



# 2026 Tobacco Certification Program Standards

Version: 6.0

Updated: November 2025

EXTERNAL

# 2026 GAP Connections Certification Program Standards

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# Documentation of Revisions

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Version 1.0 approved November 2017

Version 1.1 approved November 2018

- Changes to the ordering of sections and standards to align with the record templates and monitoring visit questionnaire.
- Changes to the critical standards on tarping tobacco and enclosed trailers to transport tobacco to remove the requirement to keep covered on the way to market.
- Changes to the additional standard for monitoring humidity in flue-cured barns to expand to monitoring temperature and humidity in flue-cured barns and specifying that this includes a wet-bulb and a dry-bulb thermometer.
- Changed standards mentioning no-till to language consistent with “conservation tillage practices.”
- Provided more clarity to what is required to family labor versus hired labor within guidance sections.
- Expanded exemptions for vocational/apprenticeship program for minimum wage and wage statements within the Labor Management section.
- **Revisions or additions of clarifying language to the following Additional Standards (revision and/or clarifying language is in *italics*):**
  - Regularly inspect market prep area, remove Non-Tobacco Related Materials (NTRM) and other potential sources of contamination that could contaminate the tobacco, keeping records of inspection dates. *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.*
  - Have a dedicated market prep and baling area with *concrete, wood, or asphalt floor.*
  - Agrochemical storage with impermeable floor 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.*
  - Have a designated, fenced or otherwise secured storage area for empty agrochemical containers *that have not been tripled rinsed and punched pending disposal*
  - 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.*
- **Revisions or additions of clarifying language to the following Critical Standards (revision and/or clarifying language is in *italics*):**
  - Maintain a clean, dry tobacco storage area *when in use*, with no treated wood in contact with tobacco, no storage of pesticides, petroleum products, paint, stains, fertilizers or Styrofoam trays, or other sources of contamination that could contaminate the tobacco in storage area.
  - *Store baled tobacco on concrete floor, untreated wood (floor or pallets), trailers, wagons, or truck beds.* (Was previously included in standard listed above.)
  - Dispose of agrochemical containers *by either recycling thru 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.*
  - 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 on the farm.*
- **Addition of these Critical Standards to align with the Terms and Conditions of GAPC Certification:**
  - 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.
  - Obtain an FSA 578 crop report for the current season.

- **Addition of the following Critical Standards:**
  - 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.
- **Removal of the following Critical Standards:**
  - Apply irrigation based on a documented scheduling method with irrigation amounts measured by moisture meter, tensiometer, rain gages, or flow meters.

**Version 2.0 approved November 2020**

- Align the standards for indirect hiring to those that are required of growers directly hiring within the FLC/H-2ALC section of Labor Management.
- Made the distinction between standards that required compliance with a standard and those that required maintaining or providing documentation or a record for verification.
- Changes to the accident reporting standards to align with OSHA Injury and Illness Recordkeeping and Reporting Requirements:
  - 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. Records of all work-related accidents must be maintained at the worksite for at least five years.
  - From February through April, growers must post a summary of the injuries and illnesses recorded the previous year (OSHA Form 300 A).
- **Addition of the following Critical Standard(s):**
  - Growers should not employ unauthorized H-2A workers or allow H-2A workers under their employment to work on an unauthorized farm location. H-2A workers are only authorized to work for the employers and at the locations listed on their H-2A contract, the ETA 790 and the ETA 9142A.
  - If you are using a H-2ALC, ensure the H-2ALC has a surety bond that covers liability incurred during the term of the worker contract period listed on the H-2A application and must remain in effect for a period of at least 2 years from the expiration date of the labor certification.

**Version 3.0 approved November 2021**

- Addition of principle statements to each section.
- Addition of the definition of a Certification Unit.
- Changes to the requirement of the self-assessment to all types of Certifications (i.e. it was previously only a requirement of International Certification).
- Changes to the additional standard on muriate of potash to allow for updated recommendations from University Extension specialists.
- Changes to the additional standard on scouting specifying that scouting should be done at a minimum of every two weeks after crop establishment.
- Changes to the additional standard on NTRM inspections to change frequency of inspection to weekly instead of daily.
- **Revisions or additions of clarifying language to the following Critical Standards (revision and/or clarifying language is in *italics*):**

- AIR AND Fire: Ensure that livestock are excluded from curing and storage structures. *If curing and storage structures are multi-tier there must be a permanent floor to separate livestock from tobacco to prevent contamination.*
- **Addition of the following Critical Standards:**
  - Follow label instructions when applying CPAs.
  - AIR and FIRE ONLY: Use only Low Converting seed for tobacco production.
  - Use only Certified and non-GMO seed for tobacco production.
- **Addition of the following Additional Standards:**
  - Use established economic thresholds for pests and apply CPAs for those pests only when exceeded as confirmed by scouting and monitoring.
  - Use low-toxicity or pest targeted CPAs instead of more toxic broad-spectrum CPAs when available and applicable.
  - Use environmentally and biologically methods to control pests with available and applicable.

**Version 4.0 approved November 2022**

- **Rewrites or additions of clarifying language to the following Critical Standards (revision and/or clarifying language is in *italics*):**
  - Use appropriate methods such as *washing, steaming, bleaching, or use of commercial tray cleaner* to clean or sanitize transplant trays in the production of seedlings.
  - All CPA applications, restricted or non-restricted, should be completed or supervised by a licensed pesticide applicator. *This includes organic growers using only non-restricted CPAs.*
  - Have a designated, enclosed, dry (weather protected) and lockable CPA storage area with proper signage. *Signage should signify "Danger", "Pesticide Storage", or "Keep Out" at a minimum, be able to withstand normal wear and tear and if exposed to outdoor conditions, be able to withstand weather.* If no storage area a grower must show *CPA purchase receipts*, receipts from a custom applicator, or organic certification.
  - Ensure that CPAs are stored in original manufacturer's containers with labels attached or on file in CPA storage room. If there is no storage area a grower must show *CPA purchase receipts*, receipts from a custom applicator, or organic certification.
  - Dispose of *empty CPA containers by triple-rinsing and punching or removing lid* AND either recycling through programs or sites designated for CPA container recycling OR *disposing* of them in appropriate landfill. CPA containers cannot be burned.
  - If there are H-2A workers on the farm the grower's name (Primary or Associate), the name of the entity which the individual is a part of (member or employee), ~~or farm location~~ must be listed on all of the: ETA 790(s) and ETA 790A(s) and ETA 9142A(s) (if requested)
  - Growers should not employ unauthorized H-2A workers or allow H-2A workers under their employment to work on an unauthorized farm location. H-2A workers are only authorized to work for the employers and at the locations listed on their H-2A contract, the ETA 790, and the ETA 9142A. *Grower's operation must be listed on the ETA paperwork.*
  - Ensure that workers are paid either daily, weekly, or bi-weekly and according to their employment terms and conditions.
  - Provide workers *with a copy of* their individual written wage for each pay period.
  - 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. *If H-2A workers are employed, growers should follow all legal requirements if an H-2A worker terminates their employment commitment.*
  - If the grower provides housing directly to seasonal workers, the grower must: *Maintain the housing facility(s) to comply with all federal and state safety and health standards*, including up-to-date certification from DOL or other appropriate governmental agencies.

