



GAPC Certification Compliance Guide

Standards, Questions, Verification, and Remediation

This document contains the detail listing of GAP Connections (GAPC) Certification Standards, Certification questions, verification methods used to verify response to question, and remediation processes if necessary. This document is to be used by the grower to prepare for the Certification Audit and Certification Site Visit.

- **Standard Category:** Critical Standards are aligned to current legal requirements or otherwise deemed necessary for the quality of the crop, or protection of the environment or workers. Additional Standards are aligned to best practices in the industry.
- **Standard:** The GAPC Certification Standard.
- **Grower Question:** The question that will be asked during the Certification Audit or Site Visit.
- **Tab # in Records:** Indicates the tab in the GAPC Records where the template or document can be found that will be requested to verify the question.
- **Verification Methods:** The methods used to verify standards or remediation of standards.
- **Remediation Processes:** The processes used to remediate, i.e. fix, practices that did not meet Certification standards.
- **Non-remediation Consequences:** The consequences when a grower chooses not to remediate practices to comply with standards by the given deadline.

Verification Methods

Abbreviation		Process
Documentation Review	DR	When the auditor is on the farm, they will verify records or documents through the Documentation Review process. The auditors will be trained on what documents to look for as well as what type of documentation is acceptable for the purposes of the certification program
Picture	P	When the auditor is on the farm, they will verify practice through document review or visual inspection. The auditors will be trained on what documents to look for as well as what type of documentation is acceptable for the purposes of the certification program. Auditors will also take a picture of the document 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 will be trained on what to look for on the farm. If the auditor does not see the item, follow up questions may be asked
Worker Interview	WI	Some items may be asked on the grower audit, but they will be verified on the Worker Interview form. In this case, we will be checking the grower and Worker responses together

Remediation Processes

Abbreviation		Process	Time to Complete
Documentation Review	DR	If documentation review is required for remediation, the grower must collect all missing records and organize the information using the GAPC record templates or the grower's own record keeping method. Once all missing records have been prepared and organized, the grower can send them to the auditor who visited their farm. Successful remediation is at the auditor's discretion.	30 days from the date audit or site visit 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.	30 days from the date audit or site visit 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 auditor who visited their farm. Successful remediation is at the auditor's discretion.	30 days from the date audit or site visit 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 audit or site visit 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 audit or site visit report was submitted

Non-remediation Consequences

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

HOW YOU GROW MATTERS: Crop and Environment Certification Standards

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
NUTRIENT MANAGEMENT						
Additional Medium	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	DR; P	DR	NC*
Additional High	Keep records of all nutrient applications- greenhouse, transplant water, and field (soil and foliar), which includes date of fertilizer application, application timing (pre-plant, side-dressing, transplanting, or foliar), type of fertilizer applied (N-P-K, and rate of application. 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	DR	DR	NC*
Additional High	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	DR	NR	NC*
Additional Medium	If using animal manure or litter for fertilizer, have it tested for nutrient content to determine appropriate rates. Guidelines on the use of animal manure in tobacco production can be found in the University of Kentucky Burley Tobacco growers guide.	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	DR; P	DR CAP	NC*
Critical	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	Verification	Remediation Processes	Non-Compliance Consequence
INTEGRATED PEST MANAGEMENT						
Additional Medium	<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"> • Date of scouting • Pests observed • Percent of plants affected/infested • Crop protection agent applications made by field and date • Conduct a follow-up of your pest control practices to determine the effectiveness of the action taken 	<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	DR	DR	NC*
Additional Medium	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	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	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	All agrochemical applications, restricted or non-restricted, should be completed or supervised by a licensed pesticide applicator	Does a licensed pesticide applicator apply or supervise all pesticide usage (restricted and non-restricted)?	2	DR	DR	NC
Critical	Use only pesticides that have been approved by the EPA for use on tobacco (labeled). Always refer to your grower contract; some buyers may prohibit use of CPA's which are labeled for tobacco	Do you only use labeled pesticides on your farm for tobacco production?	2	DR	NR	IS

