Food Safety Programs and Auditing Protocol for the Fresh Papaya Supply Chain, 2021
Field Production, Harvest, and Packing

Sections

	Page
1. Management Responsibility	2
2. Self-Audits	2
3. Worker Health/Hygiene & Toilet/Handwashing Facilities	2
4. Field History & Pre-harvest Assessment	4
5. Pesticides	4
6. Water Used in Growing Activities	5
7. Sanitizing Agents Used During Harvest	5
8. Product Containers & Harvest Equipment	6
9. Papaya Growing & Harvest	7
10. Traceability	8
11. Packinghouse Condition & Equipment	8
12. Product Wash Water Management	9
13. Papaya Packing	12

User's Note:
These protocols are intended to be used as an addendum to the Harmonized Standard, or other GAP program. As such, corresponding sections of the Harmonized Standard are listed below the heading of each section within this protocol

*In the **Practice** or **Procedure** column, standards written in black designate minimum food safety requirements necessary to pass self- or 3rd party audit. Standards written in blue, preceded by "Best Practice" are standards designated as a recommended food safety best practice, agreed on by an industry workgroup of producers, researchers and other produce safety subject matter experts. Operations should strive to meet these best practice standards, however they are not strict requirements to pass the 3rd party audit .*

Item#	Practice	Procedure	Verification	Corrective Action/ Disposition
1. Management Responsibility			**Corresponds to Combined Harmonized Standard section 1.1**	
1.1.	Operation has current copies of the *Plan de Acción Papaya, Food Safety Best Practices Guide for the Growing and Handling of Mexican Papaya,* the relevant *Harmonized Food Safety Standard*, and additional food safety documents as required by state and/or federal regulation.	Operation has a current copy of the Guidelines, this audit document and all other required documents for this standard.	Auditor observes the current copies at the operation.	Operation obtains current copies.
2. Self-Audits			**Corresponds to Combined Harmonized Standard section 1.10**	
2.1.	Operation has written procedures for conducting self-audits and conducts self-audits annually to verify compliance with established internal policies and procedures.	In addition to the requirements of the Harmonized Standards, the operation's self-audit procedure ensures compliance with established internal policies and procedures, *Food Safety Best Practices Guide for the Growing and Handling of Mexican Papaya,* the *Plan de Acción Papaya*, these Papaya Metrics, and additional food safety documents as required by state and/or federal regulation. Self-audits and any necessary corrective actions and follow-ups are documented.	Auditor reviews the self-audit procedures, and records of self-audits to verify compliance with the procedures.	Operation develops and maintains self-audit program, with corrective actions, preventive measures, documentation and follow-up.
3. Worker Health/Hygiene & Toilet/Handwashing Facilities			**Corresponds to Combined Harmonized Standard section 1.11**	
3.1.	If hand wash water tanks are used, the water must be of appropriate microbial quality, and the tanks are cleaned and sanitized and the water is changed periodically.	Water used for hand washing must meet SENASICA requirements and must comply with NOM-127-SSA1-1994 (*Environmental health, water for human use and consumption, permissible quality limits and treatments to which the water must be subjected for its purification*) as well as FDA requirements. Water tanks used to provide hand wash water shall be	Auditor reviews documentation demonstrating compliance with water standards. If surface water is treated for use in handwashing, auditor reviews treatment records. Auditor reviews cleaning and sanitizing	Clean and sanitize the tank, replace water to compliance.

