection application records were up to date and were available for review.
2.09.06	Has the growing operation got registration information available about the plant protection products registered for use for the target crops in the country of production? If N/A, go to 2.09.07. IF THIS QUESTION IS ANSWERED NO, AUTOMATIC FAILURE OF THIS AUDIT WILL RESULT.	Yes	20	20	N/A. The growing operation had registration information available for review.
2.09.06a	Are crop protection applications restricted by the guidelines established by the product label, manufacturer recommendation, or by prevailing national/ local standards and guidelines? IF THIS QUESTION IS ANSWERED NO, AUTOMATIC FAILURE OF THIS AUDIT WILL RESULT.	Yes	20	20	Yes. According to the manager, applications were made according to the guidelines established by the product label.
2.09.06b	Where harvesting is restricted by preharvest intervals (as required on the crop protection chemical product labels, manufacturer recommendations and/or by prevailing national/local standards) is the grower adhering to these pre-harvest interval time periods? IF THIS QUESTION IS ANSWERED NO, AUTOMATIC FAILURE OF THIS AUDIT WILL RESULT.	Yes	20	20	Yes. The records and label showed that pre-harvest intervals had been respected. Records of applications were available for review during the audit.
2.09.07	If applicable, for those plant protection products that are not registered for use on target crops in the country of production, if the country has no or a partial legislative framework to cover plant protection products, can the grower show that they have registration information, label information, MRL tolerances, etc. for the country of destination? IF THIS QUESTION IS ANSWERED NO, AUTOMATIC FAILURE OF THIS AUDIT WILL RESULT. IF N/A, go to 2.09.08.	Yes	20	20	Yes. The grower had registration information, label information, and MRL tolerances for the country of destination.
2.09.07a	Is there evidence available that the grower is taking all the necessary measures to comply with the country(ies) of destination expectations regarding plant protection products use (registration information, label information, MRL tolerances and any other guidelines applicable)? IF THIS QUESTION IS ANSWERED NO, AUTOMATIC FAILURE OF THIS AUDIT WILL RESULT.	N/A	0	0	Yes. There was evidence available (Pesticide MRL Database) that showed the grower was taking all the necessary measures to comply with the countries of destination expectations regarding plant protection product.
2.09.08	Are employee reentry intervals established as required by the pesticide label, manufacturer recommendation, or by prevailing national/ local standards and guidelines?	Yes	10	10	Yes. The records showed that re-entry intervals had been respected. Records of applications were available for review during the audit.
2.09.09	When crop protection applications occur, does posting take place on area of treatment according to prevailing national/ local standards and guidelines?	N/A	0	0	Yes. There was verbal confirmation by [REDACTED] that stated the posting was performed when application took place.
2.09.10	To avoid drift, are crop protection applications restricted when gusts are excessive?	N/A	0	0	N/A. Applications were not performed during the audit.
2.09.11	If crop protection containers are stored on the property (even temporarily), are they stored in a manner to prevent contamination and disposed of responsibly?	N/A	0	0	N/A. Pesticides and empty containers were not stored in the ranch. This was verbally confirmed by [REDACTED]
2.09.12	Have documented policies and/or procedures been developed for the monitoring of crop protection application equipment (e.g. calibration procedures, inspections, replacement)?	Yes	10	10	Yes. There were documented policies and/or procedures for the calibration. The document title was called "Fertilizer Application Equipment Calibration."
2.09.12a	Is it evident that the equipment used for crop protection applications is in good working order?	N/A	0	0	N/A. Equipment used for crop protection applications were not observed at the time of the audit.