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	Keep field/tract records of all agrochemical applications, including in the greenhouse, transplant water, and field. This includes: CPA/agrochemical common name, Active ingredient, Application Date, Application Method, Rate, Name of Applicator, Field name and location, EPA Number, REI	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	DR	DR	NC
Additional High	Keep field or tract records of all agrochemical applications, including greenhouse, transplant water and in the field. This includes: Pest targeted or reason for application	Does pesticide application documentation include, at minimum, the following? c) Reason for application	2	DR	DR	NC*
Additional High	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?		DR	DR	NC*
Additional High	Maintain calibration records for current year	Are records of sprayer calibration for the current season being maintained?	2	DR	DR	NC*
CROP AND OPERATIONS MANAGEMENT						
Critical	Manage and grow all the tobacco you sell under your name 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
Critical	Does the grower have a FSA Form 578 Crop report for the current year?	Does the grower have a FSA Form 578 Crop report for the current year?	3	DR; P	DR	NC
Additional Medium	Select tobacco variety based on, disease resistance, curing characteristics, cured leaf quality, and yield, and maintain records or documentation of sources you used to select your tobacco varieties (examples are: seed company literature, university production guides, buying company recommendations, etc.)	Do you have documentation that indicates tobacco varieties are selected based on disease resistance, field history, curing characteristics, cured leaf quality, or yield?	3	DR	DR	NC*

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	Whether you produce or purchase your tobacco plants, keep records of transplant/greenhouse seeding dates, varieties and seed lot numbers by field/tract.	<p>Do you produce or purchase your tobacco plants?</p> <p>What percentage of your tobacco plants do you produce?</p> <p>Is the following documentation maintained for crop management maintained at the farm? a) Seed lot numbers and varieties maintained at the farm; b) Dates of seeding for transplants;</p>	3	GI; DR	DR	NC
Additional Medium	Keep records of transplanting and topping and by field or tract	<p>Is the following documentation maintained for crop management maintained at the farm? a) Dates of transplanting for the current season; d) Dates of topping;</p>	3	DR	DR	NC*
Additional Low	Keep records of plant and row spacing and plant population maintained by field or tract	<p>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</p>	3	DR	DR	NC*
Additional Medium	Use recommended measures to control weed seed contamination of tobacco	<p>Is there a documented program for control of problem weeds that contaminate tobacco with weed seed?</p>	3	DR	DR	NC*
Additional Low	FLUE ONLY: Prior to harvest, mow all field borders/turning areas, and manual removal of pigweed and other weeds of concern from fields	<p>Do you mow all field borders, turning areas, and manually remove pigweed and other weeds of concern from the fields?</p>		GI	GI	NC*
Critical	Keep tobacco types strictly separated from each other during seeding, curing, and market preparation.	<p>If multiple tobacco types are grown on the farm, are they kept strictly separated at all levels of production?</p>		VI	NR	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	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. OR Use an enclosed trailer/vehicle and protected from weather when transporting the tobacco to market, on surfaces free of contaminants. Stock trailers should not be used for tobacco transport.	Are tarps used to cover tobacco during transport to market made of waterproof and non-plastic material on the side of the tarp in contact with the tobacco? Is tobacco always covered during transport to market, on surfaces free of contaminants?		VI	DRP	NC*
Additional High	Use University recommended rates of MH in sucker control or follow contract guidelines for MH use.	NO QUESTION				
Additional High	Separate tobacco by stalk position and quality to meet contract requirements	NO QUESTION				
CURING AND BARN MANAGEMENT						
Additional Medium	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	4	DR	DR	NC*
Additional 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 handling operations	How tall is your tallest curing structure?		GI; VI	NR	NC*
Additional Medium	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	DR	DR	NC*
Additional Medium	Maintain documentation on the curing structure or barn used for tobacco from each field and tract for traceability purposes	Are the following records maintained for curing and barn management? For tobacco from each field/tract, documentation of the curing structure or barn used.	4	DR	DR	NC*

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	AIR AND FIRE ONLY: Record the date that tobacco was placed in the curing structure and date it was removed.	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	4	DR	DR	NC*
Additional Low	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	DR	DR	NC*
Additional Medium	FIRE ONLY: Maintain records of firing procedures in the fire cured barns to include the number of firings and fuel used (i.e. slabs, sawdust, etc.)	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	DR	DR	NC*
Critical	FLUE ONLY: Have barn tests every 3 years and use only indirect fired barns with heat exchangers	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	4	DR; P	DR	NC
Additional Medium	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*
Additional Low	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	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	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	DR	DR	NC*