- Provide workers with an emergency plan for medical emergencies, fires, or weather events *that includes, at minimum, a list of important numbers for emergency services and the location of a safe shelter on the farm or an evacuation plan that leads workers to a safe location in case of weather events.*
- Farm Safety, including Farm Equipment Safety and First Aid
- **Rewrites or additions of clarifying language to the following Additional Standards (revision and/or clarifying language is in *italics*):**
  - CPA storage with impermeable floor. This includes tubs, bins, or containers *used to hold CPAs made of impermeable material.*
  - CPA storage designed to retain runoff from spills and leakages. This includes tubs, bins, or containers *used to hold CPAs made of impermeable material* that can hold more than the volume of CPA being stored.
- **Addition of the following Critical Standards:**
  - The FLC/H-2ALC must maintain the housing facility(s) to comply with all federal and state safety and health standards, including up-to-date certification from DOL or other appropriate governmental agencies.
  - If the FLC or H-2ALC is driving workers, they should be authorized to drive on their Certificate of Registration.
  - Obtain and keep a copy of the FLC's or H-2ALC's driver's license and doctor's certificate if FLC or H-2ALC is authorized to drive.

**Version 5.0 approved November 2023**

- **Rewrites or additions of clarifying language to the following Critical Standards (revision and/or clarifying language is in *italics*):**
  - *Maintain a copy and provide* workers with a copy of their individual written wage statements for each pay period that include: Worker's full name; Worker's address (seasonal or permanent); Worker's social security number (last 4-digits is acceptable); Employer's name; Employer's address; Employer's identification number (entire number); Total pay period earnings; 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; Net pay.
  - *Maintain a copy of and* ensure that all workers provided by the FLC/H-2ALC are provided with a copy of their individual written wage statements for each pay period that include: Worker's full name; Worker's address (seasonal or permanent); Worker's social security number (last 4-digits is acceptable); Employer's name; Employer's address; Employer's identification number (entire number); Total pay period earnings; 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; Net pay.
  - Grower documents *annual* training to *all* farm workers *including the farm worker's name, signature, and signature date (i.e. training date)* on the hazards and risks associated with CPAs, safe working practices, emergency response and health surveillance including:
    - Heat Stress
    - Farm Safety, including Farm Equipment Safety and First Aid
    - Carbon Monoxide Poisoning Prevention (if applicable)
    - Pesticide Safety and Personal Protective Equipment (PPE)
    - Green Tobacco Sickness (GTS)
    - Emergency response procedures
    - Recognition of REI
    - Storage, handling, application, and disposal of CPAs
- **Rewrites or additions of clarifying language to the following Additional Standards (revision and/or clarifying language is in *italics*):**
  - Grower documents annual training to all farm workers including the farm worker's name, signature, and signature date (i.e. training date) on:
    - Proper baling and market separation of tobacco

- AIR & FIRE ONLY: Grade separation
- **Version 6.0 pending approval November 2024**
  - Clarifying language around labor exchange and voluntary labor added to the Labor Management section.
  - Addition of barn safety as a training requirement for air and fire cured operations.
  - Addition of Appendix B – Training Topic Descriptions

# ABOUT GAP CONNECTIONS

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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.

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).

## ABOUT THE GAPC CERTIFICATION PROGRAM

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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 choose to participate or not in the GAP Connections Certification Program.

### CERTIFICATION PROGRAM MISSION

Distinguish those growers within the tobacco industry that commit to the adoption of agricultural standards and practices which produce a quality crop while protecting, sustaining, or enhancing the environment, ensure the safety and rights of farm laborers.

### OBJECTIVE

The objective of GAPC Certification Program is to measure compliance with GAPC Certification Standards by reviewing objective evidence, records, and procedures of those GAPC Grower Members who have applied and been approved to participate in the GAPC Certification Program.

### SCOPE

GAPC Certification Standards and Monitoring Activities apply to:

- GAPC Grower Member's records and locations, including their offices, fields, barns, greenhouses, chemical storage locations and anywhere the integrity and quality of the product being grown is affected;
- All farmworkers that provide any services in tobacco on the operation seeking Certification regardless of whether they are directly hired by the grower or indirectly hired by other entities such as Farm Labor Contractors or other third parties.

### CERTIFICATION UNIT

The certificate holder is the individual GAPC Grower Members associated with the operation (Primary and Associates). The Primary and Associate growers have the ultimate responsibility for compliance with GAPC Certification Standards. The tobacco production included in the unit of certification is the tobacco crop grown on

the farm and fields managed by the Primary and Associate growers in compliance with the GAPC Certification Standards.

## **TYPES OF CERTIFICATIONS**

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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 the type of Certification chosen by the grower.

## **CERTIFICATION STANDARDS**

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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.

Note that in some cases, GAPC Certification Standards may go beyond the Federal and State laws and regulations and in such cases, the GAPC Certification Standard shall prevail. In some cases, the Standard contradicts Federal and State laws and regulations, in which case, Federal and State laws shall prevail. Therefore, the strictest requirement shall be the best practice to follow to ensure that relevant statutory requirements are met by GAPC Certified growers and operations.

## **FUTURE REVIEWS**

GAPC Certification Standards are reviewed and revised as needed annually by the Board of Directors after consultation with stakeholders and working committees.

# General

**EVERY DECISION MATTERS**

# GENERAL CERTIFICATION STANDARDS

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## SELF-ASSESSMENT

### PRINCIPLE

Providing a method that allow growers to report and verify information about their operation during the season prior to a monitoring visit is a time efficient and cost-effective method to collect needed data and prepare growers for GAPC Certification.

### CRITICAL STANDARDS

- Complete the GAPC Annual Self-Assessment prior to the monitoring activity.

## GROWER TRAINING

### PRINCIPLE

Training allows content experts and GAPC to provide information and guidance on industry best practices and GAPC Certification Standards in the three topics of crop, environment, and labor management to improve on-farm practices and help growers achieve GAPC Certification.

### CRITICAL STANDARDS

- Grower and all Associated Growers must attend Annual GAP Training by June 30 of each year.

## 578 CROP REPORT

### PRINCIPLE

Ensuring the integrity of the GAPC Certification Program is critical to sustainable improvements within the industry. GAPC requires the FSA 578 form to verify active participation and accurate reporting for the current year.

### CRITICAL STANDARDS

- Obtain an FSA crop report(s) for the current year detailing all tobacco acreage from all counties.
- Acreage reported on current year FSA Form 578 crop report(s) must match acreage reported at time of monitoring visit.



# **Crop & Environmental Management**

**HOW YOU GROW MATTERS**

# HOW YOU GROW MATTERS: CROP MANAGEMENT

## OPERATION AND NUTRIENT MANAGEMENT

### PRINCIPLE

A desirable nutrient management plan meets the needs of the crop, minimizes the costs to the grower, and minimizes the impact on the environment. Recording information about fields and applications helps to plan an effective nutrient management strategy.

### CRITICAL STANDARDS

- If required in your watershed, comply with nutrient management regulations as applicable.

