

Michigan's Produce Safety Risk Assessment

For fruit and vegetable producers

A voluntary and confidential produce safety program that provides confidence that inspected practices are consistent with the current U.S. Food and Drug Administration Produce Safety Rule and provides recognition with a certificate of program completion.



Introduction

Regardless of the size of your farming operation, using good production, harvest and postharvest management practices that keep disease-causing organisms and other contaminants off produce will help ensure the wellness of your customers and the success of your fresh produce business.

Many grocery chains and institutional produce buyers have addressed consumer food safety concerns by requiring a certified produce safety audit from their fresh produce growers and suppliers. A number of public and private organizations can assist producers who wish to have a certified audit.

Whether or not your fresh produce buyers require a certified produce safety audit, you may be interested in demonstrating that your farming operation utilizes safe food practices. If so, then the **Produce Safety Risk Assessment (PSRA)** may be for you.

The PSRA is a voluntary program designed to educate fresh fruit and vegetable growers about food safety and to recognize those who implement produce safety management practices. Producers who successfully complete the assessment and on-site farm review receive certificates of completion that they can share with their consumers and buyers. The completion of the assessment will help you prepare for a certified produce safety audit. The PSRA is only a review of your farming practices and is not the same as a certified audit. It is also not a guarantee of food safety.

To become a Produce Safety recognized producer, you must be able to demonstrate or document conformance with all of the key produce safety management practices applicable to your farm listed in the **green-outlined boxes** in the PSRA. The other produce safety management practices in the risk assessment (not in green-outlined boxes) are educational questions to assist in conformance with other laws, rules or regulations. Producers are encouraged to adopt all of the low-risk management practices listed in the PSRA, but only the green-outlined box practices will be evaluated for the awarding of a certificate of completion. The Food Safety Modernization Act (FSMA) was signed into law on January 4, 2011. FSMA aims to ensure that the U.S. food supply is safe by shifting the focus from responding to contamination to preventing it. FSMA requirement/guidelines that may affect produce farms are included in the PSRA. The FSMA, administered by the U.S. Food and Drug Administration.

How to get started:

The PSRA is a series of risk questions that will help you assess how effectively your management practices ensure food safety on your farm.

1. Contact your local Produce Safety Technician to determine when they can meet you or another food safety representative on your farm for a PRSA
2. Schedule a walk-through of the farm and review the PRSA with a Technician.

3. Meet on the farm and review the assessment and parts of your operation that apply to produce safety or schedule a follow up to go through the assessment. Develop an action plan.

4. Implement action items and complete their Food Safety Plan, which continued assistance from Technician as needed

5. Technician schedules another visit with you to check that the action items and Food Safety Plan are ready to go (this may take multiple visits). Once complete, the Technician submits a certificate to be signed and approved by the State

6. The Technician will continue to be available to assist after completion. The Technician will schedule a revisit with the farm on the 3-year mark of them being awarded a Certificate. This is detailed as the 'expiration date' on the Certificate

To schedule a Produce Safety farm review, contact your local Produce Safety Technician. Your successful completion of this assessment, plan development/implementation and review will support the growing public interest in healthy local foods along with associated jobs and economic activity. Thank you for your interest and participation in the Produce Safety Risk Assessment.

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Agriculture and Rural Development
P.O. Box 30017, Lansing, MI 48909
800-292-3939*

Produce Safety Risk Assessment

Note: **green text** indicates proof of produce safety intentions.

Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
1.01) Does the farm operator have a produce safety program that is followed to reduce the risk of food-borne illness?	A written produce safety plan (document) exists and is being implemented.	Produce safety practices are generally followed, but a written document needs to be developed.	A food safety plan is not available.		A written plan or conformance with Cornell bulletin “Food Safety Begins on the Farm.” Examples include www.gaps.cornell.edu or www.onfarmfoodsafety.org
1.02) Does the farm operator have a person designated to implement and oversee a produce safety program?	The designated produce safety person is documented in the food safety plan.	Yes, but the written document needs to be developed .	There is no designated produce safety person.		Code of Federal Regulations (CFR) §112.23
1.03) Has a farm representative completed the Produce Safety Alliance (PSRA) training?	Yes.		No.		Requirement of FSMA 112.22 (c)
1.04) Are any crop production areas located near or adjacent to dairy, livestock or fowl production facilities and/or a municipal sewage treatment plant or landfill? If so, are crop areas downwind of these facilities in the predominant wind direction?	There is no crop production within 1 mile of a livestock or poultry operation and/or municipal sewage treatment plant or landfill. Or, There is crop production within 1 mile, but a natural barrier prevents contamination of produce from runoff, dust or excessive numbers of flies.	A commercial livestock or poultry facility and/or municipal sewage treatment plant or landfill is located within 1 mile but greater than 100 yards away. Or, There is a natural barrier that prevents contamination of produce.	There is crop production within 1 mile. And, There is no natural barrier to prevent contamination of produce.		§112.83