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	Have a documented safety program for air cured and fire-cured barns that includes inspection of tier rails and support beams for soundness, inspection of general barn soundness, removal of stored machinery, lumber and other items from barn floors that could enhance injury in falls. Ladders or steps should be installed and maintained to reach tiers	For air and fire operations, is there a documented barn safety program, including inspection dates, hazards identified, and actions taken to reduce hazards?	4	DR	DR	NC
NON-TOBACCO RELATED MATERIALS (NTRM)						
Additional Medium	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	Have at least one trash can in the market prep area	Is there at least one trash can present in facilities/market preparation areas?		VI	DRP	NC*
Additional Medium	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	Do not use brooms with synthetic bristles in market preparation area	Do brooms used in market prep area have synthetic bristles?		VI	DRP	NC*
Additional High	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	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	GI; DR	DR	NC*
Additional Low	FLUE-CURED: Use picking lines to reduce NTRM.	For flue-cured operations, does grower have picking lines?		VI	DRP	NC*
Additional Low	FLUE-CURED: Use sand reels/leaf tumblers to reduce NTRM.	For flue-cured operations, does grower have sand reels?		VI	DRP	NC*
Additional Low	AIR ONLY: Use a slotted stripping table with wire mesh cover or other stripping systems that permit dirt and other NTRM to freely fall out of the tobacco as it is stripped (stripping chains, stripping wheels, etc.)	For air and fire operations, does grower have a slotted table for stripping?		VI	DRP	NC*

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Additional Low	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*
ON-FARM TOBACCO STORAGE						
Critical	Maintain a clean, dry tobacco storage area, with no treated wood in contact with tobacco, no storage of pesticides, petroleum products, paint, stains, fertilizers or Styrofoam trays in storage area.	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
Additional Medium	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*
High	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	IS
Critical	AIR AND FIRE: Ensure that livestock are excluded from curing and storage structures	For air and fire operations, are livestock excluded from curing and storage structures?		VI	NR	IS
AGROCHEMICAL MANAGEMENT						
Critical	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	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 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	Have a designated, lockable, dry (weather protected) pesticide storage area with proper signage	Are agrochemicals stored in designated enclosed, weather protected, lockable area with appropriate warning signs?		VI; P	DRP	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	Ensure that agrochemicals are stored in original manufacturer's containers with labels attached or on file in pesticide 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
Additional Medium	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	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	Maintain an inventory of pesticide stocks in storage	Is there an inventory of all pesticides stored on the farm?	6	DR	DR	NC*
Additional Medium	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	Dispose of agrochemical containers legally	Are agrochemical containers disposed of according to disposal requirements on product labels?		VI	NR	IS
Additional Low	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	Properly dispose of non-hazardous waste products (i.e. move waste paper, cardboard, plastic (other than pesticide chemicals) to a trash receptacle or recycle container.	How do you dispose of non-hazardous waste used in tobacco production (waste paper, cardboard, plastic other than CPA containers)?		VI	DRP	NC*

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	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)?		VI	NR	IS
Additional Medium	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	IS
SOIL AND WATER MANAGEMENT						
Additional Medium	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	DR	DR	NC*
Critical	Comply with irrigation and water extraction laws and regulations	NO QUESTION				
Additional Low	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	Use cover crop or fall seeded crop following tobacco harvest	Will you plant a cover crop this year following tobacco harvest this year?	6	DR	DR	NC*
Additional Low	In a single field do not plant tobacco annually. Instead, use a rotation of no more than two years of tobacco followed by at least two years in other non-solanaceae crops (Solanaceae crops include tomatoes, eggplant, and peppers).	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	DR	DR; NR	NC*

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Additional Low	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	Use no-till crops 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	Use no-till crops 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	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.	If field/tract is considered HEL (Highly Erodible Land), is there a conservation plan?	6	DR	DR	NC
Additional High	Use vegetated buffers between field and streams or lakes (minimum buffer distance is 33 feet)	Are there buffer zones present between farmland and streams, lakes, and other natural bodies of water?		VI	DR CAP	NC*
Additional Low	Maintain field borders/buffer strips along lower edges of fields and beside field ditches and drainage ways (minimum buffer distance is 33 feet)	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
Recruiting, Hiring and Termination						
Additional High	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	DR	DR	NC*
Critical	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. I-9's are not required for immediate family farm labor	Do you have an I-9 form for each worker on your farm?	7	DR	DR	IS
Critical US ONLY	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.	<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:</u> Are workers provided a written statement that describes, at minimum, the following terms and conditions of employment? <ul style="list-style-type: none"> • Place of employment (name and address of employer) • Wage rates (including piece rates) • Crops and kinds of activities for which worker will be employed • Period of employment • Transportation, housing and other benefits to be provided, and costs charged for these benefits, if any • Whether state workers' compensation or state unemployment insurance is provided 	7	DR; P; WI	DR; CAP	IS

