

FINAL AUDIT REPORT


CB Registration No.WQS-PGFS-1510-1
 PrimusGFS ID #311425 - Cert:7
 Audited by WQS, LLC.

PrimusGFS Version 3.2

Operation Type:Farm
 Audit Report Summary

Ver en Español

Organization:	Michael Farms, Inc. Contact(s): Alex Bieri Address: 5089 Urbana Moorefield Rd. 43078 Location: Urbana, Ohio, United States Phone Number: 937 484-3573
Operation:	Michael Farms Contact(s): Alex Bieri Location: 5089 Urbana Moorefield Rd. Urbana, Ohio 43078, United States
Shipper:	Michael Farms
Operation Type:	Farm
Audit Type:	Announced Audit
Audit Executive Summary:	Michael Farms is a grower of conventional fresh vegetables located in Urbana, OH. Their Farm with 2,200 acres is being used to grow different vegetables using 6 workers year-round and additional workers during the harvest season. The water is sourced from wells and applied with overhead irrigation. There are residential houses and wooden areas around their different fields. The water for their spray applications is sourced from a well in the property and all their fertilizer and spraying applications are being done in house.
Date Documentation Review Started:	21 Sep 2023 09:00
Date Documentation Review Finished:	21 Sep 2023 15:45
Total Amount of Time on the Documentation Review:	3.75 Hours
Date Visual Inspection Started:	21 Sep 2023 10:20
Date Visual Inspection Finished:	21 Sep 2023 11:10
Total Amount of Time on Visual Inspection:	0.83 Hours
Addendum(s) included in the audit:	Not Applicable
Product(s) observed during audit:	Cabbage, Green Beans/French Beans, Sweet Corn, Potatoes
Similar product(s)/process(es) not observed:	None
Product(s) applied for but not observed:	None
Auditor:	Juan Carlos Leon (WQS, LLC.)
Preliminary Audit Score:	97%
Final Audit Score:	100%
Certificate Valid From:	25 Oct 2023 To 24 Oct 2024

GPS Coordinates:	Latitude	Longitude	 Click here to see map
	40° 1' 16"	83° 42' 42"	
	40° 3' 1"	83° 42' 37"	
	40° 3' 7"	83° 44' 14"	
	40° 1' 25"	83° 44' 6"	

FSMA Summary Report

View Certificate

Corrective Action Activity

Which input(s) are used in the growing operation?

Subcategory Name	Description
Inorganic Fertilizers	e.g., ammonium nitrate, ammonium sulfate, chemically synthesized urea, etc.

Which water source(s) is/are used in the growing operation?

Well	What is this water source used for?	Irrigation, Crop protection sprays, Fertigation
	What type of irrigation is used?	Overhead
	Does the water come in contact with the edible portion of the crop?	Yes
	Which product grouping is this water source used for?	Brassica Vegetables, Legume Vegetables, Roots and Tubers, Vegetables, Other

Information related to the audited operation

What is the maximum number of workers during peak season?	6	Is work being performed at the time of the audit?	Yes
Adjacent Land:	Agricultural fields, houses and roads.	What work is being performed?	Irrigation Other: Harvest
Operation Size:	2200 Acres	Are toilets available at the time of the audit?	Portable Toilet
Cultural Methods	Conventional		

Product information for each product

Product Group/Product Name	Observed Product	Seasonality	Country of destination for product
Cabbage	Observed on the day of audit	From: May To: October	United States
Green Beans/French Beans	Observed on the day of audit	From: May To: October	United States
Potatoes	Observed on the day of audit	From: May To: October	United States
Sweet Corn	Observed on the day of audit	From: May To: October	United States

AUDIT SCORING SUMMARY	Pre-Corrective Action Review		Post-Corrective Action Review	
Food Safety Management System Requirements	Score:	241	Score:	248
	Possible Points:	248	Possible Points:	248
	Percent Score:	97%	Percent Score:	100%
Module 2 - Farm	Score:	575	Score:	587
	Possible Points:	587	Possible Points:	587
	Percent Score:	97%	Percent Score:	100%
TOTAL	Score:	816	Score:	835
	Possible Points:	835	Possible Points:	835
	Percent Score:	97%	Percent Score:	100%

Non-Conformance Summary By Count	Pre-Corrective Action Non-Conformances	Post-Corrective Action Non-Conformances
Food Safety Management System Requirements	1	0
Module 2 - Farm	2	0
TOTAL	3	0

SECTIONS:

Food Safety Management System Requirements	Module 2 - Farm
Management System	General
Control of Documents and Records	Site
Procedures and Corrective Actions	Ground History
Internal and External Inspections	Adjacent Land Use
Release of Items/Product	Inspection
Supplier Monitoring/Control	Training
Traceability and Recall	Field Worker Hygiene (Applies to on-the-farm workers, not the harvesting workers)
Food Defense	Inorganic Fertilizers
	Well
	Pesticide Usage

FSMS	Management System	
1.01.01	<p>Question: Is there a documented food safety policy detailing the company's commitment to food safety?</p> <p>Auditor Comments: Yes. There is a Michael Farms Food Safety Manual for the packinghouse facility, the harvest crew and the farm. All their documents are written in English. It is approved by Scott Michael (CEO) on 9/6/23. It contains all the procedures and instructions for their food safety processes. There is a Food Safety Policy properly posted on their bulletin board in the premises in English and Spanish. All their documents are approved and signed by Scott Michael and / or Alex Bieri as observed.</p>	<p>Possible Points: 5 Points Scored: 5 Score: Total Compliance</p>
1.01.02	<p>Question: Is there an organizational chart showing all management and workers who are involved in food safety related activities and documentation (job descriptions) detailing their food safety responsibilities?</p> <p>Auditor Comments: Yes. There is a Michael Farms Organizational Chart showing their job functions and responsibilities in the company related to food safety. Scott Michael is the CEO, Kurt Michael is the COO, Josh Michael and Alex Bieri is the Food Safety and HR Manager among others. The document is approved by Alex Bieri.</p>	<p>Possible Points: 10 Points Scored: 10 Score: Total Compliance</p>
1.01.03	<p>Question: Is there a food safety committee and are there logs of food safety meetings with topics covered and attendees?</p> <p>Auditor Comments: Yes. The Michael Farms Food Safety Committee is integrated by Scott, Kurt and Josh Michael as well as Alex Bieri among others. They meet quarterly during their season and their more recent meeting took place on 8/14/23 where they discussed their upcoming audit among other topics.</p>	<p>Possible Points: 5 Points Scored: 5 Score: Total Compliance</p>
1.01.04	<p>Question: Is there a training management system in place that shows what types of training are required for various job roles of specific workers, including who has been trained, when they were trained, which trainings they still need to take, and a training schedule?</p> <p>Auditor Comments: Yes. There is a Michael Farms Food Safety Training Management System for every position in the company approved by Alex Bieri that shows their seasonal training schedule for every member of the company in the premises. Some training types included are Sanitation, Logistics, HACCP, SOP's and GMP's among others.</p>	<p>Possible Points: 5 Points Scored: 5 Score: Total Compliance</p>

