



GAPC Certification Standards and Remediation Details

This document contains the detail listing of GAP Connections (GAPC) Certification Standards, Certification questions, verification methods used to verify response to question, and remediation processes if necessary. This document is to be used by the grower to prepare the Certification Audit as well as to address any areas of noncompliance.

Legend

- **Verification Methods:** The methods used to verify standards or remediation of standards.
- **Remediation Processes:** The processes used to remediate, i.e. fix, practices that did not meet Certification standards.
- **Non-remediation Consequences:** The consequences when a grower chooses not to remediate practices to comply with standards by the given deadline.

Verification Methods

Abbreviation		Process
Documentation Review	DR	When the auditor is on the farm, they will verify records or documents through the Documentation Review process. The auditors will be trained on what documents to look for as well as what type of documentation is acceptable for the purposes of the certification program
Grower Interview	GI	When the auditor is on the farm, they will verify practices by asking the grower about the practice and having the grower verbally verify the response.
Visual Inspection	VI	When the auditor is on the farm, they will verify grower responses regarding barns, equipment, safety, etc. by visually inspecting these items. The auditors will be trained on what to look for on the farm. If the auditor does not see the item, follow up questions may be asked
Worker Interview	WI	Some items may be asked on the grower audit, but they will be verified on the Worker Interview form. In this case, we will be checking the grower and Worker responses together



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Remediation Processes

Abbreviation	Process	Time to Complete	
Documentation Review	DR	If documentation review is required for remediation, the grower must collect all missing records and organize the information using the GAPC record templates or the grower's own record keeping method. Once all missing records have been prepared and organized, the grower can send them to the auditor who visited their farm. Successful remediation is at the auditor's discretion.	4 weeks
Documentation Review with Corrective Action Plan (CAP)	DR CAP	In addition to the Documentation Review, a Corrective Action Plan may also be required. This indicates that the grower must submit, in addition to the appropriate documentation, a report/document that indicates why the grower did not follow the GAPC standard and how the issue will be corrected in the future.	4 weeks
Documentation Review with Picture	DRP	If documentation review with picture is required for remediation, the grower must take a picture of the remediated item or items. Once all pictures have been prepared and organized, the grower can send them to the auditor who visited their farm. Successful remediation is at the auditor's discretion.	4 weeks
Not Remediable	NR	There will be some issues on the farm that are simply not remediable, such as rotating crops, or planting disease resistant varieties. Non-Remediable issues are opportunities for improvement the following year. Critical NR practices will result in the grower not being Certified.	NA
Visual Inspection	VI	If a Visual Inspection is required, the goal should be to find a long-term solution to the issue as opposed to a temporary fix. The grower should make all necessary changes or fixes that require an auditor to revisit their farm. Then the grower can contact the auditor who visited their farm to schedule a follow-up visit. In some cases, the Visual Inspection for remediation may include Worker Interviews	4 weeks
Visual Inspection with CAP	VI CAP	In addition to the Visual Inspection, a Corrective Action Plan may also be required. This indicates that the grower must submit, in addition to the follow-up visit, a report that indicates why the grower did not follow the GAPC standard, a timeline of how the issue was fixed, and what the solution was. Worker Interviews may also be included if necessary.	4 weeks

Non-remediation Consequences

Abbreviation		Process
Not Certified	NC	Grower is Not Certified as they are not in compliance with a “Critical” standard. Grower may try to get certified again anytime in the future.
Not Certified Depending on Score	NC*	Grower is Not Certified if compliance with this additional standard is needed to reach minimum certification score. Grower may try to get certified again anytime in the future.
Immediate Suspension	IS	Grower is not certified and cannot try again to be certified until one (1) year from date of original audit.
Immediate Suspension and Potential Report	ISR	Grower is not certified and cannot try again to be certified until one (1) year from date of original audit. GAPC also reasonably believes this Non-Remediated practice constitutes a serious violation of the law, or a severe infraction that could cause the industry and/or supply chain and may be reported to authorities.



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How you Grower Matters: Crop and Environment Certification Standards

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
INTEGRATED PEST MANAGEMENT								
Critical	Keep field/tract records of all agrochemical applications, including in the greenhouse, transplant water, and field. This includes: CPA/agrochemical common name, Active ingredient, Application Date, Application Method, Rate, Name of Applicator, Field name and location, EPA Number, REI	15) Does pesticide application documentation include, at minimum, the following? a) Date of application b) Entity performing application d) Product brand name and common name/active ingredient e) EPA# f) Restricted Entry Interval (REI) by field/tract g) Rate applied h) Identification or field treated and size of treated area i) Method of pesticide application	DR				DR	NC
Critical	Use only pesticides that have been approved by the EPA for use on tobacco (labeled). Always refer to your grower contract; some buyers may prohibit use of CPA's which are labeled for tobacco	12) Do you only use labeled pesticides on your farm for tobacco production?	DR				NR	IS
Additional High	Keep field or tract records of all agrochemical applications, including greenhouse, transplant water and in the field. This includes: Pest targeted or reason for application	15) Does pesticide application documentation include, at minimum, the following? c) Reason for application	DR				DR	NC*
Additional Medium	Select tobacco variety based on, disease resistance, curing characteristics, cured leaf quality, and yield, and maintain records or documentation of sources you used to select your tobacco varieties (examples are: seed company literature, university production guides, buying company recommendations, etc.)	5a) Do you have documentation that indicates tobacco varieties are selected based on disease resistance and field history?	DR				DR	NC*

