



# Harmonized GAP Plus+ Audit Checklist

*A global market-access solution for the specialty crops industry*

## AUDITEE INFORMATION

Company Name: City Roots LLC

**Audited Location Address** GPS (Optional): \_\_\_\_\_

Street: 1005 Airport Blvd. City, State, Zip: Columbia, SC 29205

Multiple sites covered by this audit? (If Yes, provide details in Additional Comments)  Yes  No

**Mailing/Business Address**  Same as above Federal Account Number: 3421354

Street: \_\_\_\_\_ City, State, Zip: \_\_\_\_\_

Company Contact: Carol Nesmith Contact Title: Food Safety Manager

Phone Number: 803-254-2302 Fax Number: 803-254-2302

E-Mail Address: cityroots@cityrootsfarm.com

Company uses USDA GAP&GHP Logo on packaging or marketing materials?  Yes  No

Is this company currently subject to the Produce Safety Rule (21 CFR Part 112)?  Yes  No

## AUDIT INFORMATION

**Date and Time of Audit** Beginning Date: 2/16/2023 Time: 9:00 AM

Ending Date: 2/16/2023 Time: 10:45 AM

Description of Operation: Organic farm that grows microgreens in a hoop house.

Harvest Company Name (if applicable): N/A

Other Contractors: City of Columbia, Natural Roots Pest Control

Commodities Covered by Audit: Microgreen Varieties: See attached and comments.

Commodities Produced During Audit: Microgreen Varieties: see attached and comments.

Total Acres Covered by Audit: N/A Total Square Feet Covered by Audit: 25,000

## AUDITOR INFORMATION

United States Department of Agriculture Field Office: Federal-State Columbia, SC

Agricultural Marketing Service

Specialty Crops Program Auditor Name(s): Daniel Medlin

Specialty Crops Inspection Division Auditor Signature(s): Signature on file.

**AUDIT SCOPE: (Please check all scopes audited)**

General Questions (All audits must begin with and pass this portion)

- Field Operations and Harvesting.....
- Post-Harvest Operations.....
- Logo Use .....
- Tomato Audit Protocol Open-field Production and Harvesting .....
- Tomato Audit Protocol Packinghouse .....
- Tomato Audit Protocol Greenhouse.....
- Tomato Audit Protocol Packing and Distribution .....

**OTHER INFORMATION**

Person(s) Interviewed:	Carol Nesmith, Food Safety Director, Eric McClan, Owner, Heather Hetzel, Farm Manager, Katie McKinney, packing house employee.
Audit Requested by:	Carol Nesmith
Distribute Audit Report to*(if known):	Azzule Systems

\*Supplying names of retail and food service buyers is not mandatory, however it is useful to know in the event the buyer requires USDA-AMS to send a copy of the audit report directly. No audit results are sent to a 3rd party without the written consent of the auditee.

**ADDITIONAL COMMENTS**

Operation provided their food safety plan via a cloud based system prior to the audit. A desk audit of their food safety plan was performed on 2-15-2023.

Kale, Broccoli, Purple Cabbage, Red Mustard, Sunflower, Snow Pea, Purple Radish, Arugula, Red Amaranth

**INTERNAL USE ONLY**

Reviewing Official Name:	Dorene M. Choffel
Signature:	
Date:	2/20/2023
Audit Results Meets USDA Acceptance Criteria	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

# City Roots Organic Farm

City Roots, South Carolina's first urban farm, grows good food organically in the heart of Columbia, while promoting sustainable living through food, education, and events. City Roots is a family-owned, organic farm located on an urban site in Columbia, SC. Our top priority is to grow the highest quality products while educating our community on the benefits of local food and stewarding the land we farm for the ripest ingredients from our farm to your table.



## MICROGREENS:

- Case pack contains two - 1 quart clamshell per case per SKU.
- 4 oz. of Microgreens per quart clamshell.
- All varieties are available year-round.
- Shelf Life is 14 Days
- USDA Organic; Certified SC Grow

	<p><b>Rainbow Mix</b> Our most colorful mix of sweet and spicy varieties. Vibrant greens, reds, pinks, and purples throughout.</p>		<p><b>Sweet Mix</b> Sweet blend of purple cabbage, red amaranth, kale, broccoli, snow pea, sunflower, and purple cabbage.</p>
	<p><b>Spicy Mix</b> Peppery blend of arugula, purple radish, red mustard, red amaranth, and purple cabbage.</p>		<p><b>Arugula Microgreens</b> Peppery in taste and delicate in texture. Bright green color.</p>
	<p><b>Sunflower Microgreens</b> Thick skinned, nutty, sweet and mild in taste, one of our most popular.</p>		<p><b>Broccoli Microgreens</b> Sweet and mildly flavored, a wonderful addition to smoothies.</p>
	<p><b>Radish Microgreens</b> Pleasantly peppery with a roto radish flavor, varied purple stems.</p>		<p><b>Mustard Microgreens</b> Signature horseradish like spice in flavor, vibrant green color.</p>
	<p><b>Snow Pea Microgreens</b> Crisp and sweet in flavor, like a classic British garden Pea.</p>		<p><b>Kale Microgreens</b> Mild and Salty in taste, a real crowd pleaser.</p>
	<p><b>Cilantro Microgreens</b> Like its larger leafed sibling it has a remarkable flavor but with a more delicate texture and appearance.</p>		<p><b>Eric McClam</b> <a href="mailto:Eric@cityrootsfarm.com">Eric@cityrootsfarm.com</a> Cell - 803-543-7007</p>

## AUDITOR COMPLETION INSTRUCTIONS

All questions on the Produce GAPs Harmonized Food Safety Standard - USDA Checklist shall be assessed according to the Verification Instructions outlined in the Produce GAPs Harmonized Food Safety Standard. Auditors shall have a copy of the Standard with them when performing audits to verify questions are assessed appropriately. All questions shall be assessed using one of the following:

**Compliant (C)** - The operation meets the requirements of the Produce GAPs Harmonized Food Safety Standard.

**Corrective Action Needed (CAN)** - The operation does not meet the requirement(s) of the Produce GAPs Harmonized Food Safety Standard, however the non-conformance is not considered to be an immediate food safety risk.