Definitions: A **document** may be a combination of standard operating procedures outlining company policy as well as a record indicating that a particular action was taken. A **policy** indicates that a policy/standard operating procedure (SOP) must be documented in the food safety plan to show conformance with the question. A **record** indicates a record is required to be kept showing an action was taken.

*Produce Safety Plan = Food Safety Plan

Worker Health and Hygiene

Note: **green text** indicates proof of produce safety intentions.

Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
2.01) Does the farm operator provide workers with clean water to wash hands?	Water is provided by municipal water system. Or, Water is provided by a service provider that tests their water sources. Records are available. Or, Water is provided by an on-farm well that is tested at least annually and proven to have no detectable generic <i>E. coli</i> . Test records are on hand.	Water is provided from on-farm well that is not regularly tested. Or, Water is provided by a service provider and records indicating water quality are not readily available to the grower.	Water is provided from surface water source.		Water test reports indicate no detectable generic <i>E. coli</i> , or municipal drinking water is documented. §112.44(a)(4)
2.02) Does the farm operator provide workers with clean drinking water?	Potable water is provided by a municipal water system. Or, Potable water is provided by an on-farm well that is regularly tested and proven potable with records.	Water is provided from on-farm well that is not regularly tested.	Water is provided from surface water source.		Occupational Safety and Health Administration (OSHA) requirement, Michigan Department of Environment, Great Lakes and Energy (EGLE) Safe Drinking Water Act.
2.03) Does the farm operator provide staff training on proper sanitation and hygiene?	A training program is delivered to all staff and documented in the produce safety plan.	Informal training is provided that is not documented.	No training is provided.		Records indicate workers are adequately training on sanitation and hygiene. §112.21(a) §112.22(a) §112.30(a)(b)

Worker Health and Hygiene

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Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
2.04) Are all visitors informed of farm hygiene practices and provided proper toilet and hand-washing facilities?	Yes.		No.		§112.33(a)(b) §112.44(a)
2.05) Do employees/workers wash their hands before beginning or returning to work or after any potential contamination?	Yes.		No.		Employee/worker interview(s) indicate(s) satisfactory hand-washing practices. §112.32(b) §112.44(a)
2.06) Are signs posted to instruct employees to wash their hands before beginning or returning to work or after any potential contamination?	Yes. Signs are posted in the native language of the predominant number of workers.		No.		
2.07) Is employee tobacco use, eating and/or chewing gum confined to areas separate from where produce is handled?	Written policy indicates the use of tobacco, eating and/or chewing gum is confined to edges of fields out of harvesting zones or in the driveway areas between fields. In packing and storing facilities, a smoking and eating area is in a designated area located separate from the produce flow zone.	Yes, but a written policy will be developed.	No. Use of tobacco, eating and/or gum chewing occurs in produce contact areas.		§112.32


Worker Health and Hygiene

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Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
2.08) Are workers/visitors/ volunteers or anyone with potential to touch produce with diarrheal disease or symptoms of other infectious diseases prohibited from handling fresh produce or touching food contact surfaces?	Written policy prohibits sick worker contact with fresh produce. Supervisors are familiar with symptoms of infectious disease.	Yes, but a written policy will be developed.	No. Sick workers may continue to work in produce contact areas.		Written policy or employee/ worker interview(s) indicate(s) sick workers are not allowed contact with produce. §112.31(a)(b)
2.09) Is there a policy describing procedures for dealing with produce and food contact surfaces that come into contact with blood and/or other bodily fluids?	Written policy specifies handling/disposition of fresh produce and surfaces contaminated with blood and/ or other bodily fluids.	Yes, but a written policy will be developed.	No.		§112.31
2.10) Are workers instructed to seek prompt treatment for cuts, abrasions and other injuries?	Written policy requires workers to seek treatment for all injuries.	Yes, but the written policy will be developed.	No.		
2.11) Are company workers applying pesticides, sanitizing agents or other regulated materials certified or licensed?	Records indicate that workers are certified or licensed.		No.		Michigan Occupational Safety and Health Administration and MDARD: http://www.michigan.gov/ documents/mdard/Final_ Reg_633_Restricted_Use_ Pesticides_547932_7.pdf

Water Usage

Note: **green text** indicates proof of produce safety intentions.

Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
3.01) Is production water quality monitored for the crop grown (covered or uncovered) and intended use? (ie. irrigation, fertilizer application, frost protection, dust abatement, hand washing, etc.)	Irrigation water provided by municipal system. Annual water test by local water authority is documented . Or, Irrigation water provided by an on-farm well that is tested annually and the results are documented . Or, Irrigation water provided by surface water that is tested five times a year and the results are documented . Or, Water never contacts the harvestable portion.	Surface water sources are tested once near harvest time. (Note: Water testing is especially important if water comes in direct contact with harvestable parts of the plant and the food is eaten raw.)	Water is provided from a source that is not tested.		Water test reports indicate water is safe for intended use. §112.44(b) Production water can be water used for irrigation, dust abatement, frost protection, hand washing, etc. §112.44(b) Find a testing lab:  (Verified 1-8-21)
3.02) Is water used during or after harvest, such as for hand washing, cooling, ice, used on food contact surfaces etc?	Municipal water is used, and annual report is documented. Or, Well water is used and is tested at least annually, and results show no detectable generic <i>E. coli</i> .		Well water or surface water is used and not tested.		§112.44(a) §112.44(a)(4) Water test reports indicate water is safe.
3.03) Is production water source (if under your control) inspected at least annually and protected from potential direct and non-point sources of contamination?	Farm operator takes steps to minimize risk of water contamination (berms, diversions, fencing, etc.).		Water source is contaminated or not inspected (if under the grower's control).		§112.42(a) Production water can be for irrigation, dust abatement, frost protection, hand washing, etc.

Water Usage

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Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
3.04) Are all water distribution systems inspected annually and maintained as needed?	All water distribution systems are inspected annually.		Water distribution systems not inspected.		§112.42(b)
3.05) If used wash water is generated, is it disposed of according to county and state regulations?	No used water is generated Or County and state regulations are followed in disposing of used wash water. All activities are recorded.	County and state regulations are followed in disposing of used wash water.	County and state regulations are not followed when disposing of water.		

Animals/Wildlife/Livestock Exclusion

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Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
4.01) Are measures taken to restrict access of animals (domestic and wild) to the source or delivery system of crop irrigation water?	Every effort is made to restrict animal access, including use of noise cannons, scare balloons, fencing, and other barriers.	Some effort is made to limit animal access to irrigation water.	No effort made to limit animal access.		§112.41 and §112.42
4.02) Are measures taken to restrict or minimize access of animals, domestic or wild, to crop production areas?	Every effort is made to restrict animal access, including use of noise cannons, scare balloons, fencing and other barriers.	Some effort is made to limit animal access to crop production areas.	No effort is made to limit animal access.		
4.03) Are crop production areas monitored for the presence or signs of wild or domestic animals entering the land?	Records indicate production areas are monitored for the presence of animals.	Yes, but records will be developed.	Production areas are not monitored for the presence of animals where potential exists.		§112.83
4.04) Are production fields assessed before harvest for possible sources of contamination?	The produce safety plan documents a preharvest assessment.	A preharvest assessment is done, and a written document will be developed.	No preharvest assessment is done.		

Manure, Compost and Municipal Biosolids (Skip this section if manure, compost and/or biosolids are not used on the farm.)