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Additional Medium	Have a documented scouting program for pests and record the scouting information by field or tract following GAP standards. Records should include the following: date of scouting pests observed, percent of plants affected or infested, Crop protection agent applications made by field and date, Conduct a follow-up of your pest control practices to determine the effectiveness of the action taken	2) Is there a documented scouting program that includes, at minimum, the following? a) Field scouting dates; b) Pests identified during scouting; c) Fields/tracts where pests were identified; d) Level of infestation of pests identified; e) Corrective actions taken by field and date; f) Follow-up on pest control practices to determine the effectiveness of actions taken	DR			DR		NC*
Additional Low	In a single field do not plant tobacco annually. Instead, use a rotation of no more than two years of tobacco followed by at least two years in other non-solanaceae crops (Solanaceae crops include tomatoes, eggplant, and peppers).	1) Does your current crop rotation prevent tobacco from being grown in the same field for three or more consecutive years?	DR			NR		NC*
NUTRIENT MANAGEMENT								
Critical	If required in your watershed, comply with nutrient management regulations as applicable	11) If required in your watershed, do you comply with mandatory nutrient management regulations by maintaining a nutrient management plan approved by the local soil and water conservation district?	DR			DR		NC
Additional High	Keep records of all nutrient applications- greenhouse, transplant water, and field (soil and foliar), which includes date of fertilizer application, application timing (pre-plant, side-dressing, transplanting, or foliar), type of fertilizer applied (N-P-K, and rate of application.	9) Are fertilizer/lime/manure applications records for field/tracts maintained at the farm?	DR			DR		NC*
Additional Medium	It is preferable not to use muriate of potash but if using muriate of potash, applications should be made before January 1 of the production year.	8a) If muriate of potash was applied, was it applied by January 1st of the production season?	DR			NR		NC*

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Additional Medium	Make fertilizer application decisions using soil test results that are no more than three years old	6) Was a soil test conducted on each tobacco field no more than three years before the time of transplanting?	DR			DR		NC*
Additional Medium	If using animal manure or litter for fertilizer, have it tested for nutrient content to determine appropriate rates. Guidelines on the use of animal manure in tobacco production can be found in the University of Kentucky Burley Tobacco growers guide.	7a) If you use animal manure or litter for fertilizer on your tobacco, do you have documentation that indicates it has been tested for nutrient content?	DR			DR CAP		NC*
VARITEY SELECTION AND CROP AND OPERATIONS MANAGEMENT								
Critical	Whether you produce or purchase your tobacco plants, keep records of transplant/greenhouse seeding dates, varieties and seed lot numbers by field/tract.	20) Is the following documentation maintained for crop management maintained at the farm? a) Seed lot numbers and varieties maintained at the farm b) Dates of seeding for transplants f) Dates of transplanting	DR			DR		NC
Critical	Keep tobacco types strictly separated from each other during seeding, curing, and market preparation.	16) If multiple tobacco types are grown on the farm, are they kept strictly separated at all levels of production?	VI			NR		NC
Critical	Use University recommended rates of MH in sucker control or follow contract guidelines for MH use.	NO QUESTION						
Critical	Separate tobacco by stalk position and quality to meet contract requirements	NO QUESTION						
Additional High	Use tarps made of acceptable tarping material (non-plastic) in contact with the tobacco when covering it during transport to market, on surfaces free of contaminants, or use an enclosed trailer or vehicle that keeps tobacco protected from weather when transporting the tobacco to market, on surfaces free of contaminants. Stock trailers should not be used for tobacco transport	17) Are tarps used to cover tobacco during transport to market made of acceptable tarp material (non-plastic) on the side of the tarp in contact with the tobacco? 18) Is tobacco always covered during transport to market, on surfaces free of contaminants?	VI			DRP		NC*



GAPC Certification Standards and Remediation Details

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Additional Medium	Keep records of dates and amounts of irrigation water and maintain records of rainfall amounts during the growing season	12) If applicable are the following records per field/tract maintained at the farm? a) Rainfall received; b) irrigation amounts	DR			DR		NC*
Additional Medium	Keep records of topping and harvesting dates by field or tract	20) Is the following documentation maintained for crop management maintained at the farm? e) Dates of topping and harvesting	DR			DR		NC*
Additional Medium	Use recommended measures to control weed seed contamination of tobacco	19) Is there a documented program for control of problem weeds that contaminate tobacco with weed seed?	DR			DR		NC*
Additional Medium	Use appropriate methods to clean or sanitize transplant trays	5b. Trays used in production of seedlings are cleaned or sanitized	GI			NR		NC*
Additional Medium	Destroy unused seedlings within 30 days after transplanting is completed	5c) Unused seedlings are destroyed immediately after transplanting is completed	GI			NR		NC*
Additional Medium	Destroy crop residues and establish a cover crop within 60 days after harvest	5d) Crop residues from the previous year are destroyed and cover crop established within 60 days after harvest	GI			NR		NC*
Additional Low	Keep records of plant and row spacing and plant population maintained by field or tract	20) Is the following documentation maintained for crop management maintained at the farm? c) Plant population in field d) Row width and plant spacing for the current season	DR			DR		NC*
Additional Low	FLUE ONLY: Prior to harvest, mow all field borders/turning areas, and manual removal of pigweed and other weeds of concern from fields	NO QUESTION						
CURING AND BARN MANAGEMENT								
Critical	Have a documented safety program for air cured and fire-cured barns that includes inspection of tier rails and support beams for soundness, inspection of general barn soundness, removal of stored machinery, lumber and other items from barn floors that could enhance injury in falls. Ladders or steps should be installed and maintained to reach tiers	28) For air and fire cured operations, is there a documented barn safety program, including inspection dates, hazards identified, and actions taken to reduce hazards?	DR			DR		NC



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Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	FLUE ONLY: Have barn tests every 3 years and use only indirect fired barns with heat exchangers	22) Are the following records maintained for curing and barn management? e) For flue-cured operations, verification that barn heating systems have passed testing for leaks within the past three years	DR			DR		NC
Additional High	Have at least one trash can in the market prep area	29) Are the following measures in place to prevent NTRM contamination? b) Is there at least one trash can present in facilities/market preparation areas	VI			DRP		NC*
Additional High	Have a documented program that allows for traceability of tobacco through curing and delivery.	23) Does the grower have a Bale ID system allowing traceability to curing barns and structures?	DR			DR		NC*
Additional High	Regularly inspect market prep area and remove Non Tobacco Related Materials (NTRM), keeping records of inspection dates	29) Are the following measures in place to prevent NTRM contamination? e) Records kept of inspection of market prep area for NTRM while in use	DR			DR		NC*
Additional High	AIR AND FIRE ONLY: Record the date that tobacco was placed in the curing structure and date it was removed.	22) Are the following records maintained for curing and barn management? b) Date tobacco was placed in curing structure and date it was removed from curing structure (air and fire-cured only)	DR			DR		NC*
Additional High	Do not use brooms with synthetic bristles in market preparation area	29) Are the following measures in place to prevent NTRM contamination? d) Brooms used in market prep area do not have synthetic bristles	VI			DRP		NC*
Additional Medium	Have designated break areas away from market prep area	29) Are the following measures in place to prevent NTRM contamination? a) Designated break areas present away from market preparation area	VI			DRP		NC*