1.01.05	Question: Is there documented management verification review of the entire food safety management system at least every 12 months, including an evaluation of resources, and are there records of changes made?	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. There is a documented Michael Farms Food Safety Management System Verification of their Food Safety System provided during the audit dated on 9/7/23 for the facility that includes the HACCP training, sanitation procedures and the evaluation of their resources and the records of the changes made.	
1.01.06	Question: Where specific industry guidelines or best practices exist for the crop and/or product, does the operation have a current copy of the document?	Possible Points: 3 Points Scored: 3 Score: Total Compliance
	Auditor Comments: Yes. There is a document named Produce Safety Rule as well as many different USDA Grades and Standards for all their different crops with the required information about their procedures as observed on their documents.	

FSMS	Control of Documents and Records
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1.02.01	Question: Is there a written document control procedure (including document control register/record) describing how documents will be maintained, updated and replaced?	Possible Points: 3 Points Scored: 3 Score: Total Compliance
	Auditor Comments: Yes. There is a document named Michael Farms Document Control SOP approved by Alex Bieri on 8/27/19 that details how the different documents will be maintained, updated and replaced.	

1.02.02	Question: Is there a documented and implemented procedure that requires all records to be stored for a minimum period of 24 months (or greater if legally required) or for at least the shelf life of the product if it is greater than 24 months?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. There is a document named Michael Farms Document Control SOP approved by Alex Bieri that details how the records are maintained for at least 2 years before being eventually discarded. Records for 2023 and 2022 were observed during the audit.	

1.02.03	Question: Are both paper and electronic food safety related documents and records created, edited, stored and handled in a secure manner?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. The documents are stored in the main office in an area that is locked and secured. There is a security system and cameras in the office. The computer is password protected. The access is severely restricted.	

1.02.04	Question: Are records maintained in an organized and retrievable manner?	Possible Points: 3 Points Scored: 3 Score: Total Compliance
	Auditor Comments: Yes. They are properly filed and organized. All the documents are easy to retrieve when needed.	

1.02.05	Question: Are all records and test results that can have an impact on the food safety program verified by a qualified person independent of the individual(s) completing the records?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. The food safety records are signed off by Alex Bieri as observed on their files. The documents that were observed being signed off are microbiological test results, logs and SOP's among others.	

FSMS	Procedures and Corrective Actions
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1.03.01	Question: Is there a written and standardized procedure for creating Standard Operating Procedures (SOPs) and their content?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. There is a Michael Farms How to Write an SOP document approved by Alex Bieri on 9/9/04. It includes the administrative creation and revision of an SOP as well as the corrective actions.	

1.03.02	Question: Are the written procedures available to relevant users and is a master copy maintained in a central file?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. There is a master copy in the office and the information is available to all the relevant people in the organization.	
1.03.03	Question: Is there a documented corrective action procedure that describes the basic requirements for handling all non-conformances affecting food safety?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. There is a document named Michael Farms Corrective Action Procedures SOP approved by Alex Bieri on 9/10/15. The document includes the actions to take every time there is an incident and describes the implementation to prevent future occurrences.	
1.03.04	Question: Is there an incident reporting system, also known as a Notice(s) of Unusual Occurrence and Corrective Actions Log (NUOCA) ?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. There is the (NUOCA) Unusual Occurrence and Corrective Actions Log where every unusual incident is recorded. No occurrences were observed on their files for the previous year.	
FSMS Internal and External Inspections		
1.04.01	Question: Is there a documented procedure for how internal audits are to be performed at the operations, including frequency and covering all processes impacting food safety and the related documents and records?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. There is a Michael Farms Internal Audit SOP approved by Alex Bieri on 10/1/21. Their internal audits are being made seasonally for the facility and the farm using the PrimusGFS checklist. The procedure includes the corrective actions and the updating of the documentation. Their last internal audit was observed properly made for the premises by Alex Bieri on 9/8/23 for the packinghouse, the farm and the harvest crew.	
1.04.02	Question: Are there written procedures for handling regulatory inspections?	Possible Points: 3 Points Scored: 3 Score: Total Compliance
	Auditor Comments: Yes. There is a document named Michael Farms Guidelines for Handling Regulatory and Independent Inspections SOP approved on 10/1/21. It includes the pre-inspection preparations, the procedures and protocol (such as camera use, escorting and the need for mirror samplings) to follow during the inspection as well as the post inspection activities.	
1.04.03	Question: Are there records of regulatory inspections and/or contracted inspections, company responses and corrective actions, if any?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. Their previous PrimusGFS audit for this particular packinghouse in Urbana, OH took place on 9/15/22. Their corrective actions are included in their documents. A visit by the Champaign Health District was done on 8/10/23. No other audits or regulatory inspections of any kind have taken place in this facility in the previous year.	
1.04.04	Question: Are there documented calibration and/or accuracy verification procedures for measuring and monitoring devices used in the operations that are related to the safety of the product?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. There is a Michael Farms Calibration of Monitoring Devices SOP approved by Alex Bieri on 9/18/15 where they state that their sprayers are calibrated seasonally and their thermometers daily.	
1.04.05	Question: Are calibration and/or accuracy verification records maintained and are they consistent with the requirements outlined in the SOP(s) for instruments and measuring devices requiring calibration?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. As an example, their more recent sprayer calibrations were observed made on 3/22/23 and 4/11/23 by Tony Matthes showing acceptable results.	

