



## 2020 GAPC Certification Compliance Guide

---

This document contains the detail listing of GAP Connections (GAPC) Certification Standards, Certification questions, verification methods used during monitoring activities<sup>1</sup> to verify responses to questions, and remediation processes if necessary. This document is to be used by the grower to prepare for the Certification Audit, Site Visit, or Desktop Review. This document may change annually, and it is the participant's responsibility to review all content in preparation for GAPC Certification<sup>2</sup>.

---

<sup>1</sup> Monitoring visits include any and all activities by GAPC used to verify participant is following the GAPC Certification Standards, including but not limited to, audits, site visits, desktop reviews, remediation or follow-up visits, or on-farm investigations pertaining to concerns reported through the Worker Concern Helpline.

<sup>2</sup> Compliance with the GAPC Certification Standards or remediation plan does not mean that you are in compliance with all applicable laws, rules and regulations.

## Contents

---

Introduction.....	4
Types of Certifications.....	4
Certification Standards.....	5
Attendance at Monitoring Activities.....	5
Associated Growers .....	5
<b>GAPC Criteria for Associated Growers .....</b>	<b>6</b>
<b>Entity Determination Documentation List.....</b>	<b>6</b>
Monitoring Activity Code of Conduct .....	7
Repeat Non-Compliance .....	7
Checklist for GAPC Certification .....	8
Helpful Tips.....	9
2020 Approved Auditing Firms for GAPC Certification .....	10
<b>ARCHE Advisors .....</b>	<b>10</b>
<b>Eurofins .....</b>	<b>11</b>
<b>Lanco GAP Services LLC.....</b>	<b>11</b>
<b>Quality Certification Services (QCS).....</b>	<b>12</b>
<b>2020 Pricing Table .....</b>	<b>13</b>
Standards, Questions, Verification, and Remediation .....	14
<b>Verification Methods.....</b>	<b>15</b>
<b>Remediation Processes.....</b>	<b>16</b>
<b>Non-compliance Consequence .....</b>	<b>17</b>
General Certification Standards .....	18
HOW YOU GROW MATTERS: Crop and Environment Certification Standards.....	19

HOW YOU WORK MATTERS: Labor Certification Standards ..... 31

## Introduction

---

GAP Connections (GAPC) develops, maintains, and provides leadership for agricultural standards and practices. We seek to promote production that is competitive, sustainable, fair, compliant, and responsive to changing industry conditions and stakeholder needs.

The GAP Connections Grower Certification Program is a voluntary program to help domestic tobacco growers be recognized for their excellence in the areas of Crop, Environment, and Labor practices. This document outlines requirements and measurable standards associated with the voluntary GAP Connections Certification Program. Growers can follow GAP Connections Certification Standards and choose not to participate in the GAP Connections Certification Program.

GAP Connections Certification Standards do not replace or supersede contract requirements between growers and purchasing companies but instead offer the industry a set of guiding principles that identify and promote best practices for on-farm production and post-production processes which produce a quality crop while protecting, sustaining, or enhancing the environment with regard to soil, water, air, animal and plant life as well as protecting and ensuring the rights of farm laborers.

Growers can learn more about the voluntary GAPC Certification Program by contacting GAP Connections at 865.622.4606 or by visiting [www.gapconnections.com](http://www.gapconnections.com).

## Types of Certifications

---

Growers may choose one of two types of GAP Connections Certification to achieve:

- GAP Connections United States (U.S.) Certification
- GAP Connections International Certification

To be certified, a grower must adhere to the GAP Connections Certification Standards set forth for each Certification.

## Certification Standards

---

Within each of the types of GAP Connections Certifications, Certification Standards are defined as Critical or Additional.

- **Critical Standards** - are required by law or deemed necessary by the industry. Compliance with Certification Standards does not guarantee compliance with Federal, State, or local laws.
- **Additional Standards** – adhere to good agricultural practices.

## Attendance at Monitoring Activities

---

- All growers (Primary and Associated) listed on the Certification Application must be present to sign the monitoring visit report for all visits associated with the Certification of the operation (audit, site visit, desktop review). There will be questions asked of Associated Growers during the monitoring activities to verify their relationship with the operation.

## Associated Growers

---

- Associated Growers are approved at time of application. No additions to or changes to Primary Grower for any applicants for three (3) years are allowed once a Year 1 application is approved. Deletions or drops are allowed but cannot be re-added within the three (3) years.<sup>3</sup>
- Applicants approved in 2018 and 2019 are allowed to keep their Associated Growers until the completion of their third (3rd) year in the program given that they continue to meet the 2018 definition of Associated Growers. There will be no switches from Primary to Associate or Associated to Primary allowed without approval of Certification Committee.
- Associated Growers are reverified at time of monitoring visit. Associated Growers must maintain compliance with the GAPC Criteria for Associated Growers.
- Documents from the Entity Determination Documentation List used at time of application to seek approval of Associated Growers can be asked to be reviewed by auditor at time of monitoring visit. **Growers, to whom this applies, should have copies at the operation at the time of visit.** (See Entity Determination Documentation List).

---

<sup>3</sup> Changes can only be made in the case of death of or the approved medical conditions of Primary Grower reviewed and approved by Certification Committee. In these cases, an Associated Grower can become the Primary Grower with Certification Committee approval.

---

## GAPC Criteria for Associated Growers

The Associated Grower must currently be a GAPC Grower Member.

The Associated Grower must be a family member of the Primary Grower or in a legal, verified business entity (see Entity Determination Documentation List below). Family is defined as spouse, children, stepchildren, foster children, parents, stepparents, foster parents, brothers, sisters, nieces, nephews, cousins, grandparents, and grandchildren (In-laws are included).

The Associated Grower's name must be listed on a 578(s) attached to Certification application.

The Associated Grower must share the same labor force, whether family or hired, with you. Specifically, the same labor force must work in all fields and be hired and paid by the same person or entity for all work. If the labor is paid from separate accounts, the individuals or entities cannot be an Associated Grower.

All the decisions about management of fields farmed by the GAPC Grower Member and Associated Grower must be made jointly, i.e. there are not designated fields for each individual in which that grower makes separate management decisions. There are one set of records detailing the management of the crop and labor force that will be verified at the monitoring visit.

The Associated Grower must be involved in the day-to-day management of the tobacco crop. This includes making management decisions about how the crop is grown and managing labor which works in the crop. If the individual is only providing financial support for the operation and tobacco crop, they are not considered an Associated Grower.

---

### Entity Determination Documentation List

---

Type of Entity	List of Acceptable Documents <sup>4</sup>
<b>Corporation</b>	<ul style="list-style-type: none"><li>• Shareholder Agreement (also known as a Stockholder Agreement in some states)</li><li>• Stock Ledger</li><li>• Charter (Other states may refer to this document as a "Certificate of Incorporation" or "Articles of Incorporation")</li></ul>
<b>Limited Liability Company</b>	<ul style="list-style-type: none"><li>• Operating Agreement (also known as a "Limited Liability Company Agreement" or "Company Agreement" in some states)</li><li>• Articles of Organization with the Secretary of State. (Other states may refer to this document as a "Certificate of Organization" or a "Certificate of Formation")</li></ul>
<b>Limited Partnership</b>	<ul style="list-style-type: none"><li>• Limited Partnership Agreement</li><li>• Certificate of Limited Partnership (Other states may refer to this document as a "Certificate of Formation")</li></ul>
<b>General Partnership</b>	<ul style="list-style-type: none"><li>• Partnership Agreement</li><li>• Statement of Partnership Authority</li></ul>

---

<sup>4</sup> Grower should submit one document from the list corresponding with the entity. However, GAPC staff and/or auditor can request others if document chosen does not provide sufficient verification.

## Monitoring Activity Code of Conduct

---

- Growers must participate in monitoring activities with honesty and respond to questions thoroughly and truthfully. If documents provided are discovered to be intentionally fraudulent it could result in GAPC Certification being denied.
- Growers must not retaliate or intimidate workers, the auditor, or GAPC staff. If the auditor reports that any such conduct occurs during the monitoring activities, the monitoring visit will be terminated, and can result in GAPC Certification being denied.
- Growers must cooperate with agents and employees of the selected audit firm and GAPC with respect and without intimidation during monitoring activities and any follow-up actions. Failure to cooperate with agents and employees of the audit firm or GAPC is grounds for denial of GAPC Certification.

**If a grower is found to be violating the Monitoring Activity Code of Conduct Certification could be denied or revoked.**

## Repeat Non-Compliance

---

If a Grower Member fails to comply with a Critical Standard for two consecutive years and the failed Critical Standard is not related to a worker's safety, rights, and/or working environment, even if the Grower Member otherwise achieves certification through timely remediation of the Critical Standard, the Grower Member must undergo a Year 1 Certification Audit in the following year even if the Grower Member was eligible for a Renewal Monitoring Visit (Site Visit or Desktop Review) in the following year.

Failure to comply with a Critical Standard in two consecutive years that is related to a worker's safety, rights, and/or working environment could result in revocation of Certification even if the Grower Member otherwise meets the certification standards.