**Immediate Action Required (IAR)** - The operation does not meet the requirement(s) of the Produce GAPs Harmonized Food Safety Standard and the non-conformance is considered an imminent food safety risk. An imminent food safety risk is present when produce is grown, processed, packed or held under conditions that promote or cause the produce to become contaminated. Observation of employee practices (personal or hygienic) that jeopardize, or may jeopardize, the safety of the produce are considered an "IAR". The presence or evidence of rodents and an excessive amount of insects or pests are also considered an "IAR".

**Not Applicable (N/A)** - The question is not applicable to the operation.

**Auditor Comments:** The auditor shall document the findings associated with any question answered "CAN" or "IAR" in the auditor comment section of the checklist. Auditors may also document observations associated with any question on the checklist whether or not the question is a non-conformity if the explanation clarifies why a question was answered compliant. The auditor shall write a comment for each question answered "N/A" addressing why the question was answered "N/A".

**Tallying the Audit:** Once the auditor finishes the audit, the score sheet shall be filled out by recording the number of C, CAN, IAR, and NA's for each section of the audit. The question number of any question answered as CAN or IAR for each section shall be noted in the last column of the score sheet.

**Corrective Action Reports:** The auditor shall fill out a Corrective Action Report for each question that has been answered "CAN" or "IAR".

## Auditee Information

Auditees should download the complete Produce GAPs Harmonized Food Safety Standard which provides more complete & detailed information regarding the specific questions covered by this audit checklist. The complete Standard is available on the USDA website at [www.ams.usda.gov/gapghp](http://www.ams.usda.gov/gapghp).

The acceptance criteria to meet USDA-AMS requirements are outlined on the USDA Acceptance Criteria page, however be aware that depending on who the client(s) requiring the audit are, their specific acceptance criteria may vary from the USDA-AMS criteria.

It is intended that the scopes of the audit selected are completed in their entirety and the audit not restricted to one specific section. However, at the auditee's request, the audit may be split to accommodate scheduling; however, if this is done, the audit is not complete and no certificate or web posting will be issued until the audit is finalized.

To schedule an audit, please go to the USDA-AMS website at [www.ams.usda.gov/gapghp](http://www.ams.usda.gov/gapghp) and review the "How to Request a GAP & GHP Audit". For auditees without internet access, please contact your local Federal or Federal-State Specialty Crops Inspection office, or the Audit Services Branch at 202-720-5021.

**USDA Acceptance Criteria for the  
Harmonized GAP Plus+ Audit**

1	No questions are assessed as an "IAR", Immediate Action Required.
2	Falsification of records is considered an "IAR".
3	Any question marked with a ● in the MAN column must be assessed as "compliant".
4	Operation must have performed all risk assessments, designated with an "A" in the DOC column, in the USDA Harmonized GAP Plus+ Standard.
5	If the auditee has been audited against the USDA GAP Plus+ Standard or the Produce GAPs Harmonized Food Safety Standard previously, the auditee must have addressed all associated CANs or IARs, following their established corrective action procedure.
6	In each major section (G, F, and P) of the audit, at least 80% of the questions not answered as "N/A" must be answered as compliant.

**If an operation meets the acceptance criteria** as outlined above, the operation will receive a certificate stating its conformance to the Harmonized GAP Plus+ Standard as well as being posted to the USDA website. Corrective action reports will still be supplied to the auditee for all nonconformances.

**If an operation does not meet the acceptance criteria** as outlined above, a corrective action report form will be issued for each nonconformance noted on the audit. The operation has the opportunity to take measures to address the issue and schedule a new audit in order to show compliance to the acceptance criteria.

Audit Summary		Name of Auditee:			City Roots LLC		
		Date of audit:			2/16/2023		
Section	Questions	Total # in Section	# of C	# of CAN	# of IAR	# of NA	Question # of any CAN or IAR
<b>G</b>	<b>General Questions</b>	<b>67</b>	<b>63</b>	<b>0</b>	<b>0</b>	<b>4</b>	100.00%
G-1	Management Responsibility	5	5	0	0	0	
G-2	Food Safety Plan or Risk Assessment	7	7	0	0	0	
G-3	Documentation & Recordkeeping	4	4	0	0	0	
G-4	Worker Education & Training	3	3	0	0	0	
G-5	Sampling & Testing	4	3	0	0	1	
G-6	Traceability	5	3	0	0	2	
G-7	Recall Program	2	2	0	0	0	
G-8	Corrective Actions and Food Safety Incidents	5	5	0	0	0	
G-9	Self-Audits	1	1	0	0	0	
G-10	Worker Health/Hygiene and Toilet/Handwashing Facilities	23	22	0	0	1	
G-11	Waste Management	2	2	0	0	0	
G-12	Food Defense	4	4	0	0	0	
G-13	Food Fraud	2	2	0	0	0	
<b>F</b>	<b>Field Operations and Harvesting</b>	<b>66</b>	<b>51</b>	<b>0</b>	<b>0</b>	<b>15</b>	100.00%
F-1	Field History & Assessment	5	5	0	0	0	
F-2	Agricultural Chemicals/Plant Protection Products	13	7	0	0	6	
F-3	Water System Description	3	3	0	0	0	
F-4	Water System Risk Assessment	1	1	0	0	0	
F-5	Water Management Plan	6	3	0	0	3	