FSMS		Release of Items/Product
1.05.01	<p>Question: Is there a documented product release procedure available?</p>	<p>Possible Points: 5 Points Scored: 5 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. There is a Michael Farms Product Release Procedures SOP approved on 10/14/18.</p>	
1.05.02	<p>Question: Are there records of product releases kept on file?</p>	<p>Possible Points: 5 Points Scored: 5 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. Their records of product releases include the Load List, BOL, Shipping Carrier Monitoring Log and the invoice as observed. Quick Books software is used.</p>	
1.05.03	<p>Question: Is there a documented procedure for handling on hold and rejected items?</p>	<p>Possible Points: 5 Points Scored: 5 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. There is a document named Michael Farms Product Hold and Released Procedure SOP approved by Alex Bieri that covers all the procedures to be followed in these cases. All the hold and rejection instructions are internal and issued by their own QC people if needed.</p>	
1.05.04	<p>Question: Are there records of the handling of on hold and rejected items kept on file?</p>	<p>Possible Points: 0 Points Scored: 0 Score: N/A</p>
	<p>Auditor Comments: N/A. Score not affected. During the audit no items were observed either on hold or rejected.</p>	
1.05.05	<p>Question: Is there a documented procedure for dealing with customer and buyer food safety complaints/feedback along with records and company responses, including corrective actions?</p>	<p>Possible Points: 10 Points Scored: 10 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. There is a document named Michael Farms Complaints and Feedback SOP dated on 10/1/19 being used for every occurrence. All the incidents are being recorded as well as the company responses in the complaint call. No occurrences were observed on the previous year for food safety related issues.</p>	
FSMS		Supplier Monitoring/Control
1.06.01	<p>Question: Is there a written procedure detailing how suppliers and service providers are evaluated, approved, and include the ongoing verification activities including monitoring? Note that supply chain preventive controls and supply-chain-applied controls are also mentioned in Module 7.</p>	<p>Possible Points: 10 Points Scored: 10 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. There is a Michael Farms Supplier Approval & Monitoring SOP dated on 9/8/11. There are ongoing inspections for all the product they receive. There is a procedure for delisting suppliers and emergency purchases if needed as observed in their files.</p>	
1.06.02	<p>Question: Is there a list of approved suppliers and service providers including justification for use of any emergency (temporary) suppliers or providers?</p>	<p>Possible Points: 10 Points Scored: 10 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. There is a Michael Farms Approved Suppliers List authorized by Alex Bieri that contains companies such as Holthouse, Kova, Ruhlig Farms, Seedway, Taylor Farms, Monte, Tosca and Volm among others.</p>	
1.06.03	<p>Question: Are there current written food safety related specifications for all incoming products, ingredients, materials (including primary packaging), services provided on-site, and outsourced services?</p>	<p>Possible Points: 10 Points Scored: 10 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. There is a Michael Farms Supplier Approval & Monitoring SOP dated on 9/8/11 that includes their supplier criteria as well as their quality standards.</p>	

1.06.04	<p>Question: Does the organization have documented evidence to ensure that all incoming products, ingredients, materials, services provided on-site and outsourced service suppliers comply with the approval requirements and that all supplier verification activities (including monitoring) are being followed, as defined in the supplier approval procedure?</p>	<p>Possible Points: 15 Points Scored: 15 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. There are letters of guarantee for the main suppliers, insurance policies, licenses, pest control records and third-party audits. Their packaging suppliers and farms provide a letter of guarantee and / or their third-party certifications. As an example, letters of guarantee were observed for Georgia Crate & Barrel (9/6/23) and Primus GFS Certificates such as one for Holthouse Farms (11/4/22) and Ruhlig Farms (7/31/23) among others.</p>	

1.06.05	<p>Question: Where food safety related testing is being performed by laboratory service providers, are these licensed and/or accredited laboratories (e.g., ISO 17025 or equivalent, national and local regulations, etc.)?</p>	<p>Possible Points: 5 Points Scored: 5 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. The microbiological tests are done by Matrix Sciences Labs from Columbus, OH and MASI Dublin Laboratory for their microbiological environmental reports and their water respectively. There are accreditations issued by A2LA (AT-1596 expiring on 12/9/23) and the Ohio Environmental Protection Agency (877 expiring on 5/23/24) as observed on their files. The scopes of accreditation cover E. Coli, Salmonella, Listeria and Total Coliforms among other tests.</p>	

FSMS Traceability and Recall

1.07.01	<p>Question: Is there is a document 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?</p>	<p>Possible Points: 10 Points Scored: 10 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. There is a document named Michael Farms Food Traceability Plan approved by Alex Bieri on 6/12/23. The main ID documents are the lot numbers. The documents include the lot number, the packing date, the origin information and all the data needed to trace backward and forward every single product handled in the premises. A traceability exercise was done with acceptable results for their cabbage being packed on 9/21/23.</p>	

1.07.02	<p>Question: Does the organization have a documented recall program including procedures, recall team roles and contact details, external contact listings, requirement for recall effectiveness checks, explanation of different recall classes and handling of recalled product?</p>	<p>Possible Points: 15 Points Scored: 15 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. There is a document named Michael Farms Product Recall Plan approved by Alex Bieri that includes all the recall team roles, the recall flow chart, the recall classes and the recall team contact information as observed on their files.</p>	

1.07.03	<p>Question: Is testing of recall procedures (including traceback) performed and documented at least every six months, and the company can demonstrate the ability to trace materials (one step forward, one step back) effectively?</p>	<p>Possible Points: 10 Points Scored: 3 Score: Major Deficiency</p>
	<p>Auditor Comments: Major Deficiency. No mock recall was observed for their packaging material. Their traceability capabilities were observed properly operational, and no real recalls took place in the last 12 months. There was one mock recall observed made on 9/14/23 for a scenario of listeria on their green beans. The exercise was concluded in less than two hours and the lessons learned are included.</p>	

Auditee Comments: An additional mock recall was performed, based on the first mock recall (9/14/23) by changing the scenario to a packaging issue with green beans shipped. This way we could glean a unique perspective on our traceability capabilities by analyzing the same shipments from different product inputs (product vs. packaging). See attached documentation, including new Mock recall summary form and attendant receiving log entry and bill of lading for packing materials involved, as well as the original mock recall

[View Files](#)

	CA Accepted?	
<p>CB/Auditor Review Comments: Michael Farms has provided a response along with a mock recall for their packaging material. A 5 Why's Root Cause Analysis to show their analysis of the non-conformance and what they will do to avoid recurrence is being provided. Therefore, and according to the guidelines their corrective action response is being accepted.</p>	Yes	<p>Possible Points: 10 Points Scored: 10 New Score: Total Compliance</p>