		maintained at a prescribed frequency in a clean and sanitary manner.	protocol and service logs, and visually observes condition of water tanks for signs of non-compliance.	
3.2.	Policies shall require hand washing with soap and potable water at the appropriate time, such as before starting work, after use of toilet facilities, after breaks and when hands may have become contaminated. Policy shall apply to employees, outside contractors, inspectors, and visitors. Compliance is emphasized by management.	Operation shall have a written SOP regarding hand washing practices. Operation management reinforces importance of and compliance with handwashing policy. Sanitizers may not be used in lieu of soap and water hand washing, but may be used to supplement. If gloves are used when contacting papayas or food contact surfaces, policies will clearly communicate that gloves are not a replacement for good handwashing practices.	Auditor observes handwashing practices of employees and visitors for compliance. If handwashing practices are observed to be compliant, auditor will judge management emphasis to be sufficient.	SOP is developed or revised. Retraining is performed. Management increases frequency of or approach to reinforcing hand washing policy.
3.3.	Handwashing and sanitary stations must be free from leaks, spills, deterioration or damage that can result in contamination of papayas.	Handwashing and sanitary stations are inspected daily during harvesting and weekly during production/packing for leaks, spills, and other damage, and this evaluation is recorded.	Auditor reviews records of inspection of handwashing and sanitary stations and visually observes sanitary stations.	Sanitary and handwashing stations are repaired so they do not serve as a source of contamination.
3.4.	If gloves are used, there must be a written SOP regarding their use, including that they must be changed at least once per shift.	If gloves are used for product or food contact purposes, operation shall have a written policy and SOP regarding their use, maintenance and disposal, including cleaning of reusable gloves, not taking gloves into restrooms or eating areas, replacing gloves that may be damaged or have become a source of contamination (e.g., after handling papayas that are rotten, or fruit that has visible feces). The SOP should also address limitations of use of non-sanitary gloves (i.e., work gloves). The SOP will	If gloves are used, auditor reviews the SOP, records of SOP performance, and visually verifies that glove use is consistent with the SOP; i.e., gloves at the beginning of papaya handling activities are clean and not damaged; workers are observed to not take gloves into restrooms or	SOP is developed or revised. Non-compliances are corrected on site. Retraining is performed.

		require that reusable gloves shall not be taken home by workers for cleaning and sanitizing.	eating areas.	
4. Field History & Pre-harvest Assessment				**Corresponds to Combined Harmonized Standard sections 2.1 and 3.1**
4.1.	Groves are not planted below taller tree shade.	Papaya trees are planted away from shade trees to limit the risk of contamination from bird droppings or other animal activity.	Auditor verifies that trees are planted independently from shade trees.	Papayas are not harvested from trees planted under shade trees.
4.2.	Operation shall conduct the required Combined Harmonized Standard 3.1.1. pre-harvest risk assessment no more than five (5) days before the first scheduled harvest date.	The environmental assessment is re-performed, and documented, for environmental conditions that reasonably may have changed since the last assessment, including adequacy of water sources for their intended use, adjacent land uses, animal migrations or intrusion, debris, worker health and hygiene, or other potential sources of fruit contamination. **Best Practice**: Pre-harvest risk assessments should be conducted within 48 hours of the scheduled harvest. If harvest continues in the same grove over the course of multiple weeks, groves should be re-assessed at a minimum of once every 14 days.	Auditor reviews the re-assessment document, including corrective action documents for mitigations or deficiencies identified in the pre-production risk assessment, and confirms the assessment occurred within five (5) days of the first scheduled harvest date.	Operation develops or modifies the document, or reviews, as needed. Perform training as needed.
5. Pesticides				**Corresponds to Combined Harmonized Standard section 1.12**
5.1.	**Pesticide Usage- Foliar:** Water used to mix pesticides meets SENASICA requirements as well as the requirements of the intended export destination (e.g., FDA *E. coli* standards for water in 21 CFR § 112 no detectable generic *E. coli* in 100 mL of agricultural water.)	Operation has a written policy requiring foliar-application pesticides to be diluted only with water that meets SENASICA and FDA (export destination) microbial standards for post-harvest agricultural water. Operations will have documentation demonstrating compliance, such as test results for the water source used.	Auditor reviews the policy and inspects pesticide mixing and application records.	Operation develops a written policy. Retraining of pesticide applicator as needed. If unknown or non-drinking quality water was used to prepare pesticides, then test the water source for compliance with *E. coli* standards for post-harvest agricultural water. Do not