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Additional Medium	Do not have tools with plastic handles in market prep area	29) Are the following measures in place to prevent NTRM contamination? c) Tools and equipment in market preparation areas have metal or wooden handles	VI			DRP		NC*
Additional Medium	Maintain records of the type and number of curing structures or barns	(LIST UNDER FARM INFRASTRUCTURE)	DR			DR		NC*
Additional Medium	Maintain documentation on the curing structure or barn used for tobacco from each field and tract for traceability purposes	22) Are the following records maintained for curing and barn management? a) Curing structure/barn used for tobacco from each field/tract	DR			DR		NC*
Additional Medium	FLUE ONLY: Use some method or tool to monitor humidity in the barn.	24) For flue-cured operations, can temperature and humidity be monitored during curing in barns?	VI			DRP		NC*
Additional Medium	FIRE ONLY: Maintain records of firing procedures in the fire cured barns to include the number of firings and fuel used (i.e. slabs, sawdust, etc.)	22) Are the following records maintained for curing and barn management? d) For fire-cured operations, number of firings used for each barn	DR			DR		NC*
Additional Low	Have a dedicated market prep and bailing area with concrete floor	29) Are the following measures in place to prevent NTRM contamination? i) A dedicated market prep are with a concrete floor	VI			NR		NC*
Additional Low	AIR AND FIRE ONLY: Records of spacing of sticks and number of stalks per stick in air cured barns or structures.	22) Are the following records maintained for curing and barn management? c) Spacing of sticks in curing structure	DR			DR		NC*
Additional Low	AIR ONLY: No curing structures more than two tiers high, barns designed such that no worker is more than 12 feet above the barn floor in normal handing operations	21) How tall is your tallest curing structure?	GI	VI		NR		NC*

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Additional Low	AIR ONLY: Use a slotted stripping table with wire mesh cover or other stripping systems that permit dirt and other NTRM to freely fall out of the tobacco as it is stripped (stripping chains, stripping wheels, etc.)	29) Are the following measures in place to prevent NTRM contamination? h) Slotted table for stripping, or other stripping method such as stripping wheels or chains that allow NTRM to fall freely from tobacco while being stripped.	VI			DRP		NC*
Additional Low	FIRE ONLY: Monitor temperature in fire cured barns during firing	27) For fire-cured operations, can temperature be monitored during firing in barns?	GI	VI		DRP		NC*
ON-FARM TOBACCO STORAGE								
Critical	Maintain a clean, dry tobacco storage area, with no treated wood in contact with tobacco, no storage of pesticides, petroleum products, paint, stains, fertilizers, or styrofoam trays in storage area. Baled tobacco may be stored on concrete floor, untreated wood floor, trailers, wagons or truck beds.	31) If tobacco is currently being stored, do storage facilities appear generally clean with no NTRM observed?	VI			DRP		NC
Critical	Maintain a clean, dry tobacco storage area, with no treated wood in contact with tobacco, no storage of pesticides, petroleum products, paint, stains, fertilizers, or styrofoam trays in storage area. Baled tobacco may be stored on concrete floor, untreated wood floor, trailers, wagons or truck beds.	32) Are the following measures in place for tobacco storage facilities? b) Tobacco handling and storage areas are free of liquid storage (pesticides, petroleum products, paint, etc.) and preservative treated wood.	VI			NR		IS
Critical	Ensure that livestock are excluded from curing and storage structures	26) For air-cured and fire cured operations, are livestock excluded from curing and storage structures?	VI			NR		IS
Additional Medium	Have an enclosed storage area with doors and windows, if present, that can be closed.	32) Are the following measures in place for tobacco storage facilities? a) Can doors and windows be closed?	VI			VI		NC*
AGROCHEMICAL MANAGEMENT								
Critical	Use label required PPE by applicators, handlers, and early entry workers	19) Is label-required PPE use required for applicators/handlers/early entry workers?	VI			DRP		IS

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	Have a securable, dry pesticide storage area with proper signage	20) Does agrochemical storage meet the following requirements? a) Agrochemicals stored in designated enclosed, weather protected, securable area with appropriate warning signs?	VI			DRP		NC
Critical	Dispose of agrochemical containers legally	21) Are agrochemical containers disposed of according to disposal requirements on product labels?	VI			NR		IS
Critical	Properly segregate, store, recycle, or dispose of hazardous waste including but not limited to residual CPAs, fuel, oil, grease, paint, and batteries.	25) How do you dispose of hazardous waste used in tobacco production (including but not limited to residual agrochemicals, fuel, oil, grease, paint, and batteries)?	VI			NR		IS
Critical	All pesticide applications, restricted or not restricted, should be complete or supervised by a licensed pesticide applicator	10) Does a licensed pesticide applicator apply or supervise restricted use pesticide usage? 11) Does a licensed pesticide applicator apply or supervise all pesticide usage?	DR			DR		IS
Critical	Have documentation of proper training for everyone who handles, mixes, and/or applies CPAs	61) Have employees received instruction on the following, if applicable? i) Storage, handling, application and disposal of tobacco agrochemicals	DR	WI		DR		IS
Critical	Maintain copies of labels for all pesticides used in tobacco production either on the container, in storage, or in farm files	16) Copy of labels of CPAs applied, either on container in storage or in farm files?	DR			DR		NC
Critical	Maintain SDS sheets for all pesticides used in tobacco production	13) Are SDS (Safety Data Sheets, formerly known as MSDS) for agrochemicals maintained at the farm?	DR			DR		NC
Critical	Ensure that agrochemicals are stored in original manufacturer's containers with labels attached or on file in pesticide storage room.	20) Does agrochemical storage meet the following requirements? b) Agrochemicals stored in original manufacturer's containers with labels attached or on file in pesticide storage room	VI	DR		DRP	DR	NC