FSMS Food Defense

1.08.01	Question: Is there a written food fraud vulnerability assessment (FFVA) and protection plan for all types of fraud, including all incoming and outgoing products?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. There is a Michael Farms written FFVA document provided during the audit dated on 5/22/23 and approved by Alex Bieri. It includes the different fraud vulnerability aspects on their facility such as corruption, theft, tampering, simulation and diversion among others as well as the measures taken to address them.	
1.08.02	Question: Is there a written food defense vulnerability assessment and food defense plan based on the risks associated with the operation?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. There is a document named Michael Farms Food Defense Plan SOP approved on 7/8/19. There are signs directing all the visitors to the main office. There is only one main entrance. Every visitor is required to read a summary of GMP's, sign a log and comply with their policies. There are security cameras and locks. A housing unit for their employees is on the same location.	
1.08.03	Question: Are records associated with the food defense plan and its procedures being maintained, including monitoring, corrective action and verification records (where appropriate)?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. There is a visitor log that every person needs to sign. There is a requirement for every visitor to read all the policies before signing.	
1.08.04	Question: Is there a current list of emergency contact phone numbers for management, law enforcement and appropriate regulatory agencies?	Possible Points: 3 Points Scored: 3 Score: Total Compliance
	Auditor Comments: Yes. There is a list of emergency contact personnel including the top management as well as the local first responders that was observed properly posted in the facility in several key areas of high visibility.	
1.08.05	Question: Are visitors and contractors to the company operations required to adhere to food defense procedures?	Possible Points: 3 Points Scored: 3 Score: Total Compliance
	Auditor Comments: Yes. There is a log and there are English and Spanish signs about GMP's in all the facility properly posted. The visitors are asked to follow these protocols. There is a Michael Farms Visitors Log that needs to be signed by every visitor.	

FARM	General
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2.01.01	Question: Is there a designated person responsible for the operation's food safety program?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. Alex Bieri is the person designated to manage their Food Safety Program. He has a HACCP certificate issue by NEHA and dated on 9/18/20 as well as a PSA Grower Certificate dated on 5/31/17.	
2.01.02	Question: If the operation is growing under organic principles, is there written documentation of current certification by an accredited organic certification organization?	Possible Points: 0 Points Scored: 0 Score: No
	Auditor Comments: No. The operation is not growing under organic principles.	
2.01.03	Question: Does the operation have a written food safety hygiene and health policy covering at least worker and visitor hygiene and health, infants and toddlers, animal presence in growing and storage areas, fecal matter, dropped product, blood and bodily fluids?	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. There is a Michael Farms Rules and Expectations Policy approved by Alex Bieri on Spanish that is strictly enforced at all times. It includes the permanent monitoring of all the people working in the farms as well as continuous training.	

FARM	Site
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2.02.01	<p>Question: Is there a map that accurately shows all aspects of the operation, including water sources and fixtures used to deliver water used in the operation?</p>	<p>Possible Points: 5 Points Scored: 5 Score: Total Compliance</p>									
	<p>Auditor Comments: Yes. There is a Michael Farms Field map showing all aspects of the operations including their water sources for the spraying.</p>										
2.02.02	<p>Question: Are growing areas adequately identified or coded to enable trace back and trace forward in the event of a recall?</p>	<p>Possible Points: 15 Points Scored: 15 Score: Total Compliance</p>									
	<p>Auditor Comments: Yes. Michael Farms has all their products (fresh vegetables) in a contiguous area. There are harvest records in their system that include all the traceability information (field number and date) when their products are harvested and transported to the packing facility.</p>										
2.02.03	<p>Question: Has a documented risk assessment been conducted at least annually for the operation?</p>	<p>Possible Points: 15 Points Scored: 15 Score: Total Compliance</p>									
	<p>Auditor Comments: Yes. There is a Michael Farms Facility Risk Assessment approved by Alex Bieri on 4/23 for the location where the particularities and hazards of their different fields. It includes flooding hazards and adjacent land among other topics. They are located in Urbana, OH and surrounded by agricultural fields, houses and roads.</p>										
2.02.03a	<p>Question: If any risk is identified, have corrective actions and/or preventative measures been documented and implemented?</p>	<p>Possible Points: 0 Points Scored: 0 Score: N/A</p>									
	<p>Auditor Comments: N/A. Score not affected. No risks were noted in their risk assessment as observed.</p>										
2.02.04	<p>Question: Are the necessary food defense controls implemented in the operation?</p>	<p>Possible Points: 10 Points Scored: 3 Score: Major Deficiency</p>									
	<p>Auditor Comments: Major Deficiency. There are no "No Trespassing" signs maintained in the main entrances to their fields. There is continuous monitoring of all the fields by the farm personnel.</p>										
<table border="1" style="width: 100%;"> <tr> <td colspan="2"> <p>Auditee Comments: A root cause analysis was performed and determined that putting up multiple signs in low-risk areas was not the most effective solution but a mixed strategy of permanent signs in higher risk areas and purple posts in lower risk areas (per senate Bill 76) to prohibit trespassing. The company Food Defense Plan has been updated as a preventative measure and the new strategy has been implemented.</p> </td> <td style="text-align: right;"> <p>View Files</p> </td> </tr> <tr> <td style="width: 60%;"></td> <td style="text-align: center; vertical-align: middle;"> <p>CA Accepted?</p> <p>Yes</p> </td> <td> <p>Possible Points: 10 Points Scored: 10 New Score: Total Compliance</p> </td> </tr> <tr> <td colspan="3"> <p>CB/Auditor Review Comments: Michael Farms has provided a response along with pictures of their purple painted posts and "No Trespassing" signs as well as an updated Food Defense Plan. A 5 Why's Root Cause Analysis to show their analysis of the non-conformance and what they will do to avoid recurrence is being provided. Therefore, and according to the guidelines their corrective action response is being accepted.</p> </td> </tr> </table>			<p>Auditee Comments: A root cause analysis was performed and determined that putting up multiple signs in low-risk areas was not the most effective solution but a mixed strategy of permanent signs in higher risk areas and purple posts in lower risk areas (per senate Bill 76) to prohibit trespassing. The company Food Defense Plan has been updated as a preventative measure and the new strategy has been implemented.</p>		<p>View Files</p>		<p>CA Accepted?</p> <p>Yes</p>	<p>Possible Points: 10 Points Scored: 10 New Score: Total Compliance</p>	<p>CB/Auditor Review Comments: Michael Farms has provided a response along with pictures of their purple painted posts and "No Trespassing" signs as well as an updated Food Defense Plan. A 5 Why's Root Cause Analysis to show their analysis of the non-conformance and what they will do to avoid recurrence is being provided. Therefore, and according to the guidelines their corrective action response is being accepted.</p>		
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2.02.05	<p>Question: Is the exterior area immediately outside the growing area, including roads, yards and parking areas, free of litter, weeds and standing water?</p>	<p>Possible Points: 5 Points Scored: 5 Score: Total Compliance</p>									
	<p>Auditor Comments: Yes. No issues were observed immediately outside their growing area with litter, weeds or standing water.</p>										
2.02.06	<p>Question: Are control measures being implemented for the outside storage of equipment, pallets, tires, etc. (i.e. out of the mud, stacked to prevent pest harborage, away from the growing area)?</p>	<p>Possible Points: 5 Points Scored: 5 Score: Total Compliance</p>									
	<p>Auditor Comments: Yes. No issues were observed with equipment, pallets or tires improperly stored that could cause a pest harborage problem.</p>										
2.02.07	<p>Question: Are garbage receptacles and dumpsters kept covered or closed?</p>	<p>Possible Points: 0 Points Scored: 0 Score: N/A</p>									
	<p>Auditor Comments: N/A. Score not affected. During the audit it was observed no garbage cans in their fields.</p>										

