

Audit Number: A 2023-02185	Client: Harbor Farms North
Date of Audit: 1-23-2023	Location: 2839 Full Circle Drive Kalamazoo
Type of Audit: Cannabis Safety Std GACP V-2.0	Auditor: Peter Nielsen



**Perry Johnson Registrar Food Safety Inc.**

# PJRFSI Cannabis GACP Checklist

## Edition 2.0

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# Company Information

I. FACILITY INFORMATION	
Organization Name	Harbor Farmz North LLC
Facility Name (if different)	
Scope	Cannabis Safety GACP V2.0
Cannabis Licensing Type	Adult Use Recreational
List Applicable statutory and regulatory requirements	Michigan Marajuana Regulatory Agency Class C Marajuana Grower. Expires 7-23-2023. License No. AU-G-C-00216. Michigan Marajuana Regulatory Agency Marajuana Processor. Expires 7-23-2023. License No. Au-P-000134
Facility Description	Growing and Processing
Processes Seen During Audit	Growing, Harvesting, Gummies, Pre-Rolls.
Review of Corrective Actions from previous audit. Was Corrective Action implemented and verified?	Previous NC has been effectively closed out.
Verify the auditee's use of PJRFSI logo mark usage. Do the auditee's practices in marketing its Cannabis Safety certification conform to the requirements of SOP-03PJRFSI? Please check business cards, marketing material, website, etc. Tick each box as it is verified.	<input type="checkbox"/> If a copy of the certificate is posted in the facility, is it the current version? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A  <input type="checkbox"/> If a copy of the certificate is posted on the website, it is the current version? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A  <input type="checkbox"/> Does organization use the PJRFSI Cannabis logo? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A If yes, describe how the logo is used.

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	<input type="checkbox"/> Does the organization use the PJRF SI Cannabis logo on product or product packaging? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A If Yes then company in violation of SOP-03PJRF SI
Verify the auditee's use of references to accredited certification. Please check business cards, marketing material, website, social media (Facebook, LinkedIn), etc. Tick each box as it is verified.	<input type="checkbox"/> Does the website indicate which sites are certified, especially if more than one? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A  <input type="checkbox"/> Does the website clearly indicate scope of certification, especially if it is limited? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A

# Section 1: Good Agricultural and Collection Practices (GACP)

Reference: USDA GAP/EMA GACP

1.0	General Requirements		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
1.1	A documented cannabis safety program that incorporates GAP has been implemented.	m	Missing a Concise Cannabis Safety Program. Stating what is being done to provide a Safe Product for Human Consumption. The Frequency of Testing, What the Acceptable Limits are. A commitment from Management to ensure sufficient resources are provided to maintain the Product Safety. There are several SOP's for sending product to a 3 <sup>rd</sup> Party Laboratory.

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1.2	The operation has designated someone to implement and oversee an established cannabis safety program.	C	The Facility Director is in Charge of the Implementation and Maintenance of the Cannabis Safety Program.
1.3	The operation conforms with all applicable state or regulatory requirements.	C	The Facility has a Current Michigan Cannabis Operating License. Last Regulatory Inspection by Michigan CRA Thursday May 19, 2022 and MDARD November 7 <sup>th</sup> , 2022
1.4	A procedure must be in place to ensure pre-and/or post-harvest testing as required by jurisdiction. Sampling size must be appropriate for the planted acreage. The third-party lab used for testing must be ISO 17025 accredited for THC testing, or else adhering to state or federal requirements for cannabis.	m	The 3 <sup>rd</sup> Party Licensed by Michigan CRA License No. AU-SC-000112.  3 <sup>rd</sup> Party Laboratory Statistical Sampling Procedure used to collect samples is not available.  Scope of the License not available.
1.5	Cannabinoid testing must be able to determine potency/strength to determine concentration of target cannabinoid to determine legality of Marijuana.	m	Missing Product Specifications for Cannabinoid Potency / Strength. THC, Pesticides, Heavy Metals, Microbiological Pathogens.