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Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
Raw manure					
5.01) If raw manure or other animal byproducts are used in crop production, is it applied in a manner that does not contact the edible portion of the crop?	Manure application records document that manure is soil incorporated and applied 270 or more days before harvest and does not touch any part of the edible product.	Manure application records document that manure is applied, and soil incorporated 120 or more days before harvest when the edible portion of the crop has soil contact or 90 days prior to harvest and does not touch any part of the harvestable product.			Manure use records indicate proper produce safety use practices. USDA NOP >120 days if contact with harvestable portion and >90 days if no contact with harvestable portion §112.56
5.02) If liquid manure storage structures are located near or adjacent to crop production areas, are they contained to prevent contamination of crops?	Storage structures are properly constructed and maintained to prevent leakage and overflow.		Storage structures are not properly constructed and maintained to prevent leakage and overflow.		§112.52(a)
5.03) If manure, compost or biosolids are stored either in the field or on the farm near production areas, are they contained to prevent contamination of crops?	No manure, compost or biosolids are stored near the crop production area.	All manure and compost are contained in accordance with generally accepted agricultural and management practices (GAAMPs). There is no potential for runoff to flow into the crop production area. Biosolids are handled in accordance with EGLE rules and regulations, and there is no potential for runoff to flow into crop production areas.	Manure, compost or biosolids can leach and/or run off into crop production areas and is not contained.		Proper manure storage demonstrated or indicated in records. §112.52(a)

Manure, Compost and Municipal Biosolids (Skip this section if manure, compost and/or biosolids are not used on the farm.)

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Composted Manure and Biosolids					
5.04) If composted manure, dead animals and/or biosolids are used, is the material properly treated to reduce the level of pathogens?	Document in food safety plan indicates materials have been treated to reduce the level of pathogens or, if received from a third party, a certificate has been provided.		Treatment of the materials is not documented.		Compost use records indicate proper produce safety use practices. Once the compost has been documented as treated, no other untreated amendments can be added. \$112.54, \$112.55

Michigan Department of Environment, Great Lakes and Energy (EGLE)

Soils

Note: **green text** indicates proof of produce safety intentions.

Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
6.01) Have production fields been assessed for previous land uses that may pose contamination risks?	Yes. Records indicate there are no potential risks from previous land uses (dairy, livestock or poultry feedlot and/or improper use of animal wastes, farm dump or other potentially contaminating uses).	Fields are assessed, but records need to be developed.	No assessment of previous land use has been conducted.		
6.02) When previous land uses indicate possibility of contamination, have preventive measures been taken?	Records indicate that crops with minimal contact with the soil or non-food crops are grown.	Crops with minimal contact with the soil or non-food crops are grown, but records need to be developed.	No preventive measures taken to prevent food contamination.		
6.03) Are fields that are subject to flooding avoided to prevent crop contamination?	Yes.	Fields subject to flooding are used for non-food crops, portions of food crops that experience flooding are not harvested, or other precautionary measures are taken.	No precautionary measures are taken on high risk fields.		

Field Sanitation and Hygiene

Note: **green text** indicates proof of produce safety intentions.

Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
7.01) Are the number, condition, capacity and placement of toilet and hand-washing units in compliance with state and federal regulations?	At least one toilet and one hand-washing facility are available for each 20 or fraction of 20 workers.		OSHA regulations are not met.		Convenient field sanitation unit(s) confirmed. OSHA
7.02) Are toilet and handwashing systems easily accessible to farm workers and are they using them?	Farm workers can easily get to toilets and handwash facilities and they are being used.		Toilet and handwash facilities are difficult for farm workers to access or farm workers are not using them.		
7.03) Are field sanitation units located in a place that minimizes the risk for product contamination in the case of tipping, leaking or malfunction?	Field sanitation units are properly located to prevent or minimize risk of contamination to crop fields.		A spill or leak from a field sanitation unit may run into production area or product storage area.		Note: This question is n/a if farm does not use a field sanitation unit(s). §112.129(b)(1)
7.04) Are field sanitation units located in an accessible place for servicing and adequately stocked?	Location is accessible. Unit has adequate supply of paper towels, water and soap.		Location is inaccessible. Or Unit does not have adequate supply of paper towels, water or soap.		Note: This question is n/a if farm does not use a field sanitation unit(s).
7.05) Does the farm operator have a response plan in the case of a spill or leak of a field sanitation unit?	A clean-up policy is in the produce safety plan. A spill response kit is ready and accessible to everyone on the farm.	A clean-up policy is in the produce safety plan.	No.		Note: This question is n/a if farm does not use a field sanitation unit(s).
7.06) Are sewage and septic systems monitored and maintained?	Facilities are periodically monitored and maintained in accordance with state and local laws.		No.		§112.131(a)(b)(c) §112.133(a)(b)(c)(d)

Field Harvesting and Transportation

Note: **green text** indicates proof of produce safety intentions.

Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
8.01) Are harvesting containers that come in direct contact with produce cleaned and sanitized as appropriate and necessary or single-use?	The produce safety plan documents that containers are cleaned and sanitized as appropriate and necessary or are single-use.	Containers are kept cleaned and sanitized as appropriate and necessary, but a written document will be developed.	Containers are not kept cleaned.		Clean harvest containers confirmed. §112.123(d)
8.02) Is transportation equipment that comes in direct contact with produce cleaned and sanitized as necessary?	The produce safety plan documents that transportation equipment is kept adequately clean for the purposes they are used.	Transportation equipment is kept clean, but a written document will be written.	Transportation equipment is not kept clean.		Clean harvest vehicles confirmed. §112.125(a) & (b)
8.03) Are handharvesting implements (knives, pruners, machetes, etc.) kept clean on a scheduled basis?	The food safety plan documents a cleaning and sanitizing schedule for harvesting equipment.	Harvesting implements are cleaned and sanitized, but a written document will be written.	Harvesting implements are not cleaned and sanitized.		Clean harvest implements confirmed. §112.123(d) (1)
8.04) Are damaged containers properly repaired or disposed of?	Containers are inspected for damage on a regular basis. Damaged containers are repaired, discarded, or used for other purposes and clearly marked.		Damaged containers are used in harvest operations.		§112.22(b)
8.05) Is harvest equipment and/or machinery in good repair?	Yes.		Leaking fluids and/or damaged parts may contaminate produce.		§112.123(b)(2)
8.06) Has the risks posed by chemicals, petroleum, pesticides, broken glass or plastic during the harvesting operations being addressed?	Written policy is available to deal with product contamination.	Written policy will be developed.	Physical or chemical contaminants may end up in harvested produce.		

Field Harvesting and Transportation

Note: **green text** indicates proof of produce safety intentions.

Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
8.07) Are containers currently being used for harvest also used for carrying or storing non-produce items?	No. Written policy in the food safety plan does not allow harvest containers to be used for non-produce items.	Harvest containers are used to carry or store non-produce items and are clearly labeled.	Harvest containers are used to carry or store non-produce items and are not labeled.		§112.116
8.08) Is produce that is high-risk, such as leafy greens, washed and stored after harvest in a way that minimizes potential contamination?	Yes. No water is used after harvest or a sanitizer is used and monitored frequently. Water temperature is adjusted if the differential between produce and water is greater than 10° F.	A sanitizer is used, wash water is changed frequently, and/ or only running water is used. Temperature is not monitored.	No.		§112.113
8.09) Are efforts taken to remove excess dirt and mud from produce during harvest?	Every effort is taken to keep the produce adequately clean.		Dirt and mud contaminate harvested produce.		§112.113
8.10) How is dropped produce handled prior to harvest?	No dropped produce is collected, Or, Dropped produce collected from the ground is not distributed for human consumption.	Dropped produce is collected and sent for further processing with a scientifically valid kill step.	Produce is picked up from the ground and sold for raw human consumption.		§112.114

Field Harvesting and Transportation

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Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
8.11) If dropped produce is collected for processing that receives a scientifically valid kill step, what actions are taken to minimize cross-contamination of raw covered produce for human consumption?	Collection of dropped produce occurs after the collection of raw produce for human consumption to minimize potential cross-contamination of produce and produce contact surfaces.	Collection of dropped produce occurs during the collection of produce for raw consumption, but equipment used for dropped produce is distinctly marked and not used for other purposes, handled and stored separately, and hand washing and equipment cleaning follows the collection of dropped produce.	Collection of dropped produce occurs during the collection of produce for raw consumption, the same equipment is used and not cleaned in between, and both types of products are stored together.		
8.12) Is harvested produce covered during transportation from the field?	Farm policy in the produce safety plan requires produce to be covered with tarp or hauled in an enclosed trailer or truck, or protected by some other means.	Produce is covered, but a written policy needs to be developed.	Produce is not covered and is exposed to contamination by other vehicles, birds, dust, and other sources.		

Produce Packing – Field or Packing House

Note: **green text** indicates proof of produce safety intentions.

Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
9.01) Are only new or sanitized containers used for packing produce?	Produce safety plan documents that only new or sanitized consumer containers are used.	Some new containers are used. Only clean, used consumer containers are used. Containers are not sanitized.	Some dirty, not sanitized containers are used.		New, sanitized or clean consumer containers confirmed. §112.116
9.02) Are produce containers and other packing materials properly stored and protected from contamination?	Produce containers and other packing materials are properly stored and protected from contamination.		There is a potential risk that containers and packing materials may become contaminated in storage area.		Proper storage of containers and packing materials observed. §112.123(b)(2) §112.116(b)
9.03) Are produce contact surfaces in packing area and equipment (including refrigeration units) in good condition, clean and sanitized on a regular basis?	Produce safety plan documents that produce contact surfaces and areas are clean and sanitized on a regular basis.	Produce contact surfaces and areas are cleaned and sanitized on a regular basis. A document will be written.	Soiled produce contact surfaces or packing area may contaminate produce.		Clean produce contact surfaces and packing area observed. §112.123(c) & (d)(1)

Produce Traceability

Note: **green text** indicates proof of produce safety intentions.

Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
10.01) Is the produce container or the product itself uniquely identified to allow trace-back to the farm where it was produced?	Yes. Traceability is documented. Mock recalls are performed annually.	Traceability program exists. Verification through mock recalls have not been performed	No traceability system exists.		Produce uniquely identified to allow traceability.
10.02) If the farm is qualified exempt, are you keeping proper records and providing complete business information on labels and/or signs?	Yes. Records are kept, and all labels and/or signs provide the complete name and business address of the farm where the produce is grown.		No.		§112.6(b)

Pesticides and Crop Protection Materials

NOTE: If the farm is MAEAP Verified for cropping systems, skip this section.

11.01) Is crop protection material mixing and loading adequately isolated from water sources and production fields?	-At least 200 feet from surface waters. -At least 150 feet from private wells. -At least 800 feet from public wells unless protective site features exist. -Adequate isolation to prevent contamination of production fields.		Isolation does not meet the minimum low-risk requirements.		*Note: See Michigan Agriculture Environmental Assurance Program (MAEAP) technician for additional information on reduced isolation requirement from public wells or the MAEAP Crop *A*Syst.
11.02) Are crop protection materials registered for use on the crops that are treated (the product label lists the crop as eligible for application)?	Products are registered for use with the Environmental Protection Agency and with the Michigan Department of Agriculture and Rural Development.		Products are not registered for use.		
11.03) Do crop protection material applicators read and follow the label instructions?	Everyone using crop protection materials follows label and labeling instructions.		Label and labeling instructions are not always followed.		

Pesticides and Crop Protection Materials

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Risk Question	Low Risk – 3 (recommended to pass produce safety audit)	Medium Risk – 2 (potential produce safety hazard)	High Risk – 1 (significant produce safety hazard)	Your Risk	Produce Safety Review Requirement
11.04) Do applicators follow preharvest interval requirements (days to harvest)?	No produce is harvested after the last crop protection application until the minimum days have passed.		Harvest may occur before the preharvest interval is met.		
11.05) Are the applicators of restricted-use pesticides (RUP) certified applicators?	The applicators of RUP comply with the certification requirements.		Non-certified and unsupervised applicators use RUP.		
11.06) How do you assure that pesticide applications remain on-target and minimize off-target pesticide spray drift?	A written drift management plan is utilized that minimizes off-target drift.		Spraying operations are completed regardless of weather conditions or forecast, and regardless of the potential for off-target drift.		
11.07) What pesticide application records are kept?	Accurate records are maintained of all application of pesticides for at least three years (one year for general-use pesticides).	Partial records are kept.	No record is kept. Chemicals used are known by memory or invoices only.		Adequate pesticide records confirmed or plans to maintain complete application records.
11.08) How are excess mixtures and pesticide tank rinsate disposed of?	Excess mixtures and rinsate are used at or below label rates.		There is no plan in place to deal with excess mixtures or rinsate.		
11.09) Are crop protection materials and harvested products transported in the same vehicle or stored in the same storage area?	Never.	Yes, but after a thorough cleaning of the area.	Yes, without cleaning the area. Produce may become contaminated.		

Other Produce Safety Risks

12.01) There are no other immediate produce safety risks (egregious condition) where produce is grown, processed, packed or stored?	No. There is no evidence of conditions or processes that have contaminated or can contaminate products.		Yes. There is evidence of conditions or processes that have contaminated or can contaminate products.		Please see the “egregious conditions” document.
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