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Additional High	Maintain calibration records for current year	14) Are records of sprayer calibration for the current season being maintained?	DR			DR		NC*
Additional High	Maintain pesticide application records for the previous two growing seasons as well as the current season	18) Are pesticide application records available for the previous two growing seasons as well as the current season?	DR			DR		NC*
Additional Medium	Pesticide storage with impermeable floor designed to retain runoff from spills and leakages	20) Does agrochemical storage meet the following requirements? c) Impermeable floor designed to retain runoff from leaks and spills	VI			NR		NC*
Additional Medium	Mix or transfer CPAs in containment areas away from runoff channels	22) Do you mix or transfer CPAs in containment areas away from runoff channels?	VI			DR CAP		NC*
Additional Low	Maintain an inventory of pesticide stocks in storage	20) Does agrochemical storage meet the following requirements? d) An inventory, of all pesticides stored, maintained in each storage area	DR			DR		NC*
Additional Low	Have a designated, fenced or otherwise secured storage area for empty pesticide containers pending disposal	23) Is there a designated fenced or otherwise secured storage area for empty pesticide containers pending disposal?	VI			DRP		NC*
Additional Low	Properly dispose of non-hazardous waste products (i.e. move waste paper, cardboard, plastic (other than pesticide chemicals) to a trash receptacle or recycle container.	24) How do you dispose of non-hazardous waste used in tobacco production (waste paper, cardboard, plastic other than CPA containers)?	VI			DRP		NC*
SOIL AND WATER MANAGEMENT								
Critical	Comply with irrigation and water extraction laws and regulations	NO QUESTION						
Critical	As required by law, maintain a conservation management plan approved by the soil and water conservation district for fields that are considered highly erodible land.	6) If field/tract is considered HEL (Highly Erodible Land), is there a conservation plan?	DR			DR		NC
Additional High	Use vegetated buffers between field and streams or lakes (minimum buffer distance is 33 feet)	7) Are there buffer zones present between farmland and streams, lakes, and other natural bodies of water?	VI			DR CAP		NC*



GAPC Certification Standards and Remediation Details

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Additional Medium	Use energy efficient curing systems in flue cured barns.	25) For Flue-cured operations, are automated curing controls used?	VI			NR		NC*
Additional Medium	Use cover crop or fall seeded crop following tobacco harvest	2) Is the following documentation for soil and water management maintained at the farm? b) Cover crops planted during current and previous years	DR			DR		NC*
Additional Medium	Ensure that greenhouse float water is properly and legally disposed of	9) If farm has a greenhouse used for transplant production, is transplant float water properly disposed of by allowing it to evaporate or, if all CPAs used are labeled for field use, applying it to tobacco fields?	GI			DR CAP		IS
Additional Medium	Use no-till crops or sod as rotation crops on highly erodible land if applicable	4) Is no-tillage used in rotational crops on Highly Erodible Land?	GI			NR		NC*
Additional Medium	Apply irrigation based on a documented scheduling method with irrigation amounts measured by moisture meter, tensiometer, rain gages, or flow meters.	13) If irrigation is used, is there documentation of an irrigation scheduling method?	DR			DR		NC*
Additional Low	Use no-till crops or sod as rotation crops on all land (carbon sequestration by increasing soil organic matter)	5) Is no-tillage used in rotational crops on All land?	GI			NR		NC*
Additional Low	Maintain field borders/buffer strips along lower edges of fields and beside field ditches and drainage ways (minimum buffer distance is 33 feet)	8) Are vegetated field borders/buffer strips used along lower edges of fields and beside field ditches and drainage ways?	VI			DR CAP		NC*
Additional Low	If you use irrigation, then use proper irrigation management methods, which include Maintain equipment and piping to prevent leakage	14) Do you properly manage your irrigation system, which includes maintaining equipment and piping to prevent leakage?	VI			DRP		NC*
Additional Low	If you use irrigation, then use proper irrigation management methods, which include Maintain runoff water	15) Do you properly manage your irrigation system, which includes minimizing runoff water?	GI			DR CAP		NC*
Additional Low	Record the gallons of irrigation water used per pound of cured tobacco produced.	NO QUESTION						



GAPC Certification Standards and Remediation Details

How you Work Matters: Labor Certification Standards

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Recruiting, Hiring and Termination								
Critical	Ensure that the pay of all workers (including for temporary, piece rates, seasonal, and migrant workers) meet, at a minimum, national and state minimum wage requirements or adverse effect wage if H2A workers	24) Do you pay all your hired workers at a rate equal to the prevailing minimum wage (state or federal) or higher?	DR	WI		VI CAP		ISR
Critical	Complete and maintain a Form I-9 for each worker. Once the commitment has terminated, grower keeps the Form I-9 for either three years after the date of hire, or one year after the date employment is terminated, whichever is longer.	20) Are I-9 forms on file at the farm for all employees?	DR			DR		IS
Critical	Workers shall be allowed to terminate their commitment at any time, without the threat of intimidation, coercion, blacklisting, or any other type of discrimination or retaliation.	34) Are employees free to terminate or leave their employment at any time without fear of retaliation?	GI	WI		NR		ISR



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Critical	<p>US CERTIFICATION ONLY: If you hire more than 500 man-days of hired labor in any of calendar quarters of last year, at the time of hire of migrant/seasonal workers the following must be provided in writing in the worker's preferred language, to include:</p> <ul style="list-style-type: none"> • Place of employment (name and address of employer) • Wage rates (including piece rates) • Crops and kinds of activities for which employee will be employed • Period of employment • Transportation, housing and other benefits to be provided, and costs charged for these benefits, if any • Whether state workers' compensation or state unemployment insurance is provided 	<p>22) Are employees provided a written statement that describes, at minimum, the following terms and conditions of employment?</p> <ul style="list-style-type: none"> • Place of employment (name and address of employer) • Wage rates (including piece rates) • Crops and kinds of activities for which employee will be employed • Period of employment • Transportation, housing and other benefits to be provided, and costs charged for these benefits, if any • Whether state workers' compensation or state unemployment insurance is provided 	DR	WI		DR CAP		IS