## Checklist for GAPC Certification

- ❑ Apply for GAPC Certification **before April 15** and be approved by GAPC.
- ❑ Follow all GAPC Membership and GAPC Certification Standards, policies, and procedures as listed in the GAPC Certification Application and the 2020 GAPC Certification Compliance Guide including:
  - Participation in the GAPC Worker Concern Helpline or other approved third-party concern process.
  - Attend Annual GAPC Training before June 30 of current year (ALL Grower ID numbers listed on the application must attend training by deadline).
  - Complete the self-assessment, if wanting to achieve GAPC International Certification (online when you log into the Grower System at [www.gapconnections.com](http://www.gapconnections.com)), prior to your Monitoring Visit (i.e. audit, site visit, or desktop review).
- ❑ Contact an approved third-party audit firm to schedule your Certification Monitoring Visit **by April 15** of current year. A list of approved auditing firms is included in this Guide in the section titled 2020 Approved Auditing Firms for GAPC Certification. The list can also be found on the Grower Dashboard under Certification by logging in to [www.gapconnections.com](http://www.gapconnections.com).
- ❑ Complete your Certification Monitoring Visit **before October 31** of current year.
- ❑ Complete worker interviews if required:

<b>Year 1: Audit</b>	<ul style="list-style-type: none"> <li>• Worker interviews are required if non-immediate family farm labor is hired on the farming operation.</li> </ul>
<b>Year 2: Site Visit</b>	<ul style="list-style-type: none"> <li>• Worker interviews can be conducted at the request of the grower but <u>will only be required</u> with the Site Visit if the GAPC Certified Grower (1) remediated an issue in Year 1 that required worker interviews or (2) switched from ONLY immediate family farm labor to hiring non-family labor.</li> </ul>
<b>Year 3: Desktop Review</b>	<ul style="list-style-type: none"> <li>• Worker interviews can be conducted at the request of the grower, if the grower chooses to have an on-farm desktop review, but are not required.</li> </ul>

- ❑ Achieve the minimum score required:

<b>Year 1: Audit</b>	<ul style="list-style-type: none"> <li>• 100% of Critical standard points labeled as Year 1 (Y1)*</li> <li>• 75% of Additional standard points labeled as Year 1 (Y1)* (High: 5 points, Medium: 2 points, Low: 1 point)</li> </ul>
<b>Year 2: Site Visit</b>	<ul style="list-style-type: none"> <li>• 100% of Critical standard points labeled as Year 2 (Y2)*</li> </ul>
<b>Year 3: Desktop Review</b>	<ul style="list-style-type: none"> <li>• 100% of Critical standard points labeled as Year 3 (Y3)*</li> <li>• 100% of Additional standard points labeled as Year 3 (Y3)*</li> </ul>

\*See year label (i.e. Y1, Y2, and Y3) in the Standard Category column in the Certification Standards section in Compliance Guide.




- If remediation is needed to achieve a passing Certification score, remediation must be completed within 30 days of the date the Certification Monitoring Visit report was submitted. You will receive a detailed report indicating what you need to remediate by mail or email after the Certification Monitoring Visit.


## Helpful Tips


---

- Review the 2020 GAPC Certification Compliance Guide in its entirety (found online at [www.gapconnections.com](http://www.gapconnections.com)).
- Have your records and documents all in one place and ready for review on the day the auditor arrives.
- If worker interviews are being conducted, ensure workers will be available and close by for worker interviews on the day the auditor arrives.
- GAPC staff are here to help! If you have questions call GAPC at 865.622.4606.

## 2020 Approved Auditing Firms for GAPC Certification

<b>ARCHE Advisors</b> www.archeadvisors.com 	
<b>About</b>	We specialize in corporate social responsibility services, specifically labor and human rights. We have deep subject matter expertise and field experience, operation in over 120 countries helping Fortune 500 companies and their suppliers reduce risk. We do audits, projects, investigations, training and education. We have done this long enough to know that we still have much to learn but are not often surprised by the good and bad in global supply chains.
<b>Experience</b>	Our America's team has been heavily involved with Altria's US GAP program since 2010 as well as the Central and South American GAP program since 2012. Furthermore, team members worked as part of the GAP Connections assessment team during the first year of this program in 2014. ARCHE Advisors was chosen as the sole assessment firm for GAP Connections for the two (2) seasons; 2016 and 2017 and as one (1) of the firms for 2018 and 2019. The ARCHE assessors have been fully trained on the GAPC protocols.
<b>Cost</b>	See pricing table
<b>States Served</b>	All 50 states
<b>Certifications Offered</b>	GAPC Certification
<b>Contact Information</b>	Phone: (561) 319-4705   Text: (561) 319-4705   Email: <a href="mailto:GAPCertification@ArcheAdvisors.com">GAPCertification@ArcheAdvisors.com</a> Calls will be answered and emails/texts responded to between the hours of 8 AM and 5 PM (MT), Monday through Friday, if no answer on call, please leave message. Grower will have to accept terms and conditions including cancellation fees before scheduling and payment is expected in advance of any audit. Scheduled dates will be determined by auditor travel itinerary.

<b>Eurofins</b>		
<b>About</b>	Eurofins Consumer Products Testing is a division of Eurofins Scientific. Founded in 1987, Eurofins has a network of over 800 labs and 45,000 employees. Eurofins has significant US operations in Des Moines, Iowa and Leona, Pennsylvania. Eurofins is the global market leader testing and assurance in the Food, Feed and AgroSciences sectors.	
<b>Experience</b>	As the global leader in AgroSciences testing, Eurofins has substantial experience with managing risks in the food supply chain including testing, inspections, audits and certifications. The leadership of the Eurofins Consumer Products Services group includes market recognized experts in the management of supply chain risk specifically in the field of social compliance. With over 20 years of experience in supply chain social compliance and associate audit efforts – the Eurofins team is able to provide solutions to clients across a wide range of product types and geographies.	
<b>Cost</b>	See pricing table	
<b>States Served</b>	All 50 states	
<b>Certifications Offered</b>	GAP Connections	
<b>Contact Information</b>	Phone: +1 702 268-0770   Text: +1 702 268-0770   Email: <a href="mailto:GAPC@eurofinsus.com">GAPC@eurofinsus.com</a>   Hours of operation: 9AM to 9PM Eastern Time	

<b>Lanco GAP Services LLC</b>		
<b>About</b>	Lanco GAP Services LLC was formed in February 2017 to provide GAP auditing and group management services to Pennsylvania farmers. We have auditors living in Leola (Lancaster County) and Winfield (Union County), Pennsylvania.	
<b>Experience</b>	Daniel Zook has been involved in Group GAP Management on vegetable farms for 6 years and conducting on-farm audits for 2 growing seasons. Daniel lives on a vegetable farm in Leola, PA and has farmed tobacco for about 15 years, and vegetables for 27 years. Whitney Scott has been conducting audits on farms for 7 years. Whitney has been involved in vegetable farming since 1965 and lives in Winfield, PA.	
<b>Cost</b>	See pricing table	
<b>States Served</b>	Pennsylvania, and Cecil County, Maryland for on-farm monitoring visits. <b>Specifically, Year 1, 2, and 3 on-farm monitoring visits are limited to PA and MD. All geographic areas are served for the electronic Desktop Review option in Year 3.</b>	
<b>Certifications Offered</b>	GAP Connections CanadaGAP Option B Group	
<b>Contact Information</b>	Contact: Daniel B. Zook, 183 South Farmersville Road, Leola PA 17540 Phone: (717)656-4422 Hours: 7:30-11:00 AM, 1:00-4:30 PM, to speak to someone in person try calling 7:30-8:00 AM Fax: (717)212-9134   Email: <a href="mailto:zook.daniel1@gmail.com">zook.daniel1@gmail.com</a>	

## Quality Certification Services (QCS)

[www.qcsinfo.org](http://www.qcsinfo.org)



<b>About</b>	Quality Certification Services (QCS) has been an industry leader in providing organic, food safety, and ethical certifications since 1989. As an accredited certifying agency, QCS has been meeting the demands of a growing food industry for more than 25 years. QCS is proud to offer organic and food safety certifications for crop production, livestock, retail, restaurants, processing and handling, and importer and exporter operations of all sizes. As the largest certification agency on the eastern seaboard, QCS and our staff of highly qualified and dedicated food and agricultural scientists, educators, and regulators, is capable of meeting all certification needs with expertise. In fact, QCS was recently given a performance rating by GLOBALG.A.P. that ranked its Food Safety/GAPs Team No. 1 in the USA, and in the top 10 worldwide, out of 138 approved Certification Bodies. QCS is a CB dedicated to integrity in the marketplace.
<b>Experience</b>	QCS conducts a variety of audits throughout the year with clients in 39 states and 12 countries, meeting the needs of agricultural operations regardless of type, location, or size in the ever-expanding worldwide market. QCS conducts thousands of audits every year under the breadth of organic, food safety, and ethical farmworker standards, as well as industry specific standards. QCS efficiently fulfills these audit requirements by optimizing the use of regional groupings of operations and qualified staff and contract inspectors. QCS is experienced in auditing to the NOP, Agriculture justice project (AJP), and GLOBAL GAP (GGAP) standards, and have received training in GOTS and SA 8000.
<b>Cost</b>	See pricing table
<b>States Served</b>	VA, NC, SC, GA, TN, KY, IN, OH, MO
<b>Certifications Offered</b>	GAPC Certification, Organic, GLOBAL GAP, Harmonized GAP, AJP, Specific Trade Practices, Aquaculture
<b>Contact Information</b>	Phone: (352) 377-0133 Text: (352) 681-8838   Email: Dawn@qcsinfo.org Hours of Operation: 9am – 5pm EST, Monday – Friday

## 2020 Pricing Table

Note that these prices are only valid if grower contacts audit firm prior to April 15<sup>th</sup>. Growers can contact audit firms directly to inquire if there are bulk pricing discounts available for multiple growers in one geographical area.