Audit Summary		Name of Auditee:			City Roots LLC		
		Date of audit:			2/16/2023		
Section	Questions	Total # in Section	# of C	# of CAN	# of IAR	# of NA	Question # of any CAN or IAR
F-6	Animal Control	3	3	0	0	0	
F-7	Soil Amendments	2	1	0	0	1	
F-8	Vehicles, Equipment, Tools and Utensils	10	7	0	0	3	
F-9	Preharvest Assessment	1	1	0	0	0	
F-10	Water/Ice Used in the Harvesting and Postharvest Operations	5	3	0	0	2	
F-11	Containers, Bins and Packaging Materials	4	4	0	0	0	
F-12	Field Packaging and Handling	8	8	0	0	0	
F-13	Post-harvest Handling and Storage (Field Prior to Storage or Packinghouse)	3	3	0	0	0	
F-14	Equipment Sanitation & Maintenance	2	2	0	0	0	
<b>P</b>	<b>Post-Harvest Operations</b>	<b>72</b>	<b>56</b>	<b>0</b>	<b>0</b>	<b>16</b>	100.00%
P-1	Produce Sourcing	1	1	0	0	0	
P-2	Agricultural Chemicals	4	2	0	0	2	
P-3	Facility	7	5	0	0	2	
P-4	Pest and Animal Control	3	3	0	0	0	
P-5	Equipment, Tools and Utensils	7	3	0	0	4	
P-6	Maintenance and Sanitation	14	14	0	0	0	
P-7	Post-Harvest Water/Ice	11	8	0	0	3	
P-8	Containers, Bins and Packaging	9	9	0	0	0	
P-9	Storage	10	7	0	0	3	



Audit Summary		Name of Auditee:			City Roots LLC		
		Date of audit:			2/16/2023		
Section	Questions	Total # in Section	# of C	# of CAN	# of IAR	# of NA	Question # of any CAN or IAR
P-10	Transportation (Packinghouse to Customer)	6	4	0	0	2	

Audit Summary		Name of Auditee:			City Roots LLC		
		Date of audit:			2/16/2023		
Section	Questions	Total # in Section	# of C	# of CAN	# of IAR	# of NA	Question # of any CAN or IAR
<b>L</b>	<b>Logo Use</b>	<b>10</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	0.00%
L-1	Food Safety Plan or Quality Manual	2	0	0	0	0	
L-2	Traceability and Recall Programs	1	0	0	0	0	
L-3	Approved Suppliers	3	0	0	0	0	
L-4	GAP & GHP Logo Approved Use	4	0	0	0	0	
<b>T</b>	<b>Tomato Audit Protocol</b>	<b>17</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	0.00%
TOF	Open-Field Production & Harvesting	17	0	0	0	0	
<b>T</b>	<b>Tomato Audit Protocol</b>	<b>24</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	0.00%
TPH	Packinghouse	24	0	0	0	0	
<b>T</b>	<b>Tomato Audit Protocol</b>	<b>25</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	0.00%
TGH	Greenhouse	25	0	0	0	0	
<b>T</b>	<b>Tomato Audit Protocol</b>	<b>27</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	0.00%
TPD	Repacking and Distribution	27	0	0	0	0	

C, Compliant with requirement; CAN, Corrective action needed to address nonconformance; IAR, Immediate action required because of imminent food safety risk; N/A, not applicable or not needed.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
<b>General Questions</b>								
<b>G-1</b>	<b>Management Responsibility</b>							
G-1.1	A food safety policy shall be in place.	WP	•	✓				
G-1.1.a	The food safety policy shall include measurable objectives for meeting the safety needs of products.	WP		✓				
G-1.2	Management has designated individual(s) with roles, responsibilities and resources for food safety functions.	WP	•	✓				Eric McClan, Owner, is responsible for the Food Safety Plan.
G-1.2.a	The Food Safety Plan outlines an organizational structure for at least those staff whose activities affect food safety.	WP		✓				
G-1.3	There is a disciplinary policy for food safety violations.			✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
<b>G-2</b>	<b>Food Safety Plan or Risk Assessment</b>							
G-2.1.	There shall be a written Food Safety Plan. The plan shall cover the Operation. The Operation and products covered shall be defined.	WP	•	✓				The current Food Safety Plan is Version 11.
G-2.2	The Food Safety Plan shall be reviewed at least annually.	R		✓				The Food Safety Plan was last reviewed on 1-30-2023.
G-2.2.a	The Food Safety Plan shall be reviewed in the event of any change which may affect food safety.	R	•	✓				
G-2.3	Operation has an Approved Supplier program for all incoming materials, including packaging.	R	•	✓				The current Approved Supplier List was last updated on 09/06/2021.
G-2.3.a	Approved supplier program contains written procedures for the evaluation, approval, and continued monitoring of suppliers.	WP		✓				
G-2.3.b	The Operation's Approved Supplier program includes procedures for approving contractors.	R		✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
G-2.3.c	Outsourced processes must be identified, documented, and monitored.	R		✓				
<b>G-3</b>	<b>Documentation and Recordkeeping</b>							
G-3.1	Documentation shall be kept that demonstrates the food safety plan is being followed.	R	•	✓				
G-3.2.	Documentation shall be readily available for inspection.		•	✓				
G-3.3.	Documentation shall be retained for a minimum period of two years, or as required by prevailing regulation.	R	•	✓				
G-3.3.a	Food Safety Plan documentation and records shall be securely stored and effectively controlled.			✓				
<b>G-4</b>	<b>Worker Education and Training</b>							
G-4.1.	All personnel shall receive food safety training, appropriate to their job responsibilities.	R	•	✓				"City Roots Food Safety Training " was conducted on 1-23-2023 by Carol Nesmith, with a record of signatures of the personnel trained.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
G-4.2.	Personnel with supervisory food safety responsibilities shall receive training sufficient to their responsibilities.		•	✓				Carol Nesmith completed PSA Food Safety Training on 1-27-2022.
G-4.3.	Contracted personnel are held to the relevant food safety standards as they would be as employees.	R	•	✓				
<b>G-5</b>	<b>Sampling and Testing</b>							
G-5.1	Where laboratory analysis is required in the Food Safety Plan, testing shall be performed by a GLP laboratory using validated methods.	R					✓	Operation uses municipal water for all purposes. Latest water quality report shows no detectable levels of E.coli.
G-5.2	Where microbiological analysis is required in the Food Safety Plan, samples shall be collected in accordance with an established sampling procedure and prevailing regulations.	WP		✓				
G-5.3	Testing, tests, results and actions taken must be documented.	R		✓				Operation uses municipal water for all purposes. Latest water quality report shows no detectable levels of E.coli.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
G-5.4	All required testing shall include test procedures and actions to be taken based on the results.	WP	•	✓				The SOP states that if the water result is > 1 MPN generic E. coli, then chlorination is required. No water test results have exceeded the threshold criteria
<b>G-6</b>	<b>Traceability</b>							
G-6.1	A documented traceability program shall be established.	WP, R	•	✓				
G-6.1.a	Packaging must include product identification.			✓				
G-6.1.b	If product is intended for export, product meets labeling regulations of the country(ies) the product is being exported to.						✓	Operation does not export product.
G-6.1.c	If a post-harvest operation supplies product to a farm stand or CSA, records tracing the product from the post-harvest operation to the farm stand or CSA are required.	R					✓	Operation does not supply product to a farm stand or any type of CSA.
G-6.2	A trace back and trace forward exercise shall be performed at least annually.	R		✓				A trace back exercise was performed with Curiosity Coffee Bar, Columbia, SC on Lot# SF4GH11T2, dated 2-17-2023. 100% of product was reconciled in less than 1 hour.
<b>G-7</b>	<b>Recall Program</b>							