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical US ONLY	<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"> • Place of employment (name and address of employer) • Wage rates (including piece rates) • Crops and kinds of activities for which worker will be employed • Period of employment • Transportation, housing and other benefits to be provided, and costs charged for these benefits, if any • Whether state workers’ compensation or state unemployment insurance is provided 	7	DR; P; WI	DR; CAP	IS

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical International ONLY	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.	<p>Are hired workers provided a written statement that describes, at minimum, the following terms and conditions of employment?</p> <ul style="list-style-type: none"> • Place of employment (name and address of employer) • Wage rates (including piece rates) • Crops and kinds of activities for which worker will be employed • Period of employment • Transportation, housing and other benefits to be provided, and costs charged for these benefits, if any • Whether state workers' compensation or state unemployment insurance is provided 	7	DR; P; WI	DR; CAP	IS
Additional High	Maintain records concerning any worker who was terminated, and the reason for such termination. 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	DR	DR	NC*
Family Working on the Farm						
Family members include only: (1) A spouse; (2) Children, stepchildren, and foster children; (3) Parents, stepparents, and foster parents; and (4) Brothers and sisters. If the worker does not fall into one of the four categories listed here then the worker is considered a hired worker per the US DOL definition.						
Critical US ONLY	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	IS

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical International ONLY	Family members 15 years of age or younger may only be assigned light, nonhazardous work only if does not interfere with compulsory school.	<p>Are immediate family members 15 years of age or younger only assigned light work that does not interfere with compulsory school?</p> <p>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?</p>		GI	NR	IS
Critical International ONLY	Family members ages 16 – 17 cannot be assigned any DOL hazardous tasks (Appendix 1- List A) or other restricted tasks (Appendix 1 – List B).	<p>For family members ages 16-17, are DOL hazardous tasks restricted?</p> <p>For family members ages 16-17, are other hazardous tasks restricted?</p>		GI	DR CAP	IS
Critical International ONLY	Ensure that a responsible adult is always present and supervising the child’s work, and that you follow regulations on the number of hours a child is permitted to work. Furthermore, children are not permitted to work at night.	<p>Do you ensure that a responsible adult is always present to supervise work by a family minor (any immediate family member under 18)?</p> <p>Do you have minors (any immediate family member under 18) who work at night?</p>		GI	DR CAP	IS
Hired Workers						
Critical US ONLY	The grower must obtain the written consent of a youth worker's 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	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	IS
Critical	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	IS
Critical International ONLY	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	IS
Additional High	If minors are employed on the farm, records that include, at minimum: Name in full, place where the minor lives while employed, permanent address, date of birth	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	DR	DR	NC*
Wage, Benefits and Working Hours						
Critical	Ensure that the pay of all workers (including for temporary, piece rates, seasonal, and migrant workers) meet, at a minimum, national and state minimum wage requirements or adverse effect wage if H2A workers. 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	ISR
Critical	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))	7	DR; WI	VI CAP	ISR

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	<p>Provide workers with 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 social security number; 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.</p> <p>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.</p>	Do you provide all your workers with a wage statement?	7	DR; WI	NR	IS
Critical	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				
Critical	All over contract work hours are voluntary and paid in accordance with applicable laws related to wage and working hour requirements.	NO QUESTION				
Critical	All deductions must be in accordance with applicable law.	NO QUESTION				

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	Workers must not be subject to any illegal wage withholdings, such as deposits or deductions, for the purpose of recruitment or retention.	Do you withhold any amount of money from wages for anything else besides legal wage deductions such as taxes or social security?	7	DR; WI	DR; VI CAP	IS
Critical	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	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
Critical	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

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	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
Farm Labor Contractors						
Critical US ONLY	Ensure all workers provided by the FLC are 16 years of age or older. Verify age of workers by reviewing the worker's I-9 form.	Are all workers sourced through an FLC or third-party above the age of 16? Do you maintain I-9 forms for workers provided by the FLC or third-party?	7	DR; WI	DR CAP	IS
Critical International ONLY	Ensure all workers provided by the FLC are 18 years of age or older. Verify age of workers by reviewing the worker's I-9 form.	Do you maintain I-9 forms for workers provided by the FLC or third-party? Are all workers sourced through an FLC or third-party above the age of 18?	7	DR; WI	DR CAP	IS
Critical US ONLY	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	IS
Critical International ONLY	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	IS
Critical	Obtain and keep a copy of the contractor's Certificate of Registration.	Do you have a copy of the Farm Labor Contractor's Certificate of Registration with DOL?	7	DR	DR	IS