### ADDITIONAL STANDARDS

#### High

- Keep records of all nutrient applications- greenhouse, transplant water, and field (soil and foliar), which includes date of fertilizer application, application timing (pre-plant, side-dressing, transplanting, or foliar), type of fertilizer applied (N-P-K), and rate of application. This includes lime applications.
- Follow Extension recommendations if Muriate of Potash is applied as recommendations on when and how much vary depending on the growing region and type of tobacco grown. Links to University Extension Production Guides can be found at [www.gapconnections.com](http://www.gapconnections.com).

#### Medium

- Make fertilizer application decisions using soil test results that are no more than three years old before the time of transplanting.
- 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 University Extension Production Guides which can be found at [www.gapconnections.com](http://www.gapconnections.com).

## INTEGRATED PEST MANAGEMENT

### PRINCIPLE

Growers should implement diverse methods of pest controls, paired with monitoring to reduce unnecessary pesticide applications to decrease potential human health risks and adverse environmental effects. CPAs should be used after other practical alternative pest, weed, and disease management measures have been utilized. Given the hazards associated with CPA use, it is important that the people who use them are informed and trained.

### CRITICAL STANDARDS

- All CPA applications, restricted or non-restricted, should be completed or supervised by a licensed pesticide applicator. This includes organic growers using only non-restricted CPAs.
- Follow label instructions when applying CPAs.
- Use only CPAs that have been approved by the EPA for use on tobacco (labeled). Always refer to your grower contract; some buyers may prohibit use of CPAs which are labeled for tobacco.

- Keep field/tract records of all CPA applications, including in the greenhouse, transplant water and field. This includes:
  - CPA common name
  - Active Ingredient
  - Application date
  - Application method (transplant water, hand sprayer, overhead sprayer, etc.)
  - Rate
  - Name of Applicator
  - Field name and location
  - EPA Number
  - REI

Note: Growers may use a reference sheet such as the “CPA Reference Sheet” found in the GAPC records to record brand name, EPA registration number, active ingredient, and REI to avoid writing this information for each individual application. This reference sheet must be kept with the records of the individual agrochemical applications.

## ADDITIONAL STANDARDS

### High

- Keep field/tract records of all CPA applications, including greenhouse, transplant water and in the field. This includes:
  - Pest targeted or reason for application
- Use established economic thresholds for pests and apply CPAs for those pests only when exceeded as confirmed by scouting and monitoring.
- Use low-toxicity or pest targeted CPAs instead of more toxic broad-spectrum CPAs when available and applicable.
- Use environmentally and biologically methods to control pests with available and applicable.
- Maintain pesticide application records for the previous two growing seasons as well as the current season.
- Maintain calibration records for current year

### Medium

- Have a documented scouting program for pests and record the scouting information by field/tract following GAP standards.
- Scouting should be done at a minimum of every two weeks after crop establishment and records should include the following:
  - Field scouting dates
  - Pests observed and identified
  - Field/tracts where pests were identified
  - Level of infestation of pests identified (i.e., percent of plants affected/infested)
  - Corrective actions taken by field and date (i.e. crop protection agent (CPA) applications made by field and date)
  - Follow-up of your pest control practices to determine the effectiveness of the action taken
- Destroy unused seedlings within 30 days after transplanting is completed.

- Destroy crop residues and establish a cover crop within 60 days after harvest.

## CROP OPERATIONS MANAGEMENT

### PRINCIPLE

Implementing acceptable agronomic and industry requested practices from planning to post harvest will help achieve industry acceptable and quality production. Observation and records of variety disease resistance, yields, and other characteristics will assist in planning future quality and productive crops.

### CRITICAL STANDARDS

- 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.
- AIR and FIRE ONLY: Use only Low Converting seed for tobacco production.
- Use only Certified and non-GMO seed for tobacco production.
- Whether you produce or purchase your tobacco plants, keep records of transplant/greenhouse seeding dates, varieties, and seed lot numbers by field/tract.
- Keep tobacco types strictly separated from each other during seeding, curing, and market preparation.
- If tarps are used to cover tobacco during transport, use tarps made of non-plastic material on the side of the tarp in contact with the tobacco when covering it during transport and ensure all surfaces used in transport are free of contaminants.
- 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.

### ADDITIONAL STANDARDS

#### Medium Risk

- Select tobacco variety based on, disease resistance, curing characteristics, cured leaf quality, and yield, and maintain documentation of sources you used to select your tobacco varieties (examples are seed company literature, university production guides, buying company recommendations, etc.)
- Keep records of transplanting and topping dates by field/tract.
- Use recommended measures to control weed seed contamination of tobacco.

#### Low

- Keep records of plant and row spacing and plant population maintained by field/tract.
- Prior to harvest, mow all field borders, turning areas, and manual removal of pigweed and other weeds of concern from fields.

## CURING AND BARN MANAGEMENT

### PRINCIPLE

Proper curing and barn management including monitoring the curing atmosphere, is critical for maximizing both yield and quality, impacting crop value. Inspecting and maintaining barns and structures allows for safe and efficient labor housing the crop and the efficient use of fuel to cure the crop. Traceability provides transparency and integrity to your crop, operation, and brand in the market and an added reassurance to purchasers.

### CRITICAL STANDARDS

- AIR and FIRE ONLY: Record the date that tobacco was placed in the curing structure and the date it was removed.
- FLUE ONLY: Have barn tested every 3 years and use only indirect fired barns with heat exchangers.
- Have a documented barn inspection program for air cured and fire-cured barns that includes, at minimum, 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.<sup>1</sup>

### ADDITIONAL STANDARDS

#### High

- Have a documented program that allows for traceability of tobacco through curing and delivery.

#### Medium

- Maintain records of the type and number of curing structures or barns.
- Keep records of harvesting dates by field/tract.
- Maintain documentation on the curing structure or barn used for tobacco from each field and tract for traceability purposes.
- FIRE ONLY: Maintain records of firing procedures in fire cured barns to include the number of firings and fuel used (i.e. slabs, sawdust, etc.)
- FLUE ONLY: Use some method or tool to monitor temperature and humidity in the barn.<sup>2</sup> This includes a wet-bulb and a dry-bulb thermometer.

#### Low

- 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 hanging operations.
- AIR AND FIRE ONLY: Maintain records of spacing of sticks in curing barns and/or structures.
- FLUE ONLY: Use automated curing controls to measure temperature and humidity.
- FIRE ONLY: Monitor temperature in fire cured barns during firing.

<sup>1</sup> See Barn Inspection template in GAPC Records ([www.gapconnections.com](http://www.gapconnections.com))

<sup>2</sup> See Example on page 27 in Appendix 2.

## NON-TOBACCO RELATED MATERIAL (NTRM)

### PRINCIPLE

Providing a product that is free of NTRM is critical in producing a quality crop at time of delivery. By eliminating sources of NTRM or physically removing NTRM operations are increasing crop value.

### GUIDANCE

Market preparations (market prep) is defined as all preparations of tobacco for delivery and sale. This includes all activities surrounding stripping and baling tobacco.

### ADDITIONAL STANDARDS

#### High

- Have at least one trash can in market prep areas. If market prep area is not currently in use, the trash cans that will be used should be visible.
- Do not use brooms with synthetic bristles in market preparation area.
- Regularly inspect market prep area and remove Non-Tobacco Related Materials (NTRM), keeping records of weekly inspection dates when market preparation areas in 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 last year's inspection log.

#### Medium

- Have designated break areas away from market prep area.
- Do not have tools with plastic handles in market prep area.