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	INTERNATIONAL CERTIFICATION ONLY: At the time of recruitment and at the time of hire, provide all hired workers with a written disclosure describing the terms and conditions of their work commitment written in the worker's preferred language, to include: <ul style="list-style-type: none"> • Place of employment (name and address of employer) • Wage rates (including piece rates) • Crops and kinds of activities for which employee will be employed • Period of employment • Transportation, housing and other benefits to be provided, and costs charged for these benefits, if any • Whether state workers' compensation or state unemployment insurance is provided 	22) Are employees provided a written statement that describes, at minimum, the following terms and conditions of employment? <ul style="list-style-type: none"> • Place of employment (name and address of employer) • Wage rates (including piece rates) • Crops and kinds of activities for which employee will be employed • Period of employment • Transportation, housing and other benefits to be provided, and costs charged for these benefits, if any • Whether state workers' compensation or state unemployment insurance is provided 	DR	WI		DR CAP		IS
Additional High	Maintain records concerning any worker who was terminated, and the reason for such termination.	26) Are records maintained for any termination; showing the employee's name, the reason for termination with appropriate documentation?	DR			DR		NC*
Additional High	Maintain documentation of the number of permanent, local seasonal, migrant, H2A, and family employees.	Captured in the Labor Information Table on self-assessment and application.	DR			DR		NC*
Wage, Benefits and Working Hours								
Critical	Ensure that workers are paid in a timely manner	25) How often do you pay your workers? (Daily, Weekly, Bi-weekly, Monthly, Other (specify))	DR	WI		VI CAP		ISR

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	<p>Provide workers with written wage statements for each pay period that include total pay, hours worked, daily start/stop times, piece rate and units produced if applicable, and any deductions from pay. (NOTE: If subject to MSPA, H2A or FLSA, a more detailed statement may be required); Compensation must include all time under the grower's direction and control once worker initiates any work activity including short breaks (15 minutes or less) and time used to conduct training. This does not include transportation from housing to field to start and from the field to housing when work is complete; All over contract work hours are voluntary and paid in accordance with applicable laws related to wage and working hour requirements; All deductions must be in accordance with applicable law; Workers must not be subject to any illegal wage withholdings, such as deposits or deductions for the purpose of recruitment or employment</p>	23) Do you provide all your workers with a wage statement?	DR	WI		DR	VI CAP	IS
Critical	<p>Post all legally required labor standards posters where they will be visible to all employees, in a language common to the workers, which sets forth the rights and protections of the workers. Including but not limited to: Notice of Migrant and Seasonal Agricultural Workers Protection Act (MSPA)</p>	21) Are employment posters posted in a clearly visible location at the farm? a) Notice of Migrant and Seasonal Agricultural Worker Protection Act (MSPA)	VI			VI		NC

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	Post all legally required labor standards posters where they will be visible to all employees, in a language common to the workers, which sets forth the rights and protections of the workers. Including but not limited to: Notice of Employee rights under the Fair Labor Standards Act	21) Are employment posters posted in a clearly visible location at the farm? b) Notice of Employee Rights under the Fair Labor Standards Act	VI			VI		NC
Critical	Post all legally required labor standards posters where they will be visible to all employees, in a language common to the workers, which sets forth the rights and protections of the workers. Including but not limited to: Employee Rights under the H-2A Program	21) Are employment posters posted in a clearly visible location at the farm? c) Employee Rights under the H-2A Program	VI			VI		NC
Critical	Post all legally required labor standards posters where they will be visible to all employees, in a language common to the workers, which sets forth the rights and protections of the workers. Including but not limited to: OSHA Occupational Safety and Health Poster	21) Are employment posters posted in a clearly visible location at the farm? d) OSHA Occupational Safety and Health Poster	VI			VI		NC
Critical	A Worker Rights and Responsibilities poster must be posted in their native language where workers can access and read it on or near the job site, including information on how to voice worker concerns.	21) Are employment posters posted in a clearly visible location at the farm? e) Worker rights and Responsibilities Poster	VI			VI		NC

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Forced Labor and Human Trafficking								
Critical	All work must be voluntary and shall not be carried out under threat or duress. Growers must not recruit, transport, or receive workers using threats, force, coercion, abduction, fraud, or deceit or abuse of their power or the vulnerability of workers.	34) Are employees free to terminate or leave their employment at any time without fear of retaliation? AND 41) Do you use any form of forced or compulsory labor under bond, debt, or threat?	GI	WI		NR		ISR
Critical	Workers shall not be charged any fees for their recruitment or transport to their place of work, by the grower.	42) Do you charge workers any fees to be transported to your operation or to be employed?	GI	WI		VI CAP		ISR
Critical	Growers are prohibited from retaining workers' personal identity documents, visas, money, valuables, paychecks, debit or credit cards, or return tickets. Growers may provide, upon request, workers with safe place to store these items, but these items must be accessible to the workers upon request.	33) Does grower return or make readily available government issued documentation to workers upon verification of employment eligibility?	GI	WI		VI CAP		ISR
Critical	There shall be no restrictions on workers' freedom of movement, and workers shall be permitted to enter and exit their place of work.	NO QUESTION						



GAPC Certification Standards and Remediation Details

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	Growers are prohibited from employing compulsory or prison labor.	40) Do you employ any form of compulsory labor or prison labor that is not voluntary and paid wages?	GI	WI		NR		ISR
Sanitation, Housing, and Transportation								
Critical	<p>Growers must provide workers access to the following as required Growers must provide workers easy access to the following:</p> <ul style="list-style-type: none"> - Cool, potable water available during work hours - Clean and sanitary bathroom facilities during work hours - Hand washing facilities with soap at close proximity to bathrooms - Grower operations with eleven (11) or more employees, employed during the past twelve months, at any one time, engaged in hand-labor operations must provide clean and sanitary bathroom facilities during work hours and hand washing facilities with soap at close proximity within a quarter-mile walking distance from employee's place of work in the field. Toilet and handwashing facilities are not required within a quarter-mile for employees who perform field work for a period of three (3) hours or less (including transportation time to and from the field) during the day. 	<p>46) Are employees provided safe drinking water during work hours?</p> <p>47) Are employees provided clean and sanitary bathroom facilities during work hours?</p> <p>48) Are employees provided hand washing facilities with soap at close proximity at all times?</p>	VI	WI		VI CAP		ISR
Critical	Growers must offer workers sufficient rest breaks during the day, including lunch, without unreasonably compromising their ability to earn wages.	49) Do you provide employees with sufficient breaks during the day, including lunch, without unreasonably compromising their ability to earn wages?	EI			VI CAP		ISR