GAP – Field Employee Hygiene (Applies to on-the-farm or greenhouse workers not the harvesting workers)

Question No.	Question Name	Given Answer	Given Score	Possible Score	Auditor Comments	Files
2.10.01	Does the growing operation have a documented and implemented policy for dealing with employees who appear to be physically ill, or become ill while working?	Yes	10	10	Yes. The written policy was available for review. It is called "Field Employee Hygiene/Employee Illness #1."	
2.10.02	Does the growing operation have a documented and implemented policy regarding employees with open sores and wounds?	Yes	10	10	Yes. The written policy was available for review. It is called "Field Employee Hygiene/Employee Illness #2."	
2.10.03	Does the growing operation have written procedures describing the disposition of product that has come into contact with blood or other bodily fluids? IF THIS QUESTION IS ANSWERED NO, AUTOMATIC FAILURE OF THIS AUDIT WILL RESULT.	Yes	20	20	Yes. The written policy was available for review. It is called "Field Employee Hygiene/Product Contaminated With Blood #8 and 11."	
2.10.04	Does the growing operation have documented and implemented policies prohibiting eating, drinking (including gum chewing) using tobacco in the growing area?	Yes	10	10	Yes. The written policy was available for review. It is called "Good Agriculture Practices/ No Smoking Eating or Drinking in this Area."	
2.10.05	Is there a food safety hygiene training program covering new and existing employees and are there records of these training events?	Yes	15	15	Yes. There was a food safety program covering new and existing employee training. The records were available from the last training. [REDACTED] was responsible for the Safety meeting training on July 2, 2012. The title of the document is called "Employee Training Log."	

2.10.06	Are there operational toilet facilities provided? If NO, go to 2.10.07 IF THIS QUESTION IS ANSWERED NO, THE AUDIT WILL RESULT IN AN AUTOMATIC FAILURE.	Yes	20	20	Yes. Operational toilet facilities were provided.
2.10.06a	Are the toilet facilities placed within 1/4 mile or 5 minutes walking distance of all employees?	Yes	10	10	Yes. Toilets were placed within 1/4 mile/5 minutes of employees.
2.10.06b	Are toilet facilities in a suitable location to prevent contamination to product, packaging, equipment, and growing areas?	Yes	15	15	Yes. Toilet trailer was located outside of the growing area.
2.10.06c	Is a minimum of one toilet facility provided for each group of 20 employees?	Yes	5	5	Yes. Toilet units were provided for the employees.
2.10.06d	Do toilet facilities have visuals or signs, written in the appropriate languages, reminding employees to wash their hands before returning to work?	Yes	20	20	Yes. Hand wash signs were posted in English and Spanish.
2.10.06e	Are the toilets maintained in a clean and sanitary condition and are there records showing toilet cleaning, servicing and stocking is occurring regularly?	Yes	10	10	Yes. Toilet supplies were maintained properly during the inspection. The last service was on August 8, 2013.
2.10.06f	Are the catch basins of the toilets designed and maintained to prevent contamination (e.g. free from leaks and cracks)?	Yes	5	5	Yes. Catch basins was intact and free from cracks or leaks during the audit.
2.10.06g	Is there a documented and implemented procedure for emptying the catch basin in a hygienic manner and also in a way that prevent product, packaging, equipment and water systems and growing area contamination?	Yes	5	5	Yes. There was documented and implemented procedures for emptying the catch basin in a hygienic manner. It is called "Portable Toilet Policy."
2.10.07	Is there evidence of human fecal contamination in the growing area(s)? If this question is answered Yes, automatic failure of this audit will result.	No	20	20	No. There were no evidence of fecal contamination in the growing area during the audit.
2.10.08	Are there operational hand washing facilities provided? If No, go to 2.10.09	Yes	15	15	Yes. A hand washing unit was attached to the exterior of the toilet.
2.10.08a	Are the hand washing facilities placed within 1/4 mile or 5 minutes walking distance of all employees?	Yes	10	10	Yes. The hand washing facilities were located with the toilets.
2.10.08b	Are hand wash stations clearly visible (e.g. situated outside the toilet facility) and easily accessible to workers?	Yes	5	5	Yes. The hand wash stations were clearly visible, there were located outside of the toilet unit.
2.10.08c	Are hand wash stations properly stocked with soap, paper towels and trash can?	Yes	5	5	Yes. The supervisor and harvest trucks had spare supplies. This was verbally confirmed by [REDACTED]
2.10.08d	Are the hand wash stations designed and being maintained to prevent contamination onto the growing area(s) (i.e. spent water does not go straight to the ground)?	Yes	5	5	Yes. The hand wash units appeared to be well designed and maintained.
2.10.08e	Does the growing operation have a documented and implemented policy and procedure in place requiring employees to wash their hands (e.g. prior to beginning work, after breaks, after toilet use)?	Yes	10	10	Yes. There was a policy and procedures in place. It is called "Field Employee Hygiene/Hand Washing Policy."
2.10.09	Is fresh potable drinking water provided for workers? If No, go to 2.10.10	Yes	10	10	Yes. Drinking water was available at the time of the audit.
2.10.09a	If used, are water containers maintained in a clean condition?	Yes	5	5	Yes. Water containers were clean.
2.10.10	Are first-aid kits available and is the inventory maintained properly?	Yes	5	5	Yes. The first aid kit was kept on site and maintained properly.
2.10.11	Are there trash cans available on the field placed in suitable locations?	Yes	5	5	Yes. Trash cans were located next to the toilet units.
2.10.12	Are there any foreign material issues observed that are or could be potential risks to the product in the growing area(s) (e.g., jewelry)?	No	5	5	No. No foreign materials issues were observed during the audit.
2.10.13	Is there a documented and implemented policy that infant or toddler aged children are not allowed in the growing area? NOTE: This includes any packaging or equipment storage areas.	Yes	10	10	Yes. There was a documented policy in place. It is called "Field Employee Hygiene/No Toddlers, Infants or Children Allowed in the growing area."

