

GOOD MANUFACTURING PRACTICES AND STEWARDSHIP

Introduction

This document is an audit tool to help determine the level of compliance with good management and product stewardship practices as determined by the CPDA. Compliance with this audit is mandatory in order to receive a CPDA recommendation for agricultural adjuvant products.

Self Evaluation Practices

To effectively conduct this self audit the following practices are recommended:

Audit teams

Teams of three or more persons are recommended. Select team members that reflect a cross section of the business. People from diverse functions and disciplines should be included on the team.

Review

Review the audit results and discuss among the team. Review the results with site management. This can highlight potential problem areas with the business management and assure action/resources to correct/avoid the problem. Consider a peer review if there are some questionable areas on the audit. Select the peer group from people with particular expertise on the issue in question.

Rating System to be Used

The rating system will follow the ACC established and approved scoring criteria.

RI – Reassessing implementation of management practice

PP – Practice in place

IA – Implementing action plan

DP – Developing action plan

EV – Evaluating current practices against standards

NA – No action

DNA – Does not apply

Compliance

Audit score must reflect 75% of the practices at the PP or RI stage.

No more than 10% of the practices can be at the EV stage.

No scores in the NA category.

CPDA Good Management Practices / Product Stewardship Audit

1) Policy Statement(s)

A written, signed and dated policy statement (s) exists at the corporate and/or local level reflecting management's positive attitude and commitment to continuous improvement in good management and stewardship practices. This policy statement (s) should apply to every work site and be signed by the current chief operating executive or equivalent. It should be posted in a visible location at each facility and refer to the following areas: Occupational Health and Safety, Quality, Environmental Protection, Legal Compliance

- RI The policy statement has been reviewed and/or reissued within the past year.
- PP There is a current policy statement in place
- IA A policy statement exists but has not been formally issued.
- DP A policy statement is under development and a plan is in place to implement.
- EV A policy statement is under evaluation.
- NA No policy statement exists, no plan to develop one.
- DNA Does not apply

2) Quality/Health/Safety/Environment Program (s) Accountability

Accountability for coordinating the Q/H/S/E Program(s) is clearly defined in writing. At least one person at each site is designated as the coordinator, and there are clearly stated responsibilities for each aspect of the Program(s). The designated coordinator at each site has been appropriately trained in modern Q/H/S/E practices and legal regulations. They have access to related professional support.

- RI Accountability in place and has been reassessed within the past year.
- PP Accountability is assigned and accepted
- IA Accountability is identified and will be assigned
- DP Accountabilities are planned to be identified
- EV The assignment of accountability is being evaluated
- NA No one is accountable for any of these items

DNA Does not apply

3) Rules, Standards and Procedures Manual

A manual of standard safe practices and acceptable procedures is established and accessible to all employees. Plant rules and standards are clearly understood by all employees and used as part of all job training programs.

RI Manual is in place and has been reviewed in the past year

PP Manual is in place

IA Manual has been prepared, plan is in place to implement

DP Rules, standards and procedures are being developed

EV Development of a manual is being evaluated

NA No plan to develop a standards manual

DNA Does not apply

4) Joint Health & Safety Committee

A joint labor/management health & safety committee must exist at each plant site. They hold regular meetings on an established schedule at least six times per year. Fixed lines of communication exist which facilitate the recommendations and the concerns of the committee being communicated both up and down the organization.

RI Safety Committee in place for more than 2 years. All recommendations reviewed

PP Safety committee in place

IA Safety committee identified, not formally in place.

DP Safety committee election planned

EV Implementation of a safety committee under evaluation

NA No plan to introduce a safety committee

DNA Does not apply

5) Training

A written standard exists requiring a specific health, safety and environmental protection training schedule for all line management and plant employees at a plant site. Workers training is similar to management H/S/E training, but not focused on specific departmental concerns. There is also a requirement for pre-start-up health and safety reviews at the beginning of the first shift for each new production campaign. New employees are required to undergo plant orientation and health, safety and environmental protection program training prior to starting work. This training includes: Legal requirements/regulations, communications and responsibility, knowledge of plant hazards and a test or audit of each person's understanding and retention.