2.02.08	Question: Where soil, substrates or fertilizer (e.g., compost) are stored or handled, are measures in place to ensure seepage and runoff is collected or diverted and does not reach growing areas, product, or any of the water sources? A ZERO POINT DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. No potential contamination issue was observed in the growing area with soil, substrates or fertilizer.	
2.02.09	Question: Where there are fill stations for fuel or pesticides, is it evident that the location and/or use is not a risk of contamination to the product, water sources, growing areas, equipment, packaging materials, etc.?	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. During the audit no issues were observed with pesticides or fuel tanks that could provide potential cross contamination to the fields.	
2.02.10	Question: Is the audited area free from animal presence and/or animal activity (wild or domestic)? If Total Compliance, go to 2.02.11.	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. During the audit no animal presence or animal activity was observed on the farm.	
2.02.10a	Question: Is the audited area free from any evidence of animal fecal matter? A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments:	
2.02.11	Question: Is the audited area free from any evidence of human fecal matter? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Total Compliance. No evidence of human fecal matter was observed in the audited area.	
2.02.12	Question: Is the audited area free of evidence of infants and toddlers?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Total Compliance. No evidence of infants or toddlers were observed in the audited area.	
FARM		
Ground History		
2.03.01	Question: Were growing area(s) used for growing food crops for consumption last season?	Possible Points: 0 Points Scored: 0 Score: Yes
	Auditor Comments: Yes. The area currently being farmed has been used in agriculture for human consumption crops for the previous seasons.	
2.03.02	Question: Has the growing area(s) been used for any non-agricultural functions? If No, go to 2.03.03.	Possible Points: 0 Points Scored: 0 Score: No
	Auditor Comments: No. The area being farmed has reportedly been under conventional agriculture for the previous seasons.	
2.03.02a	Question: If the growing area 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?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments:	
2.03.03	Question: Has the growing area(s) been used for animal husbandry or grazing land for animals in the last 12 months? If No, go to 2.03.04.	Possible Points: 0 Points Scored: 0 Score: No
	Auditor Comments: No. The area has not been used for animal husbandry or grazing purposes.	

2.03.03a	Question: If the land was used previously for animal husbandry or grazing land for livestock, has a risk assessment been performed?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments:	
2.03.04	Question: Has flooding from uncontrolled causes occurred on the growing area(s) since the previous growth cycle? If No, go to 2.04.01.	Possible Points: 0 Points Scored: 0 Score: No
	Auditor Comments: No. The audited area has not been flooded.	
2.03.04a	Question: If the growing area(s) and product was affected from the flood waters, is there documented evidence of a risk assessment and that corrective measures were taken to affected land and product?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments:	
2.03.04b	Question: Have soil tests been conducted on the flooded area(s) showing the soil was negative or within an appropriate regulatory agency's approved limits for contaminants?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments:	
2.03.04c	Question: If septic or sewage systems adjacent to the growing area were affected by the flood waters, is there a documented inspection after flooding to ensure they are functioning properly and are not a source of contamination?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments:	
FARM	Adjacent Land Use	
2.04.01	Question: Is the adjacent land to the growing area a possible source of contamination from intensive livestock production (e.g., feedlots, dairy operations, poultry houses, meat rendering operation)? If No, go to 2.04.02.	Possible Points: 0 Points Scored: 0 Score: No
	Auditor Comments: No. The adjacent land is not a source of a contamination. There are no feed lots, dairy operations, poultry houses or meat rendering operations nearby.	
2.04.01a	Question: Where there is intensive livestock production on the adjacent land, 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.)?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments:	
2.04.02	Question: Is there evidence of domestic animals and/or wild animals (includes homes with hobby farms, and non-commercial livestock) in proximity to the growing operation? If No, go to 2.04.03.	Possible Points: 0 Points Scored: 0 Score: No
	Auditor Comments: No. There was no evidence of domestic and wild animals observed in proximity to the growing operation. No potential for runoff or potential contamination on the field was observed.	
2.04.02a	Question: Where there are domestic and/or wild animals (includes homes with hobby farms, and non-commercial livestock) have physical measures been put in place to restrain the animals and their waste from entering the growing area (e.g., vegetative strips, windbreaks, physical barriers, berms, fences, diversion ditches)?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments:	
2.04.03	Question: Are untreated animal manure piles, compost, biosolids, or non-synthetic amendment stored and/or applied on adjacent land? If No, go to 2.04.04.	Possible Points: 0 Points Scored: 0 Score: No
	Auditor Comments: No. There are no untreated manure piles, compost, biosolids or non-synthetic amendments observed in the farm or in the adjacent land during the audit.	