				harvest product unless water test results demonstrate compliance.
6. Water Used in Growing Activities			**Corresponds to Combined Harmonized Standard section 2.2**	
6.1.	**Non-Foliar:** The water used in growing activities must meet SENASICA requirements as well as the requirements of the intended export destination (e.g., FDA *E. coli* standards as described in 21 CFR § 112).	Written procedure requires a BAM or other testing procedure validated for generic *E. coli* quantitation in water (e.g., see FDA Equivalent Testing Methodology for Agricultural Water fact sheet). Untreated surface water (e.g., from rivers, ponds, reservoirs etc.) can only be used in irrigation methods where the water does not have contact with the fruit (e.g., drip irrigation).	Auditor reviews water test results and any corrective actions taken to bring the water source into compliance.	Perform a sanitary survey for each affected water source, perform any remedial action as required and retest. If the retest also exceeds the standard, further evaluate potential corrective actions, such as treatment, retreatment, or discontinue use of source. If untreated surface water comes in contact with the fruit (e.g., through the leaking drip tape or foliar spray), the papaya has to be discarded.
6.2.	**Foliar:** The water used in growing activities meets SENASICA requirements as well as requirements of the intended export destination (e.g., FDA standards for water in 21 CFR § 112).	Written procedure requires a BAM or other testing procedure validated for generic *E. coli* quantitation in water (e.g., see FDA Equivalent Testing Methodology for Agricultural Water fact sheet). Untreated surface water must not be used for foliar applications.	Auditor reviews water test results and any corrective actions taken to bring the water source into compliance. If papayas have been contacted with non-compliant water, including untreated surface water, auditor reviews the risk assessment and disposition.	Perform a sanitary survey for each affected water source, perform any remedial action as required and retest. If the retest also exceeds the standard, further evaluate potential corrective actions, such as treatment, retreatment, or discontinue use of source.
7. Sanitizing Agents Used During Harvest			**Corresponds to Combined Harmonized Standard section 2.5**	
7.1.	All compounds used to clean or sanitize food contact containers, tools, utensils, equipment or other food contact surfaces are approved for that use by	Documentation is available to demonstrate that cleaning and sanitizing products are approved for their use and are used according to label directions. Sanitizing chemicals uses shall be	Auditors review documentation and supplies to confirm approved use, and interview individuals	Non-compliances are corrected on-site. Records are reviewed for potential product adulteration. Retraining is performed.

	COFEPRIS and prevailing agency for the country of destination (e.g., US EPA). Actual use conforms to label directions.	documented.	responsible for their use for knowledge of approved use. Auditor reviews records of use, and visually observes use, to verify compliance with label directions.	
8. Product Containers & Harvest Equipment			**Corresponds to Combined Harmonized Standard section 2.5 and 3.3**	
8.1.	Reusable product bins, trays and containers are made of impervious materials that can be cleaned and sanitized.	Written SOP requires that all re-usable product containers are made of materials that can be sanitized, or clean and single-use sanitary liners are used. Wood is not an appropriate food contact surface. Procedures require damaged containers that are no longer easily cleanable or sanitary shall be removed from service of food contact purposes.	Auditor reviews SOP and sanitation records, and visually observes product bins, trays and containers and their use for evidence of non-compliance.	SOP is developed or revised. Non-compliances are corrected. Operation makes a commitment for phasing out non-conforming product containers; e.g., wooden bins, in a reasonable timeline. Retraining is performed.
8.2.	Harvest and transportation containers are cleaned at a frequency sufficient to limit contamination.	Operation has a written policy describing the frequency and method for cleaning and sanitation of harvest and transportation containers, including but not limited to trailers, crates, and wheelbarrows.	Auditor reviews the policy and visually observes that trailers, crates, wheelbarrows, and other harvest and transportation containers for evidence of compliance.	Policy is developed or revised. Non-compliances are corrected. Affected produce is evaluated for contamination and disposition.
8.3.	Containers, tools, and equipment are stored in a manner that reduces the risk of contamination.	Containers, tools, and equipment are free from animal and bird feces, and excessive dust and dirt. This may include storage away from trees or other areas where wildlife may be present, and/or the use of covers/tarps to protect the containers, tools and equipment prior to use. If used, tarps must be cleaned and sanitized before storage and stored in a manner that prevents contamination. Harvest crates and totes are not placed on drip tape during harvest.	Auditor observes the storage of containers, tools and equipment is sufficient to protect them from dirt and contamination.	Contaminated containers, tools, and equipment are cleaned and sanitized prior to use. Storage areas are reevaluated.

