

## General Certification Standards

---

### SELF-ASSESSMENT

#### CRITICAL STANDARDS FOR INTERNATIONAL CERTIFICATION

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

### GROWER TRAINING

#### CRITICAL STANDARDS

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

### 578 CROP REPORT

#### 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.

## HOW YOU GROW MATTERS: Crop Management Standards

---

### OPERATION AND NUTRIENT MANAGEMENT

#### 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.
- It is preferable not to use muriate of potash but if using muriate of potash, application should be made before January 1 of the production year.<sup>1</sup>

##### Medium

- Make fertilizer application decisions using soil test results that are no more than three years old
- 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<sup>2</sup>.

---

<sup>1</sup> See Resources on page 26 in Appendix 2.

<sup>2</sup> See Resources on page 26 in Appendix 2.

## INTEGRATED PEST MANAGEMENT

### CRITICAL STANDARDS

- All agrochemical applications, restricted or non-restricted, should be completed or supervised by a licensed pesticide applicator
- Use only pesticides that have been approved by the EPA for use on tobacco (labeled)<sup>3</sup>. Always refer to your grower contract; some buyers may prohibit use of agrochemical's which are labeled for tobacco.
- Keep field/tract records of all agrochemical applications, including in the greenhouse, transplant water and field. This includes:
  - CPA/agrochemical common name<sup>4</sup>
  - Active Ingredient<sup>4</sup>
  - Application date
  - Application method (transplant water, hand sprayer, overhead sprayer, etc.)
  - Rate
  - Name of Applicator
  - Field name and location
  - EPA Number<sup>4</sup>
  - REI<sup>4</sup>

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 agrochemical applications, including greenhouse, transplant water and in the field. This includes:
  - Pest targeted or reason for application
- Maintain pesticide application records for the previous two growing seasons as well as the current season.
- Maintain calibration records for current year <sup>5</sup>

#### Medium

- Have a documented scouting program for pests and record the scouting information by field/tract following GAP standards<sup>6</sup>. Records should include the following:
  - 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

<sup>3</sup> See Resources on page 25 in Appendix 2.

<sup>4</sup> See Resources on page 25 in Appendix 2.

<sup>5</sup> See Resources on page 27 in Appendix 2.

<sup>6</sup> See Example on page 25 in Appendix 2.

- Use appropriate methods to clean or sanitize transplant trays.
- 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

### 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.
- 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 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.
- 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 records or documentation of sources you used to select your tobacco varieties (examples are: seed company literature, university production guides, buying company recommendations, etc.)<sup>7</sup>
- Keep records of transplanting and topping dates by field/tract.
- Use recommended measures to control weed seed contamination of tobacco.<sup>8</sup>

#### Low

- Keep records of plant and row spacing and plant population maintained by field/tract.
- FLUE ONLY: 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

### CRITICAL STANDARDS

- Record the date that tobacco was placed in the curing structure and the date it was removed.
- FLUE ONLY: Have barn tests every 3 years and use only indirect fired barns with heat exchangers.
- 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.<sup>9</sup>

<sup>7</sup> See Resources on page 25 in Appendix 2.

<sup>8</sup> See Resources on page 26 in Appendix 2.

<sup>9</sup> See Barn Inspection template in GAPC Records ([www.gapconnections.com](http://www.gapconnections.com))

## 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, fuel used (i.e. slabs, sawdust, etc.)
- FLUE ONLY: Use some method or tool to monitor temperature and humidity in the barn.<sup>10</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: Records of spacing of sticks and number of stalks per stick in air cured barns or structures.
- FLUE ONLY: Use automated curing controls to measure temperature and humidity.
- FIRE ONLY: Monitor temperature in fire cured barns during firing.

## NON-TOBACCO RELATED MATERIAL (NTRM)

Market prep: All preparations of tobacco for delivery and sale. This includes all activities surrounding stripping and baling tobacco.

Taint: Unpleasant odor or taste. Potential sources of taint include, wood preservatives, disinfectants, aromatic plant materials, hydrocarbon fuels, or livestock.

## 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 need to 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),<sup>11</sup> keeping records of daily 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 if in Year 2 or 3 of Certification Program 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.

<sup>10</sup> See Example on page 27 in Appendix 2.

<sup>11</sup> See Example on page 27 in Appendix 2.

## Low

- FLUE-CURED: Use picking lines to reduce NTRM.
- FLUE-CURED: Use sand reels/leaf tumblers to reduce NTRM.
- 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.)
- Have a dedicated market prep and baling area with concrete, wood, or asphalt floor.

## ON-FARM TOBACCO STORAGE

Taint: Unpleasant odor or taste. Potential sources of taint include, wood preservatives, disinfectants, aromatic plant materials, hydrocarbon fuels, or livestock.

### CRITICAL STANDARDS

- Maintain a clean, dry tobacco storage area, with no treated wood in contact with tobacco, no storage of pesticides, petroleum products, paint, stains, fertilizers or Styrofoam trays in storage area or other sources of taint that could contaminate the tobacco in storage area.
- AIR AND FIRE ONLY: Ensure that livestock are excluded from curing and storage structures.

### 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.

## Environmental Management Standards

## AGROCHEMICAL MANAGEMENT

### CRITICAL STANDARDS

- Maintain SDS sheets for all pesticides used in tobacco production.
- Maintain copies of labels for all agrochemicals currently being used in tobacco production either on the container in storage, or in farm files. Does not include agrochemicals that are no longer in use and are not on the farm.
- Have a designated, lockable, dry (weather protected) pesticide storage area with proper signage. If no storage a grower must show receipts from a custom applicator or organic certification.
- Ensure that agrochemicals are stored in original manufacturer's containers with labels attached or on file in agrochemical storage room.
- Dispose of agrochemical containers by either recycling through programs or sites designated for pesticide recycling **OR** triple-rinsing and punching or removing lid and taking them to appropriate landfill. Agrochemical containers cannot be burned.
- 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

- Agrochemical storage with impermeable floor. This includes tubs, bins, containers with impermeable flooring that can hold more than the volume of agrochemical being stored.
- Agrochemical storage designed to retain runoff from spills and leakages<sup>12</sup>. This includes tubs, bins, containers with impermeable flooring that can hold more than the volume of agrochemical 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 an inventory of agrochemical stocks in storage updated monthly if changes occurred within the month.
- Have a designated, fenced or otherwise lockable storage area for empty agrochemical containers that have not been triple rinsed and punched pending disposal.
- Properly dispose of non-hazardous waste products (i.e. move wastepaper, cardboard, plastic (other than pesticide chemicals) to a trash receptacle or recycle container. Burning non-hazardous waste is not acceptable.

## SOIL AND WATER MANAGEMENT

### 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.<sup>13</sup>
- 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

---

<sup>12</sup> See Resources on page 28 in Appendix 2.

<sup>13</sup> See Resources on page 26 in Appendix 2

- 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).<sup>14</sup>
- 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).

---

<sup>14</sup> See Resources on page 25 in Appendix 2.