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	If the grower provides housing directly to seasonal workers, the grower must: Ensure that the facility complies with all federal and state safety and health standards, including up-to-date certification from DOL or other appropriate governmental agencies, inspect housing prior to occupancy and at mid-season, using the OSHA Housing Safety and Health Checklist Provided in Agricultural Labor Management Guide	44) If housing is provided to seasonal employees, is there up-to-date safety inspection certification from a government agency posted?	DR			DR		ISR
Critical	☒If the grower provides housing directly to seasonal workers, the grower must: Post or present to each worker, in their native language a statement of the terms and conditions of occupancy which must include: name and address and contact information of the individual in charge of the housing, emergency contact information, physical address and mailing address of the housing facility, who may live at the housing facility, charges to be made for housing, meals to be provided and any associated cost for them, charges for utilities, any other charges or conditions of occupancy.	28) If housing is provided to migrant employees, is there a posted and filed statement at the farm that includes, at minimum, the following terms and conditions of occupancy? <ul style="list-style-type: none"> • Name and address of individual in charge of housing and owner of the housing, if different • Phone number of person in charge of the housing • Mailing address and phone number where persons living in the housing facility may be reached • Names of occupants of the housing facility • Housing, utility and other charges, if any • Meals to be provided and costs charged • Any other conditions of occupancy 	DR	VI		DR	VI	NC

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	If transportation is provided, growers must ensure that vehicles meet legally required safety standards and that drivers are properly licensed and insured. Vehicles must be inspected when required by law, and person supplying the transportation must maintain inspection records.	30) Are drivers properly insured and licensed? AND 31) Is the transport vehicle inspected to ensure it is safe? AND 32) Do you have inspection records for the transport vehicle?	DR			DR		NC
Worker Rights and Responsibilities and Worker Concern Process								
Critical	The GAPC worker concern helpline poster or other approved third-party worker concern phone number must be posted in their native language where workers can access and read it on or near the job site.	65) Did you post the poster and share the information with your employees?	VI	WI		VI		NC

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	<p>In an effort to identify and resolve workplace issues before they progress, each Grower must implement a worker concern process. This is a documented program that is discussed AND given to or posted for all workers. The policy must be written in a language common to the workers and set forth the terms of the available worker concern process to include statements stating the following (growers may use the posters and template documentation provided by GAPC):</p> <p>The grower is committed to providing a safe working environment for all workers and satisfy all legal rights of workers while they are on their farm. A method is available for workers to notify the Grower, orally and in writing of any concern related to the terms and conditions of work.</p> <p>The Grower will investigate concerns brought forth by workers and provide notice to the workers, if known, of how the concern will be or was addressed. At the request of the workers, an informal meeting between the grower and workers will be held to address the concern.</p> <p>If a worker raises a concern with grower and is not satisfied with the resolution or handling of the issue, they are encouraged to call the GAPCs' Worker Concern Helpline or to an alternative approved third-party helpline to voice and address the concern.</p> <p>The Grower, any of his/her employees or agents will not retaliate against workers for using the worker concern process.</p>	63) Do you provide an efficient grievance mechanism for your workers, such as regular meetings, complaint box or worker concern helpline so they can request changes or improvements in working or living conditions?	VI	WI		VI		NC



GAPC Certification Standards and Remediation Details

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Freedom of Association								
Critical	Respect the legal rights of workers to, or not to, associate, organize and bargain collectively.	35) Do you allow workers freedom of association with organized groups?	GI	WI		VI CAP		IS
Critical	Do not interfere in union activities.	36) Do you allow reasonable access to your workers from organized groups?	GI	WI		VI CAP		IS
Critical	Do not discriminate nor retaliate against workers for such activities.	37) Do you discriminate against workers who associate with organized groups?	GI	WI		VI CAP		IS
Harassment and Discrimination								
Critical	All workers must be treated with dignity and respect and not be threatened with or subjected to verbal, physical, sexual or mental harassment or abuse, coercion, or corporal punishment during employment or recruitment.	38) Do you verbally, physically, or sexually abuse workers?	GI	WI		NR		ISR
Critical	Workers must not be subject to discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status, or marital status.	39) Do you discriminate when hiring workers based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status, or marital status?	GI	WI		NR		IS
Additional High	Have a documented anti-discrimination policy.	27) Do you have an Anti-Discrimination Policy?	DR			DR		NC*
Farm Labor Contractors								
Critical	US CERTIFICATION ONLY: Ensure all workers provided by the FLC are 16 years of age or older. Verify age of workers by reviewing the worker's I-9 form.	17) Do you maintain I-9 forms for workers provided by the FLC or third-party ? AND 16) Are all workers sourced through an FLC or third-party above the age of 16?	DR	WI		DR CAP		IS
Critical	US CERTIFICATION ONLY: Ensure no worker under 18 provided by the FLC is assigned DOL hazardous tasks (Appendix 1 - List A)	14) Are all workers hired through an FLC under the age of 18 restricted from DOL hazardous tasks?	GI	WI		DR CAP		IS