2.0 Traceability			
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
2.1	A documented traceability program has been established.	C	Product is traceable thru LeafLink an Inventory Sales linking the MTRC Tracking number independent of the MTRC System.
2.2	The operation has performed a "mock recall" that was proven to be effective.	m	A mock recall has not been completed in the last 12 months.

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2.3	Each production area is identified or coded to enable traceability in the event of a recall.	C	GEN – 015 Master Manufacturing Record and Batch Records provide documentation of the Production area.
2.4	Seeds/propagated seedlings should originate from plants that have been accurately identified in terms of genus, species, variety/cultivar/chemotype and origin and should be traceable.	C	CULT-001 Propagation SOP. All clones and propagated product is traceable back to the Mother Plant using Michigan CRA METRC System.
2.5	Presence of different species, varieties or different plant parts has to be controlled during the entire production process. The use of genetically modified plants or seeds must comply with regional and/or national regulation.	C	CULT-001 Propagation SOP. All clones and propagated product is traceable back to the Mother Plant using Michigan CRA METRC System.

3.0 Worker Health & Hygiene			
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
3.1	Drinking water is available to all workers.	C	Potable Water is available for all employees.
3.2	All employees and all visitors to the location are required to follow proper sanitation and hygiene practices.	C	GEN-002 Dress Code Expectations & PPE. Employees and Visitors are required to follow the posted GMP of hand washing, Wearing Foot Coverings and Dedicated protective clothing provided by Harbor Farmz.
3.3	Training on proper sanitation and hygiene practices is provided to all staff.	C	GMP Training Matrix shows Employees, the specific SOP's trained on, Date of Training and who conducted the training. Access to the Training Matrix is restricted to Management.

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3.4	Employees who handle or package product are washing their hands before beginning or returning to work.	NA	An opportunity of observe employees washing their hands was not available. Employee GMP and training states when hand washing is required.
3.5	Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work.	C	Employee Hygiene signs are posted in the Employee Welfare areas and Break Rooms.
3.6	All toilet/restroom/field sanitation facilities are clean. They are properly supplied with single use towels, toilet paper, hand soap or anti-bacterial soap, and water for hand washing meets the microbial standards for drinking water.	C	All Employee Welfare areas are adequately equipped with Warm Water, soap and Single Use Disposable Paper Towels.
3.7	All toilet/restroom/field sanitation facilities are serviced and cleaned on a scheduled basis.	m	Cleaning of the Employee Welfare areas and Break rooms is being completed but there is not a record or formal schedule.
3.8	Smoking and eating are confined to designated areas separate from where product is handled.	C	GEN-004 Personal Hygiene Policy describes areas for Smoking and Eating.
3.9	Workers with diarrheal disease or symptoms of other infectious diseases are prohibited from handling product.	C	GEN-004 Personal Hygiene Policy addresses procedures for Employees with Symptoms of Infectious Disease to follow.
3.10	There is a policy describing procedures which specify handling/disposition of product or product contact surfaces that have come into contact with blood or other bodily fluids.	m	GEN-014 Body Fluid Clean-up Procedure. Details clean up procedures.  Missing Training Records or the Sanitation Manager responsible for Cleaning up Body Fluids.
3.11	Workers are instructed to seek prompt treatment with clean first aid supplies for cuts, abrasions and other injuries.	C	GEN-004 Personal Hygiene Policy addresses procedures for Employees to follow in the event of a cut.

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3.12	Company personnel or contracted personnel that apply regulated pre-harvest and/or post-harvest materials are licensed. Company personnel or contracted personnel applying non-regulated materials have been trained on its proper use.	NA	None Regulated products are use in this In-door Agricultural Facility.
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4.0 Water Usage			
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
4.1	What is the source of irrigation water? (Pond, Stream, Well, Municipal, Other)  How are the plants irrigated? (Flood, Drip, Sprinkler, Other) Please specify.  A water quality assessment has been performed to determine the quality of water used for irrigation purpose on the crop(s) being applied.	C	Water is provided from a Municipal source meeting EPA Requirements for Potable Water. The municipal water is then treated and optimized internally for plant growth. The Plant water system is not connected to the Municipal Water System.
4.2	A water quality assessment has been performed to determine the quality of water use for chemical application or fertigation method.	C	Municipal Water is tested from within the facility annually to demonstrate the water meets EPA Standards for Potable Water.
4.3	If necessary, steps are taken to protect irrigation water from potential direct and non-point source contamination.	C	Potable water is protected against back siphonage from the fertigation system.