#### Low

- FLUE-CURED: Use picking lines to reduce NTRM.
- FLUE-CURED: Use sand reels/leaf tumblers to reduce NTRM.
- AIR AND FIRE ONLY: Use a slotted stripping table with wire mesh cover or other stripping systems that permits dirt and other NTRM to freely fall out of the tobacco as it is stripped (stripping chains, stripping wheels, etc.)
- Have a dedicated market prep and baling area with concrete, wood, or asphalt floor.

## ON-FARM TOBACCO STORAGE

### PRINCIPLE

On-farm storage is often necessary to hold tobacco from the time it has completed curing through market preparation until it is ready to be delivered. Proper tobacco leaf conditions help to avoid deterioration in quality and loss of yield.

## **CRITICAL STANDARDS**

- Maintain a clean, dry tobacco storage area, with no preservative treated wood in contact with tobacco, no storage of pesticides, petroleum products, paint, stains, fertilizers or Styrofoam trays in storage area or other sources that could contaminate the tobacco in storage area.
- AIR AND FIRE ONLY: Ensure that livestock are excluded from curing and storage structures. If curing and storage structures are multi-tier there must be a permanent floor to separate livestock from tobacco to prevent contamination.

## **ADDITIONAL STANDARDS**

### **High**

- Store baled tobacco on concrete floor, untreated wood, trailers, wagons, or truck beds.

### **Medium**

- Have an enclosed storage area with doors and windows that can be secured, if windows present. Doors and windows can be closed.

# HOW YOU GROW MATTERS: ENVIRONMENTAL MANAGEMENT

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## AGROCHEMICAL MANAGEMENT

### PRINCIPLE

Growers shall manage agrochemical applications using legal, safe, and environmentally friendly practices.

Growers shall implement proper handling, controlled storage and proper disposal techniques of all agrochemicals and agrochemical containers used on tobacco production.

### CRITICAL STANDARDS

- Maintain SDS sheets for all Crop Protection Agents (CPAs) used in tobacco production.
- Maintain copies of labels for all CPAs currently being used in tobacco production either on the container in storage, or in farm files. Does not include CPAs that are no longer in use and are not on the farm.
- Have a designated, enclosed, dry (weather protected) and lockable CPA storage area with proper signage. Signage should signify "Danger", "Pesticide Storage", or "Keep Out" at a minimum, be able to withstand normal wear and tear and if exposed to outdoor conditions, be able to withstand weather. If no storage area a grower must show CPA purchase receipts, receipts from a custom applicator, or organic certification.
- Ensure that CPAs are stored in original manufacturer's containers with labels attached or on file in CPA storage room. If there is no storage area a grower must show CPA purchase receipts, receipts from a custom applicator, or organic certification.
- Dispose of empty CPA containers by triple-rinsing and punching or removing lid AND either recycling through programs or sites designated for CPA container recycling OR disposing of them in appropriate landfill. CPA containers cannot be burned.
- Properly segregate, store, recycle, or dispose of hazardous waste including but not limited to residual CPAs, fuel, oil, grease, paint, and batteries.

### ADDITIONAL STANDARDS

#### Medium

- CPA storage designed to retain runoff from spills and leakages. This includes tubs, bins, or containers used to hold CPAs made of impermeable material that can hold more than the volume of CPA being stored.
- Mix or transfer CPAs in containment areas away from runoff channels.
- Ensure that greenhouse float water is properly and legally disposed of.

#### Low

- Maintain a current inventory of CPAs in storage and update monthly if changes occurred within the month.
- Have a designated, fenced or otherwise lockable storage area for empty CPA containers that have not been tripled rinsed and punched pending disposal.

- Properly dispose of non-hazardous waste products (i.e., wastepaper, cardboard, plastic (other than CPA containers)) by moving to a trash receptacle or recycle container. Burning non-hazardous waste is not acceptable.

## SOIL AND WATER MANAGEMENT

### PRINCIPLE

Soils are a dynamic, living, and fragile resource while water is a limited resource. Growers shall manage both to conserve, protect, preserve, and improve.

### CRITICAL STANDARDS

- 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.

### ADDITIONAL STANDARDS

#### High

- Use vegetated buffers between field and streams or lakes (minimum buffer distance is 33 feet).

#### Medium

- Keep records of dates and amounts of irrigation water and maintain records of rainfall amounts during the growing season.
- Use cover crop or fall seeded crop following tobacco harvest.
- Use crops planted with conservation tillage practices or sod as rotation crops on highly erodible land if applicable.

#### Low

- If you use irrigation, then use proper irrigation management methods, which include:
  - Maintain equipment and piping to prevent leakage
  - Maintain runoff water
- 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-solanceae crops (Solanceae crops include tomatoes, eggplant, and peppers).
- Use conservation tillage practices in tobacco production (i.e. minimum or reduced tillage, strip tillage, no tillage).
- Use crops planted with conservation tillage practices or sod as rotation crops on all land (carbon sequestration by increasing soil organic matter).
- Maintain field borders/buffer strips along lower edges of fields and beside field ditches and drainage ways (minimum buffer distance is 33 feet).



# **Labor Management**

**HOW YOU WORK MATTERS**

# HOW YOU WORK MATTERS: LABOR MANAGEMENT

## RECRUITING, HIRING AND TERMINATION

### PRINCIPLE

Growers shall comply with applicable federal and state laws relating to recruiting, hiring and termination and maintain documentation to verify compliance. I-9's shall be completed and used to verify worker's age to ensure compliance with the age requirements of the GAPC Certification Program.

### CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- If there are H-2A workers on the farm obtain and keep a copy(s) of the ETA 790(s) and 790A(s) for all H-2A workers which must include the number of workers, location of employment, name of employer, number of housing units, housing location, and H-2A case number.
- If there are H-2A workers on the farm the grower's name (Primary or Associate), the name of the entity which the individual is a part of (member or employee) must be listed on all of the:
  - ETA 790(s) and ETA 790A(s)
  - ETA 9142A(s) (if requested)
- Growers should not employ unauthorized H-2A workers or allow H-2A workers under their employment to work on an unauthorized farm location. H-2A workers are only authorized to work for the employers and at the locations listed on their H-2A contract, the ETA 790, and the ETA 9142A. Grower's operation must be listed on the ETA paperwork.
- 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<sup>3</sup>.

### CRITICAL STANDARDS FOR U.S. CERTIFICATION

- If you hire more than 500 man-days of hired labor in any of calendar quarters of last year, at the time of hire of seasonal workers (excludes immediate family farm labor<sup>18</sup>, workers involved in a vocational or apprenticeship program<sup>4</sup>, and labor exchange/volunteer labor<sup>5</sup>) and at the time of recruitment of migrant workers the following must be provided in writing 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,

<sup>3</sup> Immediate family members includes only: (1) A spouse; (2) Children, stepchildren, and foster children; (3) Parents, stepparents, and foster parents; and (4) Brothers and sisters of owner/operator. If the worker does not fall into one of the four categories listed here then the worker is considered a hired employee per the US DOL definition.

<sup>4</sup> 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.

<sup>5</sup> Individuals that are not immediate family farm labor or apprenticeship/vocational labor that work on the operation for no compensation (volunteer) or for no compensation AND an exchange of labor to help on their farm (labor exchange). Volunteer Farm Help form is required.

