R.J. REYNOLDS U.S. TOBACCO GAP ASSESSMENT PROGRAM, 2016 SUMMARY

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Tobacco field in VA – 2016 Growing Season
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Introduction

R.J. Reynolds’ third-party assessment program, which is performed through the oversight of GAP Connections, offers growers a chance to demonstrate their commitment to producing a quality crop while using the best management practices to protect the environment and provide a safe workplace, in accordance with the Good Agricultural Practices (GAP) standards by the consolidated U.S. Tobacco GAP Program. For the 2016 growing season, Arche Advisors was contracted by GAP Connections, as a third party to conduct on-farm assessments, on behalf of R.J. Reynolds, to measure compliance to these standards. These assessments have a two-fold purpose: to provide an accurate assessment of practices on each individual farm, and to provide an overview of GAP compliance in the industry. The Good Agricultural Practices (GAP) assessments for 2016 are a continuation of the assessments conducted in year’s past. In 2016, Arche Advisors assessed these practices at 341 growers for R.J. Reynolds, of the 1,037 assessed through GAP Connections. The assessments for R.J. Reynolds, took place covering seven US states, over a 3-month period, from July to October. The states included: Florida, Georgia, Kentucky, North Carolina, South Carolina, Tennessee and Virginia.

Arche Advisors is a corporate responsibility-consulting firm that specializes in labor and human rights in global supply chains. The assessment team brings several decades of combined experience in corporate social responsibility and sustainability to our audit services. Our team’s work with Fortune 500 companies across various sectors allows us to bring a rich perspective to our work engagements. Our experience in both training suppliers and in assessing agricultural labor practices is unparalleled. With global labor experts based in the Americas, Asia, Africa and Europe, Arche Advisors is well positioned to provide first class support throughout the globe. Our America’s team has been heavily involved with Altria for the US GAP program since 2010 and the Central and South American GAP program since 2012. Furthermore, team members have worked with R.J. Reynolds, Altria and GAP Connections, as a part of the assessment team, during the first years of this program.

Verification Methods

The scope of these 341 assessments conducted in 2016 covered the three areas within the established GAP standards: crop management, environmental management and labor management. While on-site, the assessors utilized varying verification methods, which included documentation review, observation of practices, and grower and employee interviews.
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Information Verification Methods

- **Crop Management**
  - Document Review: 57%
  - Observation: 24%
  - Environmental Management: 51%
  - Grower Interviews: 19%
  - Labor Management: 41%
  - Employee Interviews: 0%

- **Environmental Management**
  - Document Review: 41%
  - Observation: 0%
  - Environmental Management: 7%
  - Grower Interviews: 0%
  - Labor Management: 21%
  - Employee Interviews: 22%

- **Labor Management**
  - Document Review: 46%
  - Observation: 21%
  - Environmental Management: 10%
  - Grower Interviews: 22%
  - Labor Management: 10%
  - Employee Interviews: 0%
Overview of Farms

Over the course of 14 weeks, from July to October, the Arche Advisors assessment team of eight assessors, conducted 341 grower assessments for R.J. Reynolds, covering the following states: Florida (2), Georgia (17), Kentucky (82), North Carolina (144), South Carolina (30), Tennessee (34) and Virginia (32).

Each assessment took approximately one to two hours to complete, and the assessor, working up to 10 hours per day, conducted two to five assessments in total, which depended upon the following factors: farm size, organization of the grower, proximity of the workforce, scheduling ease and proximity to one another. The assessment team consisted of individuals with agricultural experience and some with tobacco experience. The majority had five to twenty years of auditing experience ranging from agriculture to clothing, electronics, jewelry, pharmaceutical, livestock, forest, and other types of consumer products.

The tobacco types grown by this year’s selection of growers included: flue-cured (207), burley (101), dark fire (53) and dark air...
(26). There were 56 growers assessed that grow more than one type of tobacco.
Of the growers assessed, they are broken down by tobacco type as well as acreage, including: Very Small (<3 acres), Small (3 – 19 acres), Medium (20 – 59 acres), Large (60 – 150 acres) and Very Large (>150 acres). For flue-cured farms, the acreage is broken down into: Small (<50 acres), Medium (50 – 199 acres) and Large (>200 acres).
### Assessment Process and Methodology

Throughout the assessment process, it was important for each grower to be able to provide feedback on each aspect of the project: training, scheduling/communication, assessment scope and employee interviews. A hotline was set up for growers being assessed, answered by a representative of GAP Connections acting on behalf of R.J. Reynolds, to provide feedback throughout the process. Calls were received on the hotline demonstrating its value as an alternate line of communication, as valuable scheduling feedback was disseminated to Arche Advisors throughout the season.