CALIFORNIA DEPARTMENT OF PUBLIC HEALTH
FOOD AND DRUG BRANCH
EMERGENCY RESPONSE UNIT

Environmental Investigation of an *Escherichia coli*
O157:H7 Outbreak in October 2013 Associated with Pre-
Packaged Salads

EXHIBIT C
Ratto Bros. [Redacted] Corrective
Actions

[Ver en Español](#)

**Operation: Ranch
Corrective Action Report**

Version 1.6 – Feb 10

Audited by

Organization:

RATTO BROS., INC.

Contact(s):

Address: 6312 Beckwith Road 95358

Location: Modesto, CA

Phone: 209-545-4445

Ranch:

RBI Ranch #6 & RBI #9 & RBI #10

Contact:

Location: 95358 Modesto, California, United States

Shipper:

Ratto Bros., Inc.

Operation Type:

Ranch

Date Audit Started:

08/08/2013 09:00

Date Audit Finished:

08/08/2013 10:00

Product(s):

Aniso, Basil, Beets, Bok Choy, Baby Bok Choy, Green Cabbage, Napa Cabbage, Red Cabbage, Savoy Cabbage, Cactus, Root Celery, Rainbow Chard, Chinese Mustard, Chong Gak Moo, Cilantro, Collard Greens, Dandelions, Dill, Dill-Baby, Endive, Escarole, Green Chard, Kale, Color Kale, Kohlrabi, Leek, Butter Lettuce, Green Leaf Lettuce, Red Leaf Lettuce, Romaine Lettuce, Lo Bok, Mint, Greens Mustard, Onions, Parsley Green, Italian Parsley, Put Bae Choo, Radicchio, Daikon Radish, Red Chard, Spinach, Turnip Poly, Greens Turnips, Yul Moo

Auditor:

Audit Percentage Score:

95.91%

Score after acceptance of corrective actions:

99.32%

Certificate Link:

[View Certificate](#)

Audit Scoring Summary	Pre-Corrective Action Review		Post-Corrective Action Review	
Food Safety Management System Requirements	Score:	202	Score:	202
	Possible Points:	202	Possible Points:	202
	Percent Score:	100.00%	Percent Score:	100.00%
Good Agricultural Practices Requirements	Score:	783	Score:	818
	Possible Points:	825	Possible Points:	825
	Percent Score:	94.91%	Percent Score:	99.15%
Total:	Score:	985	Score:	1020
	Possible Points:	1027	Possible Points:	1027
	Percent Score:	95.91%	Percent Score:	99.32%

Non-Conformance Summary By Count	Pre-Corrective Action Non-Conformances	Post-Corrective Action Non-Conformances (NC's without completed CA's)
Food Safety Management System Requirements	0	0
Good Agricultural Practices Requirements	4	0
Total:	4	0

GAP – Ground History

2.03.04

Is there evidence of animal presence and/or animal activity in audited area? If answer is NO, go to 2.03.05

Auditor Answer:

Yes

Approved

Auditor Comments:

Yes. There was evidence of animal presence (birds on block #2 Ranch 6) in the audited area during the audit.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

There were a few birds observed close to the area that was being harvested. However, crew leader and employees have been extensively trained to inform someone if he/she encounters any contamination issues (birds, dogs, feces, etc.) that could possibly contaminate our product, equipment, packaging material, environment and employees. Our crew leaders also fill out PRE-HARVEST FOOD SAFETY ENVIRONMENTAL FIELD INSPECTION each time they are going to harvest a field if problem-assessment must take place.