GAPC Certification Standards and Remediation Details

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	Obtain and keep a copy of the contractor's Certificate of Registration.	19) If farm employees are hired through a labor contractor: a copy of the Farm Labor Contractor's Certificate of Registration with DOL, disclosure of employment, if applicable, insurance (auto and workers comp), driver's license for all drivers, doctor's certificate for all drivers, housing inspections for all labor camps utilized.	DR			DR		IS
Critical	Obtain and keep a copy of the housing inspection if FLC is authorized to house.	19) If farm employees are hired through a labor contractor: a copy of the Farm Labor Contractor's Certificate of Registration with DOL, disclosure of employment, if applicable, insurance (auto and workers comp), driver's license for all drivers, doctor's certificate for all drivers, housing inspections for all labor camps utilized.	DR			DR		IS
Critical	Obtain and keep a copy of insurance if FLC is authorized to transport.	19) If farm employees are hired through a labor contractor: a copy of the Farm Labor Contractor's Certificate of Registration with DOL, disclosure of employment, if applicable, insurance (auto and workers comp), driver's license for all drivers, doctor's certificate for all drivers, housing inspections for all labor camps utilized.	DR			DR		IS
Critical	Ensure that workers are properly paid by either: paying workers directly rather than through an FLC or third party labor provider or ensure the FLC provides wage statements to workers as legally required and grower must obtain and keep copies	18) Do you pay workers directly or keep copies of wage statements provided by the FLC to workers as legally required?	DR	WI		DR CAP		IS
Critical	Ensure no worker under 18 provided by the FLC is assigned other hazardous tasks (Appendix 1 - List A)	15) Are all workers hired through an FLC under the age of 18 restricted from other restricted tasks? AND 12) Does the FLC provide you with copies of wage statements for your employees?	GI	WI		DR CAP		IS



GAPC Certification Standards and Remediation Details

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	INTERNATIONAL CERTIFICATION ONLY: Ensure all workers provided by the FLC are 18 years of age or older. Verify age of workers by reviewing the worker's I-9 form.	17) Do you maintain I-9 forms for workers provided by the FLC or third-party ? AND 13) Are all workers sourced through an FLC or third-party above the age of 18?	DR	WI		DR CAP		IS
Family Working on the Farm								
	Family members include only: (1) A spouse; (2) Children, stepchildren, and foster children; (3) Parents, stepparents, and foster parents; and (4) Brothers and sisters. If the worker does not fall into one of the four categories listed here then the worker is considered a hired employee per the US DOL definition.							
Critical	US CERTIFICATION ONLY: Comply with all federal and state child labor laws pertaining to immediate family labor.	7) Are you in compliance with federal and state child labor laws related to family?	GI			NR		IS
Critical	INTERNATIONAL CERTIFICATION ONLY: Family members ages 15 years of age or younger may only be assigned light, nonhazardous work only if does not interfere with compulsory school.	8) Are family below the age of 16 who work on the farm prohibited from performing hazardous work, as identified by the Secretary of Labor? AND 11) For family members under 16, are they only assigned light work and do they attend school as required?	GI			NR		IS
Critical	INTERNATIONAL CERTIFICATION ONLY: Family members ages 16 – 17 cannot be assigned any DOL hazardous tasks (Appendix 1- List A) or other restricted tasks (Appendix 1 – List B).	9) For family members ages 16-17, are DOL hazardous tasks restricted? 10) For family members ages 16-17, are other hazardous tasks restricted?	GI			NR		IS
Critical	INTERNATIONAL CERTIFICATION ONLY: Ensure that a responsible adult is always present and supervising the child's work, and that you follow regulations on the number of hours a child is permitted to work. Furthermore, children are not permitted to work at night.	5) Do you ensure that a responsible adult is always present to supervise work by a family minor (any family member under 18)? AND 6) Do you have minors who work at night?	GI			DR CAP		IS



GAPC Certification Standards and Remediation Details

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Hired Workers								
Critical	US CERTIFICATION ONLY: The grower must obtain the written consent of a youth worker's parent or legal guardian prior to work commitment commencing.	3) Do you maintain written consent from parents, for any youth employee(s) (i.e. under 18)?	DR			DR		NC
Critical	Growers must not employ or obtain services from any person who is younger than 16 years of age. Exceptions for utilizing a person under 16 years of age include the following: Youth excused from compulsory school attendance by applicable law, and youth involved in accredited learning programs can be assigned work tasks as long as the tasks relate directly to the learning experiences of the program and are in compliance with law.	Do you hire anyone under the age of 16 to work in your tobacco operation?	WI			NR		IS
Critical	No hired worker under 18 may be assigned DOL hazardous tasks (Appendix 1 - List A).	1) Are hired employees under 18 restricted from DOL hazardous tasks?	GI	WI		NR		IS
Critical	INTERNATIONAL CERTIFICATION ONLY: No hired worker under 18 may be assigned Other Restricted Tasks (Appendix 1 - List B).	2) Are hired employees under 18 restricted from other restricted tasks?	GI	WI		NR		IS
Additional High	If minors are employed on the farm, records that include, at minimum: Name in full, place where the minor lives while employed, permanent address, date of birth	4) If minors are employed on the farm, do you maintain records that include, at minimum: 1) name in full; 2) place where the minor lives while employed; 3) permanent address (if different from current residence); 4) date of birth;	DR			DR		NC*

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Farm Safety								
	Growers should provide a safe and healthy workplace by complying with the standards below and all applicable safety, health and environmental laws and regulations. Growers must:							
Critical	Maintain records of all work-related accidents and illnesses serious enough to interfere with the workers' ability to perform their job and/or otherwise required by occupational safety and health laws.	43) Do records of work place accidents include, at minimum, the following? a) Number of accidents b) cause of accidents and how the accidents occur	DR			DR		NC
Critical	Review accident records periodically for guidance on avoiding future injuries.	43) Do records of work place accidents include, at minimum, the following? c) Are accident and injury records periodically reviewed to avoid future injuries?	GI			DR CAP		NC
Critical	Follow Occupational Safety and Health Administration (OSHA) guidelines with respect to addressing GTS and heat stress risks.	NO QUESTION						
Critical	Take precautions to limit worker exposure to wet tobacco and ensure adequate measures are in place to prevent GTS	45) For employees working with wet tobacco, are precautions taken to limit exposure to wet tobacco and measures in place to prevent Green Tobacco Sickness (GTS)?	GI	WI		DRP	DR CAP	NC
Critical	Follow the legal requirements that restrict workers from entering an area where agrochemicals have been used, and as legally required, post signs designating re-entry times for specific fields after agrochemical application.	51) Do you prevent employees from entering a field sprayed with agrochemicals before the REI has passed?	GI	VI	WI	DRP		IS
Critical	Have a dedicated emergency contact person for all workers	57) Do you have a dedicated emergency contact person for all of your workers?	GI	DR		DR		NC
Critical	Provide access to Emergency Medical Services (EMS)	58) Do you provide your workers with access to emergency medical services (EMS)?	GI	DR	WI	DRP		NC
Critical	Provide workers with an emergency plan for medical emergencies, fires, or weather events.	59) Do you have a written emergency plan for your workers in case of medical emergencies, fires, or weather events?	DR	WI		DR		NC