Training sessions were conducted, with a representative from the US Department of Labor, at the annual growers’ GAP meeting. This season, training was focused on the labor pool and record keeping. This meeting was held at the beginning of the year, in several locations, to make it feasible for all growers to attend. The goal of this training was for growers to become more familiar with the laws encompassing the Fair Labor Standards Act in relation to minimum age of employment, proper compensation methods and Right to Work in the United States, with proper record keeping methods discussed.

<table>
<thead>
<tr>
<th>Type of Tobacco</th>
<th>Size of Farm</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flue-cured</td>
<td>Large (50)</td>
</tr>
<tr>
<td></td>
<td>Medium (101)</td>
</tr>
<tr>
<td></td>
<td>Small (56)</td>
</tr>
<tr>
<td></td>
<td><em>(n=207)</em></td>
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<tr>
<td>Burley</td>
<td>Very Large (1)</td>
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<tr>
<td></td>
<td>Large (7)</td>
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<tr>
<td></td>
<td>Medium (19)</td>
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<tr>
<td></td>
<td>Small (61)</td>
</tr>
<tr>
<td></td>
<td>Very Small (13)</td>
</tr>
<tr>
<td></td>
<td><em>(n=101)</em></td>
</tr>
<tr>
<td>Dark Fire</td>
<td>Large (3)</td>
</tr>
<tr>
<td></td>
<td>Medium (15)</td>
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<tr>
<td></td>
<td>Small (32)</td>
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<tr>
<td></td>
<td>Very Small (3)</td>
</tr>
<tr>
<td></td>
<td><em>(n=53)</em></td>
</tr>
<tr>
<td>Dark Air</td>
<td>Medium (1)</td>
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<td>Small (20)</td>
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<tr>
<td></td>
<td>Very Small (5)</td>
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<td><em>(n=26)</em></td>
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</table>
The growers assessed were randomly chosen by GAP Connections from the total number of growers contracted with R.J. Reynolds in 2016. When the project was complete in October 2016, Arche Advisors conducted a GAP Assessment of 341 of the provided grower locations. Some of the provided growers were assessed together as ‘Associated Growers’, as they were growing at the same farm, i.e. father and son, but each had a separate contract. This was done to not duplicate efforts. Of the total growers provided, two (2) denied the scheduling and conducting of the assessment. R. J. Reynolds was made aware of those who chose not to comply.

Arche Advisors utilized eight assessors over a three-month period to cover the scope of the assessments, of which R.J. Reynolds growers consisted of 1/3 of the total growers assessed. Each assessor was assigned growers within a specific geographic area. Assessments were conducted by one assessor, who scheduled and visited each of the growers within their assigned region. The assessors planned their assessments efficiently, keeping in mind proximity of the farms. It was difficult to please all growers with scheduling, as the date and time did not always match with their schedule, and there were instances where the auditor was forced to backtrack to pick up growers on an alternate date. Scheduling of dates and times were populated within a SharePoint site, so that all parties involved with the assessments were aware of upcoming visits.

The assessment reports and employee interviews were conducted utilizing an iPad, with cellular connection, and the Apple app Forms on Fire. Each completed assessment and employee interview report was generated within the app, and uploaded to the SharePoint site, either immediately upon completion, or that evening, depending upon the on-site strength of the cellular connection. By utilizing the iPad and the online templates, real time reporting of the assessment data was possible for each individual assessment.

Prior to each assessment, a completed Electronic Data Release Form was received from each grower, which was needed to approve the release of assessment data to R.J. Reynolds for the current growing season. If the Electronic Data Release Forms were unavailable, it was the assessor’s responsibility to ensure the form was complete through the iPad app, and submitted with the other templates, after the assessment.