	ARCHE Advisors	Eurofins	Lanco GAP*	QCS	QCS Combo Pricing (Organic + GAPC)
Year 1 Certification Audit with Workers Interviews	\$500	\$500	\$475	\$450 + expenses	\$450, no expenses accrued
Year 1 Certification Audit without Worker Interviews	\$450	\$475	\$375	\$350 + expenses	\$350, no expenses accrued
Year 2 Certification Site Visit with Worker Interviews	\$450	\$400	\$425	\$400 + expenses	\$400, no expenses accrued
Year 2 Certification Site Visit without Worker Interviews	\$400	\$400	\$325	\$350 + expenses	\$350, no expenses accrued
Year 3 Desktop Review with On-Farm Visit	\$400	\$400	\$275	\$350 + expenses	\$350, no expenses accrued
Year 3 Desktop Review Electronic Document Submission Review	\$200	\$250	\$150	\$50/hour	\$50/hour
Remediation through Document Review (No On-Farm Visit)	\$50	\$250	\$15/document or item (\$30 minimum)	\$50/hour	\$50/hour
Remediation through On-Farm Visit	\$650	\$400	\$175	\$350 + expenses	\$350, no expenses accrued

\*Discount of up to \$50 per audit if scheduling with members of qualified organized group. To qualify as organized group: 1. The group will have a group leader/ field representative to coach the group members in Good Agricultural Practices and Remediation if necessary. 2. Applicants will indicate their choice of auditing firm to the group leader, who will send the list of applicants and their contact information to the selected auditing firm. 3. Applicants contact information need not be kept confidential from other members of the group for scheduling purposes. 4. The group will be located in the same geographic area (larger areas OK for larger groups).

## Standards, Questions, Verification, and Remediation

---

- **Standard Category:** Critical Standards are required by law or deemed necessary by the industry. Additional Standards adhere to good agricultural practices.
  - **Y1: Year One: Grower going through Full Audit**
  - **Y2: Year Two: Grower going through Site Visit**
  - **Y3: Year Three: Grower going through Desktop Review**
- **Standard:** The GAPC Certification Standard.
- **Grower Question:** The question that will be asked during the Certification Monitoring Visit (audit, site visit, or desktop review).
- **Tab # in Records, Page #:** Indicates the tab in the GAPC Records where the template or document can be found that will be requested to verify the question. Page number indicates the page number behind the tab where the template can be found that will be required to verify the question.
- **Verification Methods:** The methods used to verify standards or remediation of standards. (See verification methods table)
- **Remediation Processes:** The processes used to remediate, i.e. fix, practices that did not meet Certification standards. (See remediation processes table)
- **Non-remediation Consequences:** The consequences when a grower chooses not to remediate practices to comply with standards by the given deadline. (See non-compliance consequence table)

## 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 are trained on what documents to look for as well as what type of documentation is acceptable for the purposes of the certification program
Picture	P	In addition to other verification methods a picture may also be required for verification. Auditors will also take a picture of the document, poster, or facility to be stored in the questionnaire.
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 are 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	When the auditor is on the farm and worker interviews are required or requested, the auditor will interview, at minimum, twenty percent (20%) of the grower's workforce, with a minimum of two worker interviews for those operations with more than one worker and a maximum of ten worker interviews for those operations with 50 or more workers, for the current season in which the GAPC Grower Member is seeking certification. Workers interviews must be representative of all labor sources used on the farm. More interviews can be conducted if deemed necessary by auditor to verify practices. If the grower uses a Farm Labor Contractor those workers must be present for interviews. Workers are to be selected randomly by the auditor. Worker interviews are to be conducted anonymously and grower must not be present for worker interviews.

## Remediation Processes<sup>5</sup>

	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 designated remediator with audit firm. Successful remediation is at the auditor's discretion.	30 days from the date the monitoring report was submitted
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. A template CAP can be found online at <a href="http://www.gapconnections.com">www.gapconnections.com</a> .	30 days from the date the monitoring report was submitted
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 designated remediator. Successful remediation is at the auditor's discretion.	30 days from the date the monitoring report was submitted
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.	30 days from the date the monitoring report was submitted
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.	30 days from the date the monitoring report was submitted

<sup>5</sup> In the event that your selected auditing firm encounters circumstances on your operation that are not in compliance with GAPC Certification Standards, GAPC may, but is not required to, permit you to remediate and correct any noncompliance with GAPC standards so that you may qualify for GAPC Certification in the year of application. There is no obligation on the part of GAPC to permit remediation. If GAPC permits remediation, all required remediation must be completed within 30 days of the date the monitoring visit was submitted. Failure to timely remediate noncompliance with GAPC Certification Standards may result in denial of GAPC Certification for your operation.



## Non-compliance Consequence

Abbreviation		Process
Not Certified	NC	Grower is <b>Not Certified</b> as they are not in compliance with a “Critical” standard.
Not Certified Depending on Score	NC*	Grower is <b>Not Certified</b> if compliance with this Additional standard is needed to reach minimum required Additional Certification score.
Not Certified and Potential Reportable	NCR	Grower is <b>Not Certified</b> . GAPC also reasonably believes this practice constitutes a serious violation of the law, or a severe infraction that endangers the health, safety, or rights of workers and may be reported to authorities and/or contracting companies. <sup>6</sup>

<sup>6</sup> In the event that GAPC, through any means, in its sole discretion, determines that an operation is engaged in serious violations of laws designed to protect workers, GAPC reserves the right to report the GAPC Grower Member’s operation to the proper governmental authorities and revoke the GAPC Grower Member’s GAPC Certification. Conduct that may potentially result in a report to outside authorities is detailed in GAPC Certification Compliance Guide (indicated with a “NCR”). In addition to conduct identified in GAPC Certification Compliance Guide, any actions that pose an immediate risk of serious injury or death, forced labor, or human trafficking may be reported to the appropriate governmental authorities.

## General Certification Standards

Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
<b>SELF-ASSESSMENT</b>						
Critical International ONLY Y 1,2,3	Complete the GAPC Annual Self-assessment prior to monitoring visit.	Was the self-assessment completed prior to the monitoring visit (self-assessment percentage complete must be 100%)?		DR	DR	NC
<b>GROWER TRAINING</b>						
Critical Y 1,2,3	Grower and all Associated Growers must attend Annual GAP Training by June 30 of each year.	Reviewed prior to audit. Grower training must be completed by June 30 to be Certified.	1, 1	DR	NR	NC
<b>578 CROP REPORT</b>						
Critical Y 1,2,3	Obtain an FSA Form 578 crop report(s) for the current year detailing all tobacco acreage from all counties.	Does the grower have an FSA Form 578 Crop report(s) for the current year detailing all tobacco acreage from all counties? If there is an Associated Grower, their name must be listed on a 578(s) attached to Certification application.	1	DR; P	DR	NC
Critical Y 1,2,3	Acreage reported on current year FSA Form 578 crop report(s) must match acreage reported at time of monitoring visit.	Does the FSA Form 578 crop report(s) for the current year match exactly the acreage reported by grower during monitoring visit?	1	DR; P	DR	NC

## HOW YOU GROW MATTERS: Crop and Environment Certification Standards

Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
<b>OPERATION AND NUTRIENT MANAGEMENT</b>						
Additional Medium Y 1	Make fertilizer application decisions using soil test results that are no more than three years old.	Was a soil test conducted on each tobacco field no more than three years before the time of transplanting?	1, 3	DR; P	DR	NC*
Additional High Y 1,3	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. This includes lime applications.	Are fertilizer/lime/manure applications records for greenhouses and field/tracts maintained at the farm? This 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.	1, 4 & 5	DR	DR	NC*
Additional High Y 1	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.	Did you use muriate of potash on your tobacco crop this year? a) If manure or muriate of potash was applied, was it applied by January 1 of the production season?; b) For any application of muriate of potash after January 1, do you apply more than 110 pounds per acre?	1, 5	DR	NR	NC*
Additional Medium Y 1	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.	Do you use animal manure or litter for fertilizer on your tobacco? a) 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?	1, 6	DR; P	DR CAP	NC*
Critical Y 1,2	If required in your watershed, comply with nutrient management regulations as applicable.	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?	1	DR	DR	NC

Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
<b>INTEGRATED PEST MANAGEMENT</b>						
Additional Medium Y 1,3	<p>Have a documented scouting program for pests and record the scouting information by field/tract following GAP standards. Records should include the following:</p> <ul style="list-style-type: none"> <li>• Date of scouting</li> <li>• Pests observed</li> <li>• Percent of plants affected/infested</li> <li>• Crop protection agent applications made by field and date</li> <li>• Conduct a follow-up of your pest control practices to determine the effectiveness of the action taken</li> </ul>	<p>Do you have a documented scouting and monitoring program for your tobacco production?</p> <p>Is there a documented scouting program that includes, at minimum, the following?</p> <p>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</p>	2, 1	DR	DR	NC*
Additional Medium Y 1	Use appropriate methods to clean or sanitize transplant trays.	Are trays used in the production of seedlings cleaned or sanitized using appropriate methods?		GI	NR	NC*
Additional Medium Y 1	Destroy unused seedlings within 30 days after transplanting is completed.	Are unused seedlings destroyed within 30 days after transplanting is completed?		GI	NR	NC*
Additional Medium Y 1	Destroy crop residues and establish a cover crop within 60 days after harvest.	Crop residues from the previous year are destroyed and cover crop established within 60 days after harvest?		GI	NR	NC*
Critical Y 1,2,3	<b>All agrochemical applications, restricted or non-restricted, should be completed or supervised by a licensed pesticide applicator.</b>	<b>Does a licensed pesticide applicator apply or supervise all pesticide usage (restricted and non-restricted)? Grower must have copy of current pesticide license at time of audit. If grower uses a third-party to apply pesticides on your operation you must have a copy of their pesticide license at time of audit.</b>	2, 2	DR	DR	NC

Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2	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.	Do you only use labeled pesticides on your farm for tobacco production?	2, 3	DR	NR	NC
Critical Y 1,2,3	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.	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	2, 3-5	DR	DR	NC
Additional High Y 1	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.	Does pesticide application documentation include, at minimum, the following? c) Reason for application	2, 4 & 5	DR	DR	NC*
Additional High Y 1	Maintain pesticide application records for the previous two growing seasons as well as the current season.	Are pesticide application records available for the previous two growing seasons as well as the current season?	2	DR	DR	NC*
Additional High Y 1	Maintain calibration records for current year.	Are records of sprayer calibration for the current season being maintained?	2, 6	DR	DR	NC*
<b>CROP OPERATIONS MANAGEMENT</b>						
Critical Y 1,2	Direct the day to day activities involved in producing the tobacco sold under your name, the name of an Associated Grower, employee, or the name of the farming operation.	Do you direct the day to day activities involved in producing the tobacco sold under your names, the name of an Associated Grower, employee, or the name of the farming operation?		GI	NR	NC

Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
Additional Medium Y 1	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.)	Do you have documentation that indicates tobacco varieties are selected based on disease resistance, field history, curing characteristics, cured leaf quality, or yield?	3, 1	DR	DR	NC*
Critical Y 1,2,3	<b>Whether you produce or purchase your tobacco plants, keep records of transplant/greenhouse seeding dates, varieties, and seed lot numbers by field/tract.</b>	<b>Do you produce or purchase your tobacco plants?</b>  <b>What percentage of your tobacco plants do you produce?</b>  <b>Is the following documentation maintained for crop management maintained at the farm?</b> <b>a) Seed lot numbers and varieties maintained at the farm; b) Dates of seeding for transplants;</b>	3, 1	GI; DR	DR	NC
Additional Medium Y 1	Keep records of transplanting and topping by field or tract.	Is the following documentation maintained for crop management maintained at the farm? a) Dates of transplanting for the current season; d) Dates of topping;	3, 2	DR	DR	NC*
Additional Low Y 1	Keep records of plant and row spacing and plant population maintained by field or tract.	Is the following documentation maintained for crop management maintained at the farm? b) Row width and plant spacing for the current season; c) Plant population in field	3, 2	DR	DR	NC*
Additional Medium Y 1	Use recommended measures to control weed seed contamination of tobacco.	Is there a documented program for control of problem weeds that contaminate tobacco with weed seed?	3, 2	DR	DR	NC*

Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
Additional Low Y 1	FLUE ONLY: Prior to harvest, mow all field borders/turning areas, and manual removal of pigweed and other weeds of concern from fields.	Do you mow all field borders, turning areas, and manually remove pigweed and other weeds of concern from the fields?		GI	GI	NC*
Critical Y 1,2	<b>Keep tobacco types strictly separated from each other during seeding, curing, and market preparation.</b>	<b>If multiple tobacco types are grown on the farm, are they kept strictly separated at all levels of production?</b>		VI	NR	NC
Critical Y 1,2	<b>If tarps are used to cover tobacco during transport, use tarps made of acceptable tarping material (non-plastic) on the side of the tarp in contact with the tobacco when covering it during transport to market, on surfaces free of contaminants.</b>	<b>If tarps are used, are tarps made of acceptable tarping material (non-plastic) on the side of the tarp in contact with the tobacco when covering it during transport to market, on surfaces free of contaminants?</b>		VI	DRP	NC
Critical Y 1,2	<b>If an enclosed trailer or vehicle is used to transport tobacco to market, all surfaces should be free of contaminants. Stock trailers should not be used for tobacco transport.</b>	<b>If an enclosed trailer/vehicle is used to transport tobacco to market, are all surfaces should be free of contaminants?</b>		VI	DRP	NC
Additional High Y 1	Use University recommended rates of MH in sucker control or follow contract guidelines for MH use.	NO QUESTION				
Additional High Y 1	Separate tobacco by stalk position and quality to meet contract requirements.	NO QUESTION				
<b>CURING AND BARN MANAGEMENT</b>						
Additional Medium Y 1	Maintain records of the type and number of curing structures or barns.	Are the following records maintained for curing and barn management? Type and number of curing structures or barns	1, 2	DR	DR	NC*
Additional Low Y 1	AIR AND FIRE 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 operations.	How tall is your tallest curing structure?		GI; VI	NR	NC*

Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
Additional Medium Y 1	Keep records of harvesting dates by field or tract.	Is the following documentation maintained for crop management maintained at the farm? Dates of harvesting for the current season	4, 2 (Air) 4 (Fire) 3 (Flue)	DR	DR	NC*
Additional Medium Y 1	Maintain documentation on the curing structure or barn used for tobacco from each field and tract for traceability purposes.	Are records maintained documenting the curing structure or barn used for tobacco from each field and tract for traceability purposes?	4, 2 (Air) 4 (Fire) 3 (Flue)	DR	DR	NC*
<b>Critical Y 1,2,3</b>	<b>Record the date that tobacco was placed in the curing structure and date it was removed.</b>	<b>Are the following records maintained for curing and barn management? For air and fire operations, date tobacco was placed in the curing structure and the date it was removed from curing structure</b>	<b>4, 2 (Air) 4 (Fire)</b>	<b>DR</b>	<b>DR</b>	<b>NC</b>
Additional Low Y 1	AIR AND FIRE ONLY: Records of spacing of sticks and number of stalks per stick in air cured barns or structures.	Are the following records maintained for curing and barn management? Spacing of sticks in curing structure	4, 2 (Air) 4 (Fire)	DR	DR	NC*
Additional Medium Y 1	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.)	Are the following records maintained for curing and barn management? For fire-cured operations, number of firings used for each barn and type of fuel used for each firing	4, 4 (Fire)	DR	DR	NC*
<b>Critical Y 1,2,3</b>	<b>FLUE ONLY: Have barn tests every 3 years and use only indirect fired barns with heat exchangers.</b>	<b>Are the following records maintained for curing and barn management? For flue-cured operations, verification that barn heating systems have passed testing for leaks within the past three years</b>	<b>4, 1 (Flue)</b>	<b>DR; P</b>	<b>DR</b>	<b>NC</b>
Additional Medium Y 1	FLUE ONLY: Use some method or tool to monitor temperature and humidity in the barn. This includes a wet-bulb and a dry-bulb thermometer.	For flue-cured operations, can temperature and humidity be monitored during curing in barns?		VI	DRP	NC*



Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
Additional Low Y 1	FLUE ONLY: Use automated curing controls to measure temperature and humidity.	For flue-cured operations, are automated curing controls used?		VI	DRP	NC*
Additional Low Y 1	FIRE ONLY: Monitor temperature in fire cured barns during firing.	For fire-cured operations, can temperature be monitored during firing in barns?		GI; VI	DRP	NC*
Additional High Y 1	Have a documented program that allows for traceability of tobacco through curing and delivery.	Does grower have a documented program that allows for traceability of tobacco through curing and delivery (i.e. bail ID system, etc.)?	4, 2 (Air) 4 (Fire) 3 (Flue)	DR	DR	NC*
Critical Y 1,2,3	<b>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.</b>	<b>For air and fire operations, is there a documented barn safety program, including inspection dates, hazards identified, and actions taken to reduce hazards?</b>	4, 7 (Air & Fire)	DR	DR	NC
<b>NON-TOBACCO RELATED MATERIALS (NTRM)</b>						
Additional Medium Y 1	Have designated break areas away from market prep area.	Does grower have designated areas for your workers to take a break that are away from the market preparation areas?		VI	DRP	NC*
Additional High Y 1	Have at least one trash can in the market prep area. If market prep area is not currently in use, the trash cans that will be used to be visible.	Is there at least one trash can present in facilities/market preparation areas?		VI	DRP	NC*
Additional Medium Y 1	Do not have tools with plastic handles in market prep area.	Do the tools and equipment in market preparation areas have metal or wooden handles?		VI	DRP	NC*
Additional High Y 1	Do not use brooms with synthetic bristles in market preparation area.	Do brooms used in market prep area have synthetic bristles?		VI	DRP	NC*

Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
Additional High Y 1,3	Regularly inspect market prep area and remove Non-Tobacco Related Materials (NTRM), keeping records of daily inspection dates when market preparation area is in use. If market prep area is not currently in use, a documented inspection program including an inspection checklist and log of dates needs to be available or if in Year 2 or 3 of Certification Program last year's inspection log.	Does grower have records kept of inspection of market prep area for NTRM while in use?  Does grower inspect market preparation facilities for NTRM daily when in use?	5, 3	GI; DR	DR	NC*
Additional Low Y 1	FLUE-CURED: Use picking lines to reduce NTRM.	For flue-cured operations, does grower have picking lines?		VI	DRP	NC*
Additional Low Y 1	FLUE-CURED: Use sand reels/leaf tumblers to reduce NTRM.	For flue-cured operations, does grower have sand reels?		VI	DRP	NC*
Additional Low Y 1	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.)	For air and fire operations, does grower 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.)?		VI	DRP	NC*
Additional Low Y 1	Have a dedicated market prep and baling area with concrete, wood, or asphalt floor.	Does grower have a dedicated market prep area with a concrete, wood, or asphalt floor?		VI	NR	NC*
<b>ON-FARM TOBACCO STORAGE</b>						
Critical Y 1,2	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 or other sources of taint that could contaminate the tobacco in storage area.	If tobacco is currently being stored, do storage facilities appear generally clean with no NTRM observed?  Are tobacco handling and storage areas free of liquid storage (pesticides, petroleum products, paint etc.) and preservative treated wood?		VI	DRP	NC

Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
Additional Medium Y 1	Have an enclosed storage area with doors and windows that can be secured, if windows present. Doors and windows can be closed.	Can doors and windows be secured on tobacco storage facilities?		VI	VI	NC*
Additional High Y 1	Store baled tobacco may be stored on concrete floor, untreated wood floor, trailers, wagons, or truck beds.	Is baled tobacco stored on a concrete floor, untreated wood (floor or pallet), trailers, wagons, or truck beds?		VI; GI	VI or VIP	NC*
Critical Y 1,2	<b>AIR AND FIRE:</b> Ensure that livestock are excluded from curing and storage structures.	<b>For air and fire operations, are livestock excluded from curing and storage structures? If livestock are used to transport tobacco into the curing or storage structures the manure must be cleaned out immediately when tobacco is finished being unloaded.</b>		VI	NR	NC
<b>AGROCHEMICAL MANAGEMENT</b>						
Critical Y 1,2,3	Maintain SDS sheets for all pesticides used in tobacco production.	Are SDS (Safety Data Sheets, formerly known as MSDS) for agrochemicals maintained at the farm?	6	DR	DR	NC
Critical Y 1,2,3	Maintain copies of labels for all agrochemicals currently being used in tobacco production either on the container in storage, or in farm files. Does not include agrochemicals that are no longer in use and are not on the farm.	Copy of labels of CPAs applied, either on container in storage or in farm files? Does not include agrochemicals that are no longer in use.	6	DR	DR	NC
Critical Y 1,2	Have a designated, lockable, dry (weather protected) pesticide storage area with proper signage. If no storage a grower must show receipts from a custom applicator or organic certification.	Are agrochemicals stored in designated enclosed, weather protected, lockable area with appropriate warning signs?		VI; P	DRP	NC
Critical Y 1,2	Ensure that agrochemicals are stored in original manufacturer's containers with labels attached or on file in agrochemical storage room.	Are agrochemicals stored in original manufacturer's containers with labels attached or on file in pesticide storage room? If there is no storage area a grower must show receipts from a custom applicator or organic certification.	6	VI; DR	DRP: DR	NC

Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
Additional Medium Y 1	Agrochemical storage with impermeable floor. This includes tubs, bins, containers with impermeable flooring that can hold more than the volume of agrochemical being stored.	Does agrochemical storage have an impermeable floor?		VI	NR	NC*
Additional Medium Y 1	Agrochemical storage designed to retain runoff from spills and leakages. This includes tubs, bins, containers with impermeable flooring that can hold more than the volume of agrochemical being stored.	Is agrochemical storage designed to retain runoff from leaks and spills?		VI	NR	NC*
Additional Low Y 1	Maintain a current inventory of agrochemical stocks in storage updated monthly if changes occurred within the month.	Is there a current inventory of all pesticides stored on the farm updated monthly (if changes occurred within the month)?	6, 1	DR	DR	NC*
Additional Medium Y 1	Mix or transfer CPAs in containment areas away from runoff channels.	Do you mix or transfer CPAs in containment areas away from runoff channels?		VI	DR CAP	NC*
Critical Y 1,2	<b>Dispose of agrochemical containers by either recycling through programs or sites designated for pesticide recycling OR triple-rinsing and punching or removing lid and taking them to appropriate landfill. Agrochemical containers cannot be burned.</b>	<b>Are agrochemical containers disposed of according to disposal requirements on product labels? Standard pertains to containers with chemical residue still in them. Prohibited disposal procedures include, but are not limited to, open dumping, open burning, water dumping and ocean dumping.</b>		VI	NR	NC
Additional Low Y 1	Have a designated, fenced or otherwise lockable storage area for empty agrochemical containers that have not been tripled rinsed and punched pending disposal.	Is there a designated fenced or otherwise lockable storage area for empty pesticide containers that have not been tripled rinsed and punched pending disposal?		VI; P	DRP	NC*
Additional Low Y 1	Properly dispose of non-hazardous waste products (i.e. move wastepaper, cardboard, plastic (other than pesticide chemicals) to a trash receptacle or recycle container. Burning non-hazardous waste is not acceptable.	How do you dispose of non-hazardous waste used in tobacco production (wastepaper, cardboard, plastic other than CPA containers)? Acceptable practices include recycling and landfill. Prohibited practices would include burning and keeping on the farm (i.e. on-farm trash pit, dumping site, etc.)		VI	DRP	NC*

Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2	Properly segregate, store, recycle, or dispose of hazardous waste including but not limited to residual CPAs, fuel, oil, grease, paint, and batteries.	How do you dispose of hazardous waste used in tobacco production (including but not limited to residual agrochemicals, fuel, oil, grease, paint, and batteries)? Acceptable practices include recycling or a documented program that collects the hazardous waste from the farm or has a drop-off location(s). Grower should be prepared with documentation on program for audit.		VI	NR	NC
Additional Medium Y 1	Ensure that greenhouse float water is properly and legally disposed of.	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	NC*
<b>SOIL AND WATER MANAGEMENT</b>						
Additional Medium Y 1	Keep records of dates and amounts of irrigation water and maintain records of rainfall amounts during the growing season.	If applicable are the following records per field/tract maintained at the farm? a) Rainfall received; b) irrigation amounts	6, 2 & 3	DR	DR	NC*
Critical Y 1,2	Comply with irrigation and water extraction laws and regulations.	NO QUESTION				
Additional Low Y 1	If you use irrigation, then use proper irrigation management methods, which include: a) Maintain equipment and piping to prevent leakage; b) Maintain runoff water.	Do you properly manage your irrigation system, which includes maintaining equipment and piping to prevent leakage?  Do you properly manage your irrigation system, which includes minimizing runoff water?		VI; GI	VI: DR CAP	NC*
Additional Medium Y 1	Use cover crop or fall seeded crop following tobacco harvest.	Will you plant a cover crop this year following tobacco harvest this year?	6, 4	DR	DR	NC*

Standard Category	Standard	Grower Question	Tab # in Records, Page #	Verification	Remediation Processes	Non-Compliance Consequence
Additional Low Y 1	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).	Is documentation of crop rotation history for current year and the two previous years maintained at the farm?  Does your current crop rotation prevent tobacco from being grown in the same field for three or more consecutive years?	6, 4	DR	DR; NR	NC*
Additional Low Y 1	Use conservation tillage practices in tobacco production (i.e. minimum or reduced tillage, strip tillage, no tillage).	Are the following tillage practices implemented in tobacco production at the farm? a) Conventional tillage; b) minimum or reduced tillage; c) Strip tillage; d) No tillage		GI	NR	NC*
Additional Medium Y 1	Use crops planted with conservation tillage practices or sod as rotation crops on highly erodible land if applicable.	Is sod or conservation tillage used in rotational crops on Highly erodible land?		GI	NR	NC*
Additional Low Y 1	Use crops planted with conservation tillage or sod as rotation crops on all land (carbon sequestration by increasing soil organic matter).	Is sod or conservation tillage used in rotational crops on all land?		GI	NR	NC*
Critical Y 1,2,3	<b>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.</b>	<b>If field/tract is considered HEL (Highly Erodible Land), is there a conservation plan approved by the soil and water conservation district?</b>	6	DR	DR	NC
Additional High Y 1	Use vegetated buffers between field and streams or lakes (minimum buffer distance is 33 feet).	Are there buffer zones present between tobacco fields and streams, lakes, and other natural bodies of water?		VI	DR CAP	NC*
Additional Low Y 1	Maintain field borders/buffer strips along lower edges of fields and beside field ditches and drainage ways (minimum buffer distance is 33 feet).	Are vegetated field borders/buffer strips used along lower edges of fields and beside field ditches and drainage ways?		VI	DR CAP	NC*