[File 1](#)

[File 2](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

No

CB Comments

Accepted.

GAP – Adjacent land use

2.04.02

Are, or is there evidence of domestic animals, wild animals, grazing lands (includes homes with hobby farms, and non commercial livestock) in proximity to growing operation? If No, go to 2.04.03

Auditor Answer:

Yes

Approved

Auditor Comments:

Yes. There was evidence of domestic animals (three dogs) in the adjacent land.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

Please review picture of house on ranch 6 where occupant removed his dogs, as well as a letter that was sent to occupant regarding the company's food safety program.

[File 1](#)

[File 2](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

No

CB Comments

Accepted.

GAP – Irrigation/Water Use

2.08.05c

Do animals (domestic, livestock, or wild) have access to the water source?

Auditor Answer:

Yes

Rejected

Auditor Comments:

Yes. Animals have access to the water source.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

Even though our water source is an open source we take various measures to ensure that the water used for irrigation, washing of equipment, mixing of pesticides, etc. remains free from contaminants. These are some of the measures we take: water is filtered, chlorinated, tested regularly, equipment is maintained/cleaned/repared/replaced to ensure it is not a source of contamination to our water source and we have onsite personnel as well as a security company that patrols our ranches.

Decision for Corrective Action?

Rejected

CB Comments

Rejected. No evidence submitted.

2.08.05d

Is it evident that the water source is free of contamination issues and are measures taken to minimize contamination of the water source?

Auditor Answer:

No

Approved

Auditor Comments:

No. The water source was not free from contamination there was vegetation.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

Please review the company's Controlling Vegetation Around Wells/Canal Policy as well as the monthly well/canal inspection log that addresses vegetation management.

[File 1](#)

[File 2](#)

[File 3](#)

[File 4](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

Yes

CB Comments

Accepted.

CALIFORNIA DEPARTMENT OF PUBLIC HEALTH
FOOD AND DRUG BRANCH
EMERGENCY RESPONSE UNIT

Environmental Investigation of an *Escherichia coli*
O157:H7 Outbreak in October 2013 Associated with Pre-
Packaged Salads

EXHIBIT D
Photos of Positive Sample Locations
(Ratto Bros.)

Ratto Bros., Inc.

209-545-4445

Date: 11/21/13

Photographs taken by: Brandon Adcock #710

Exhibit D Page 1 of 5



Sample: 171112113-004: Puddle on dirt farm road, West of Ranch 9, Field 1

Ratto Bros., Inc.
209-545-4445
Date: 11/21/13
Photographs taken by: Brandon Adcock #710
Exhibit D Page 2 of 5



Sample: 171112113-006: Mud from road in front of CAFO, [REDACTED] road East of Ranch 7

Ratto Bros., Inc.
209-545-4445
Date: 11/21/13
Photographs taken by: Brandon Adcock #710
Exhibit D Page 3 of 5



Sample: 171112113-007: Puddle on road in front of CAFO, [REDACTED] road East of Ranch 7

Ratto Bros., Inc.

209-545-4445

Date: 11/21/13

Photographs taken by: Brandon Adcock #710

Exhibit D Page 4 of 5



Sample: 171112113-008: Mud on road in front of CAFO, [REDACTED] road Northwest of RB Ranch 9, Field 1

Ratto Bros., Inc.

209-545-4445

Date: 11/21/13

Photographs taken by: Brandon Adcock #710

Exhibit D Page 5 of 5



Sample: 171112113-009: Puddle on road in front of CAFO, [REDACTED] road Northwest of Ranch 9, Field 1