Of the questions within the assessment report, some questions were not applicable to all growers. For example, there are questions within the report that may target a flue-cured grower, and not the other tobacco types, or labor questions, which would not be applicable to family labor or hired employees living on the farm, i.e. H-2A. In the data provided within Addendum I to this assessment, the questions were analyzed based upon tobacco type and reported in percentages of ‘Yes’, ‘No’ or ‘N/A’ answers.
Employee interviews were conducted with 266 employees, or 20% of the employees present, on 201 of the assessed farms, ranging from H-2A workers, local workers and migrant labor hired through Farm Labor Contractors (FLC) or Crew Leaders. The family workers were not assessed in the scope of the employee interviews, as directed at the onset of the program. Arche Advisors assessors, ensured that the interviews were conducted from all employee types; H-2A, FLC/ Crew Leader and Local employees, to not monopolize interviews for one type of worker. The Arche Advisors assessors requested random employee interviews from each grower, and for the majority of growers with employees present, were allowed to conduct private one on one interviews away from the growers location. There were 27 growers who did not allow employee interviews, or for others, there were no employees present, and the assessors did not insist on conducting if not allowed, as directed by GAP Connections. R.J. Reynolds was not made aware of this issue until after the conclusion of the audit program and the preparation of the audit summary.
Grower Profiles

At the beginning of each season, the growers are asked to complete a Grower Profile, which assists R.J. Reynolds and the assessors when planning visits for the upcoming growing season. Of the growers chosen for assessment in 2016, the following insights were generated from the data provided by each grower, and by the assessor, if not previously provided by the grower, at the time of the on-site assessment:

- 1 burley grower reported employing non-family minors below the age of 13. This grower is an Amish grower in VA, and trades labor with his neighbor, who has sons below the age of 13. This is a common practice within the Amish community.
- 1 flue-cured grower in SC reported employing non-family minors between the ages of 14 – 15. Documentation was present for the minors, with parental permission.
- 3 flue-cured growers reported employing non-family minors between the ages of 16 - 17. These growers are in SC, and documentation was present for these minors.
- 39% of growers reported employing H-2A workers, 4% reported employing migrant labor and 43% reported employing local labor. Most of these growers reported employing more than one type of labor source, to include these sources, as well as family labor.
- 12% reported employing family labor with no other labor source.
- 96% received a GAP Connections Handbook, whereas 97% reported attending a GAP Connections training in 2016, where they should have received the Handbook.
- 66% reported Spanish as the language spoken by their employees. The remainder of the growers reported English as the language spoken, or no employees.

Crop Management

The Crop Management section consisted of 15 core questions, with 40 total questions, centered around the following topics: variety integrity and selection; integrated pest management; nutrient management; crop and operation management; curing and barn management; non-tobacco related materials (NTRM) and on-farm tobacco storage.

The assessors utilized varying techniques to answer the questions within this category. Most of the questions were answered by reviewing documentation provided by the
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grower (57%), with observation (24%) and by interviewing the grower (19%) throughout the assessment. For most questions, there was more than one technique utilized. The focal point of this area was pest management and NTRM prevention and storage, as multiple questions were asked around these areas.

The responses that appear to solicit the most positive results, were quantified as:

1) Pest Management Implementation (99.5% affirmative). All of the following practices each scored 99%, or better, positive answers:
   a. Tobacco varieties selected based on disease resistance and field history
   b. Trays used in production of seedlings are cleaned or sanitized
   c. Unused seedlings destroyed immediately after transplanting and harvesting
   d. Crop residue destroyed and cover crop established after harvest

2) NTRM Prevention
   a. Trash Cans Present in Market Prep Areas (100% affirmative)
   b. Tools and Equipment in Market Prep have Metal or Wooden Handles (99% affirmative)
   c. Market Prep Facilities Cleaned Regularly (99% affirmative)
   d. Designated Break Areas in Use, Away from Market Prep (99% affirmative)

3) Record of Curing Structure / Barn used from each Field / Tract (96% affirmative)

The responses that appear to solicit the most negative results, were quantified as:

1) Documented Pest Scouting Program:
   a. Recording of field scouting dates (89% affirmative)
   b. Pests identified during scouting (87% affirmative)
   c. Fields / tracts where pests were identified (87% affirmative)
   d. Level of infestation of pest identified (84% affirmative)

2) Rainfall Maintenance Records (89% affirmative)

3) Irrigation Records were Maintained (92% affirmative of those who irrigated). Of those growers who were chosen for assessment, only 34% irrigated, as the remainder relied upon rainfall to provide the necessary water to the crops

It was apparent that year over year, the growers have made steady improvements to their compliance with the Crop Management section. For both the positive and negative answers above, the answers were either flat or showed some slight improvement, of 1 to 2%. Based on these results, it is apparent that more effort is being made by the growers to comply with the GAP requirements, but more work is necessary.
Environmental Management

The Environmental Management section consisted of 9 core questions, with 21 total questions, focused on the following topics: soil and water management and agrochemical management.