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	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?	7	DR	DR	IS
Critical	Obtain and keep a copy of insurance if FLC is authorized to transport.	If the Farm Labor Contractor transports workers, do you have: <ul style="list-style-type: none"> • a copy of their insurance (auto and workers comp) • driver’s license for all drivers • doctor’s certificate for all drivers 	7	DR	DR	IS
Critical	Ensure that workers are properly paid by either: paying workers directly rather than through an FLC or third-party labor provider or ensure the FLC provides wage statements to workers as legally required and grower must obtain and keep copies	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	IS
Forced Labor and Human Trafficking						
Critical	Workers shall be allowed to terminate their commitment at any time, without the threat of intimidation, coercion, blacklisting, or any other type of discrimination or retaliation.	Are workers free to terminate/ leave their employment at any time without fear of retaliation?		GI; WI	NR	ISR
Critical	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	ISR
Critical	All work must be voluntary and shall not be carried out under threat or duress. Growers must not recruit, transport, or receive workers using threats, force, coercion, abduction, fraud, or deceit or abuse of their power or the vulnerability of workers.	Do you use any form of forced or compulsory labor under bond, debt, or threat?		GI; WI	NR	ISR

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	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	ISR
Critical	Growers are prohibited from retaining workers' personal identity documents, visas, money, valuables, paychecks, debit or credit cards, or return tickets. Growers may provide, upon request, workers with safe place to store these items, but these items must be accessible to the workers upon request.	Does grower return or make readily available government issued documentation to workers upon verification of employment eligibility?		GI; WI	VI CAP	ISR
Critical	There shall be no restrictions on workers' freedom of movement, and workers shall be permitted to enter and exit their place of work.	Are workers allowed to enter and exit their place of work freely and without restrictions?		GI; WI	VI CAP	ISR
Worker Rights and Responsibilities and Worker Concern Process						
Critical	A Worker Rights and Responsibilities poster must be posted in their native language where workers can access and read it on or near the job site.	Is there a Worker Rights and Responsibilities Poster posted where workers can access and read it on or near the job site?		VI	VI	NC
Critical	The GAPC worker concern helpline poster or other approved third-party worker concern phone number must be posted in their native language where workers can access and read it on or near the job site.	Did you post the Worker Concern Helpline poster and share the information with your workers? Grower must show worker concern documentation with signature of workers.	8	VI; DR; WI; P	VI	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	<p>In an effort to identify and resolve workplace issues before they progress, each Grower must implement a worker concern process. This is a documented program that is discussed AND given to or posted for all workers. The policy must be written in a language common to the workers and set forth the terms of the available worker concern process to include statements stating the following (growers may use the posters and template documentation provided by GAPC):</p> <ul style="list-style-type: none"> • 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 inwriting of any concern related to the terms and 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 not retaliate against workers for using the worker concern process. 	<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
Freedom of Association						
Critical	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	IS
Critical	Do not interfere in union activities.	Do you allow reasonable access to your workers from organized groups?		GI; WI	VI CAP	IS
Critical	Do not discriminate nor retaliate against workers for such activities.	Do you discriminate against workers who associate with organized groups?		GI; WI	VI CAP	IS
Harassment and Discrimination						
Critical	All workers must be treated with dignity and respect and not be threatened with or subjected to verbal, physical, sexual or mental harassment or abuse, coercion, or corporal punishment during employment or recruitment.	Do you verbally, physically, or sexually abuse workers?		GI; WI	NR	ISR
Critical	Workers must not be subject to discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status, or marital status.	Do you discriminate when hiring workers based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status, or marital status?		GI; WI	NR	IS
Additional High	Have a documented anti-discrimination policy.	Do you have an Anti-Discrimination Policy?	8	DR	DR	NC*
Sanitation, Housing, and Transportation						
Critical	<p>Growers must provide workers access to the following as required Growers must provide workers easy access to the following:</p> <ul style="list-style-type: none"> • Cool, potable water available during work hours • Clean and sanitary bathroom facilities during work hours • Hand washing facilities with soap at close proximity to bathrooms 	<p>Are workers provided safe drinking water during work hours?</p> <p>Are workers provided clean and sanitary bathroom facilities during work hours?</p> <p>Are workers provided hand washing facilities with soap at close proximity at all times?</p>		VI; WI	VI CAP	ISR