## HOW YOU WORK MATTERS: Labor Certification Standards

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
<b>Recruiting, Hiring and Termination</b>						
Additional High Y 1,3	Maintain documentation of the number of permanent, local, seasonal, migrant, H2A, and immediate and non-immediate family workers.	Are records maintained that document the number of permanent, local, seasonal, migrant, H-2A, and immediate and non-immediate family workers?	7, 1 & 2	DR	DR	NC*
Critical Y 1,2,3	<p>If there are H-2A workers on the farm the grower's name (Primary or Associate) or the name of the entity which the individual is a part of must be listed on the:</p> <ul style="list-style-type: none"> <li>• ETA 790: Box 1 (must match C1 on 9142A)</li> <li>• ETA 9142A: C1 (must match Box 1 on 790)</li> <li>• If workers are acquired through an association (growers name must be listed on 790 Box 1 or in an addendum/appendix).</li> </ul>	Is the name of the grower (Primary or Associate) or the name of the entity which the individual is a part of listed on both the ETA 790: Box 1 (must match C1 on 9142A) and the ETA 9142A: C1 (must match Box 1 on 790)?		DR	NR	NC
Critical Y 1,2,3	Complete and maintain a Form I-9 for each worker. Once the work commitment has terminated, grower keeps the Form I-9 for either three years after the date of hire, or one year after the date the work commitment is terminated, whichever is longer. Form I-9 is not required for immediate family farm labor.	Do you have a completed I-9 form for each worker on your farm?	7	DR	Incomplete: DR None: NR	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical US ONLY Y 1,2,3	If you hire more than 500 man-days of hired labor in any of calendar quarters of last year, at the time of <u>recruitment of migrant workers</u> the following must be <u>provided in writing</u> in the worker's preferred language, to include: place of work (with specifics, such as the name and address of the Company or the association), pay rates (including piece rates) to be paid, crops and kinds of activities for which the worker may be assigned, period of work commitment, transportation, housing, and any other worker benefits to be provided, if any, and any costs to be charged for each, and whether state workers' compensation or state unemployment insurance is provided.	<p><u>If there were more than 500 man-days of hired labor in any of the calendar quarters of last year and migrant workers are hired: Are workers provided a written statement that describes, at minimum, the following terms and conditions of employment?</u></p> <ul style="list-style-type: none"> <li>• Place of employment (name and address of employer)</li> <li>• Wage rates (including piece rates)</li> <li>• Crops and kinds of activities for which worker will be employed</li> <li>• Period of employment</li> <li>• Transportation, housing and other benefits to be provided, and costs charged for these benefits, if any</li> <li>• Whether state workers' compensation or state unemployment insurance is provided</li> </ul>	7	DR; P; WI	DR; CAP	NC



Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical US ONLY Y 1,2,3	<p>If you hire more than 500 man-days of hired labor in any of calendar quarters of last year, at the time of <u>hire of seasonal workers</u> (excludes immediate family farm labor) the following must be provided <u>verbally and if requested in writing</u> in the worker's preferred language, to include: place of work (with specifics, such as the name and address of the Company or the association), pay rates (including piece rates) to be paid, crops and kinds of activities for which the worker may be assigned, period of work commitment, transportation, housing, and any other worker benefits to be provided, if any, and any costs to be charged for each, and whether state workers' compensation or state unemployment insurance is provided.</p> <p>Note: Workers are exempt if they are involved in a vocational or apprenticeship program sanctioned by the Board of Education in the state. Documentation verifying the vocation or apprenticeship program will be required.</p>	<p><u>If there were more than 500 man-days of hired labor in any of the calendar quarters of last year and seasonal workers are hired:</u> Are workers provided a written statement that describes, at minimum, the following terms and conditions of employment?</p> <ul style="list-style-type: none"> <li>• Place of employment (name and address of employer)</li> <li>• Wage rates (including piece rates)</li> <li>• Crops and kinds of activities for which worker will be employed</li> <li>• Period of employment</li> <li>• Transportation, housing and other benefits to be provided, and costs charged for these benefits, if any</li> <li>• Whether state workers' compensation or state unemployment insurance is provided</li> </ul>	7	DR; P; WI	DR; CAP	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical International ONLY Y 1,2,3	At the time of recruitment and at the time of hire, provide <u>all hired workers</u> (excludes immediate family farm labor) a written disclosure describing the terms and conditions of their work commitment written in the worker's preferred language, to include: place of work (with specifics, such as the name and address of the Company or the association), pay rates (including piece rates) to be paid, crops and kinds of activities for which the worker may be assigned, period of work commitment, transportation, housing, and any other worker benefits to be provided, if any, and any costs to be charged for each, and whether state workers' compensation or state unemployment insurance is provided.	Are hired workers provided a written statement that describes, at minimum, the following terms and conditions of employment? <ul style="list-style-type: none"> <li>• Place of employment (name and address of employer)</li> <li>• Wage rates (including piece rates)</li> <li>• Crops and kinds of activities for which worker will be employed</li> <li>• Period of employment</li> <li>• Transportation, housing and other benefits to be provided, and costs charged for these benefits, if any</li> <li>• Whether state workers' compensation or state unemployment insurance is provided</li> </ul>	7, 3 & 4	DR; P; WI	DR; CAP	NC
Additional High Y 1,3	Maintain records concerning any worker who was terminated, the reason for such termination, and report to the proper authorities (important for H-2A). Termination records are not required for immediate family farm labor.	Are records maintained for any termination; showing the worker's name, the reason for termination with appropriate documentation?	7, 5	DR	DR	NC*
<b>Immediate Family Working on the Farm</b>						
Immediate 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 worker per the US DOL definition.						
Critical US ONLY Y 1,2	Comply with all federal and state child labor laws pertaining to immediate family labor.	Are you in compliance with federal and state child labor laws related to family?		GI	NR	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical International ONLY Y 1,2	Immediate family members 15 years of age or younger may only be assigned light, nonhazardous work only if does not interfere with compulsory school.	Are immediate family members 15 years of age or younger only assigned light work that does not interfere with compulsory school?  Are immediate family members 15 years of age or younger who work on the farm prohibited from performing hazardous work, as identified by the Secretary of Labor?		GI	NR	NC
Critical International ONLY Y 1,2	Immediate family members ages 16 – 17 cannot be assigned any DOL hazardous tasks (Appendix 1- List A) or other restricted tasks (Appendix 1 – List B).	For family members ages 16-17, are DOL hazardous tasks restricted?  For family members ages 16-17, are other hazardous tasks restricted?		GI	DR CAP	NC
Critical International ONLY Y 1,2	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.	Do you ensure that a responsible adult is always present to supervise work by a family minor (any immediate family member under 18)?  Do you have minors (any immediate family member under 18) who work at night?		GI	DR CAP	NC
<b>Hired Workers</b>						
Critical US ONLY Y 1,2,3	The grower must obtain the written consent of a youth worker’s (under 18) parent or legal guardian prior to work commitment commencing.	Do you maintain written consent from parents, for any youth worker(s) (i.e. under 18)?	7	DR	DR	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2	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: (US and International) Youth excused from compulsory school attendance by applicable law, and (US Only) 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?		GI; WI	NR	NC
Critical Y 1,2	No hired worker under 18 may be assigned DOL hazardous tasks (Appendix 1 - List A).	Are hired workers under 18 restricted from DOL hazardous tasks?		GI; WI	DR CAP	NC
Critical International ONLY Y 1,2	No hired worker under 18 may be assigned Other Restricted Tasks (Appendix 1 - List B).	Are hired workers under 18 restricted from other restricted tasks?		GI; WI	DR CAP	NC
Additional High Y 1	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.	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	7, 6	DR	DR	NC*
<b>Wage, Benefits and Working Hours</b>						
Critical Y 1,2,3	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. Workers are exempt if they are involved in a vocational or apprenticeship program sanctioned by the Board of Education in the state. Documentation verifying the vocation or apprenticeship program will be required.	Do you pay all your hired workers at a rate equal to the prevailing minimum wage (state or federal) or higher?	7	DR; WI	NR	NCR

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2,3	Ensure that workers are paid either daily, weekly, or bi-weekly.	How often do you pay your workers? [Daily, Weekly, Bi-weekly, Monthly, Other (specify)] If using H-2A workers, do you have an established day of the week for pay?	7	DR; WI	VI CAP	NCR
Critical Y 1,2,3	Provide workers with individual written wage statements that remain in their possession for each pay period that include (wage statements are not required for immediate family farm labor): Worker's full name; Worker's address (seasonal or permanent) Worker's social security number (last 4-digits is acceptable); Total pay period earning; Number of hours worked; Basis on which wages are paid (piece rate if paid on a piecework basis); Number piecework units earned, if applicable; Specific sums withheld, and the purpose of each sum withheld.  NOTE: If subject to MSPA, H2A or FSLA, a more detailed statement may be required. Workers are exempt if they are involved in a vocational or apprenticeship program sanctioned by the Board of Education in the state. Documentation verifying the vocation or apprenticeship program will be required.	Do you provide all your workers with an individual wage statement that remains in their possession?	7	DR; WI	Incomplete: DR None: NR	NC
Critical Y 1,2,3	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.	NO QUESTION				