2.04.03a	Question: Where present, have physical measures been taken to secure untreated animal manure piles, compost, biosolids, or non-synthetic amendment stored and/or applied on adjacent land?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments:	
2.04.03b	Question: 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?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments:	
2.04.04	Question: 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, etc.)? If No, go to 2.04.05.	Possible Points: 0 Points Scored: 0 Score: No
	Auditor Comments: No. The farm area is not in a high risk location and is away from any potential contamination from sewers, toilet or industrial facilities. The fields are surrounded by agricultural fields with no observed risk of potential contamination.	
2.04.04a	Question: Where the growing area is situated in a higher risk location, have appropriate measures been taken to mitigate risks related to nearby operations?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments:	
2.04.05	Question: Are there any other potential risks in the adjacent land that could potentially lead to contamination of the growing area?	Possible Points: 0 Points Scored: 0 Score: Yes
	Auditor Comments: Total Compliance. There are no other potential risks in the adjacent land that were observed during the audit.	
2.04.05a	Question: Have appropriate measures been taken to mitigate risks related to nearby operations?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments: N/A. Score not affected. No potential risks in the area were observed.	
2.04.06	Question: Is there evidence of human fecal matter in the adjacent land to the audited area? If No, go to 2.05.01.	Possible Points: 0 Points Scored: 0 Score: No
	Auditor Comments: No. No evidence of human fecal matter was observed in the adjacent land to the audited area.	
2.04.06a	Question: Where there is evidence of human fecal matter in the adjacent land, are there adequate controls in place to mitigate risk (e.g., access controls (barriers), distance from the growing area and equipment, crop type and maturity, land condition, etc.)?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments:	
FARM Inspection		
2.05.01	Question: Is there documented evidence of the internal audits performed, detailing findings and corrective actions?	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. There are reports for their inspections or internal audits provided. All of them are properly filed. They were observed properly maintained and including their corrective actions when needed. The more recent one for their farm is dated on 9/8/23 as observed.	

2.05.02	Question: Are there chemical inventory logs for chemicals, including pesticides and fertilizers?	Possible Points: 3 Points Scored: 3 Score: Total Compliance
	Auditor Comments: Yes. There is storage of PPP material in their farms. All their chemicals are supplied by Heritage Coops as well as their fertilizer tanks. Their chemical inventory is being properly maintained as observed. As an example, on 9/16/23 there was 55 gallons of Gramoxone and 60 gallons of Mustang among other crops. The inventory is maintained by Anthony Matthies.	
2.05.03	Question: Are all chemicals (pesticides, sanitizers, detergents, lubricants, etc.) stored securely, safely and are they labeled correctly?	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. All their chemicals were observed properly stored and labeled.	
2.05.04	Question: Are the crop, ingredients (including water), food contact packaging and food contact surfaces within accepted tolerances for spoilage and free from adulteration? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. All the crops and ingredients were observed free from any adulteration and with no spoilage or decay during the audit.	

FARM	Training
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2.06.01	Question: Is there a food safety hygiene training program covering new and existing workers and are there records of these training events?	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. There is a Michael Farms Food Safety Training Program where all the workers are properly trained in a seasonal basis or more often if needed. There are records for their training available for review. The training was provided by Alex Bieri in Spanish for all their workers as noted.	
2.06.02	Question: Are there written and communicated procedures in place that require food handlers to report any cuts or grazes and/or if they are suffering from any illnesses that might be a contamination risk to the products being produced, and return to work requirements? (In countries with health privacy/confidentiality laws, e.g. USA, auditors can check procedure/policy but not actual records).	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. There is a Michael Farms Rules and Expectations Policy approved by Alex Bieri with a section that covers open wounds and how to proceed when such a situation occurs in the facility. The return-to-work requirements are also included.	
2.06.03	Question: Are there worker food safety non-conformance records and associated corrective actions (including retraining records)?	Possible Points: 3 Points Scored: 3 Score: Total Compliance
	Auditor Comments: Yes. There are records for food safety non-conformance that are maintained in the company, including, if needed, the particular retraining.	

FARM	Field Worker Hygiene (Applies to on-the-farm workers, not the harvesting workers)
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2.07.01	Question: Are toilet facilities adequate in number and location? A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. There are portable toilets in the farm that are provided for the farm and harvest workers. A total of 1 double unit was observed in the ranch in one field with no farm employees on the field during the audit. Harvest crew workers were observed in other field with additional portable units.	
2.07.01a	Question: Are toilet facilities in a suitable location to prevent contamination to product, packaging, equipment, and growing areas?	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. The toilets in their fields are conveniently designed to avoid any contamination to the nearby fields.	

2.07.01b	Question: Are toilet facilities designed and maintained to prevent contamination (e.g., free from leaks and cracks)?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. There were no issues observed with the toilets facilities and catch basins.	
2.07.01c	Question: Are toilet facilities constructed of materials that are easy to clean?	Possible Points: 3 Points Scored: 3 Score: Total Compliance
	Auditor Comments: Yes. The toilets were observed constructed of plastic materials that are easy to clean.	
2.07.01d	Question: Are the toilet facility materials constructed of a light color allowing easy evaluation of cleaning performance?	Possible Points: 3 Points Scored: 3 Score: Total Compliance
	Auditor Comments: Yes. The toilets were observed constructed of a light color plastic that makes easy to evaluate their cleanliness.	
2.07.01e	Question: Are toilet facilities supplied with toilet paper and is the toilet paper maintained properly (e.g., toilet paper rolls are not stored on the floor or in the urinals)?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. The toilets were observed supplied with toilet paper that is properly placed in a toilet paper holder.	
2.07.01f	Question: Where used, is there a documented procedure for emptying the waste holding tanks in a hygienic manner and also in a way that prevents product, packaging, equipment, water systems and growing area contamination?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. There is a Portable Toilet Servicing and Sanitation SOP. The toilets are being serviced with all the needed equipment to do the work in a hygienic manner without causing any contamination.	
2.07.01g	Question: Are the toilet facilities and hand washing stations clean and are there records showing cleaning, servicing and stocking is occurring regularly?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. The toilets and hand washing stations were observed properly maintained and there are records to show the service frequency.	
2.07.02	Question: Is hand washing signage posted appropriately?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. The toilets in the ranch have Spanish signs about the proper hand washing techniques.	
2.07.03	Question: Are hand washing stations adequate in number and appropriately located for worker access and monitoring usage? A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. The hand washing facilities are properly located in order for any worker to get there in less than 5 minutes.	
2.07.03a	Question: Are the hand wash stations designed and maintained properly (e.g., ability to capture or control rinse water to prevent contamination onto product, packaging, and growing area, free of clogged drains, etc.)?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. No issues were observed with the spent water that is not going to the ground.	
2.07.03b	Question: Are hand wash stations clearly visible (e.g., situated outside the toilet facility) and easily accessible to workers?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. The hand washing stations are clearly visible and located just outside the toilets	