The assessors utilized varying techniques to answer the questions within this category. Most of the questions were answered by reviewing documentation provided by the grower (51%), with observation (7%) and by interviewing the grower (42%) throughout the assessment. For most questions, there was more than one technique utilized.

The responses that appear to solicit the most positive results, were quantified as:

1. Presence of Buffer Zones between Farmland and Bodies of Water (100% affirmative)
2. A Licensed Pesticide Applicator Applies or Supervises Restricted Use Pesticide Usage (98% affirmative)
3. Maintenance of Pesticide Application Documentation
   a. Date of Application (98% affirmative)
   b. Product Common Active Ingredient (97% affirmative)
   c. Rate Applied (97% affirmative)
   d. Identification of Field Rates & Size of Treated Area (97% affirmative)
4. Maintenance of Soil & Water Management Documentation: Cover crops planted during current and previous years (98% affirmative)

The responses that appear to solicit the most negative results, were quantified as:

1. Maintenance of SDS (Safety Data Sheets) for Agrochemicals (87% affirmative)
   a. Dark Fire (95% affirmative)
   b. Flue-cured (94% affirmative)
   c. Dark Air (89% affirmative)
   d. Burley (71% affirmative)
2. Maintenance of Pesticide Application Documentation
   a. Entity Performing Application (94% affirmative)
   b. Reason for Application (94% affirmative)
   c. EPA # (90% affirmative)
   d. Restricted Entry Interval (REI) Notification (91% affirmative)
3. Maintenance of Soil & Water Management Documentation: Crop rotation history for current and previous years (94% affirmative)
4. Is a Conservation Plan available, for Fields / Tracts Considered HEL (Highly Erodible Land) (91% affirmative who reported HEL)
It was apparent that year over year, the growers have made steady improvements to their compliance with the Environmental Management section, however a few questions show a very slight decline of about 1 – 2%. For the majority of both the positive and negative answers above, there has been a slight improvement, which has been flat or an up-tick of 2 to 5%. Although there have been a few slightly declining numbers, in all the growers are showing improvement in Environmental Management.

Labor Management

The Labor Management section consists of 19 core questions, with 44 total questions, around the following topics: laws & regulations, farm safety and employee training. Under laws and regulations, the assessment questions pertain to hiring and payroll documentation, pay rates, and required postings. Eleven of the core questions, or 58%, address this section.

The assessors utilized varying techniques to answer the questions within this category. Most of the questions were answered by interviewing the grower (46%), with observation (22%), documentation (21%) and employee interviews (11%) utilized throughout the assessment. For most questions, there was more than one technique utilized.

The responses that appear to solicit the most positive results, were quantified as:

1. All Workers are Paid at, or Above, the Prevailing Minimum Wage (100% affirmative)
2. Growers Returning to Workers or Making Readily Available any Government-Issued Documentation (100% affirmative)
3. Freedom of Employees to Terminate or Leave Their Employment at Any Time (100% affirmative)
4. Grower Ensures all Minors, below Age 16, are Prohibited from Performing Hazardous Tasks (100% affirmative)
5. Tobacco Production Equipment Has the Appropriate Shields and Guards Installed (99.7% affirmative)
6. Growers Ensure that Exposure to Wet Tobacco is Limited to Prevent Green Tobacco Sickness (GTS) (99.5% affirmative)
7. Grower Provides Appropriate Personal Protective Equipment for all Employees, as Required (99% affirmative)
8. Safety Training is Conducted for all Employees (99% affirmative)

The responses that appear to solicit the most negative results, were quantified as:

1. Grower Maintains I-9 Forms for All Employees (86% affirmative)
2. Fire Extinguishers are Present near Barns and at Market Prep Area (92% affirmative)
3. Workplace Accident Records are Maintained, Recording the Number of Accidents as well as the Cause of Accidents (95% affirmative for each)
4. Grower Maintains Required Records for Minors Employed on the Farm (95% affirmative)
5. First Aid Kits are Available in the Field, Market Prep area and in all Transportation (97% affirmative)

Through the review of the 2016 Labor Management assessment data, it is apparent the growers have made great strides in complying with the GAP requirements. However, there was one (1) burley grower in VA who employs non-family minors below the age of 13. This grower is Amish, is contracted for 14 acres of tobacco production, and the non-family employees are his neighbor’s children. This information will be elaborated on below, under the section Age Profiles & Tenure.