8.4.	Knives and other harvesting tools are used and maintained in a manner that reduces risk of contamination.	Knives and other tools are not damaged. If placed on the ground, they must be cleaned and sanitized prior to use. Tools are placed in a dip station with adequate antimicrobial level at every break, and are cleaned and sanitized after each shift. Records of antimicrobial concentration in dip stations are maintained.	Auditor observes that knives and other tools are not damaged. Antimicrobial concentration in dip stations is verified. Auditor observes proper handling of knives and other tools.	Damaged knives or tools are replaced. Antimicrobial levels are adjusted. Retraining on proper cleaning and handling of knives and other tools.
8.5.	New food grade paper used for harvest and transport activities is only used once. Packing material is tested for microbiological hazards every 6 months.	Packing material is new, food grade, inspected upon arrival, and stored to prevent contamination. Records of microbiological test results are maintained.	Auditor inspects storage area for packing materials to verify that they are new and food grade. Auditor observes that only new paper is used for packing. Microbiological test results are reviewed.	Operation discontinues re-use of paper, or use of non-food grade paper, for packing. Microbiological testing is conducted.
9. Papaya Growing & Harvest			**Corresponds to Combined Harmonized Standard section 3.4**	
9.1.	Ladders must be used in a way that limits papaya contamination with soil from the ladder	Ladders are transported separately from the fruit so the legs/base of the ladder do not come in contact with the fruit. Employees only touch the sides of the ladder, not the rungs/ steps. If gloves are used, they should be sanitized in an antimicrobial solution before cutting papayas if steps are accidentally contacted, as per company policy.	Auditor observes ladder use, including transportation to/from the orchard as well as during harvest. If gloves are sanitized, auditor verifies the antimicrobial concentration and procedure is in accordance with company policy	Employees are retrained on appropriate ladder use. Sanitizer concentration is adjusted and the risk to papayas is assessed.
9.2.	Papayas shall be free from visible soil and measures to control dust are implemented	Papayas in contact with soil (“drops”) must not be harvested. If dust is a problem, papayas should be protected (e.g., by wetting roads, reducing speed limits, by sealing the road, covering papayas in trucks with tarps, etc.)	Auditor verifies that papayas touching soil are not harvested. Auditor reviews the risk of dust, and measures taken to limit exposure of papayas to dust.	Papayas that are visibly soiled are discarded. Measures to limit dust are implemented.
9.3.	Visibly contaminated, damaged, or decaying papayas are not harvested, and are discarded so as to not attract animals/pests. Employees handle damaged or	Damaged, rotten, or visibly contaminated papaya is not harvested. This fruit is removed from the field/growing area or otherwise treated so as to not serve as an attractant to pests. If harvest workers	Auditor observes that fruit is not left in the grove. Decaying fruit is disposed of or appropriately treated to limit the presence of animals/	Unharvested fruit is removed from the field or appropriately treated. Employees are retrained on procedures. If

	visibly contaminated fruit in a manner than prevents cross-contamination of harvested fruit.	touch visibly contaminated fruit, they must discard the fruit and wash their hands or change gloves prior to returning to harvest.	pests in the field. Visibly rotten, damaged, or fecally-contaminated fruit is not observed in the wash tanks.	animals/pests are present, the risk to the fruit is assessed.
9.4.	Papayas are stored to limit potential contamination.	Harvested papayas are not stored under trees. Paper used for lining crates/ wheelbarrows are single- use only. Foam or fabric is not used during harvest, transportation, or storage of papayas.	Auditor observes that papayas are stored in a way that limits potential contamination.	Harvested papayas are moved away from tree shade. Employees are retrained on procedures. Affected product is assessed for potential contamination and appropriate disposition.
10. Traceability			**Corresponds to Combined Harmonized Standard section 1.7**	
10.1.	Lot identification shall be labeled on all cases and clearly legible.	A product coding system is in place where product or raw material shall be labeled with grower and lot identification, and coded to enable access to date of harvest and/or packing, origin (name of farm, grower and/or packing location), and country of origin for traceback purposes.	Auditor reviews coding procedures, observes cases for appropriate coding, and verifies compliance by review of records.	Boxes with missing, inaccurate or illegible coding are labeled with appropriate identification. Procedure is developed or revised. Retraining is performed.
11. Packinghouse Condition & Equipment			**Corresponds to Combined Harmonized Standard section 5.6**	
11.1.	Facility is constructed/ arranged to allow separation of incoming, in-process and finished products.	Facilities or processes assure separation and positioning of incoming raw materials so as not to become a source of contamination of in-process and finished product.	Auditor observes placement of incoming raw materials, in-process and finished products for opportunities for cross-contamination.	Procedures are developed or revised. Non-compliances are corrected on site. Retraining is performed.
11.2.	Operation has procedures that minimize the accumulation of standing water.	If floor drains exist, they are adequate, functional, free of obstruction and are properly maintained and cleaned sufficient to prevent them from becoming sources of contamination. If standing water exists, it is removed from floors and floors cleaned in a manner and at a frequency sufficient to prevent creation of a source of contamination.	Auditor observes floor drains and evidence of standing water for compliance with procedures.	Floor drains are installed, repaired or maintained, or procedures are modified, to prevent standing water from becoming a potential source of contamination.