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
G-7.1.	A documented recall program, including written procedures, shall be established.	WP, R	•	✓				A documented recall program, including written procedures, has been established. A "mock" recall was performed on 2-10-2023.
G-7.1.a	The recall program written procedures must include specifications for the recall process including direct customer and public notifications as well as steps for verification and responsibilities.	WP	•	✓				
<b>G-8</b>	<b>Corrective Actions and Food Safety Incidents</b>							
G-8.1	The Operation shall have documented corrective action procedures.	WP, R	•	✓				
G-8.1.a	Corrective action procedures shall include a procedure to evaluate complaints.	WP		✓				
G-8.1.b	Food safety incidents are recorded and assessed to determine severity and risk, and are addressed according to a documented food safety incident management procedure.	R		✓				Operation has a written SOP for food safety incidents. Operation has stated that there have been no food safety incidents to report.



Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
G-8.1.c	The documented incident management procedure is reviewed, tested and verified at least once a year.	WP, R		✓				Operation conducted a review and verified the food safety incident SOP with a mock exercise on 2-2-2023.
G-8.2	Non-conforming product on hold for food safety is clearly identified and segregated from other products and packaging materials.	WP R	•	✓				
<b>G-9</b>	<b>Self-Audits</b>							
G-9.1.	The Operation shall have documented self-audit procedures.	R		✓				A self-audit was performed on 1-24-23 by the Food Safety Manager, using the USDA checklist.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
<b>G-10</b>	<b>Worker Health/Hygiene and Toilet/Handwashing Facilities</b>							
G-10.1	Operation shall have a policy for toilet, handwashing, hygiene, and health.	WP	•	✓				
G-10.2	Employees and visitors shall be made aware of and follow all personal hygiene practices as designated by the Operation.		•	✓				Visitors are required to sign a log that acknowledges the operations personal hygiene practices upon arrival.
G-10.3	Toilet facilities and restrooms shall be designed, constructed, and located in a manner that minimizes the potential risk for product contamination and are directly accessible for servicing.		•	✓				
G-10.4	Toilet facilities shall be of adequate number, easily accessible to employees and visitors and in compliance with applicable regulations.		•	✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
G-10.5	The practice of disposing of used toilet tissue on the floor, in trash receptacles, or in boxes is prohibited except in situations where waste systems are not capable of handling toilet paper.		•	✓				
G-10.6	Toilet and wash stations shall be maintained in a clean and sanitary condition.	R	•	✓				
G-10.7	A response plan is in place for major spills or leaks of field sanitation units.	WP					✓	Operation does not utilize field sanitation units.
G-10.8	Personnel shall wash their hands at any time when their hands may be a source of contamination.		•	✓				
G-10.9	Signage requiring handwashing is posted.			✓				
G-10.10	Clothing, including footwear, shall be effectively maintained and worn so as to protect product from risk of contamination.		•	✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
G-10.11	If gloves are used, the Operation shall have a glove use policy.		•	✓				Gloves are not mandatory for any task on the farm except for the covering of a minor cut or lesion.
G-10.12	If protective outer garments are worn in product handling areas, they shall be handled in a manner to protect against contamination. When appropriate, racks and/or storage containers or designated storage area for protective clothing and tools used by employees shall be provided.			✓				
G-10.13	The wearing of jewelry, body piercings and other loose objects (e.g. false nails) shall be in compliance to company policy and applicable regulation.			✓				
G-10.14	The use of hair coverings shall be in compliance to company policy and applicable regulation.			✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
G-10.15	Employees' personal belongings shall be stored in designated areas.			✓				
G-10.16	Smoking, chewing, eating, drinking (other than water), chewing gum, spitting, urinating, defecating, and using tobacco, shall be prohibited except in clearly designated areas.		•	✓				
G-10.17	Operation shall have a written policy that break areas are located so as not to be a source of product contamination.	WP		✓				
G-10.18	Drinking water shall be available to all employees.	R		✓				Drinking water is provided from a faucet in the break room. Most recent test for municipal water on 1-9-2023 was negative for generic E.coli.
G-10.19	Workers and visitors who show signs of illness shall be excluded from direct contact with produce or food-contact surfaces.	WP	•	✓				
G-10.19.a	Workers showing signs of illness shall not be allowed to enter food handling areas.	WP	•	✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
G-10.20	Personnel with exposed cuts, sores or lesions shall not be engaged in handling product.		•	✓				
G-10.21	Operation shall have a blood and bodily fluids policy.	WP	•	✓				
G-10.22	First aid kits shall be accessible to all personnel.			✓				
<b>G-11</b>	<b>Waste Management</b>							
G-11.1	Operation has implemented a waste management plan.			✓				Operation contracts The City of Columbia for waste disposal.
G-11.2	Trash shall not come in contact with produce.		•	✓				
<b>G-12</b>	<b>Food Defense</b>							
G-12.1	Operation shall assess the potential for unauthorized access to growing and/or packing areas and its impact on food safety.	A	•	✓				
G-12.2	Operation shall develop an emergency response plan.	WP R		✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
G-12.3.a	Initially and at least annually thereafter, the Operation shall evaluate and document the risks associated with security (food defense), including unintentional security risks.	A	•	✓				The food defense assessment was last reviewed on 2-1-2023.
G-12.3.b	There shall be a written food defense plan to mitigate risks identified in the food defense risk assessment.	WP, R		✓				
<b>G-13</b>	<b>Food Fraud</b>							
G-13.1.a	The Operation shall initially and at least annually thereafter, evaluate and document the risks associated with food fraud.	A	•	✓				The food fraud assessment was last reviewed on 2-1-2023.
G-13.1.b	There shall be a written food fraud plan to mitigate risks identified in the food fraud risk assessment.	WP, R		✓				