Year over year there have been noted improvements in Labor Management of between 2 and 10% increase in affirmative answers.

Employee Hiring Status

Of the growers included in the 2016 Assessment scope, there were a number of growers who employed family members and had no other employee base, accounting for 18% of the total growers. In review of the permanent employees, 26% of the total workforce, for the 341 growers assessed, were family members, compared to 20% local labor, 49% H-2A employees, and 5% migrant. For the employees during the peak season, family members dropped to 16%, H2A employees dropped to 47%, migrant employees maintained at 5% and local employees increased to 32%.
Type of Employees (Permanent)

- H2A: 49%
- Family: 26%
- Local: 20%
- Migrant: 5%

Type of Employees (Peak Season)

- H2A: 47%
- Family: 32%
- Local: 16%
- Migrant: 5%
Age Profiles and Tenure

Twenty-two employees under the age of 18 were hired. This number has been broken down to the following groups:

Of the three growers who employed family and non-family workers 13 years and younger, two are in Virginia, are burley growers and are associated with the Amish community and one is a flue-cure grower in GA who employed his grandson. It is common practice within the Amish community to work family members in the fields at a young age, and to share family workers with neighbors and other relatives. The non-family minors, 13 years and under, are employed by one burley grower in Virginia, who are his neighbor's children.

Of the adult employees interviewed, the ages ranged from 18 years to 72 years of age, with the average being 37 years. The employee tenure on the farm ranged from the first season to 34 years, with the average tenure being 7 years.
Employee Interviews

Arche Advisors’ assessors conducted employee interviews at 201 of the 341 growers assessed in 2016, or 59% of the growers assessed. Of the assessments where no interviews were conducted, 27 (8%) growers denied the interviews, as the employees were too busy in the fields, or they felt there would be too much disruption to the production flow. For the remainder, 113 growers (33%), there were no employees present on the assessment date, or they did not employ anyone other than family. Arche Advisors conducted interviews with 20%, or 266, of the employees present at the time of the assessment, as was the directive at the onset of the assessment process. As directed by R.J. Reynolds and GAP Connections, family labor was not to be included in the scope of the interviews.
Employee Profiles

Arche Advisors assessors conducted private interviews with 266 employees, of the grower workforce present, of which 241 (91%) were male and 25 (9%) were female. The assessors randomly chose interviewees and conducted the interviews in the native language of the employees to ensure a higher level of comfort during the process and to ensure the integrity of the information shared. Each interview was conducted on an individual basis and separate from the grower’s location. All employees were willing to speak with the assessors and appeared to speak freely.

The employees were categorized by H-2A (57%), Migrant Labor (hired by a FLC (Farm Labor Contractor) or Crew Leader (5%) and Local (38%), and furthermore by Seasonal (70%) and Permanent (30%). Most of the employees were hired directly by the grower (84%), with the balance evenly split between hiring by a FLC/ Crew Leader (8%) and other hiring (8%).

![Employee Profiles Diagrams](image-url)
Labor Relations

Regarding the employees’ rate of pay, 100% of employees reported being paid at or above the local minimum wage. Ninety-nine percent of all employees interviewed reported being paid an hourly rate. The remaining employees reported either daily pay or piecework pay, and 99% reported receiving weekly pay. Of the 266 employees interviewed, 256 (96%) reported receiving some form of an itemized pay stub.

Most of the employees interviewed (99%) described their relationship with and treatment by the grower as “very good” (134) or “good” (129), with the balance reporting “fair” (3). Of the 266 employees interviewed, 100% informed the assessor that they would return to work at the farm next year.

Each employee interviewed was presented with 38 questions, after basic demographic questions were asked. The questions were centered around wages, freedom of movement, worker treatment and safety training and access to PPE. From the interview data collected, the answers received were generally positive. However, there were questions asked that received a negative response. When received, was reported negatively by at most, ten employees.