5.0 Soil Amendments			
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
5.1	A soil amendment risk assessment shall address soil amendment risk, preparation, use and storage.	C	All soil used for growing Clones and Plants is purchased from a Supplier providing sterile Potting Soil Matrix.
5.2	If raw or incompletely treated manure is used, it shall be used in a manner so as not to serve as a source of contamination.	NA	No Manure used in this facility.



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6.0	Agricultural Chemicals		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
6.1	Use of agricultural chemicals shall comply with label directions and prevailing regulation.	NA	No Commercial Agriculture Chemicals used in this facility.
6.2	Agricultural chemicals shall be applied by trained, licensed or certified application personnel, as required by prevailing regulation.	NA	No Commercial Agriculture Chemicals used in this facility.

## Outdoor Cultivation

N/A if cultivation in a facility or greenhouse

7.0	Sewage Treatment		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
7.1	The farm sewage treatment system/septic system is functioning properly and there is no evidence of leaking or runoff.	C	All plant water is disposed thru the Sanitary Sewer System that meets Local and State Plumbing Codes.
7.2	There is no municipal/commercial sewage treatment facility or waste material landfill adjacent to the farm.	NA	This is an In-door Agricultural operation.
7.3	Manure stored near or adjacent to crop production areas is contained to prevent contamination of crops.	NA	This is an In-door Agricultural operation.

8.0	Animals/Wildlife/Livestock		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
8.1	Measures are taken to restrict access of livestock to the source or delivery system of crop irrigation water.	NA	This is an In-door Agricultural operation.



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8.2	Crop production areas are monitored for the presence or signs of wild or domestic animals the entering the land.	NA	This is an In-door Agricultural operation.
8.3	Measures are taken to reduce the opportunity for wild and/or domestic animals from entering crop production areas.	NA	This is an In-door Agricultural operation.

9.0	Outdoor Soil		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
9.1	A previous land use risk assessment has been performed.	C	A Phase I and Phase II Risk Assessment was completed prior to the Construction of the building.
9.2	When previous land use history indicates a possibility of contamination, preventive measures have been taken to mitigate the known risks and soils have been tested for contaminants and the land use is commensurate with test results. Crop production areas that have been subjected to flooding are tested for potential microbial hazards.	C	A Phase I and Phase II Risk Assessment was completed prior to the Construction of the building.

## Indoor Cultivation

N/A if cultivation is outdoors

10	Indoor Cultivation		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
10.1	Chemicals not approved for use on product are stored and segregated away from packing area.	C	Janitorial and Maintenance Chemicals are stored Separate form the Packaging and Packaging Storage area.

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10.2	The growing area is free of litter and debris.	C	Litter and Debris was not observed in the Growing area.
10.3	The growing area is reasonably free of standing water.	C	Standing Water was not Observed in the indoor growing area.
10.4	Outside garbage receptacles/dumpsters are closed and are located away from growing area entrances and the area around such sites is reasonably clean.	C	Outside garbage receptacles/dumpsters are away from the building on a paved surface. Containers are maintained covered.
10.5	The growing area interior is clean and maintained in an orderly manner.	C	The growing area was observed to be clean.
10.6	Floor drains appear to be free of obstructions.	C	Obstructions, odors were not observed in the growing area Floor Drains.
10.7	Pipes, ducts, fans and ceilings which are over growing areas operations, are clean.	C	Potential for Overhead contamination was not observed.
10.8	Glass materials above growing areas are contained in case of breakage.	C	Glass was not observed above the growing area.
10.9	Possible wastewater spillage is prevented from contaminating any cannabis handling area by barriers, drains, or a sufficient distance.	C	The Growing beds are designed to channel water directly into drains preventing possible contamination of the Cannabis Handling or Processing area.
10.10	There is a policy describing procedures which specify handling/disposition of finished product that is opened, spilled, or comes into contact with the floor.	m	Missing a policy or statement detailing disposition of product that has come in contact with the floor.
10.11	Pallets and containers are clean and in good condition.	C	Pallets and containers were observed to be in good condition. Not Splintering or broken.
10.12	Measures are taken to exclude animals and pests in growing areas.	C	In-door Agriculture, no potential for animals. Pest Control services eliminates Pest from the interior of the building.