- RI Training program in place, regular sessions held for the past 2 years. Program has been reviewed annually.
- PP Training program in place
- IA Training needs identified, sessions planned
- DP Training needs under evaluation, company commitment to training program
- EV Need for training under evaluation
- NA No plan to do any more than on the job training
- DNA Does not apply

6) Planned Inspections

At least monthly, health and safety inspections are planned for each plant department. These inspections have a documented schedule and are conducted by a supervisor who may be accompanied by a worker representative.

- RI Regular inspections have been conducted and recorded for the past 2 years
- PP Inspections have been conducted and recorded
- IA Inspection procedure written, inspections planned
- DP Inspection procedure under development
- EV Need for regular inspection being evaluated
- NA Inspections are seldom or never conducted

DNA Does not apply

7) Preventative Maintenance Program

There is a documented preventive maintenance program and schedule established for all mechanical equipment. As part of this program, critical components have been identified for detailed inspections. Maintenance and replacement schedules are set up to upgrade parts prior to failure. Indications of worn parts and imminent failure are identified and checked. All inspections and regular maintenance are performed by competent persons and documented.

RI PM program in place for the past 2 years with annual reviews

PP PM program in place

IA PM program developed, is being or is planned to be implemented

DP PM needs identified, program under development

EV Need for a PM program being evaluated

NA Maintenance is done as equipment breaks down

DNA Does not apply

8) Accident / Incident Investigation

There is a standard requiring all accidents / incidents including unusual occurrences to be recorded and examined for potential harm or loss. The Health & Safety Committee is to be involved in these investigations. A written report summarizing the findings and subsequent preventative action is to be communicated to all employees concerned with the system failures involved.

RI Accident reporting procedure in place for the past 2 years with annual review

PP Accident reporting procedure in place

IA Accident reporting procedure written and will be implemented

DP Accident reporting procedure under development

EV Need for an accident reporting procedure under evaluation

NA Accidents are not investigated and seldom reported

DNA Does not apply

9) Emergency Preparedness

A written emergency plan exists. This plan has been communicated to all employees and is drilled at least annually. Relevant to a formulation or packaging facility, this plan covers: fire, evacuation, equipment protection (e.g. shut-down procedures), power failures, responsibility and chain of command, search and rescue, first aid, co-ordination with police/fire/disaster services, environmental protection, natural disasters and sabotage

- RI Written plan in place. Annual drill conducted. Annual review conducted
- PP Written plan in place
- IA Plan is written but awaiting implementation
- DP Plan is being written
- EV Need for plan is under evaluation
- NA There is no preparedness for emergencies at the site
- DNA Does not apply

10) Legal Compliance

There is a written and implemented process in place to self-assess compliance with all applicable laws and regulations (e.g. OSHA, EPA, SARA etc.)

- RI All legal requirements are met and are reviewed at least annually
- PP All legal requirements are met
- IA Legal requirements are identified and a plan to comply has been written
- DP Legal requirements are being identified
- EV Determination if there are legal requirements to be met
- NA It is likely that legal requirements are not being met
- DNA Does not apply

11) Medical Examinations

A procedure is established which assesses the fitness to work for all permanent, temporary and seasonal employees involved with handling or exposed to chemicals. This procedure includes a pre-employment medical examination. Annual medical examination similar to the pre-placement examinations are arranged for all permanent (or returning seasonal) employees who handle chemicals.

- RI Medical program with annual review in place for the past 2 years
- PP Medical program in place
- IA Medical program complete, doctor contracted, to be implemented
- DP Medical program under development
- EV Evaluating need for medical program
- NA Medical exams are seldom or never performed
- DNA Does not apply

12) Identification of Potential Health Hazards

The most current health and safety information for raw materials and finished goods, including the MSDS, is available. Conduct and evaluation of the processes to identify physical, chemical or environmental risks. Implement action plans to remediate these conditions.

- RI Risk assessment done on all processes. Safety information in place and reviewed monthly
- PP Risk assessment done on all processes. Safety information in place
- IA Risk assessment started not all processes complete
- DP Risk assessment program under development
- EV Need for risk assessment being evaluated
- NA Significant risks exist and have not been identified
- DNA Does not apply

13) Personal Hygiene Facilities

Adequate showers and washroom facilities must be provided at the work site. These facilities are clean and tidy at all times. They are used for wash up each time an employee who handles chemicals leaves the work area to eat or go somewhere outside the plant. Contaminated clothing is removed before employees leave the work site.