- 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.

## CRITICAL STANDARDS FOR INTERNATIONAL CERTIFICATION

- At the time of recruitment and at the time of hire, provide all hired workers (excludes immediate family farm labor<sup>18</sup> and labor exchange/volunteer labor<sup>6</sup>) 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.

## ADDITIONAL STANDARDS

### High

- Maintain documentation of the number of permanent, local, seasonal, migrant, H2A, and immediate and non-immediate family workers.
- 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<sup>21</sup>, workers involved in a vocational or apprenticeship program<sup>7</sup>, nor labor exchange/volunteer labor<sup>8</sup>.

## IMMEDIATE FAMILY WORKING ON THE FARM

### PRINCIPLE

Align GAPC U.S. Certification Standards with U.S. law regarding immediate family labor and align GAPC International Certification with the International Labor Convention (ILO) regarding restrictions on immediate family labor.

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<sup>6</sup> Individuals that are not immediate family farm labor or apprenticeship/vocational labor that work on the operation for no compensation (volunteer) or for no compensation AND an exchange of labor to help on their farm (labor exchange). Volunteer Farm Help form is required.

<sup>7</sup> 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.

<sup>8</sup> Individuals that are not immediate family farm labor or apprenticeship/vocational labor that work on the operation for no compensation (volunteer) or for no compensation AND an exchange of labor to help on their farm (labor exchange). Volunteer Farm Help form is required.

## GUIDANCE

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 of owner/operator. 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 STANDARDS FOR US CERTIFICATION

- Comply with all federal and state child labor laws pertaining to immediate family labor.

## CRITICAL STANDARDS FOR INTERNATIONAL CERTIFICATION

- Immediate family members ages 15 years of age or younger may only be assigned light, nonhazardous work only if does not interfere with compulsory school.
- Immediate family members ages 16 – 17 cannot be assigned any DOL hazardous tasks (Appendix A- List A) or other restricted tasks (Appendix A – List B).
- 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.<sup>9</sup> Furthermore, children are not permitted to work at night.

## HIRED WORKERS

### PRINCIPLE

Eliminating work which puts minor's (under the age of 18) health, safety, education, and development at risk.

### GUIDANCE

Standards in this section do not apply to immediate family farm labor. If your operation hires ANY non-immediate family farm labor these standards will apply to those non-immediate family workers including those involved in apprenticeship/vocational labor or labor exchange/volunteer labor.

## CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- No hired worker under 18 may be assigned DOL hazardous tasks (Appendix A - List A).
- If labor exchange or volunteer labor used, a Volunteer Farm Help document must be completed.

## CRITICAL STANDARDS FOR US CERTIFICATION

- The grower must obtain the written consent of a youth worker's (under 18) parent or legal guardian prior to work commitment commencing.
- Growers must not engage or obtain services from any person who is younger than 16 years of age. Exceptions for utilizing a person under 16 years of age include the following:
  - Youth excused from compulsory school attendance by applicable law, AND
  - Youth involved in accredited learning programs can be assigned work tasks if the tasks relate directly to the learning experiences of the program and are in compliance with law.

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<sup>9</sup> The recommended hourly limit for family children 13 to 15 years old is 2 hours per day.

- Youth labor that is excused from compulsory school attendance by applicable law, and youth involved in accredited learning programs (apprenticeship or vocational programs) must have verification documentation.

## CRITICAL STANDARDS FOR INTERNATIONAL CERTIFICATION

- Growers must not employ or obtain services from any person who is younger than 16 years of age.
- No hired worker under 18 may be assigned Other Restricted Tasks (Appendix A - List B).

## ADDITIONAL STANDARDS

### High

- If minors are employed on the farm, records that include, at minimum:
  - Name in full
  - Place where the minor lives while employed,
  - Permanent address,
  - Date of birth

## WAGE, BENEFITS, AND WORKING HOURS

### PRINCIPLE

Wages shall be in accordance with all federal, state, and local laws and records of time worked and/or production provided by workers. Workers shall be given the terms and conditions of their employment and receive wage statements to ensure transparency and monitoring for proper payment, illegal fees and deductions.

### GUIDANCE

Standards in this section do not apply to immediate family farm labor<sup>10</sup>, workers involved in a vocational or apprenticeship program<sup>11</sup>, nor labor exchange/volunteer labor<sup>12</sup>. If your operation hires ANY non-immediate family farm labor not involved in a vocational or apprenticeship program these standards will apply to those workers.

## CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- 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.
- Ensure that workers are paid either daily, weekly, or bi-weekly and according to their employment terms and conditions.

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<sup>10</sup> Immediate family members includes only: (1) A spouse; (2) Children, stepchildren, and foster children; (3) Parents, stepparents, and foster parents; and (4) Brothers and sisters of owner/operator. If the worker does not fall into one of the four categories listed, then the worker is considered a hired employee per the US DOL definition.

<sup>11</sup> 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.

<sup>12</sup> Individuals that are not immediate family farm labor or apprenticeship/vocational labor that work on the operation for no compensation (volunteer) or for no compensation AND an exchange of labor to help on their farm (labor exchange). Volunteer Farm Help form is required.

- Maintain a copy and provide workers with a copy of their individual written wage statements for each pay period that include (wage statements are not required for immediate family farm labor):
  - Worker's full name,
  - Worker's address (permanent or seasonal),
  - Worker's social security number (last 4-digits is acceptable),
  - Employer's name,
  - Employer's address,
  - Employer's identification number (entire number),
  - Total pay period earnings,
  - 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,
  - Net Pay

NOTE: If subject to MSPA, H2A or FSLA, a more detailed statement may be required.

NOTE: This Standard is above U.S. law requirements.

- Compensation must include all time under the grower's direction and control once worker initiates any work activity including short breaks (20 minutes or less) and time used to conduct training. This does not include transportation from housing to field to start and from the field to housing when work is complete.
- All over contract work hours are voluntary and paid in accordance with applicable laws related to wage and working hour requirements.
- All deductions must be in accordance with applicable law.
- Workers must not be subject to any illegal wage withholdings, such as deposits or deductions, for the purpose of recruitment or retention.

## LABOR POSTERS

### PRINCIPLE

Growers shall comply with all applicable federal and state laws relating to postings of laws, regulations and critical messages.

### GUIDANCE

Standards in this section do not apply to immediate family farm labor<sup>13</sup>. If your operation hires ANY non-immediate family farm labor these standards will apply to your operation as applicable including those involved in apprenticeship/vocational labor or labor exchange/volunteer labor.

### CRITICAL STANDARDS

- 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:

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<sup>13</sup> Immediate family members includes 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 then the worker is considered a hired employee per the US DOL definition.

- Notice of Migrant and Seasonal Agricultural Workers Protection Act (MSPA)
- Notice of Employee Rights under the Fair Labor Standards Act
- Employee Rights under the H-2A Program (if H-2A workers work on the operation)
- OSHA Occupational Safety and Health Poster

## FARM LABOR CONTRACTORS(FLCs) /H-2ALCs (Indirect Hired Labor)

### PRINCIPLE

Growers shall comply with all applicable federal and state laws relating to the use of FLCs and H-2ALCs and ensure that all practices required by GAPC Certification in regard to directly hired labor or applied to indirectly hired labor (i.e. labor provided by a third-party) including eliminating work which puts minor's (under the age of 18) health, safety, education, and development at risk.