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10.13	There is an established pest control program for the facility.	m	A licensed Pest Control Service Provider maintains an IPM program, Records reviewed show a monthly service. <b>Missing a Service agreement and a Site Map showing the Pest Control Devices.</b> <b>PCO License Expires 12-31-2022</b> <b>Liability Insurance Expires 10-1-2022.</b>
10.14	If used, pest control devices, including rodent traps and electrical flying insect devices are located so as to not contaminate product or cannabis handling surfaces.	C	Pest Control devices were observed on the perimeter of the Interior Wall and Exterior Wall.
10.15	Service reports for the pest control program are available for review.	C	Pest Control Service Reports are available on line. The PCO is escorted by a facility representative.
10.16	Interior walls, floors and ceilings are well maintained and are free of major cracks and crevices.	C	Cracks, crevices were not observed on the Interior Walls, Floors or Ceilings.

## Section 2: Operations and Harvesting

11	Sanitation and Hygiene		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
11.1	A documented pre-harvest assessment is made on the crop production areas. Risks and possible sources of crop contamination are noted and assessed.	C	In door Agriculture, the growing rooms and plants are continually monitored for Plant Health and Potential Contamination.

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11.2	The number, condition, and placement of field sanitation units comply with applicable state and/or federal regulations.	NA	This is an indoor Agriculture Facility. Employee Welfare areas are readily available.
11.3	If sanitation units are not required then a toilet facility is readily available for all workers.	NA	In-door Agriculture with adequate Employee Welfare areas.
11.4	Field sanitation units are located in a location that minimizes the potential risk for product contamination and are directly accessible for servicing.	NA	No Field Sanitation Units.

12	Harvesting and Transportation		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
12.1	All harvesting containers and bulk hauling vehicles that come in direct contact with product are cleaned and/or sanitized on a scheduled basis and kept as clean as practicable.	C	Plants are grown indoor and transported from the grow room to the dry room.
12.2	All hand harvesting equipment and implements (knives, pruners machetes, etc.) are kept as clean as practical and are disinfected on a scheduled basis.	C	CULT – 002 Vegetative Growth Phase SOP. Requires the use of Clean Scissors when Pruning or Defoliating. Gen-012 Cleaning Solution Standards SOP contains Mixing Instructions.
12.3	Damaged containers are properly repaired or disposed of.	C	Damaged containers are disposed of.
12.4	Harvesting equipment and/or machinery which comes into contact with product is in good repair.	C	Harvest equipment are the Pruning Shears.

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12.5	Light bulbs and glass on harvesting equipment are protected so as not to contaminate product or fields in the case of breakage.	NA	No Glass observed in the Harvest Area.
12.6	There is a standard operating procedure or instructions on what measures should be taken in the case of glass/plastic breakage and possible contamination during harvesting operations.	C	GEN-009 Foreign Material Procedure. Describes the isolation of the affected area, inspect employee shoes and dispose of affected material.
12.7	There is a standard operating procedure or instructions on what measures should be taken in the case of product contamination by chemicals, petroleum, pesticides or other contaminating factors.	C	GEN-009 Foreign Material Procedure contains procedures to handle contaminated product.
12.8	For mechanically harvested product, measures are taken during harvest to inspect for and remove foreign objects such as glass, metal, rocks, or other dangerous/toxic items.	NA	No Mechanical Harvesting
12.9	Harvesting containers, totes, etc. are not used for carrying or storing non-product items during the harvest season, and farm workers are instructed in this policy.	NA	No Mechanical Harvesting
12.10	Efforts have been made to remove excessive dirt and mud from product and/or containers during harvest.	NA	Plants are harvested above the growing pots, no dirt or mud involved.
12.11	Harvest will be conducted in a manner that minimizes the presence of foreign matter in harvested crop.	C	Plants are manually harvested in a controlled growing room. No potential for Foreign Material contamination.
12.12	Transportation equipment used to move product from cultivation area to storage areas or storage areas to processing plant which comes into contact with product is clean and in good repair.	C	In-door agriculture area, total enclosure, harvested product is moved from the Growing Room to the Drying Room.

