



# GAPC Certification Tips

Our weekly email containing tips, advice and reminders that will help you achieve GAPC Certification in 2019.

## This week: OSHA 300 Forms and Remediation



### 1. OSHA 300 Forms

**GAPC Standard:** 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.

**What the auditor will look for:** Do you have your OSHA 300A, 300, 301 forms prepared (records of work place accidents)?

#### Posted on Farm:

- OSHA 300A: Date, establishment information, and current number of accidents in 2019 ("0" if none).

#### In Records:

- OSHA 300: Date, establishment information, and log of accidents if any occurred ("0" if no accident occurred)
- OSHA 301(s): Incident report for each accident and illness that occurred (only needed if an accident occurred)

**Requirements by law:** All growers with 20-249 workers must submit OSHA Form 300A even if no accidents or illness occurred. The date by which growers are required to submit to OSHA the information from their completed Form 300A is March 2nd of the year after the calendar year covered by the form. Learn more information about OSHA 300A form record keeping requirements on their website: <https://www.osha.gov/recordkeeping/index.html>

### 2. Remediation: What is it? Can everything be remediated?

Remediation is the process of fixing practices that did not meet GAPC Certification Standards. Below are some points about remediation in the 2019 GAPC Certification Program.

- **All remediation must be done within 30 days of the audit or site visit report being submitted to GAPC.**
- **Growers will know at the conclusion of the audit or site visit what was missed.**
- **Growers will receive a detail report of their results after the audit or site visit.** If a grower provides an email address it will be instantaneous, however, if a grower does not provide an email address the report will be mailed.
- **Instructions on how to remediate any remediable issue can be found in the GAPC Compliance Guide.**
- **Growers will have to schedule and coordinate with individual audit firms to get the remediation completed in the 30 day time frame.** All invoicing and payments for remediation is at the discretion of the audit firm.

There are six different types of remediation a grower could be asked to go through depending on the non-compliance issue.

#### Types of Remediation

1) **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.

2) **Documentation Review with Corrective Action Plan (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.

3) **Documentation Review with Picture (DR):** 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) **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.

5) **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

6) **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.

#### Not everything can be remediated....

As you read above there are some things that are not remediable. These items unfortunately cannot be fixed this year and depending on your score and whether or not it is a critical item may prevent you from becoming GAPC Certified.

For example, both of the following questions are not remediable but one is a critical standard and the other is an additional standard.

- Do you only use labeled pesticides on your farm for tobacco production? This is a critical standard and if you answer "no" then you will not be able to be GAPC Certified in 2019.
- Does your current crop rotation prevent tobacco from being grown in the same field for three or more consecutive years? This is an additional standard. If you answer "no" to this question it will depend on your additional score as you need to achieve 75% of the additional standards.

To find out which standards and questions are remediable and how they will have to be remediated review the GAPC Certification Compliance Guide which were mailed or emailed to you in your initial approval packet and found [here](#).

Please note in the [GAPC Certification Compliance Guide](#) there are also listed the non-remediation consequences, what happens if you choose not to remediate a practice found to be noncompliant.

**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 the following calendar year.

**Immediate Suspension and Potential Report (ISR):** Grower is not certified and cannot try again to be certified until the following calendar year. 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.

### In future emails...

- Housing and Transportation
- Anti-discrimination Policy
- Appeals Process
- Audit Results

Past Certification weekly tips are posted online for easy access at:

<https://www.gapconnections.com/services/certification-program>

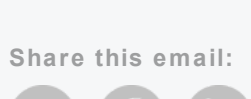
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