### GUIDANCE

Standards in this section apply to operations that indirectly hire labor through a third-party defined by U.S. law as a Farm Labor Contractor or H-2ALC. A Farm Labor Contractor (FLC) is someone who, for money or other valuable consideration, recruits, solicits, hires, employs, furnishes or transports migrant and/or seasonal agricultural workers or, provides housing to migrant agricultural workers. They are often called crew leaders or crew bosses. Anyone in the US who meets this definition of a Farm Labor Contractor as defined by the US Department of Labor must be registered with the US Department of Labor.

### CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- Ensure no worker under 18 provided by the FLC/H-2ALC is assigned DOL hazardous tasks (Appendix A - List A).
- If a grower chooses to work with an individual defined as a FLC or H-2ALC by current U.S. laws, they must be currently registered with the U.S. DOL and have a valid and non-expired Certificate of Registration.
- Obtain and keep a copy of the FLC or H-2ALC's valid and non-expired Certificate of Registration.
- If there are H-2A workers on the farm provided by a H-2ALC, obtain and keep a copy of the ETA 790(s) and 790a(s) for all H-2ALC workers that work on your farm which must include the number of workers, location of employment, name of employer, number of housing units, housing location, and H-2A case number.
- If there are H-2A workers on the farm provided by a H-2ALC, the grower's operation must be listed on work order and the H-2ALC's name must be listed on the:
  - ETA 790(s) and 790A(s)
  - ETA 9142A(s) (if requested)
- Growers should not employ unauthorized H-2A workers. H-2A workers are only authorized to work for the employers and at the locations listed on their H-2A contract, the ETA 790(s) and 790A(s) and the ETA 9142A(s).
- If there are H-2A workers on the farm provided by a H-2ALC, there must be a contract between the grower and the H-2ALC. The contract is required by U.S. DOL when the H-2ALC requests H-2A workers.
- If there are H-2A workers on the farm provided by a H-2ALC, a copy of the contract between the grower and the FLC must be provided. The contract is required U.S. DOL when the H-2ALC requests H-2A workers.

- If there are H-2A workers on the farm provided by a H-2ALC, the H-2ALC must have a surety bond that covers liability incurred during the term of the worker contract period listed on the H-2A application and must remain in effect for a period of at least 2 years from the expiration date of the labor certification.
- If there are H-2A workers on the farm provided by a H-2ALC, the grower must have proof of a surety bond that covers liability incurred during the term of the worker contract period listed on the H-2A application and must remain in effect for a period of at least 2 years from the expiration date of the labor certification.
- If the FLC or H-2ALC is housing workers, they should be authorized to house on their Certificate of Registration.
- Obtain and keep a copy of the housing inspection if FLC or H-2ALC is authorized to house.
- The FLC/H-2ALC must maintain the housing facility(s) to comply with all federal and state safety and health standards<sup>14</sup>, including up-to-date certification from DOL or other appropriate governmental agencies.
- If the FLC or H-2ALC is transporting workers, they should be authorized to transport on their Certificate of Registration.
- If FLC or H-2ALC is transporting workers, they must be insured.
- Obtain and keep a copy of insurance for each vehicle if FLC or H-2ALC is authorized to transport.
- If the FLC or H-2ALC is driving workers, they should be authorized to drive on their Certificate of Registration.
- Obtain and keep a copy of the FLC's or H-2ALC's driver's license and doctor's certificate if FLC or H-2ALC is authorized to drive.
- 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
- Ensure that the pay of all workers provided by the FLC/H-2ALC meets, at a minimum, national and state minimum wage requirements or adverse effect wage if H2A workers by either paying workers directly rather than through FLC/H-2ALC or ensure the FLC/H-2ALC provides wage statements to workers as legally required and grower obtains and keeps copies.
- Maintain a copy of and ensure that all workers provided by the FLC/H-2ALC are provided with a copy of their individual written wage statements for each pay period that include:
  - Worker's full name,
  - Worker's address (seasonal or permanent),
  - Worker's social security number (last 4-digits is acceptable),
  - Employer's name,

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<sup>14</sup> Housing must be maintained during occupancy to meet the appropriate OSHA, ETA standards, and/or local and state-specific rules for employer-provided housing and/or migrant housing.

- Employer's address,
- Employer's identification number (entire number),
- Total pay period earnings,
- 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,
- Net pay

NOTE: If subject to MSPA, H2A or FSLA, a more detailed statement may be required.

## **CRITICAL STANDARDS FOR US CERTIFICATION**

- The grower must obtain the written consent of any youth worker's (under 18) parent or legal guardian prior to work commitment commencing provided by the FLC/H-2ALC.
- Ensure all workers provided by the FLC/H-2ALC are 16 years of age or older.
- Verify workers provided by the FLC/H-2ALC are 16 years of age or older by reviewing the worker's I-9 form.

## **CRITICAL STANDARDS FOR INTERNATIONAL CERTIFICATION**

- Ensure all workers provided by the FLC/H-2ALC are 18 years of age or older.
- Verify workers provided by the FLC/H-2ALC are 18 years of age or older by reviewing the worker's I-9 form.
- Ensure no worker under 18 provided by the FLC/H-2ALC is assigned other hazardous tasks (Appendix A – List B).

## **ADDITIONAL STANDARDS**

### **High**

- If minors (under 18), provided by the FLC/H-2ALC, work on the farm records that include, at minimum must be maintained: Name in full, place where the minor lives while employed, permanent address, date of birth.

## **FORCED LABOR AND HUMAN TRAFFICKING**

### **PRINCIPLE**

All farm labor must be voluntary. There shall be no forced labor or labor carried out under any threat or duress.

## GUIDANCE

Standards in this section do not apply to immediate family farm labor. If your operation hires ANY non-immediate family farm labor these standards will apply to those non-immediate family workers including those involved in apprenticeship/vocational labor or labor exchange/volunteer labor.

## CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- Workers shall be allowed to terminate their work commitment at any time, without the threat of intimidation, coercion, blacklisting, or any other type of discrimination or retaliation. If H-2A workers are employed, growers should follow all legal requirements if an H-2A worker terminates their employment commitment.<sup>15</sup>
- Growers are prohibited from employing compulsory or prison labor.
- 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.
- Workers shall not be charged any fees for their recruitment or transport to their place of work, by the grower.
- 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.
- There shall be no restrictions on workers' freedom of movement, and workers shall be permitted to enter and exit their place of work.<sup>16</sup>

## WORKER RIGHTS AND RESPONSIBILITIES AND WORKER CONCERN PROCESS

### PRINCIPLE

Informing and training workers of their rights and access to a worker concern process equips workers with the knowledge and skills to identify and report any concerns they may have about the working environment. Prohibiting worker retaliation allows workers to report concerns without fear allowing for their

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<sup>15</sup> H-2A workers must only work for the employer listed on the contract and at the location(s) stated on the contract.