2.07.03c	Question: Are hand wash stations adequately stocked with unscented soap and paper towels?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. The hand washing stations are properly stocked with soap, paper towels and a trash can.	
2.07.04	Question: Are total coliforms (TC) and generic E. coli tests conducted on the water used for hand washing at the required and/or expected frequency?	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. There is a Michael Farms Environmental Monitoring Program SOP approved by Alex Bieri on 7/26/22 that includes the requirement to have monthly water microbiological reports for their water. The document includes the policy, responsibility, sampling procedure, frequency, documents, verification and corrective actions. One of the more recent reports observed was submitted on 5/24/23 by Masi Laboratory testing for E. Coli and TC on their water and the results are < 1 MPN / 100 ml.	
2.07.04a	Question: Do written procedures (SOPs) exist covering proper sampling protocols, which include where samples should be taken and how samples should be identified?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. There is a Michael Farms Environmental Monitoring Program SOP approved by Alex Bieri on 7/26/22 that covers their sampling protocols.	
2.07.04b	Question: Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. There is a Michael Farms Environmental Monitoring Program SOP approved by Alex Bieri on 7/26/22 that includes actions to be taken with the affected product. A corrective action report is required that shows a root cause analysis.	
2.07.04c	Question: If unsuitable or abnormal results have been detected, have documented corrective measures been performed?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments: N/A. Score not affected. There are no unsuitable or abnormal results that have been obtained.	
2.07.05	Question: Are workers washing and sanitizing their hands before starting work each day, after using the restroom, after breaks, before putting on gloves and whenever hands may be contaminated?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments: N/A. Score not affected. The practice was not observed during the audit since the workers were not working on the field.	
2.07.06	Question: Are workers who are working directly or indirectly with food, free from signs of boils, sores, open wounds and are not exhibiting signs of foodborne illness?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. No boils, sores or open wounds were observed on the workers during the audit.	
2.07.07	Question: Is jewelry confined to a plain wedding band and watches, studs, false eyelashes, etc., are not worn?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. No issues were observed with the jewelry that according to the guidelines is only confined to a plain wedding band.	
2.07.08	Question: Are worker personal items being stored appropriately (i.e. not in the growing area(s) or material storage area(s))?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. No issues were observed with their personal items that are being stored in their vehicles.	

2.07.09	Question: Is smoking, eating, chewing and drinking confined to designated areas, and spitting is prohibited in all areas?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. No issues were observed with eating, chewing and drinking with the workers in the field.	
2.07.10	Question: Is fresh potable drinking water readily accessible to workers?	Possible Points: 10 Points Scored: 10 Score: Total Compliance
	Auditor Comments: Yes. There is fresh potable drinking water accessible for the workers in the supervisor truck as observed.	
2.07.10a	Question: Are single use cups provided (unless a drinking fountain is used) and made available near the drinking water?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. There are single use cups for the workers to drink while they are in the fields.	
2.07.11	Question: Are first aid kits adequately stocked and readily available?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Yes. There are first aid kits in the ranch by the office as well as in the ranch vehicles and they are well stocked and maintained.	
2.07.12	Question: Are there adequate trash cans placed in suitable locations?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments: N/A. Score not affected. There are no trash cans in the fields and according to their policies they are not needed.	
2.07.13	Question: Are any potential foreign material issues (e.g., metal, glass, plastic) controlled?	Possible Points: 5 Points Scored: 5 Score: Total Compliance
	Auditor Comments: Total Compliance. No foreign material issues were observed during the audit in these fields.	
FARM		
Inorganic Fertilizers		
2.08.06	Question: Are inorganic fertilizers used as an input (e.g., ammonium nitrate, ammonium sulfate, chemically synthesized urea, etc.)? Information gathering question.	Possible Points: 0 Points Scored: 0 Score: Yes
	Auditor Comments: Yes. There are inorganic fertilizers being used in the operation.	
2.08.06a	Question: Is fertilizer being used where the country regulations/guidelines ban the use of such materials (e.g., Californian Leafy Green Commodity Specific Guidelines)? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments: N/A. Score not affected. There are no restrictions for the fertilizer they are using for any crop that is being grown in the farm.	
2.08.06b	Question: Are there fertilizer use records available for each growing area, including application records?	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. There are fertilizer records observed on the fields for all the different applications they use. They were observed properly maintained and updated by Anthony Matthies and his team for all their farms. As an example, Ammonium Sulfate (60 lbs. / acre) was used for their green beans (Johnson Farm) on pre-planting at 5/23/23 with a ground application as observed.	