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12.13	There is a policy in place and has been implemented that harvested product being moved from cultivation area to storage areas or processing plants are covered during transportation.	C	Movement between the Indoor Growing to the indoor Drying and indoor processing. No potential for external contamination.
12.14	Harvested crop is protected from moisture where necessary to minimize growth of bacteria, yeast, and mold.	C	Harvested product is dried at a rate to prevent growth of Mold and Bacterial.

## Section 3: Post-Harvest Operations

13	Drying & Packing		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
13.1	Product delivered from the cultivation area which is held in a staging area prior to packing or processing is protected from possible contamination.  Prior to packing, product is properly stored and/or handled in order to reduce possible contamination.	C	Product is maintained indoor, no external exposure or potential for contamination.
13.2	Product that is dried outdoors will be sufficiently covered to protect against contamination from birds or other flying animals.	NA	No outdoor drying.
13.3	Indoor drying operations will ensure sufficient ventilation for airborne moisture and provide adequate air circulation. If heaters or other sources of artificially generated heat are used in the drying operation, provide adequate ventilation of the heating equipment and use only fuels that will not result in smoke or other combustion production coming in contact with the crop.	C	Indoor drying room conditions are controlled to minimized airborne contamination, remove moisture and provide adequate air movement for uniform drying.

14	Packing House Worker Health & Hygiene		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor

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14.1	Employee facilities (locker rooms, lunch and break areas, etc.) are clean and located away from packing area.	C	Employee facilities were observed to be clean. Facilities are cleaned daily.
14.2	When there is a written policy regarding the use of hair nets/beard nets in the production area, it is being followed by all employees and visitors.	C	GEN-004 Personal Hygiene Policy contains the Hair restraint policy.
14.3	When there is a written policy regarding the wearing of jewelry in the production area, it is being followed by all employees and visitors.	C	GEN-004 Personal Hygiene Policy contains the Jewelry Policy.

15	Packing House General Housekeeping		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
15.1	Only food grade approved and labeled lubricants are used in the packing equipment/machinery.	C	Food Grade Lubricants were observed.
15.2	Chemicals not approved for use on product are stored and segregated away from packing area.	C	Non-Food Grade Chemicals are stored separate from Food Grade Chemicals
15.3	The plant grounds are reasonably free of litter and debris.	C	Litter was not observed on the exterior of the building.
15.4	The plant grounds are reasonably free of standing water.	C	Standing water was not observed outside the building.
15.5	Outside garbage receptacles/dumpsters are closed or are located away from packing facility entrances and the area around such sites is reasonably clean.	C	Exterior garbage receptacles are away from the building on hard surfaces and covered.
15.6	Packing facilities are enclosed.	C	Packaging area is fully enclosed.
15.7	The packing facility interior is clean and maintained in an orderly manner.	C	The Packaging area is clean and organized.
15.8	Floor drains appear to be free of obstructions.	C	Obstructions or odors were not observed in the floor drains.