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	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?</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?</p>		VI; WI	VI CAP	ISR
Critical	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	ISR
Critical	<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, 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>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	ISR

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	<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"> • Name and address of individual in charge of housing and owner of the housing, if different • Phone number of person in charge of the housing • Mailing address and phone number where persons living in the housing facility may be reached • Names of occupants of the housing facility • Housing, utility and other charges, if any • Meals to be provided and costs charged • Any other conditions of occupancy 	9	DR; VI; P	DR; VI	NC
Critical	<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	DR	DR	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Farm Safety						
Growers should provide a safe and healthy workplace by complying with the standards below and all applicable safety, health and environmental laws and regulations. Growers must:						
Critical	Maintain records of all work-related accidents and illnesses serious enough to interfere with the workers' ability to perform their job and/or otherwise required by occupational safety and health laws.	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	DR	DR	NC
Critical	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	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	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

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	Identify risks on the farm such as those involved in operating machinery/equipment, adverse weather conditions, agrochemical applications, etc. and train workers on how to avoid and protect themselves from such risks.	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?	10	DR	DR	NC
Critical	Follow the legal requirements that restrict workers from entering an area where agrochemicals have been used, and as legally required, post signs designating re-entry times for specific fields after agrochemical application.	Do you prevent workers from entering a field sprayed with agrochemicals before the REI has passed?		GI; VI; WI	DRP	IS
Critical	Have a dedicated emergency contact person for all workers	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	Provide access to Emergency Medical Services (EMS)	Do you provide your workers with access to emergency medical services (EMS)?	10	GI; DR; WI	DRP	NC
Critical	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	DR; WI	DR	NC
Additional High	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*
Training						
Critical	Grower and all associated growers must annual attend Annual GAP Training meeting	Reviewed prior to audit. Grower training must be completed prior to audit to be Certified.	10	DR	DR	NC
Grower documents training to farm workers on the hazards and risks associated with agrochemicals, safe working practices, emergency response and health surveillance including:						
Critical	Heat Stress	Is there documentation verifying that workers received instruction on heat stress?	10	DR; WI	DR CAP	NC

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	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	DR; WI	DR CAP	NC
Critical	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	DR; WI	DR CAP	NC
Critical	Pesticide Safety and Personal Protective Equipment (PPE)	Is there documentation verifying that workers received instruction on use of PPE (Personal Protective Equipment)?	10	DR; WI	DR CAP	NC
Critical	Green Tobacco Sickness (GTS)	Is there documentation verifying that workers received instruction on Green Tobacco Sickness (GTS) (symptoms and treatments)?	10	DR; WI	DR CAP	NC
Critical	Emergency response procedures	Is there documentation verifying that workers received instruction on emergency response procedures?	10	DR; WI	DR CAP	NC
Critical	Recognition of REI	Is there documentation verifying that workers received instruction on recognition of REI?	10	DR; WI	DR CAP	NC
Critical	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	DR; WI	DR CAP	NC
Critical	NTRM Prevention	Is there documentation verifying that workers received instruction on NTRM Prevention?	10	DR; WI	DR CAP	NC
Additional High	Proper baling and market separation of tobacco	Is there documentation verifying that workers received instruction on proper baling and market preparation of tobacco?	10	DR; WI	DR CAP	NC*

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Additional High	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	DR; WI	DR CAP	NC*
Critical	Grower follows all requirements of state and national regulations and training requirements related to worker protection and agrochemical use.	Is there documentation verifying that workers received instruction on required worker protection standard training?	10	DR; WI	DR CAP	NC
Safety Equipment						
Critical	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	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	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	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	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	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

Standard Category	Standard	Grower Question	Tab # in Records	Verification	Remediation Processes	Non-Compliance Consequence
Critical	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	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
Additional High	Have adequately maintained farm vehicles, machinery and tools with the originally installed guards, shields or other protections as per manual/guidance provided by manufacturer or dealer of equipment.	Does tobacco production equipment have guards or shields where originally installed?		VI	VI	NC*
Additional High	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	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*