2.08.06c	<p>Question: Are there Certificate(s) of Analysis (CoA), specifications, product label or other documents available for review provided by the supplier stating the components of the material?</p> <p>Auditor Comments: Yes. There is a letter of guarantee from Heritage Coop for their fertilizer as well as a COA (Guaranteed Analysis) showing the ingredients such as Nitrogen and Potassium as observed on their files.</p>	<p>Possible Points: 10 Points Scored: 10 Score: Total Compliance</p>
FARM Well		
2.09.02a	<p>Question: Are generic E. coli tests conducted on the water (taken from the closest practical point of use) at the required and/or expected frequency? A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.</p> <p>Auditor Comments: Yes. There is a Michael Farms Environmental Monitoring Program SOP approved by Alex Bieri on 7/26/22 that includes the requirement to have twice per season tests for their irrigation water (TC and EC). The document includes the policy, responsibility, sampling procedure, frequency, documents, verification and corrective actions. One of the more recent reports observed was submitted on 5/24/23 by Masi Laboratory testing for E. Coli and TC on their water and the results are < 1 MPN / 100 ml.</p>	<p>Possible Points: 15 Points Scored: 15 Score: Total Compliance</p>
2.09.02b	<p>Question: Do written procedures (SOPs) exist covering proper sampling protocols which include where samples should be taken and how samples should be identified?</p> <p>Auditor Comments: Yes. There is a Michael Farms Environmental Monitoring Program SOP approved by Alex Bieri on 7/26/22 that covers their sampling protocols. The samples are taken by Anthony Matthies and his team as observed.</p>	<p>Possible Points: 10 Points Scored: 10 Score: Total Compliance</p>
2.09.02c	<p>Question: Do written procedures (SOPs) exist covering corrective measures for unsuitable or abnormal water testing results?</p> <p>Auditor Comments: Yes. There is a Michael Farms Environmental Monitoring Program SOP approved by Alex Bieri on 7/26/22 that covers their measures for unsuitable or abnormal water testing results.</p>	<p>Possible Points: 10 Points Scored: 10 Score: Total Compliance</p>
2.09.02d	<p>Question: If unsuitable or abnormal results have been detected, have documented corrective measures been performed?</p> <p>Auditor Comments: N/A. Score not affected. There are no unsuitable or abnormal results that have been obtained.</p>	<p>Possible Points: 0 Points Scored: 0 Score: N/A</p>
2.09.02e	<p>Question: Where anti-microbial water treatments (e.g. chlorination, U.V., ozone, etc.) are used, are there records of the monitoring frequencies, results and where necessary the corrective actions?</p> <p>Auditor Comments: N/A. Score not affected. An anti microbial water treatment is not used or required for this farm.</p>	<p>Possible Points: 0 Points Scored: 0 Score: N/A</p>
2.09.02f	<p>Question: Are records kept for periodic visual inspection of the water source and available for review?</p> <p>Auditor Comments: Yes. There are Michael Farms Well Inspection Checklists approved by Alex Bieri. The documents were observed properly maintained.</p>	<p>Possible Points: 5 Points Scored: 5 Score: Total Compliance</p>
2.09.07	<p>Question: Is dryland farming used in the growing operation</p> <p>Auditor Comments: No. Dryland farming is not used in the growing operation.</p>	<p>Possible Points: 0 Points Scored: 0 Score: No</p>
2.09.08	<p>Question: Are there backflow prevention devices on all main lines, including where chemical, fertilizer and pesticide applications are made?</p> <p>Auditor Comments: Yes. There is a check valve in each well that is properly installed and maintained.</p>	<p>Possible Points: 10 Points Scored: 10 Score: Total Compliance</p>

2.09.09	Question: If the operation stores water (tank, cistern, container), is the storage container well maintained?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments: N/A. Score not affected. There is no water storage in this growing operation.	

FARM Pesticide Usage

2.10.01	Question: Are there up-to-date records of all pesticides applied during the growth cycle? A ZERO POINT (NON-COMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.	Possible Points: 15 Points Scored: 10 Score: Minor Deficiency
	Auditor Comments: Minor Deficiency. Their spray records do not include the target pest. There are updated records for their crop protection applications as observed. All their records are maintained by Michael Farms where they include the information once the application has been made. All the products used are included in their records. Applications are made in house under the supervision of Anthony Matthies.	

Auditee Comments: A root cause analysis revealed the missing target pest information to be a result of a lack of integration of product label info and logged data. In other words, not all label info is repeated on the log sheet, only that which is essential and/or operationally useful. The log was therefore modified (ie. corrected) to explicitly include the target pest info for each application. A sample application log is attached as well as an excerpt of a product label confirming proper use.

[View Files](#)

CB/Auditor Review Comments: Michael Farms has provided a response along with an update Pesticide Application Report that now includes the target pest. A 5 Why's Root Cause Analysis to show their analysis of the non-conformance and what they will do to avoid recurrence is being provided. Therefore, and according to the guidelines their corrective action response is being accepted.	CA Accepted? Yes	Possible Points: 15 Points Scored: 15 New Score: Total Compliance
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2.10.02	Question: Are all pesticides applied during the growth cycle authorized/registered by the authority/government of the country of production? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. The products being used are authorized by the EPA for the USA. As an example, Mustang was observed applied with the EPA number 279-3126.	

2.10.03	Question: Are all pesticides used during the growth cycle applied as recommended/directed in the label? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. The products being used are applied as per the instructions on the label including target pest or weed as well as rates and application methods as observed.	

2.10.04	Question: Where harvesting is restricted by pre-harvest intervals, are required pre-harvest intervals on product labels, national (e.g., EPA) registration and any federal, state or local regulations and guidelines being adhered to? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	Possible Points: 15 Points Scored: 15 Score: Total Compliance
	Auditor Comments: Yes. The Mustang was applied on 9/15/23 (PHI of 1 day and REI of 12 hours) for their green beans at a rate of 4 ounces per acre. The harvest took place on 9/21/23 as observed. It could be noted that they are properly following their PHI according to the label.	

2.10.05	Question: Where products are destined for export, is there information for pesticide Maximum Residue Limits (MRLs) compliance considering country of destination, target crop(s), and active ingredients applied?	Possible Points: 0 Points Scored: 0 Score: N/A
	Auditor Comments: N/A. Score not affected. The products are not destined for export. There is an EPA list on the farm that shows the approved products to be used in the USA. The products used in the growing operation are authorized for use in the USA.	

2.10.06	<p>Question: Where products are destined for export, is there evidence that Maximum Residue Limits (MRLs) of the intended markets are?</p>	<p>Possible Points: 0 Points Scored: 0 Score: N/A</p>
	<p>Auditor Comments: N/A. Score not affected. The products are not destined for export. There is an EPA list on the farm that shows the approved products to be used in the USA. The products used in the growing operation are authorized for use in the USA.</p>	
2.10.07	<p>Question: Is there a documented procedure for the pesticide applications, considering mixing and loading, applying, and equipment cleaning?</p>	<p>Possible Points: 15 Points Scored: 15 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. There is a document named Michael Farms Pesticide Mixing and Loading Procedure SOP approved by Alex Bieri that is available for review that includes the procedure for the mixing / loading, applying and equipment cleaning of the crop protection materials. Applications made in house.</p>	
2.10.08	<p>Question: Is there documentation that shows the individual(s) making decisions for pesticide applications is competent?</p>	<p>Possible Points: 15 Points Scored: 15 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. There is a pesticide license on the name of Anthony Matthies with the number 152448 issued by the Ohio Department of Agriculture that expires on 3/31/26 as observed.</p>	
2.10.09	<p>Question: Is there documentation that shows that individuals who handle pesticide materials are trained and are under the supervision of a trained person?</p>	<p>Possible Points: 15 Points Scored: 15 Score: Total Compliance</p>
	<p>Auditor Comments: Yes. All the applications are monitored by Anthony Matthies as observed on their records.</p>	