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15.9	Pipes, ducts, fans and ceilings which are over cannabis handling operations, are clean.	C	Potential for Overhead contamination was not observed.
15.10	Glass materials above product flow zones are contained in case of breakage.	C	No Glass material observed above product or product flow areas.
15.11	Possible wastewater spillage is prevented from contaminating any cannabis handling area by barriers, drains, or a sufficient distance.	C	Potential for contamination of plants or edible material from waste water was not observed.
15.12	There is a policy describing procedures which specify handling/disposition of finished product that is opened, spilled, or comes into contact with the floor.	C	GEN-009 Foreign Material Procedure contains procedures to handle contaminated product.
15.13	Only new or sanitized containers are used for packing the product.	C	Containers are not re-used.
15.14	Pallets and containers are clean and in good condition.	C	Pallets were observed to be in Good Condition, not splintering or broken.
15.15	Packing containers are properly stored and protected from contamination (birds, rodents and other pests).	C	Packaging material is stored inside above the floor under the Pest Control Program.
15.16	Measures are taken to exclude animals and pests from packing and storage facilities.	C	Packaging and Storage areas are in-side, no potential for animals or pests.
15.17	There is an established pest control program for the facility.	C	A licensed Pest Control Operator manages the Interior and Exterior Pest Control Program.
15.18	If used, pest control devices, including rodent traps and electrical flying insect devices are located so as to not contaminate product or cannabis handling surfaces.	C	Interior Pest Control Devices are Mechanical Traps, Exterior Pest Control Devices are Bait boxes.

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15.19	Service reports for the pest control program are available for review.	C	Monthly Pest Control Service Reports were reviewed on line.
15.20	Interior walls, floors and ceilings are well maintained and are free of major cracks and crevices.	C	Evidence of Cracks, Crevices in the floor, walls or Ceilings was not observed.

16	Traceability		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
16.1	Records are kept recording the source of incoming product and the destination of outgoing product which is uniquely identified to enable traceability.	C	LeafLink is used to track product grown here, and BioMass purchased in addition to all product being traced thru CRA METRC
17	Maintenance and Sanitation		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
17.1	A Preventive Maintenance and/or Master Cleaning Schedule, with related SOPs, shall be established.	C	Servicing of the Air Handling system, Heat Pumps, HVAC are on a Service Schedule Annually, Bi-annually and Quarterly based on the unit and location being serviced by the particular unit.
17.2	Any temporary repairs on cannabis contact surfaces are constructed of food-grade material. Operation has a procedure to ensure that permanent repairs are implemented in a timely manner.	C	No temporary repairs. Effective permanent repairs are made.
17.3	All cleaning agents shall be approved for their intended use on cannabis contact surfaces.	C	All cleaning agents are approved for cannabis and food contact surfaces.
17.4	Cleaning equipment and tools are clean, in working order and stored properly away from product handling areas.	C	All cleaning utensils were observed to be clean and properly stored.

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17.5	Cannabis contact surfaces shall be cleaned, sanitized and maintained according to the Cannabis Safety Plan.	C	Cannabis contact surfaces are cleaned and sanitized after use. Daily or Batch as required.
17.6	Transporting equipment shall be maintained to prevent contamination of products being transported.	C	Material used to move product withing the facility were observed to be clean.
17.7	Waste materials and their removal are managed to avoid contamination.	C	Potential for contamination from waste was not observed.
17.8	Outside garbage receptacles/dumpsters are closed and located away from building entrances and the area around such sites is reasonably clean.	C	Exterior Garbage Receptacles and Dumpster are located away from the building on a hard surface and kept covered.
17.9	The plant grounds are reasonably free of litter, waste culls, vegetation, debris and standing water.	C	Litter and waste was not observed.
17.10	Sewage or septic systems are maintained so as not to be a source of contamination.	C	Sewage systems are maintained, no Evidence of blockage or odors.
17.11	The sewage disposal system is adequate for the process and maintained to prevent direct or indirect product contamination.	C	Potential for contamination from the Sewage System was not Observed. The system meets Local and State Plumbing codes.