Code Key: A=Assessment of Risk; WP = Written Policy/Procedure/Plan; R = Record

**Additional Auditor Comments:**

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments



Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
	<b>Field Operations and Harvesting</b>							
<b>F-1</b>	<b>Field History and Assessment</b>							
F-1.1	The food safety plan shall, initially and at least annually thereafter, evaluate and document the risks associated with land use history and adjacent land use including equipment and structures.	A	•	✓				The risk assessment with the land use history and adjacent use, including equipment and structures was last evaluated by the Food Safety Manager on 1-31-2023. No changes were made to existing Food Safety Plan.
F-1.1.a	Operation has performed and documented a risk assessment of each production area prior to the harvest of that location. The risk assessment must include potential cross contamination between production sites.	A	•	✓				The most recent harvest risk assessment was performed by the Food Safety Manager on 1-31-2023.
F-1.1.b	Operation has identified control measures for all significant hazards identified during risk assessment.	WP	•	✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-1.2	For indoor growing and field storage buildings, building shall be constructed and maintained in a manner that prevents contamination of produce.		•	✓				
F-1.3	Sewage or septic systems are maintained so as not to be a source of contamination.		•	✓				
<b>F-2</b>	<b>Agricultural Chemicals/Plant Protection Products</b>							
F-2.a	The Operation has a current list of agricultural chemicals that are used and approved for the crops being grown.	R					✓	Operation is a USDA certified organic farm. The only chemical in use is Sanidate used for sanitation and during their post-harvest washing process.
F-2.1	Use of agricultural chemicals shall comply with label directions and prevailing regulation.	R	•	✓				
F-2.1.a	Agricultural chemical records include the target organism(s) and justification for application.	R					✓	Operation is a USDA certified organic farm. The only chemical in use is Sanidate used for sanitation and during their post harvest washing process.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-2.1.b	Records of agricultural chemicals include the identity of the harvested crop, location, application dates, harvest dates, treatment, product name, and dose rate.	R					✓	Operation is a USDA certified organic farm. The only chemical in use is Sanidate used for sanitation and during their post harvest washing process.
F-2.1.c	Use of biological controls shall comply with label directions and prevailing regulation.	R					✓	Operation does not use a biological control.
F-2.1.d	Operation keeps records of agricultural chemical applications used on nursery stock, transplants and other propagation material produced on site.	R					✓	Operation is a USDA certified organic farm. The only chemical in use is Sanidate used for sanitation and during their post-harvest washing process.
F-2.2	If product is intended for export, agricultural chemical use, including post-harvest chemicals, shall consider requirements in the intended country of destination.						✓	Operation does not export product.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-2.3	Agricultural chemicals shall be applied by trained, licensed or certified application personnel, as required by prevailing regulation.	R		✓				Operation is a USDA certified organic farm. The only chemical in use is Sanidate used for sanitation and during their post-harvest washing process. Training for Sanidate use is covered in their food safety training. Auditor verified training.
F-2.3.a	Operator demonstrates knowledge of preparing and calculating agricultural chemical mixes.			✓				Auditor verified training during interview with employee during tour of operation.
F-2.4	Water used with agricultural chemicals shall not be a potential source of product or field contamination.	R		✓				Water used to mix agricultural chemicals is from a municipal source. Latest water quality report showed <1 E.coli and <1 Total coliforms.
F-2.4.a	Equipment used to apply agricultural chemicals shall be kept in good condition and calibrated annually to ensure accurate application.	R		✓				
F-2.5	Agricultural chemical disposal shall not be a source of product or field contamination.	R		✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-2.5.a	Agricultural chemicals approved for use on the crops being grown are stored separately from agricultural chemicals used for other purposes.	R		✓				
<b>F-3</b>	<b>Water System Description</b>							
F-3.1	A water system description shall be available for review.	WP	•	✓				
F-3.2	The water source shall be in compliance with prevailing regulations.			✓				
F-3.3	Water systems shall not be cross-connected with human or animal waste systems.		•	✓				
<b>F-4</b>	<b>Water System Risk Assessment</b>							
F-4.1	An initial risk assessment shall be performed and documented that takes into consideration the historical testing results of the water source, the characteristics of the crop, the stage of the crop, and the method of application.	A	•	✓				The water risk assessment was last reviewed on 1-23-2023, by the Food Safety Manager.
<b>F-5</b>	<b>Water Management Plan</b>							