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2,3	All over contract work hours are voluntary and paid in accordance with applicable laws related to wage and working hour requirements.	NO QUESTION				
Critical Y 1,2,3	All deductions must be in accordance with applicable law.	NO QUESTION				
Critical Y 1,2,3	<b>Workers must not be subject to any illegal wage withholdings, such as deposits or deductions, for the purpose of recruitment or retention.</b>	<b>Do you withhold any amount of money from wages for anything else besides legal wage deductions such as taxes or social security?</b>	7	DR; WI	DR; VI CAP	NC
Critical Y 1,2	Post all legally required labor standards posters where they will be visible to all workers, 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).	Are employment posters posted in a clearly visible location at the farm? Notice of Migrant and Seasonal Agricultural Worker Protection Act (MSPA)  If farm hires migrant or seasonal labor (excluding immediate family farm labor) poster should be posted.		VI; P	DRP	NC
Critical Y 1,2	Post all legally required labor standards posters where they will be visible to all workers, 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.	Are employment posters posted in a clearly visible location at the farm? Notice of Employee Rights under the Fair Labor Standards Act  If farm hires ANY non-immediate family farm labor, poster should be posted.		VI; P	DRP	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2	Post all legally required labor standards posters where they will be visible to all workers, 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.	Are employment posters posted in a clearly visible location at the farm? Employee Rights under the H-2A Program  If farm uses H-2A then notice of employee rights must be poster.		VI; P	DRP	NC
Critical Y 1,2	Post all legally required labor standards posters where they will be visible to all workers, 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.	Are employment posters posted in a clearly visible location at the farm? OSHA Occupational Safety and Health Poster  If farm hired 11 or more workers on any given day during the previous 12 months OSHA poster is required.		VI; P	DRP	NC
<b>Farm Labor Contractors</b>						
Critical US ONLY Y 1,2	Ensure all workers provided by the FLC are 16 years of age or older.	Are all workers sourced through an FLC or third-party above the age of 16?	7	DR; WI	DR CAP	NC
Critical US ONLY Y 1,2,3	Verify workers are 16 years of age or older by reviewing the worker's I-9 form.	Do you maintain complete I-9 forms for workers provided by the FLC or third-party? I-9's must be present at time of audit.	7	DR; WI	Incomplete: DR None: NR	NC
Critical International ONLY Y 1,2,3	Ensure all workers provided by the FLC are 18 years of age or older.	Are all workers sourced through an FLC or third-party above the age of 18?	7	DR; WI	DR CAP	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical International ONLY Y 1,2	Verify workers are 18 years of age or older by reviewing the worker's I-9 form.	Do you maintain complete I-9 forms for workers provided by the FLC or third-party?	7	DR; WI	Incomplete: DR None: NR	NC
Critical Y 1,2	Ensure no worker under 18 provided by the FLC is assigned DOL hazardous tasks (Appendix 1 - List A).	Are all workers hired through an FLC under the age of 18 restricted from DOL hazardous tasks?		GI; WI	DR CAP	NC
Critical International ONLY Y 1,2	Ensure no worker under 18 provided by the FLC is assigned other hazardous tasks (Appendix 1 - List A).	Are all workers hired through an FLC under the age of 18 restricted from other restricted tasks?		GI; WI	DR CAP	NC
Critical Y 1,2,3	Obtain and keep a copy of the contractor's valid and non-expired Certificate of Registration.	Do you have a copy of the Farm Labor Contractor's Certificate of Registration with DOL?	7	DR	DRP	NC
Critical Y 1,2,3	If there are H-2A workers on the farm through a H-2ALC, the FLC's name must be listed on the: <ul style="list-style-type: none"> <li>• ETA 790: Box 1 (must match C1 on 9142A)</li> <li>• ETA 9142A: C1 (must match Box 1 on 790)</li> <li>• Grower's operation must be listed on work order.</li> <li>• Individual must show contract between grower and FLC that FLC's provides when requesting H-2A workers.</li> </ul>	Is the name of the FLC listed on both the ETA 790: Box 1 (must match C1 on 9142A) and the ETA 9142A: C1 (must match Box 1 on 790)?  Is the grower's operation listed on the work order?  Does the grower have the contract between them and the FLC?		DR	NR	NC
Critical Y 1,2,3	Obtain and keep a copy of the housing inspection if FLC is authorized to house.	If the FLC is authorized to house and provides housing for workers, do you have a copy of the housing inspection(s)?	7	DR; P	DRP	NC



Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2,3	Obtain and keep a copy of insurance if FLC is authorized to transport.	<p>If the Farm Labor Contractor transports workers, do you have:</p> <ul style="list-style-type: none"> <li>a copy of their insurance (auto and workers comp)</li> <li>driver's license for all drivers</li> <li>doctor's certificate for all drivers</li> </ul>	7	DR	DR	NC
Critical Y 1,2,3	Obtain and keep copy of the terms and conditions of their work commitment written in the worker's preferred language, to include: place of work (with specifics, such as the name and address of the Company or the association), pay rates (including piece rates) to be paid, crops and kinds of activities for which the worker may be assigned, period of work commitment, transportation, housing, and any other worker benefits to be provided, if any, and any costs to be charged for each, and whether state workers' compensation or state unemployment insurance is provided.	Do you have copies of the terms and conditions of their work commitment written in the worker's preferred language, to include: place of work (with specifics, such as the name and address of the Company or the association), pay rates (including piece rates) to be paid, crops and kinds of activities for which the worker may be assigned, period of work commitment, transportation, housing, and any other worker benefits to be provided, if any, and any costs to be charged for each, and whether state workers' compensation or state unemployment insurance is provided?	7	DR; P; WI	DR; CAP	NC
Critical Y 1,2,3	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.	Do you pay workers directly or keep copies of wage statements provided by the FLC to workers as legally required?	7	DR; WI	DR CAP	NC
<b>Forced Labor and Human Trafficking</b>						
Critical Y 1,2	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.	Are workers free to terminate/ leave their employment at any time without fear of retaliation?		GI; WI	NR	NCR
Critical Y 1,2	Growers are prohibited from employing compulsory or prison labor.	Do you employ any form of compulsory labor or prison labor that is not voluntary and paid wages?		GI; WI	NR	NCR

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2	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.	Do you use any form of forced or compulsory labor under bond, debt, or threat?		GI; WI	NR	NCR
Critical Y 1,2	Workers shall not be charged any fees for their recruitment or transport to their place of work, by the grower.	Do you charge workers any fees to be transported to your operation or to be employed?		GI; WI	VI CAP	NCR
Critical Y 1,2	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.	Does grower return or make readily available government issued documentation to workers upon verification of employment eligibility?		GI; WI	VI CAP	NCR
Critical Y 1,2	There shall be no restrictions on workers' freedom of movement, and workers shall be permitted to enter and exit their place of work.	Are workers allowed to enter and exit their place of work freely and without restrictions?		GI; WI	VI CAP	NCR
<b>Worker Rights and Responsibilities and Worker Concern Process</b>						
Critical Y 1,2	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.	Is there a Worker Rights and Responsibilities Poster posted where workers can access and read it on or near the job site?		VI; P	VI; P	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2,3	The most current 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.	<p>Did you post the most current Worker Concern Helpline poster and share the information with your workers? Grower must show worker concern documentation with signature of workers.</p> <p>If you use North Carolina Growers Association (NCGA) to source H-2A workers for your farm you may use the NCGA grievance mechanism to fulfill the requirement of a documented worker concern process and you do not have to post the GAPC Worker Concern Helpline poster. You must provide the following:</p> <ul style="list-style-type: none"> <li>• Documentation that describes the procedures and policies used</li> <li>• Documentation on how this is shared with your workers (found in the signed Acknowledgement of Receipt from NCGA)</li> <li>• Visual evidence of it being displayed or shared on a daily basis with the workers (i.e. poster, sign, wallet card, etc.)</li> </ul>	8, 1-3	VI; DR; WI; P	VI; P	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2	<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> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• The Grower, any of his/her employees or agents will not retaliate against workers for using the worker concern process.</li> </ul>	<p>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?</p>	8	VI; DR; WI	VI	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
<b>Freedom of Association</b>						
Critical Y 1,2	Respect the legal rights of workers to, or not to, associate, organize, and bargain collectively.	Do you allow workers freedom of association with organized groups?		GI; WI	VI CAP	NC
Critical Y 1,2	Do not interfere in union activities.	Do you allow reasonable access during non-work hours to your workers from organized groups?		GI; WI	VI CAP	NC
Critical Y 1,2	Do not discriminate nor retaliate against workers for such activities.	Do you discriminate against workers who associate with organized groups?		GI; WI	VI CAP	NC
<b>Harassment and Discrimination</b>						
Critical Y 1,2	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.	Do you verbally, physically, or sexually abuse workers?		GI; WI	NR	NCR
Critical Y 1,2	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.	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	NC
Additional High Y 1,3	Have a documented Anti-Discrimination Policy.	Do you have an Anti-Discrimination Policy?	8, 4-5	DR	DR	NC*
<b>Sanitation, Housing, and Transportation</b>						
Critical Y 1,2	Growers must provide workers access to the following as required: <ul style="list-style-type: none"> <li>Cool, potable water available during work hours</li> <li>Clean and sanitary bathroom facilities during work hours</li> <li>Hand washing facilities with soap at close proximity to bathrooms</li> </ul>	Are workers provided safe drinking water during work hours?  Are workers provided clean and sanitary bathroom facilities during work hours?  Are workers provided hand washing facilities with soap at close proximity at all times?		VI; WI	VI CAP	NCR