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# Section 4: Storage and Transportation

18	Product, Containers & Pallets		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
18.1	The storage facility is cleaned and maintained in an orderly manner.	C	Storage area was observed to be Clean and organized.
18.2	Bulk storage facilities are inspected for foreign material prior to use and records are maintained.	NA	No bulk Storage.
18.3	Storage rooms, buildings, and/or facilities are maintained and sufficiently sealed or isolated and are protected from external contamination.	C	Potential for external contamination in the Storage Rooms or Facilities was not Observed
18.4	Storage grounds are reasonably free of litter and debris.	C	No litter observed.
18.5	Floors in storage areas are reasonably free of standing water.	C	Floors are clean, dry no debris Trapping Cracks or Crevices.
18.6	Possible wastewater spillage is prevented from contaminating any cannabis handling area by barriers, drains, or sufficient distance.	C	Waste Water is collected in an enclosed tray and plumbed directly to drain.
18.7	There is a policy describing procedures which specify handling/disposition of finished product which is opened, spilled, or comes into contact with the floor.	C	GEN-009 Foreign Material Procedure contains procedures to handle contaminated product
18.8	Packing containers are properly stored and sufficiently sealed, to be protected from contamination (birds, rodents, pests, and other contaminants).	C	Packing material is properly stored to prevent contamination from Birds, Rodents, Pests.
18.9	Pallets, pallet boxes, tote bags, and portable bins, etc. are clean, in good condition and do not contribute foreign material to the product.	C	Pallets were observed to be in good condition, not splintering or broken.
18.10	Product stored outside in totes, trucks, bins, other containers or on the ground in bulk is covered and protected from contamination.	NA	No Outside Storage.

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18.11	Packaged product is stored in buildings off the floor, within a sufficient distance from the wall and separated from other substances to avoid cross-contamination.	C	Packaged product was observed stored on racking off the floor with sufficient clearance to clean under the racking.
18.12	Non-food grade substances such as paints, lubricants, pesticides, etc., are not stored in close proximity to the product.	m	Non-Food Grade Material was observed in the Isolate Room near the 3-compartment sink.
18.13	Mechanical equipment used during the storage process is clean and maintained to prevent contamination of the product.	NA	No Mechanical Equipment Observed.

19	Product, Containers & Pallets		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
19.1	Measures are taken to exclude animals and pests from storage facilities.	C	Cracks, Crevices, holes were not observed in the Storage Area.
19.2	There is an established pest control program for the facility.	C	A Pest Control Services are provided by a Licensed Pest Control Service Provider.
19.3	Service reports for the pest control program are available for review.	C	Electronic Service reports are provided on line.
19.4	Interior walls, floors, and ceilings are well-maintained and are free of major cracks and crevices.	C	Cracks, Crevices were not observed in the walls, floors or ceilings.

20	Transportation		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
20.1	Prior to the loading process, conveyances are required to be clean, in good physical condition, free from disagreeable odors and from obvious dirt/debris.	m	Missing a record of Transport vehicles being inspected for Cleanliness, Damage, Odors or potential contaminants prior to loading.
20.2	Product items are not loaded with potentially contaminating products.	m	Missing a record of Transport vehicles being inspected for Cleanliness, Damage, Odors or

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			potential contaminants prior to loading.
20.3	Company has a written policy for transporters and conveyances to maintain a specified temperature(s) during transit.	NA	No temperature sensitive product produced in the facility.
20.4	Conveyances are loaded to minimize damage to product.	C	Product is packaged to prevent damage during transit and storage.

21	Worker Health and Personal Hygiene		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
21.1	Employee facilities (locker rooms, lunch and break areas, etc.) are clean and located away from storage, shipping, and receiving areas.	C	Employee Locker Rooms were observed to be clean and located away from Storage, Shipping and Receiving areas.
21.2	When there is a written policy regarding the use of hair/beard nets in the storage and transportation areas, it is being followed by all affected employees and visitors.	C	GEN-004 Personal Hygiene Policy contains the Hair restraint policy.
21.3	When there is a written policy restricting the wearing of jewelry in the storage and transportation areas, it is being followed by all affected employees and visitors.	C	GEN-004 Personal Hygiene Policy contains the Jewelry Policy.

22	Traceability		
	Requirement	Major (M) Minor (m) Compliant (C)	Comment by Auditor
22.1	Records are kept regarding the source of incoming product and the destination of outgoing product which is uniquely identified to enable traceability.	C	Product and Raw Materials are tacked using LeafLink and Michigan CRA METRC system.

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