- RI Adequate facilities in place. Hygiene program in place and followed
- PP Adequate facilities in place.
- IA Adequate facilities under construction.
- DP Adequate facilities planned
- EV Need for hygiene facilities being evaluated.
- NA There is marginal or no hygiene facility available
- DNA Does not apply

14) Record Maintenance

Independent of the medical records maintained by the medical consultant or company medical officer, each site maintains a health and safety record system for all plant employees. This record includes length of employment, nature of work, records of unsafe working practices involving the employee or injuries incurred by the employee. It also includes the record of training courses the employee has undertaken and the participation of each employee in specific health monitoring programs.

Note that all employee specific medical records are to be regarded as confidential.

- RI All medical records maintained. Records reviewed on a annual basis
- PP All medical records maintained.
- IA Plan to maintain all medical records written and planned to be implemented
- DP Plan to maintain all medical records under development
- EV Assessing need to maintain medical records
- NA No records are maintained on medical histories
- DNA Does not apply

15) First Aid Program

Each site has sufficient number of qualified first aiders to provide at least two certified (First Aid /CPR) people readily available in each plant department/area for every shift. First aid equipment is readily available in every area and its location is clearly marked. Emergency telephone numbers should be located beside the first aid station. Names of qualified first aid personnel are identified and records are maintained for all first aid treatments.

- RI Appropriate number of trained first aiders in place. Training reviewed annually
- PP Appropriate number of trained first aiders in place
- IA Appropriate number of first aiders scheduled for training
- DP Plan in place to train first aiders
- EV Need for first aiders being evaluated
- NA No first aiders on site, no plan to train any personnel
- DNA Does not apply

16) Plant Location

Ideally a formulation or packaging plant should be located away from residential areas, hospitals, schools, shopping centers, drinking water sources, and areas liable to flooding. If this is not possible, extra precautions must be taken; for example, facilities to limit the spread of contaminants in emergency situations.

- RI Plant location ideal, all precautions taken against releases
- PP Plant location in built up area, all precautions taken against releases
- IA Plant location in built up area, precautionary measures underway
- DP Plant location in built up area, precautionary measures planned
- EV Plant location in built up area, precautionary measures incomplete
- NA Plant in built up area, no precautionary measures planned
- DNA Does not apply

17) Site Layout

The site layout permits reasonable movement of materials. It has sufficient space to allow for hygienic working conditions. It allows clear access to fire-fighting at any time of the day. Security provisions are set up to adequately protect the site from trespassers.

- RI Well planned, secure site. Easy access for emergency vehicles
- PP Well maintained site, can be secured, easy access for emergency vehicles
- IA Improvements to site underway
- DP Improvements to site planned
- EV Need to improve site under evaluation
- NA Poorly planned, unsecured site
- DNA Does not apply

18) Building Construction

The construction of all building on the site meets all applicable building, fire, electrical and any other legal regulations which may apply. All exterior and interior walls and ceiling are constructed of non-combustible or minimum 1.5 hour fire-rated materials. Fire separation wall openings have been provided with automatic self-closing doors. Floors are essentially impervious and have a smooth finish (no cracks) for ease of cleaning.

- RI Meets all requirements of construction
- PP Meets most requirements of construction, no serious faults
- IA Some faults but construction underway to correct
- DP Some faults but construction planned to correct
- EV Significant faults, construction under evaluation
- NA Significant to serious faults
- DNA Does not apply

19) Building Ventilation and Heating

All areas where products are stored or used should be well ventilated to ensure both lighter-than-air and heavier-than-air vapors and gases are not allowed to accumulate within the interior of buildings. The heating systems should be hot water or low pressure steam variety with the source of heat (e.g. boiler system) located in a room separated from the rest of the facility. Open flame heaters are strongly discouraged.