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Additional High	Have a staff member (or grower) certified in First Aid/CPR/AED training.	56) Do you have anyone on your farm that is certified in FirstAid/CPR/AED training?	DR			DR		NC*
Training								
Critical	Grower and all associated growers must annual attend Annual GAP Training meeting	NO QUESTION	DR			DR		NC
	Grower documents training to farm workers on the hazards and risks associated with agrochemicals, safe working practices, emergency response and health surveillance including:							
Critical	Heat Stress	61) Have employees received instruction on the following, if applicable? h) Heat stress (symptoms and treatments)	DR	WI		DR CAP		NC
Critical	Farm Safety, including Farm Equipment Safety	61) Have employees received instruction on the following, if applicable? e) General farm safety f) Safe operation of farm equipment and machinery	DR	WI		DR CAP		NC
Critical	Carbon Monoxide Poisoning Prevention (if applicable)	61) Have employees received instruction on the following, if applicable? b) For dark-fired operations only, prevention of carbon monoxide poisoning	DR	WI		DR CAP		NC
Critical	Pesticide Safety and Personal Protective Equipment (PPE)	61) Have employees received instruction on the following, if applicable? j) Use of PPE (Personal Protective Equipment)	DR	WI		DR CAP		NC
Critical	Green Tobacco Sickness (GTS)	61) Have employees received instruction on the following, if applicable? g) Green Tobacco Sickness (GTS) (symptoms and treatments)	DR	WI		DR CAP		NC
Critical	Emergency response procedures	61) Have employees received instruction on the following, if applicable? m) Emergency response procedures	DR	WI		DR CAP		NC



GAPC Certification Standards and Remediation Details

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	Recognition of REI	61) Have employees received instruction on the following, if applicable? k) Recognition of REI	DR	WI		DR CAP		NC
Critical	Storage, handling, application, and disposal of CPAs	61) Have employees received instruction on the following, if applicable? i) Storage, handling, application, and disposal of tobacco agrochemicals	DR	WI		DR CAP		NC
Critical	NTRM Prevention	61) Have employees received instruction on the following, if applicable? d) NTRM Prevention	DR	WI		DR CAP		NC
Critical	Grower follows all requirements of state and national regulations and training requirements related to worker protection and agrochemical use.	61) Have employees received instruction on the following, if applicable? l) Required Worker protection standard training	DR	WI		DR CAP		NC
Critical	Identify risks on the farm such as those involved in operating machinery/equipment, adverse weather conditions, agrochemical applications, etc. and train workers on how to avoid and protect themselves from such risks.	62) Do you identify risks involved with operating machinery or equipment, bad weather conditions, agrochemicals, etc. and train workers on how to avoid and protect themselves from such risks?	DR			DR		NC
Additional High	Proper baling and market separation of tobacco	61) Have employees received instruction on the following, if applicable? c) Proper baling and market preparation of tobacco	DR	WI		DR CAP		NC*
Additional High	For air-cured and fire-cured operations only, grade separation	61) Have employees received instruction on the following, if applicable? a) For air-cured and fire-cured operations only, grade separation	DR	WI		DR CAP		NC*
	Provide Personal Protective Equipment (PPE), including but not limited to safety gloves, hearing protection, safety hats and/or helmets, safety footwear, and dust masks, as required by applicable law.							
Critical	Gloves and water resistant clothing for workers working with wet tobacco	50) Do employees have access to the following equipment? a) Gloves and water resistant clothing for workers working with wet tobacco	VI	WI		VI		NC

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Critical	Chemical resistant gloves for handling chemicals	50) Do employees have access to the following equipment? b) Chemical resistant gloves for handling chemicals	VI	WI		VI		NC
Critical	Chemical resistant footwear for workers handling agrochemicals	50) Do employees have access to the following equipment? c) Chemical resistant footwear for workers handling agrochemicals	VI	WI		VI		NC
Critical	Safety glasses for workers applying or handling agrochemicals or performing jobs which can create flying objects that damage eyes such as grinding, sawing, driving nails, etc.	50) Do employees have access to the following equipment? d) Safety glasses for workers applying or handling agrochemicals or performing jobs which can create flying objects that damage eyes such as grinding, sawing, driving nails, etc.	VI	WI		VI		NC
Critical	Hearing protection equipment for workers operating machinery or power tools	50) Do employees have access to the following equipment? e) Hearing protection equipment for workers operating machinery or power tools	VI	WI		VI		NC
Critical	Dust masks for workers handling cured tobacco or operating machinery or power tools under dusty conditions	50) Do employees have access to the following equipment? f) Dust masks for workers handling cured tobacco or operating machinery or power tools under dusty conditions	VI	WI		VI		NC
Additional High	Have adequately maintained farm vehicles, machinery and tools with the originally installed guards, shields or other protections as per manual/guidance provided by manufacturer or dealer of equipment.	52) Does tobacco production equipment have guards or shields where originally installed?	VI			VI		NC*

Standard Category	Standard	Grower Question	Verification			Remediation Processes		Non-Compliance Consequence
Additional High	Have adequate First-aid equipment for the number of their workers for the grower's tobacco production operation.	53) Is a first aid kit present and available at the edge of the field or in the field whenever workers are working in that field? 55) Is a first aid kit available within the facility or in a vehicle within 200 feet of the facility in the case of curing barns, greenhouses, market preparation areas, machinery sheds, etc whenever workers are performing work tasks there? 56) Is a first aid kit available in vehicles used to transport workers on the farm?	VI	WI		VI		NC*
Additional High	Have fire extinguishers available within two hundred feet of curing barns when workers are present.	60 Are fire extinguishers present in the following areas when workers are present? (can be in vehicles) a) Near barns (within 200 feet) b) Near market preparation facilities (within 200 feet)	VI	WI		VI		NC*