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-5.1	There shall be a water management plan to mitigate risks associated with the water system on an ongoing basis.	WP	•	✓				
F-5.2	Water testing shall be part of the water management plan, as directed by the water risk assessment and current industry standards or prevailing regulations for the commodities being grown.	WP	•	✓				Municipal water from the City of Columbia is used for all applications at the operation.
F-5.3	The testing program shall be implemented consistent with the water management plan.	R	•	✓				Most recent test for municipal water, used for cleaning, sanitation, and irrigation via a watering wand on 1-9-2023 was negative for generic E.coli. Test results with <1 MPN detectable levels of generic E. coli results in the immediate discontinuation use of water until acceptable water test results are obtained.
F-5.4	If water is treated to meet microbiological criteria, the treatment is approved and effective for its intended use and is appropriately monitored.	R	•				✓	Water is not being treated.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-5.5	If post-harvest handling is used to achieve microbial criteria, Operation has documentation supporting its use.	R	•				✓	Post-harvest handling is not included in the operations harvesting or post-harvest process.
F-5.6	If Operation uses an alternative approach to regulatory microbiological testing, Operation has scientific data or information to support the alternative.	R	•				✓	Operation does not use an alternative approach to regulatory testing.
<b>F-6</b>	<b>Animal Control</b>							
F-6.1	The Operation has a written risk assessment on animal activity in and around the production area.	A	•	✓				Carol Nesmith, Food Safety Manager conducted the Animal Control Risk Assessment on 1-31-2023.
F-6.2	The Operation routinely monitors for animal activity in and around the growing area during the growing season.	R		✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-6.3	Based on the risk assessment, there shall be measures to prevent or minimize the potential for contamination from animals, including domesticated animals used in farming operations.	WP, R	•	✓				



Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
<b>F-7</b>	<b>Soil Amendments</b>							
F-7.1	The food safety plan shall address soil amendment risk, preparation, use, and storage.	A, R	•	✓				Carol Nesmith, Food Safety Manager completed the soil ammendment risk assessment on 2-1-2023.
F-7.2	If a soil amendment containing raw or incompletely treated manure is used, it shall be used in a manner so as not to serve as a source of contamination of produce.	R	•				✓	Operation does not use raw or treated manure.
<b>F-8</b>	<b>Vehicles, Equipment, Tools and Utensils</b>							
F-8.1	Equipment, vehicles, tools utensils and other items or materials used in farming operations that may contact produce are identified.	R		✓				
F-8.2	Equipment, vehicles, tools and utensils used in farming operations which come into contact with product are in good repair and are not a source of contamination of produce.	WP, R		✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-8.2.a	All equipment and instruments which have an effect on food safety shall be identified, adequately maintained and calibrated at a frequency sufficient to assure continuous accuracy.	R	•				✓	Operation does not use any type of equipment that would have a bearing on food safety.
F-8.2.b	Calibration of equipment is traceable to a recognized standard.	WP					✓	Operation does not use any type of equipment that would have a bearing on food safety.
F-8.2.c	A cleaning and sanitation program for food contact surfaces shall be established, implemented and maintained. The program shall include measures for monitoring to verify effectiveness.	WP, R		✓				
F-8.3	Vehicles, equipment, tools and utensils shall be controlled so as not to be a source of chemical hazards.	WP		✓				
F-8.4	Vehicles, equipment, tools and utensils shall be controlled so as not to be a source of physical hazards.			✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-8.5	Cleaning and sanitizing procedures do not pose a risk of product contamination.			✓				
F-8.6	Water tanks are cleaned at a sufficient frequency so as not to be a source of contamination.	WP	•				✓	Operation does not use any type of water tank.
F-8.7	All cleaning agents shall be approved for their intended use on food contact surfaces.			✓				
<b>Harvesting</b>								
<b>F-9</b>	<b>Preharvest Assessment</b>							
F-9.1	A preharvest risk assessment shall be performed.	A	•	✓				Carol Nesmith, Food Safety Manager completed the Pre-Harvest Risk Assessment on 2-23-2023.
<b>F-10</b>	<b>Water/Ice Used in the Harvesting and Postharvest Operations</b>							
F-10.1	Operation has procedures for water used in contact with product or food contact surfaces.	WP, R	•	✓				
F-10.2	Water use SOPs address the microbial quality of water or ice that directly contacts the harvested crop or is used on food-contact surfaces.	R	•	✓				Most recent test for municipal water, used for irrigation via a watering wand on 1-9-2023 was negative for generic E.coli.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-10.3	If water is re-used, SOPs address antimicrobial treatment.	R	•				✓	Operation does not re-use water.
F-10.4	Water use SOPs address condition and maintenance of water-delivery system.	R	•	✓				
F-10.5	If applicable to the specific commodity, water use SOPs address control of wash water temperature.	R					✓	Water temperature control is not required for microgreens.
<b>F-11</b>	<b>Containers, Bins and Packaging Materials</b>							
F-11.1	Operation has written policy regarding storage of harvesting containers.	WP		✓				
F-11.2	Operation has written policy regarding inspection of food contact containers prior to use.	WP		✓				
F-11.3	Operation has written policy regarding acceptable harvesting containers.	WP		✓				
F-11.4.	Operation has written policy prohibiting use of harvest containers for non-harvest purposes.	WP	•	✓				
<b>F-12</b>	<b>Field Packing and Handling</b>							

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-12.1	Operation shall have a written policy that visibly contaminated, damaged or decayed produce is not harvested, or is culled.	WP	•	✓				
F-12.2	Product that contacts the ground shall not be harvested unless the product normally grows in contact with the ground.	WP	•	✓				Operation grows microgreens in a plastic trough. Any product that reaches the ground is to be culled.
F-12.3	Harvest procedures shall include measures to inspect for and remove physical hazards.			✓				
F-12.4	Cloths, towels, or other cleaning materials that pose a risk of cross-contamination shall not be used to wipe produce, unless risk mitigation procedures are in place.			✓				Only single use towels are to be used.
F-12.5	Packaging materials shall be appropriate for their intended use.		•	✓				
F-12.6	Packaging shall be stored in a manner that prevents contamination.			✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-12.7	Operation has written policy regarding whether packaging materials are permitted in direct contact with the soil.	WP		✓				
F-12.8.a	The Operation has implemented a product release procedure.	WP		✓				
<b>F-13</b>	<b>Postharvest Handling and Storage (Field Prior to Storage or Packinghouse)</b>							
F-13.1	Harvested produce is handled in a manner such that it is not likely to become contaminated.		•	✓				
F-13.1.a	When product is field packed, collection, storage, and distribution points are maintained in a clean and hygienic condition.			✓				
F-13.2	Materials that come in contact with the produce shall be clean and in good repair.		•	✓				
	<b>Transportation (Field to Storage or Packinghouse)</b>							
<b>F-14</b>	<b>Equipment Sanitation and Maintenance</b>							