- RI Climate controlled work areas, heat source isolated, no open flames
- PP Well ventilated, heat source isolated, no open flames
- IA Well ventilated, heat source under construction to isolate, no open flames
- DP Well ventilated, plan to isolate heat source and remove open flames
- EV Well ventilated, heat source not isolated, may be open flames
- NA Poorly ventilated, heat source not isolated, may be open flames
- DNA Does not apply

20) Interior / Exterior Lighting

Intrinsically safe lighting is of sufficient intensity to provide safe working conditions and is strategically located to allow hazard warnings, product labels or any other instruction to be easily read. Lighting units are installed where they are least likely to interfere with handling or processing equipment and/or with material in storage.

- RI Bright well planned lighting. All warning signs well illuminated
- PP Bright well planned lighting. Most warning signs well illuminated
- IA Sufficient lighting. Most warning signs well illuminated
- DP Sufficient lighting. Some warning signs well illuminated
- EV Sufficient lighting. Most warning signs poorly illuminated
- NA Poor lighting. Warning signs poorly illuminated
- DNA Does not apply

21) Electrical Installations

Lighting, electrical panels, and other electrical equipment conform with the applicable electrical codes. Switch panels are located outside areas where flammable liquids or gases are handled / stored. Electrical systems are regularly inspected by a competent electrician. High voltage (>220 V) and control panels are properly identified, closed and secured against unauthorized tampering.

- RI All above conditions met. Regular, recorded inspections are conducted
- PP All above conditions met
- IA Work underway to ensure that all above conditions are met
- DP Work planned to ensure that all above conditions are
- EV It is likely that service is below code. Plan in place to upgrade
- NA Electrical service compliance with codes is unknown and high voltage sources are not marked or secured
- DNA Does not apply

22) Personal Protective Equipment

Appropriate personal protective equipment is identified and distributed for the materials and equipment hazards present. Sufficient quantities of the correct equipment are available there is a formal issue, recall, and maintenance procedure. Equipment is only issued following proper fitting and training in its use. Use of personal protective equipment, where required, is strictly enforced.

- RI Above conditions are met. Training and fit testing is reviewed on a regular basis.
- PP Above conditions are met
- IA Proper equipment is issued, maintained and enforced. Training and fit testing has been planned and will be implemented.
- DP Assessment is underway to identify hazards and determine where equipment is required. Training and fit testing program planned. Equipment is issued but not enforced.
- EV Assessment is underway to identify hazards and determine where equipment is required. No training or fit testing program planned.
- NA Personal protective equipment is not issued and/or its use is not enforced

DNA Does not apply

23) Contractors

Arrangements are to be made for contractors personnel on site, to ensure their adherence to site safety standards and to take account of special non-routine hazards which may be associated with the contractor's operation. There is also provision for a company safety representative to periodically inspect the precautionary measures taken by contractor personnel in working on the project contracted.

RI Procedure in place for contract workers. Procedure reviewed at least annually. Regular inspections by company safety representative.

PP Procedure in place for contract workers. Regular inspections by company safety representative

IA Procedure in place for contract workers. No regular inspections by company safety representative

DP Procedure developed for contract workers.

EV Need for procedure for contract workers under evaluation.

NA No procedure or contact workers, no plan to generate one.

DNA Does not apply

24) Emergency Equipment

In addition to safety provisions made by building and fire codes (e.g. access to emergency exists), the facility must provide emergency showers, eye-wash fountains and readily accessible first aid supplies. This equipment must be clearly marked.

RI All equipment in place and clearly marked. Operation tested or contents reviewed monthly.

PP All equipment in place and clearly marked.

IA All equipment in place not clearly marked. Plan to improve marking

DP Some equipment/supplies required, plan in place to improve

EV Some equipment/supplies required, improvements being evaluated

NA Serious lack of emergency equipment

DNA Does not apply

25) Fire / Explosion Precautions

Where combustible liquid formulations are used, transferred, or stored, all electrical equipment in the vicinity must not produce sparks and must be approved from a fire and explosion safety viewpoint. Applicable vapor and dust explosion limits must be known. Naked flames and spark-producing tools and equipment are also prohibited from this area (e.g. No Smoking). To prevent build-up of static electrically, all equipment must be adequately grounded. Drums are also to be grounded during emptying and filling. Proper grounding and ventilation also applies to powdered products which present a dust explosion hazard.