11.3.	All food contact surfaces are made of material and designed to be easily cleaned and sanitized, and are maintained in good condition.	All papaya contact surfaces and equipment are made of materials, designed or constructed to be easily cleaned and sanitized, all food contact surfaces are free of rust or corrosion, and seams between food contact surfaces are smooth or accessible for cleaning. Foam and fabric are not used.	Auditor observes product contact surfaces and equipment and their use for evidence of non-compliance.	Non-compliances are corrected or replaced. Operation makes a commitment for phasing out non-conforming papaya contact surfaces and equipment, in a reasonable timeline. Retraining is performed.
12. Product Wash Water Management			**Corresponds to Combined Harmonized Standard section 5.4**	
12.1.	In systems where papayas are submerged or dwell in water, papayas are handled to limit the infiltration of wash water. The temperature differential between water and the average pulp temperature of papayas when entering the water must not be greater than 8°C. **Best Practice**: Water temperature should not be colder than the average pulp temperature of papayas when entering the water.	Operation shall have methods for determining average pulp temperature of a minimum of 5 papayas taken from the geometric center of the harvest trailer, a procedure for control of water temperature, shall monitor temperature at a prescribed frequency sufficient to assure continuous compliance (minimum of hourly), and shall maintain records of water temperature. Papayas are submerged for no more than 10 minutes, and at a depth no greater than 60 cm. Operation shall have a procedure as to what corrective actions are taken if criteria are not met. Water spray or shower systems, wherein papayas are not submerged or dwell, do not require temperature control. **Best Practice**: Papayas should not be submerged for more than 2 minutes, or at a depth greater than 30 cm (about 1 layer of papaya).	Auditor shall review the procedure and shall review records of temperature monitoring. Auditor observes process including the operation's sampling of pulp and water temperatures. Auditor verifies the duration and depth of submersion. Auditor reviews records for deviations and their disposition.	Procedure is developed or revised. Retraining is performed. Papayas washed in water at temperatures exceeding the allowed temperature differential to the pulp temperature shall be discarded back to the last evidence of compliance.

12.2.	Operations utilizing spray systems in place of whole papaya immersion shall design the line so that the entire papaya surface is rinsed.	Spray systems shall be designed such that rinse water contacts all surfaces of the papaya.	Auditor observes spray system for compliance.	Equipment or process is redesigned or retrofitted to ensure all surfaces of papaya are contacted.
12.3.	If a spray bar system is used, operation has a water use SOP that addresses treatment of that water.	Operation's water use SOP requires spray bar water to be treated using an approved antimicrobial to maintain a microbially hostile environment on equipment. If water is recirculated or reused, it must meet the requirements of 12.4 and either 12.6 or 12.7.	Auditor shall review water use SOP for completeness, and observes water treatment and monitoring records for adequacy and consistency of treatment.	Operation discontinues using spray bar water that is not treated sufficiently to maintain a hostile environment on equipment. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
12.4.	All wash water tanks and water that is re-used or recirculated must contain adequate levels of antimicrobials to prevent cross contamination, and water should be as clean as possible	Water must meet hygiene standards described in 6.2. A procedure is established describing the type of antimicrobial in each tank or system that limits cross contamination of bacteria, the established critical limit, and other parameters such as pH. Frequencies and methods of verification are described in the procedure.	Auditor shall review the wash water management procedure.	Procedure is developed or revised.
12.5.	Stored water is treated to prevent contamination, and tanks are cleaned. Microbial water quality meets the appropriate standards based on its use, as defined in this standard or by prevailing regulation.	Water stored in tanks, cisterns or closed reservoirs prior to use in the packinghouse must contain antimicrobials to prevent contamination (e.g, 3-5 ppm free chlorine) and be cleaned and sanitized at least every 6 months. Records of antimicrobial concentrations and records of sanitation are maintained.	Auditor shall review records of antimicrobial concentration, sanitation, and microbial water quality. Auditor visually verifies that tanks are clean.	Antimicrobial is added and addition is documented. Tanks are cleaned. Procedures are developed or revised. Staff are retrained on procedures and /or recordkeeping.