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
F-14.1	The Operation shall have a policy, written procedures, and a checklist to verify cleanliness and functionality of shipping units (e.g., trailer).	WP, R	•	✓				
F-14.2	Loading/unloading procedures and equipment shall minimize damage to and prevent contamination of produce.			✓				

Code Key: A=Assessment of Risk; WP = Written Policy/Procedure/Plan; R = Record

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
<b>Additional Auditor Comments:</b>								



Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
	<b>Post-Harvest Operations</b>							
<b>P-1</b>	<b>Produce Sourcing</b>							
P-1.1	The Operation has a policy and takes affirmative steps to ensure that all fresh produce that are packed or stored in the Operation are grown following requirements in <i>Field Operations and Harvesting</i> harmonized standard.	R		✓				
<b>P-2</b>	<b>Agricultural Chemicals</b>							
P-2.1	Use of agricultural chemicals shall comply with label directions and prevailing regulation.	R	•	✓				
P-2.1.a	Compressed air or other gases that are mechanically introduced into food or used in the process to clean food-contact surfaces or equipment must be appropriate for its use.	R	•				✓	Operation does not use compressed air as part of their post-harvest process.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-2.2	If product is intended for export, pre- and post-harvest agricultural chemical use shall consider requirements in the intended country of destination.						✓	Operation does not export product.
P-2.3	Agricultural chemicals shall be applied by trained, licensed or certified application personnel, as required by prevailing regulation.	R		✓				Auditee states that they only use chemicals for cleaning. However, procedure for cleaning chemical use is covered in their in-house food safety training.
<b>P-3</b>	<b>Facility</b>							
P-3.1	Operation has initially and at least annually thereafter, performed and documented a hazard analysis of the packinghouse, and has addressed all identified hazards.	A	•	✓				The most recent hazard analysis was performed by Carol Nesmith, Food Safety Manager on 1-31-2023.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-3.1.a	If microbiological hazards requiring a control are identified in the hazard analysis of the packinghouse a microbial environmental monitoring program shall be established.	WP, R					✓	Operation has not identified a microbiological hazard requiring a control.
P-3.2	Building shall be located, designed, constructed and maintained in a manner that prevents contamination of produce during handling, storage and cooling.			✓				
P-3.3	Adequate lighting shall be provided in all areas.			✓				
P-3.4	Only essential glass and brittle plastic shall be present in the building.	R		✓				
P-3.5	Catwalks above product zones are protected to prevent produce or packaging contamination.						✓	Operations facility does not have catwalks.
P-3.6	If applicable, Operation has a written Allergen Control Program.	A, WP	•	✓				
<b>P-4</b>	<b>Pest and Animal Control</b>							

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-4.1	Operation has procedures to manage pests to the extent appropriate to the Operation.	WP	•	✓				Operation contracts their pest control with Natual Roots, Columbia, SC.
P-4.2	Operation restricts animals from food handling areas.		•	✓				
P-4.3	If used, pest control devices, including rodent traps and electrical flying insect devices, are located so as to not contaminate produce or food handling surfaces.			✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
<b>P-5</b>	<b>Equipment, Tools and Utensils</b>							
P-5.1	All food contact equipment, tools and utensils are designed and made of materials that are easily cleaned and maintained.	WP	•	✓				
P-5.2	Equipment is installed in a way that provides access for cleaning.			✓				
P-5.3	Equipment lubrication is managed so as not to contaminate food products.			✓				
P-5.4	All instruments used to measure temperature, pH, antimicrobial levels and/or other important devices used to monitor requirements in this section shall be adequately maintained and calibrated at a frequency sufficient to assure continuous accuracy.	R	•				✓	Operation uses test strips to monitor the efficacy of the Sanidate in their wash water. Auditor confirmed compliance.
P-5.4.a	Calibration of equipment is traceable to a recognized standard.	WP					✓	Operation uses test strips to monitor the efficacy of the Sanidate in their wash water. Auditor confirmed compliance.
P-5.5	Foreign material control devices are inspected and maintained.	R					✓	Operation does not use a foreign material control device.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-5.5.a	Metal detection equipment, if utilized, shall be checked at a scheduled frequency as outlined in the operation's food safety/HACCP plan using iron, non-iron and stainless steel testing wands.	R					✓	Operation does not use a metal detection device.
<b>P-6</b>	<b>Maintenance and Sanitation</b>							
P-6.1	A Preventive Maintenance and/or Master Cleaning Schedule, with related SOPs, shall be established.	WP, R	•	✓				
P-6.1.a	Routine housekeeping practices must be implemented.			✓				
P-6.1.b	Maintenance activities shall not introduce food safety risks.			✓				
P-6.2	Any temporary repairs on food contact surfaces are constructed of food-grade material. Operation has a procedure to ensure that permanent repairs are implemented in a timely manner.			✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-6.3	All cleaning agents shall be approved for their intended use on food contact surfaces.			✓				
P-6.4	Cleaning equipment and tools are clean, in working order and stored properly away from product handling areas.			✓				
P-6.5	Food contact surfaces shall be cleaned, sanitized and maintained according to the Food Safety Plan	R	•	✓				
P-6.5.a	A cleaning and sanitation program for food contact surfaces shall be established, implemented and maintained. The program shall include measures for monitoring to verify effectiveness.	WP, R		✓				
P-6.6	Transporting equipment shall be maintained to prevent contamination of products being transported.	R		✓				
P-6.7	Waste materials and their removal are managed to avoid contamination.		•	✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-6.8	Outside garbage receptacles/dumpsters are closed and located away from building entrances and the area around such sites is reasonably clean.			✓				
P-6.9	The plant grounds are reasonably free of litter, waste culls, vegetation, debris and standing water.			✓				
P-6.10	Sewage or septic systems are maintained so as not to be a source of contamination.		•	✓				
P-6.11	The sewage disposal system is adequate for the process and maintained to prevent direct or indirect product contamination.		•	✓				
<b>P-7</b>	<b>Post-Harvest Water/Ice</b>							
P-7.1	A water system description shall be prepared.	R	•	✓				
P-7.2	Documented scheduled assessment of water system including delivery equipment shall be performed.	R	•	✓				SOP states water system is inspected annually and drains are inspected daily. Auditor verified operation's compliance with SOP.



Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-7.3	Water use SOPs address the microbial quality of water or ice that directly contacts the harvested crop or is used on food-contact surfaces.	R	•	✓				Most recent test for municipal water, used for cleaning and sanitation of food contact surface areas on 1-9-2023 was negative for generic E.coli.
P-7.4	Operation's Food Safety Plan includes produce washing process, if used.	A, WP	•	✓				Microgreens are washed using a two sink/clean then sanitize system using Sanidate 5.0.
P-7.5	If used, water antimicrobial treatments shall be monitored sufficiently to assure continuous control.	R	•	✓				Operation uses Sanidate 5.0 as part of their washing process. Efficacy is measured hourly using test strips at a range of 50-70 ppm.
P-7.6	Re-used water that contacts product or food contact surfaces shall be treated using an approved antimicrobial process or chemical treatment.		•				✓	Operation does not re-use water.
P-7.7	Operation has documentation demonstrating regulatory approval of the wash water antimicrobials in use.	R		✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-7.8	If wash water antimicrobial is used, it shall be used in accordance with established operational procedure and manufacturer instructions.	R		✓				Operation uses Sanidate 5.0 as part of their washing process. Efficacy is measured hourly using test strips at a range of 50-70 ppm.
P-7.9	If applicable to the specific commodity, water use SOPs address control of immersion water temperature.	R					✓	Water temperature control is not required for microgreens.
P-7.10	Water change schedules shall be developed for all uses of water where water is re-used.						✓	SOP states that the sink used for washing microgreens is to be changed hourly.
P-7.11	Debris, damaged and/or visibly contaminated produce shall be removed from wash areas/dump tanks to the extent possible.			✓				
<b>P-8</b>	<b>Containers, Bins and Packaging</b>							
P-8.1	Specifications for all packaging materials that impact on finished product safety shall be provided and comply with prevailing regulations.	R		✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-8.2	Operation has a written procedure for inspecting incoming packaging materials.	WP, R		✓				
P-8.3	Operation has written policy regarding storage and post-storage handling of product-contact containers.	WP		✓				
P-8.4	Materials that come in contact with the produce shall be clean and in good repair.	WP, R		✓				
P-8.5	Operation has written policy regarding whether product-contact containers are permitted in direct contact with the ground or floor.	WP		✓				
P-8.6	Operation has written policy regarding inspection of food contact containers and bins prior to use.	WP		✓				
P-8.7	Operation has written policy regarding acceptable product-contact containers.	WP	•	✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-8.8	Operation has written policy prohibiting use of product-contact containers for non-product purposes unless clearly marked or labeled for that purpose.	WP		✓				
P-8.9	Pallets shall be kept clean and in good condition as appropriate for their intended use.			✓				
<b>P-9</b>	<b>Storage</b>							
P-9.1	Product storage areas and conditions shall be appropriate to the commodities stored.			✓				
P-9.2	Iced produce is handled so as not to serve as a source of contamination.						✓	Operation does not ice product.
P-9.3	Non-product storage areas shall be maintained so as not to be a source of product or materials contamination.			✓				
P-9.4	Materials and packaging materials shall be protected from contaminants.			✓				

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-9.4.a	The operation has a procedure to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.	WP		✓				
P-9.5	Adequate space shall be maintained between rows of stored materials to allow cleaning and inspection.	WP		✓				
P-9-6	All chemicals shall be stored in a secure separate area. All chemicals shall be properly labeled.			✓				
P-9.7	When produce is cooled, it is cooled to temperatures appropriate to the commodity according to current established regulatory or industry standards.	R					✓	Operation does not cool product.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-9.8	Where temperature control is required for food safety, cooling facilities shall be fitted with temperature monitoring equipment or suitable temperature monitoring device.	R					✓	Temperature control relating to food safety is not required for microgreens.
P-9.9	Cooling equipment shall be maintained so as not to be a source of product contamination.	WP, R	•	✓				The cooling equipment was last inspected and serviced on 1-23-2023 by Advanced Technology.
<b>P-10</b>	<b>Transportation (Packinghouse to Customer)</b>							
P-10.1	There is a written policy for transporters and conveyances to maintain a specified temperature(s) during transit.	WP					✓	Temperature control relating to food safety is not required for microgreens.
P-10.2	Prior to loading, the vehicle shall be pre-cooled.	WP, R		✓				
P-10.3	The refrigerated transport vehicles shall have properly maintained and fully functional refrigeration equipment.	WP		✓				
P-10.4	Where required, temperatures of product are taken and recorded prior to or upon loading.	WP, R					✓	Temperature control relating to food safety is not required for microgreens.

Name of Auditee:				City Roots LLC				
Date of Audit:				2/16/2023				
Req. #	Requirement	DOC	MAN	C	CAN	IAR	NA	Auditor Comments
P-10.5	The Operation shall have a policy, written procedures, and a checklist to verify cleanliness and functionality of shipping units (e.g., trailer).	WP, R	•	✓				
P-10.6	Loading/unloading procedures and equipment shall minimize damage to and prevent contamination of produce.			✓				

Code Key: A=Assessment of Risk; WP = Written Policy/Procedure/Plan; R = Record

<b>Additional Auditor Comments:</b>



# United States Department of Agriculture

---

This is to verify that

**City Roots LLC**

**Columbia, South Carolina**

has successfully met USDA's acceptance criteria of the voluntary

**Harmonized GAP Plus+ Field Operations and Harvesting Audit**

*Microgreens*

A handwritten signature in black ink, appearing to read "Jennifer A. Dougherty".

**Acting Chief, Audit Services Branch**

**Audit ID: 44396**

**2/16/2023**