- RI All above conditions met. Safety information reviewed at least annually.
- PP All above conditions met
- IA Plan in place to gather necessary safety information.
- DP Plan in place to meet above conditions and gather necessary safety information.
- EV Proper grounding and ventilating of all equipment is being evaluated.
- NA Equipment is improperly grounded and poorly ventilated.
- DNA Does not apply

26) Machine Guarding

All mechanical power transmission points, pinch points, in-running nip points, and points of operation are physically guarded against entanglement with employees' clothing, fingers and hair. These guards are secured well and are regularly inspected to keep them in good condition. Guards on powered hand tools are also used as provided and are well maintained. Emergency stop buttons, trip wires, electric photocells, and other interlock guards are positioned so as to provide operators with easy and quick access.

- RI All necessary guards are installed and maintained. Guards are checked and recorded at least weekly
- PP All necessary guards are installed and maintained.
- IA Where guards are required they are installed or under installation
- DP Some guards are required. There is a plan in place to install them.
- EV There is a plan in place to evaluate where guards are required
- NA There are a number of places where guards are required.

DNA Does not apply

27) Housekeeping

Floors are clean, orderly, and in sanitary condition, There are no slip, trip, or fall hazards and opening are covered or securely barricaded. Aisles and passageways are clear and unobstructed. They are marked and of sufficient width to allow normal movements and safe visibility. Approaches to exits are unobstructed and clearly marked, and the exit doors are not locked and are kept clear of snow or other obstructions. Stairs are clear of slipping or tripping hazards. They are adequately lit, have secure handrails, and provide slip-resistant treads (or grating) and nosings. Ladders and platforms are free from obstructions, are unpainted, provide nonskid footing, and are clean of grease and oil.

RI Housekeeping is excellent. Regular documented inspections are conducted

PP Housekeeping is excellent, very few exceptions

IA Housekeeping is very good, few exceptions

DP Some areas where housekeeping could be improved

EV Numerous areas where housekeeping needs to be improved

NA Housekeeping is poor

DNA Does not apply

28) Stacking and Storage

Storage areas are marked so as to provide safe access, not allow blockage of exits or aisles-ways, and restrict incompatible materials from being stored together. All stored products are stable and secure against sliding or collapsing. Load/height limits are posted and respected on all racks and platforms.

RI Safe storage areas are used and safe practices are followed. Incompatible products are marked and segregated. Load and height limits are posted.

PP Safe storage areas are used and safe practices are followed. Incompatible products are marked and segregated.

IA Safe storage areas are used and safe practices are followed. There is a plan in place to segregate materials and post warning signs.

DP Safe storage areas are used and safe practices are followed. A plan to segregate materials and post warning signs is under development.

EV Storage needs improvement, a plan for improvement is under evaluation

NA Storage needs improvement, no plan to improve

DNA Does not apply

29) Chemical and Fuels

Tanks and other storage or process vessels are constructed of an appropriate material for the contained materials and are properly grounded/bonded. All vessels are checked on a regular basis to ensure they are in good condition. Safety controls and warning devices are installed to ensure heated or reacting products are not allowed to reach dangerous temperatures. Levels in all tanks and vessels are monitored and, where justified, fitted with high/low level alarms. For small quantity storage proper safety containers and storage cabinets are provided (i.e. fire resistant and vented). Fuels are stored outside or in a storage facility blocked off from the rest of the production / packaging plant.

RI All storage vessels in compliance. Safety devices and controls installed. Small containers properly stored. Vessels inspected and results recorded at least monthly

PP All storage vessels in compliance. Safety devices and controls installed.

IA All storage vessels in compliance. Safety devices in process of installation

DP Plan in place to bring all vessels into compliance

EV Evaluating need for improvements in storage vessels

NA Storage of chemicals needs improvement, no plan to improve in place.

DNA Does not apply

30) Compressed Gases

Cylinders and tanks are stored upright and secured against falling over. They are segregated by contents and legibly marked. Caps are in place and hand tight. Their storage area is away from sources of heat, stairs, elevators and egress routes, and is adequately ventilated. These containers are also regularly checked against damage and corrosion (test record maintained).

RI Cylinders stored properly. Cylinders are marked. Inspections done and recorded at least monthly

PP Cylinders stored properly. Cylinders are marked.

IA Plan in place to properly store and mark all cylinders