12.6.	If water quality is based upon a chlorine-based sanitizer, at least 100 ppm free available chlorine (FAC), measured at the exit of the product from the water system, must be maintained at all times, unless validation data are available to demonstrate a lower FAC is effective under operating conditions.	Operation shall have a procedure to manage FAC levels, shall establish process adjustments so as to not drop below 100 ppm, shall establish corrective actions for when the FAC level drops below the target ppm, and shall maintain records to verify proper management of levels. If FAC levels are determined by test strip or ORP (min 675 mV), monitoring must be conducted at least hourly and must be verified by titration or calibrated probe at least at the start of production and after a water change. pH is maintained between 5.5-7 and is verified. Papayas washed in water less than 100 ppm FAC and/or outside pH 5.5-7 are discarded and not rewashed. **Best practice:** FAC levels are monitored by titration or calibrated probe on an hourly basis.	Auditor shall review the procedure and shall review records of FAC and pH measurement and appropriate management. Auditor reviews records for deviations and their disposition.	Procedure is developed or revised. Retraining is performed. Papayas washed in water at FAC less than 100 ppm shall be discarded back to the last evidence of compliance.
12.7.	If water quality is based upon a peroxyacetic, peracetic or peracid system, levels shall be maintained above 30 ppm and in accordance with manufacturer's label directions and regulatory requirements.	Operation shall have a procedure to manage peracid levels, shall establish process adjustments so as not to drop below 30 ppm, shall establish corrective actions for when the peracid level drops below the target ppm, and shall maintain records to verify proper management of levels. If PAA levels are determined by test strip or ORP (min 675 mV), monitoring must be conducted at least hourly and must be verified by titration or calibrated probe at least at the start of production and after a water change. pH is maintained below 8 and is verified. Papayas washed in water less than 30 ppm PAA and/or above pH 8 are	Auditor shall review the procedure and shall review records of peracetic acid and pH measurement and appropriate management. Auditor reviews records for deviations and their disposition.	Procedure is developed or revised. Retraining is performed. Papayas washed in water at less 30 ppm shall be discarded back to the last evidence of compliance.

		discarded and not rewashed. **Best practice:** PAA levels are monitored by titration or calibrated probe on an hourly basis.		
12.8.	Water turbidity shall be monitored to maintain sufficient concentration of antimicrobials.	Operation shall have a procedure to measure turbidity, and a procedure to adjust turbidity if parameters are exceeded, as established by the measurement method. If turbidity is monitored through visual evaluation, operation shall have verification records demonstrating effectiveness of method in maintaining corresponding antimicrobial concentration. Records of monitoring and corrective action are maintained.	Auditor shall review the procedure and shall review records of turbidity measurement. Auditor reviews records for deviations and their disposition	Procedure is developed or revised to demonstrate control of water turbidity. Papayas washed in water exceeding established turbidity parameters must be assessed for safety based on corresponding antimicrobial concentration.
12.9.	Sponges or other materials used to wash papayas must be maintained so as to not serve as a source of contamination.	Sponges must be immersed in an antimicrobial solution between washing papayas. Sponges must be discarded at least once per shift.	Auditor observes that sponges are immersed in antimicrobial solution between papayas, and that sponges appear in good condition.	Employees are trained to immerse sponges between washing of papayas. Antimicrobial levels are adjusted and papayas are evaluated for safety.
13. Papaya Packing			**Corresponds to Combined Harmonized Standard section 5.8**	
13.1.	Papayas are dry when packed	Papayas are dried by air/fans. If cloths are used, they are changed at least every 2 hours and an SOP requires cloths be washed, sanitized, and dried before re-use.	Auditor verifies that papayas are dry when packed. If cloths are used, auditor reviews SOP and observes that they are changed every 2 hours.	Procedure is adjusted so that papayas are dry before packing. Retraining is performed. Cloths are handled appropriately.

13.2.	New food grade paper used for packing is only used once. Packing material is tested for microbiological hazards every 6 months.	Packing material is new, food grade, inspected upon arrival, and stored to prevent contamination. Records of microbiological test results are maintained.	Auditor inspects storage area for packing materials to verify that they are new and food grade. Auditor observes that only new paper is used for packing. Microbiological test results are reviewed.	Operation discontinues re-use of paper, or use of non-food grade paper, for packing. Microbiological testing is conducted.