Employers of H-2A workers must notify USCIS within 2 workdays if any of the following occur: (1) No show: The H-2A worker fails to report to work within 5 workdays of the latter of the employment start date on the H-2A petition, or the start date established by the employer; (2) Abscondment: The H-2A worker leaves without notice and fails to report for work for 5 consecutive workdays without the consent of the employer; (3) Termination: The H-2A worker is terminated before completing of the H-2A labor or services for which he or she was hired; or (4) Early Completion: The H-2A worker finishes the labor or services for which he or she was hired more than 30 days earlier than the date specified in the H-2A petition.

<sup>16</sup> H-2A workers must only work for the employer listed on the contract and at the location(s) stated on the contract.

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active role in continuous monitoring of working conditions for themselves and others working in tobacco production.

## GUIDANCE

Standards in this section do not apply to immediate family farm labor. If your operation hires ANY non-immediate family farm labor these standards will apply to those non-immediate family workers including those involved in apprenticeship/vocational labor or labor exchange/volunteer labor.

## CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- 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.
- Grower must implement the GAPC Worker Concern Helpline process or other approved third-party worker concern process. This includes:
  - Sharing the GAPC Worker Concern Helpline (WCH) talking points listed below and found on the back of the poster and on the GAPC WCH Documentation record with their workers. Must be provided in a language common to the workers.
    - The Grower is committed to providing a safe working environment for all workers and satisfy all legal rights of workers while they are on their farm.
    - A method is available for workers to notify the Grower, orally and in writing, of any concern related to the terms or conditions of work.
    - 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.
    - 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.
    - The Grower, any of his/her employees or agents will retaliate against workers for using the worker concern process.
  - Completing the GAPC WCH Documentation with signature of workers and date.

Other approved third-party worker concern helplines or processes:

- 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:
  - Documentation that describes the procedures and policies used;
  - Documentation on how this is shared with your workers (found in the signed Acknowledgement of Receipt from NCGA);
  - Visual evidence of it being displayed or shared on a daily basis with the workers (i.e. poster, sign, wallet card, etc.
- 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.

## FREEDOM OF ASSOCIATION

### PRINCIPLE

Growers shall recognize and respect workers' rights to freedom of association and to bargain collectively. Representatives of worker associations should be able to carry out their activities within the framework of law, regulation, prevailing labor relations and practices, and agreed procedures.

### GUIDANCE

Standards in this section do not apply to immediate family farm labor. If your operation hires ANY non-immediate family farm labor these standards will apply to those non-immediate family workers including those involved in apprenticeship/vocational labor or labor exchange/volunteer labor.

## CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- Respect the legal rights of workers to, or not to, associate, organize and bargain collectively.
- Do not interfere in union activities.
- Do not discriminate nor retaliate against workers for such activities.

## HARRASSMENT AND DISCRIMINATION

### PRINCIPLE

Growers shall ensure the fair treatment of workers. No harassment, discrimination, or any other form of abuse or the threat or implication of these actions towards workers shall be tolerated.

### GUIDANCE

Standards in this section do not apply to immediate family farm labor. If your operation hires ANY non-immediate family farm labor these standards will apply to those non-immediate family workers including those involved in apprenticeship/vocational labor or labor exchange/volunteer labor.

## CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- 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 work commitment or recruitment.
- 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.

## ADDITIONAL STANDARDS

### High

- Have a documented anti-discrimination policy.

## **SANITATION, HOUSING AND TRANSPORTATION**

### **PRINCIPLE**

Growers shall comply with all federal and state laws relating to sanitation, housing, and transportation while providing breaks and access to water, bathroom facilities and handwashing stations. Provided housing shall be clean, safe, and meet the basic needs of the workers.

### **GUIDANCE**

Standards in this section apply to ALL farming operations including those that only have immediate family farm labor, if applicable.

### **CRITICAL STANDARDS FOR ALL CERTIFICATIONS**

- Growers must provide workers easy access to the following as required:
  - Cool, potable water available during work hours
  - Clean and sanitary bathroom facilities during work hours
  - Hand washing facilities with soap at close proximity to bathrooms
- Grower operations with eleven (11) or more 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 workers' 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.
- Growers must offer workers rest breaks during the day, including lunch, without compromising their ability to earn wages.
- If the grower provides housing directly to seasonal workers or migrant workers, the grower must:
  - Maintain the housing facility(s) to comply with all federal and state safety and health standards<sup>17</sup>, including up-to-date certification from DOL or other appropriate governmental agencies.
  - Inspect housing prior to occupancy and at mid-season, using the OSHA Housing Safety and Health Checklist Provided in Agricultural Labor Management Guide.
  - 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, and
    - Any other charges or conditions of occupancy

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<sup>17</sup> Housing must be maintained during occupancy to meet the appropriate OSHA, ETA standards, and/or local and state-specific rules for employer-provided housing and/or migrant housing.

- If transportation is provided, growers must ensure that vehicles meet legally required safety standards and that drivers are properly insured and licensed. Vehicles must be inspected when required by law, and person supplying the transportation must maintain inspection records.

## **Additional Standards**

### **High**

- If the grower provides housing directly to seasonal or migrant workers, the grower must:
  - Inspect housing prior to occupancy and at mid-season, using the OSHA Housing Safety and Health Checklist provided in Agricultural Labor Management Guide.

## **FARM SAFETY**

### **PRINCIPLE**

Providing a safe working environment prevents accidents and injuries and minimizes health risks. Workers should have the rights to be informed and consulted on health and safety and have the right to remove themselves from danger, without prejudice, where there is justified imminent and serious risk to their safety.

### **GUIDANCE**

Standards in this section apply to ALL farming operations including those that only have immediate family farm labor.

### **CRITICAL STANDARDS FOR ALL CERTIFICATIONS**

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:

- 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. Records of all work-related accidents must be maintained at the worksite for at least five years.
- From February through April, growers must post a summary of the injuries and illnesses recorded the previous year (OSHA Form 300 A).
- Operations with 20-249 workers must submit injury and illness summary data to OSHA electronically through the Injury Tracking Application by March 2.
- Review accident records periodically for guidance on avoiding future injuries.
- Follow Occupational Safety and Health Administration (OSHA) guidelines with respect to addressing GTS and heat stress risks.
- Take precautions to limit worker exposure to wet tobacco and ensure adequate measures are in place to prevent GTS
- Identify risks on the farm such as those involved in operating machinery/equipment, adverse weather conditions, CPA applications, etc. and train workers on how to avoid and protect themselves from such risks.
- Follow the legal requirements that restrict workers from entering an area where CPAs have been used, and as legally required, post signs designating re-entry times for specific fields after CPA application.
- Have a dedicated emergency contact person for all workers.
- Provide access to Emergency Medical Services (EMS).

- Provide workers with an emergency plan for medical emergencies, fires, or weather events that includes, at minimum, a list of important numbers for emergency services and the location of a safe shelter on the farm or an evacuation plan that leads workers to a safe location in case of weather events.

## ADDITIONAL STANDARDS

### High

- Have a staff member (or grower) certified in First Aid/CPR/AED training.

## TRAINING

### PRINCIPLE

Training equips growers, families and workers with the information and skills to identify hazards and provide a safe working environment for themselves and others on the farm. Growers should provide workers with regular health and safety training appropriate to the work they perform.

### GUIDANCE

Standards in this section apply to ALL farming operations including those that only have immediate family farm labor. Training is to be done for all workers (family and non-family).

## CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- Grower documents annual training to all farm workers including the farm worker's name, signature, and signature date (i.e. training date) on the hazards and risks associated with CPAs, safe working practices, emergency response and health surveillance including: (see Appendix B: Description of Required Training Topics)
  - Heat Illness and Heat Illness Prevention
  - General Farm Safety and Safe Operation of Farm Equipment and Machinery
  - First Aid
  - Carbon Monoxide Poisoning Prevention (if applicable)
  - Use of Personal Protective Equipment (PPE):
  - Green Tobacco Sickness (GTS):
  - Farm Emergency Plan and Emergency Response procedures
  - Pesticide Safety including:
    - Recognition of Restricted Entry Interval (REI):
    - Storage, handling, application, and disposal of CPAs:
  - NTRM Prevention
  - AIR & FIRE ONLY: Barn Safety
- Grower follows all requirements of state and national regulations and training requirements related to worker protection and CPA use.

## ADDITIONAL STANDARDS

### High

- Grower documents annual training to all farm workers including the farm worker's name, signature, and signature date (i.e. training date) on:
  - Proper baling and market separation of tobacco
  - AIR & FIRE ONLY: Grade separation

## SAFETY EQUIPMENT

### PRINCIPLE

Ensuring that any person who prepares and applies pesticides has access to appropriate protective and safety equipment and maintaining safety precautions on equipment reduces exposure to hazards and harm while working on the farm. Producers must

### GUIDANCE

Standards in this section apply to ALL farming operations including those that only have immediate family farm labor. Training is to be done for all workers (family and non-family). 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 STANDARDS FOR ALL CERTIFICATIONS

- Use label-required PPE by applicators/handlers/early entry workers.
- Provide gloves and water-resistant clothing for workers working in wet tobacco.
- Provide chemical resistant gloves for anyone handling or applying CPAs.
- Provide chemical resistant aprons for anyone mixing or loading CPAs.
- Provide chemical resistant footwear for anyone mixing or loading CPAs.
- Provide safety glasses for workers applying or handling CPAs or performing jobs which can create flying objects that damage eyes such as grinding, sawing, driving nails, etc.
- Provide hearing protection equipment for workers operating machinery or power tools.
- Provide dust masks for workers handling cured tobacco or operating machinery or power tools under dusty conditions.

## ADDITIONAL STANDARDS

### High

A grower is required to:

- 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.
- Have adequate First-aid equipment for the number of workers for the grower's tobacco production operation.
- Have ready-to use fire extinguishers available within two hundred feet of curing barns when workers are present.

# Appendices

## APPENDIX A: Hazardous Lists Reference

### List A: DOL Hazardous Tasks List Items Related to Tobacco Production<sup>18</sup>

- Operating a tractor of over 20 power-take-off (PTO) horsepower or connecting or disconnecting an implement or any of its parts to or from such a tractor.
- Operating or assisting to operate (including starting, stopping, adjusting, feeding or any other activity involving physical contact associated with the operation) any of the following machines: the unloading mechanism of a non-gravity-type self-unloading wagon or trailer or power post hole diggers, power post driver, or non-walking type rotary tiller.
- Operating or assisting to operate (including starting, stopping, adjusting, feeding, or any other activity involving physical contact associated with the operation) any of the following machines: trencher or earthmoving equipment; forklift; or power-driven circular, band, or chain saw.
- Working from a ladder or scaffold (painting, repairing, or building structures, pruning trees, picking fruit, etc.) at a height of over 20 feet.
- Driving a bus, truck, or automobile when transporting passengers or riding on a tractor as a passenger or helper.
- Handling or applying toxic agricultural chemicals (including cleaning or decontaminating equipment, disposal or return of empty containers, or serving as a flagman for aircraft applying such chemicals). Such toxic chemicals are identified by the word “poison,” or “warning,” or are identified by a “skull and crossbones” on the label.

### List B: International Restricted Tasks (for youth under 18 years of age)

- Harvesting, topping, suckering tobacco.
- Operating machinery with moving parts or moving vehicles.
- Use of tools requiring motion for cutting (e.g., machete) or shears.
- Handling and application of crop protection agents (CPA) or fertilizers.
- Lifting and handling heavy loads unless the load is less than 10% of the person’s body mass.
- Working at heights greater than four feet without approved fall protection equipment.
- Work at night (30 minutes after sundown to 30 minutes before sunrise).
- Working in intense hot weather, humidity or direct sunlight unless guidance on the GTS and Heat Stress Bulletin and precautions in the OSHA Heat Safety Tool and “Using the Heat Index: A Guide to Employees” are followed. Ready access to cool, potable water is required.
- Working long hours (more than 8 hours in a 24-hour period).

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<sup>18</sup> Source: <https://www.dol.gov/whd/regs/compliance/whdfs40.pdf>

## APPENDIX B: Description of Required Training Topics

**Heat Illness and Heat Illness Prevention:** How to identify heat illness symptoms, how heat illness affects an individual's health and safety, how to protect oneself from heat illness and other preventive measures, and review of operation's heat illness prevention plan, if available.

**General Farm Safety and Safe Operation of Farm Equipment and Machinery:** The importance of being aware of and able to identify farm safety risks on the operation. Identifying farm equipment and machinery hazards, learn tips to prevent safety risks and hazards on equipment and machinery including Rollover Protection Standards (ROPS) and machine safeguarding operating instructions.

**First Aid:** Basic steps in providing first aid in the event of an emergency or non-emergency injury or illness, identifying the location of first aid kits, recognizing an emergency, distinguishing the difference between life threatening and non-life-threatening emergencies and emergency action steps (check, call, care).

**Carbon Monoxide Poisoning Prevention:** Carbon monoxide is a poisonous gas that has no smell or taste. Breathing it in can make you unwell, and it can kill if exposed to high levels. Smoke inhalation during a fire can cause carbon monoxide poisoning. Information for workers to learn what is Carbon Monoxide Poisoning, how to identify symptoms, preventative steps, and emergency response.

**Pesticide Safety:** Preventive information and practices to protect workers from pesticide poisoning and injury. Including the sources and routes of pesticide exposure, identifying the symptoms of pesticide exposure, recognizing and explaining the meaning of warning signs in the fields, taking appropriate actions to prevent overexposure and apply routine and emergency decontamination procedures. This topic will also include the recognition of Restricted Entry Interval (REI) and the proper procedures of storage, handling, application, and disposal of CPAs.

**Use of Personal Protective Equipment (PPE):** Discuss when PPE is necessary, different types of PPE required, limitations of PPE, and proper care and maintenance of PPE.

**Green Tobacco Sickness (GTS):** How to recognize GTS symptoms, how to prevent GTS, how to administer proper emergency response to GTS symptoms.

**Farm Emergency Plan and Emergency Response:** Discuss different types of natural and man-made emergencies, understand the risks in these emergencies, discuss procedures in place, and a communication plan to report emergencies.

**NTRM Prevention:** Define NTRM, the importance of recognizing NTRM, and how to prevent it.

**Barn Safety:** Workers who are facilitating the hanging and/or removing tobacco in the barns should be provided instructions and information on how to do so properly and safely including how to properly climb the barn and hang tobacco, the proper attire to wear (clothes and footwear), how to prevent distractions, and how to report any safety hazards identified such as insect nests, broken boards, etc..