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2	Grower operations with eleven (11) or more workers, 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 worker's place of work in the field. Toilet and handwashing facilities are not required within a quarter mile for workers 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>If grower operations have eleven (11) or more workers, employed during the past twelve months, at any one time, engaged in hand-labor operations: Do they provide clean and sanitary bathroom facilities during work hours? Grower must provide proof of purchase or rental of sanitary bathroom facilities.</p> <p>If grower operations have eleven (11) or more workers, employed during the past twelve months, at any one time, engaged in hand-labor operations: Do they provide hand washing facilities with soap at close proximity within a quarter-mile walking distance from worker's place of work in the field? Grower must provide proof of purchase or rental of handwashing facilities.</p>		VI; DR; WI	VI CAP	NCR
Critical Y 1,2	Growers must offer workers rest breaks during the day, including lunch, without compromising their ability to earn wages.	Do you provide workers with breaks during the day, including lunch, without compromising their ability to earn wages?		GI; WI	VI CAP	NCR
Critical Y 1,2,3	<p>If the grower provides housing directly to seasonal workers, the grower must:</p> <p>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.</p>	<p>If housing is provided to seasonal workers, is there up-to-date safety inspection certification from a government agency posted?</p> <p>What is the date of the housing inspection?</p>	9	DR; P	DR	NCR
Additional High Y 1,2,3	<p>If the grower provides housing directly to seasonal workers, the grower must:</p> <p>Inspect housing prior to occupancy and at mid-season, using the OSHA Housing Safety and Health Checklist Provided in Agricultural Labor Management Guide.</p>	<p>Do you have a copy of the OSHA Housing Safety and Health Checklist?</p> <p>Do you inspect the housing on a regular basis or at least at mid-season using the OSHA Checklist?</p>		DR	DR	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2,3	<p>If the grower provides housing directly to seasonal workers, the grower must:</p> <p>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.</p>	<p>If housing is provided to migrant workers, is there a posted and filed statement at the farm that includes, at minimum, the following terms and conditions of occupancy?</p> <ul style="list-style-type: none"> <li>• Name and address of individual in charge of housing and owner of the housing, if different</li> <li>• Phone number of the person in charge of the housing</li> <li>• Mailing address and phone number where persons living in the housing facility may be reached</li> <li>• Names of occupants of the housing facility</li> <li>• Housing, utility and other charges, if any</li> <li>• Meals to be provided and costs charged</li> <li>• Any other conditions of occupancy</li> </ul>	9, 1	DR; VI; P	DR; VI	NC
Critical Y 1,2,3	<p>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.</p>	<p>Do you provide a transport vehicle for the workers' use?</p> <p>Are drivers properly insured and licensed?</p> <p>Is the transport vehicle inspected to ensure it is safe?</p> <p>Do you have inspection records for the transport vehicle?</p> <p>Do the vehicles used to transport workers appear in good condition (i.e. safe to drive)?</p>	9, 2-4	DR	DR	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
<b>Farm Safety</b>						
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 Y 1,2,3	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.	Do you have your OSHA 300A, 300, 301 forms prepared (records of work place accidents) including? a) Posted on farm - OSHA 300A: Date, establishment information, and current number of accidents in 2019, ("0" if none); b) In records - OSHA 300: Date, establishment information, and log of accidents if any occurred; c) In records if an accident has occurred - OSHA 301(s): Incident report for each accident that occurred	10, 1-3	DR	DR	NC
Critical Y 1,2	Review accident records periodically for guidance on avoiding future injuries.	Are accident and injury records periodically reviewed to avoid future injuries?		GI	DR CAP	NC
Critical Y 1,2	Follow Occupational Safety and Health Administration (OSHA) guidelines with respect to addressing GTS and heat stress risks.	For workers working with wet tobacco, are precautions taken to limit exposure to wet tobacco and measures in place to prevent Green Tobacco Sickness (GTS)?  What precautions are taken?		GI; WI	DRP; DR CAP	NC
Critical Y 1,2	Take precautions to limit worker exposure to wet tobacco and ensure adequate measures are in place to prevent GTS.	For workers working with wet tobacco, are precautions taken to limit exposure to wet tobacco and measures in place to prevent Green Tobacco Sickness (GTS)?  What precautions are taken?		GI; WI	DRP; DR CAP	NC
Critical Y 1,2	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.	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?		GI	GI	NC



Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2	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.	Do you prevent workers from entering a field sprayed with agrochemicals before the REI has passed?		GI; VI; WI	DRP	NC
Critical Y 1,2	Have a dedicated emergency contact person for all workers.	Do you have a dedicated emergency contact person for all of your workers?  Who is the dedicated emergency contact person?	10	GI; DR	DR	NC
Critical Y 1,2	Provide access to Emergency Medical Services (EMS).	Do you provide your workers with access to emergency medical services (EMS)?	10, 11	GI; DR; WI	DRP	NC
Critical Y 1,2,3	Provide workers with an emergency plan for medical emergencies, fires, or weather events.	Do you have a written emergency plan for your workers in case of medical emergencies, fires, or weather events?	10, 13-16	DR; WI	DR	NC
Additional High Y 1	Have a staff member (or grower) certified in First Aid/CPR/AED training.	Do you have anyone on your farm that is certified in First Aid/CPR/AED training?		DR	DR	NC*
<b>Training</b>						
Grower documents training to farm workers on the hazards and risks associated with agrochemicals, safe working practices, emergency response and health surveillance including:						
Critical Y 1,2,3	Heat Stress	Is there documentation verifying that workers received instruction on heat stress?	10, 17	DR; WI	DR CAP	NC
Critical Y 1,2,3	Farm Safety, including Farm Equipment Safety	Is there documentation verifying that workers received instruction on general farm safety and safe operation of farm equipment and machinery?	10, 17	DR; WI	DR CAP	NC
Critical Y 1,2,3	Carbon Monoxide Poisoning Prevention (if applicable)	Is there documentation verifying that workers received instruction on (for dark-fired operations only) prevention of carbon monoxide poisoning?	10, 17	DR; WI	DR CAP	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical Y 1,2,3	Pesticide Safety and Personal Protective Equipment (PPE)	Is there documentation verifying that workers received instruction on use of PPE (Personal Protective Equipment)?	10, 17	DR; WI	DR CAP	NC
Critical Y 1,2,3	Green Tobacco Sickness (GTS)	Is there documentation verifying that workers received instruction on Green Tobacco Sickness (GTS) (symptoms and treatments)?	10, 17	DR; WI	DR CAP	NC
Critical Y 1,2,3	Emergency response procedures	Is there documentation verifying that workers received instruction on emergency response procedures?	10, 17	DR; WI	DR CAP	NC
Critical Y 1,2,3	Recognition of REI	Is there documentation verifying that workers received instruction on recognition of REI?	10, 17	DR; WI	DR CAP	NC
Critical Y 1,2,3	Storage, handling, application, and disposal of CPAs	Is there documentation verifying that workers received instruction on storage, handling, application, and disposal of tobacco agrochemicals?	10, 17	DR; WI	DR CAP	NC
Critical Y 1,2,3	Grower follows all requirements of state and national regulations and training requirements related to worker protection and agrochemical use.	Is there documentation verifying that workers received instruction on required worker protection standard training?	10, 17	DR; WI	DR CAP	NC
Critical Y 1,2,3	NTRM Prevention	Is there documentation verifying that workers received instruction on NTRM Prevention?	10, 18	DR; WI	DR CAP	NC
Additional High Y 1	Proper baling and market separation of tobacco	Is there documentation verifying that workers received instruction on proper baling and market preparation of tobacco?	10, 18	DR; WI	DR CAP	NC*
Additional High Y 1	For air-cured and fire-cured operations only, grade separation	Is there documentation verifying that workers received instruction on (for air-cured and fire-cured operations only) grade separation?	10, 18	DR; WI	DR CAP	NC*
<b>Safety Equipment</b>						

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Personal protective equipment (PPE) will be evaluated based on tasks performed by workers. PPE should be available to all those workers performing tasks that require PPE.						
Critical Y 1,2	Use label required PPE by applicators/handlers/early entry workers	Is agrochemical label required personal protective equipment (PPE) use required for applicators, handlers, and early entry workers?		VI; WI	VI	NC
Critical Y 1,2	Gloves and water-resistant clothing for workers working with wet tobacco	Do workers have access to the following equipment? Gloves and water-resistant clothing for workers working with wet tobacco		VI; WI	VI	NC
Critical Y 1,2	Chemical resistant gloves for anyone handling or applying agrochemicals	Do workers have access to the following equipment? Chemical resistant gloves for anyone handling or applying agrochemicals		VI; WI	VI	NC
Critical Y 1,2	Chemical resistant aprons for anyone mixing or loading agrochemicals	Do workers have access to the following equipment? Chemical resistant aprons for anyone mixing or loading agrochemicals		VI; WI	VI	NC
Critical Y 1,2	Chemical resistant footwear for anyone mixing or loading agrochemicals	Do workers have access to the following equipment? Chemical resistant footwear for anyone mixing or loading agrochemicals		VI; WI	VI	NC
Critical Y 1,2	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.	Do workers have access to the following equipment? 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 Y 1,2	Hearing protection equipment for workers operating machinery or power tools	Do workers have access to the following equipment? Hearing protection equipment for workers operating machinery or power tools		VI; WI	VI	NC
Critical Y 1,2	Dust masks for workers handling cured tobacco or operating machinery or power tools under dusty conditions	Do workers have access to the following equipment? Dust masks for workers handling cured tobacco or operating machinery or power tools under dusty conditions		VI; WI	VI	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Additional High Y 1	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.	Does tobacco production equipment have guards or shields where originally installed?		VI	VI	NC*
Additional High Y 1	Have adequate first aid equipment for the number of their workers for the grower's tobacco production operation.	<p>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?</p> <p>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?</p> <p>Is a first aid kit available in vehicles used to transport workers on the farm?</p>		VI; WI	VI	NC*
Additional High Y 1	Have fire extinguishers available within two hundred feet of curing barns when workers are present.	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*