Questions asked that were unanimously answered in the positive were:

- Do you Receive at or Above the Local Minimum Wage? (100% affirmative)
- A Supply of Safe Drinking Water is supplied in the fields and housing (100% affirmative)
- Full Access is Provided to Passport/Identity Cards (100% affirmative)
- Witness of Verbal Abuse by the Grower of Employees (100% negative)
- Witness of Physical Abuse by the Grower of Employees (100% negative)
- Witness of Sexual Harassment on the Farm (100% negative)

Of the answers with at least one (1) negative response, the top eight (8) are:

- Recognition of Fields which have been Sprayed and are Not to be Entered (98% affirmative – 260 employees)
- Awareness of Right to Join a Labor Union (99% affirmative – 264 employees)
- Access to applicable PPE; i.e. gloves, safety glasses, hearing protection, dust masks (99% affirmative – 265 employees)
- Procedures to Follow in the Event of an Emergency (99% affirmative – 264 employees)
- Instruction on General Farm Safety (99% affirmative – 265 employees)
- Instruction on Heat Stress (99% affirmative – 265 employees)
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- Instruction on GTS (Green Tobacco Sickness) (99% affirmative – 251 employees, 14 reported no work in GTS)
- Instruction on NTRM (Non-Tobacco Related Material) Prevention (99% affirmative – 265 employees)

Improvements have been made, but there is more work to perform. The main issue reported above, from the interviews, is the fact that safety trainings are not conducted for 100% of the employee populace. Further, training on Farm Safety, Heat Stress, Green Tobacco Sickness and utilization of appropriate PPE is recommended.

Recommendations and Next Steps

Crop Management Findings

1. 84% of growers maintain a level of infestation of pest identified
2. 87% of growers maintain a record of pests identified during scouting
3. 87% of growers maintain a record of fields / tracts where pests were identified
4. 88% of growers maintain a recording of field scouting dates
5. 89% of growers maintain Rainfall Maintenance Records
6. Irrigation Records were Maintained (92% affirmative of those who irrigated). Of those growers who were chosen for assessment, only 34% irrigated, as the remainder relied upon rainfall to provide the necessary water to the crops

Recommendations

Training on the above aspects of the GAP standards is key to growers understanding the necessity of recording data and why it is necessary. Of the growers not recording data, the majority do not understand the importance or use of the data once recorded, and therefore do not comply.

Environmental Management Findings

1. 87% of growers maintain SDS (Safety Data Sheets) for Agrochemicals
   a. Dark Fire (95% affirmative)
   b. Flue-cured (94% affirmative)
   c. Dark Air (89% affirmative)
   d. Burley (71% affirmative)
2. 91% of growers maintain a Conservation Plan, for Fields / Tracts Considered HEL (Highly Erodible Land) – of those growers who reported HEL
3. Maintenance of Pesticide Application Documentation
   a. 94% of growers maintain information for the entity performing application
   b. 94% of growers maintain a reason for application
   c. 90% of growers record the EPA #
   d. 91% of growers record the Restricted Entry Interval (REI) Notification
4. 94% of growers maintain Soil & Water Management Documentation: Crop rotation history for current and previous years

Recommendations

R.J. Reynolds should request to include these areas of Environmental Management in the training at the annual grower meeting, so that all growers in attendance understand how to utilize the forms that are currently provided. The use of the safety data sheets should be addressed, where to find them and the importance of documentation, so that all growers will understand what is needed for compliance.

Labor Management Findings

1. 86% of growers maintain I-9 forms for all employees
2. 92% of growers maintain fire extinguishers near Barns and at market prep area
3. 95% of growers maintain workplace accident records, recording the number of accidents as well as the cause of accidents
4. 95% of growers maintain required records for minors employed on the farm
5. 96% of growers maintain first aid kits at the Field, market prep area and in all transportation

Recommendations

R.J. Reynolds should request to provide more in depth training, at the time of the annual GAP meeting, of the importance of receiving and maintaining complete and accurate I-9 forms for all employees. The forms are currently provided through the H-2A program, for all employees who come through that program. However, the main concern is from local day labor, who may not wish to provide any information. Furthermore, training by completing a mock injury report, which can be found within the GAP Handbook, would assist the growers in their understanding how to use the form. Further discussion should also be included in that training, regarding the accident/ injury recordkeeping protocols.
Next Steps

As with the recommendations above, and throughout the summary, it is important to ensure growers, as well as employees, are trained on the GAP Requirements pertaining to payroll, documentation, chemical management, freedom of association, farm safety measures and NTRM prevention. More time should be scheduled, during the annual GAP meeting, to train the growers in these aspects of the assessment process and maintenance of the required documents. It was repeatedly requested, by the growers during the assessments, that they would like more emphasis placed on the GAP Assessment, and requirements, so that they feel better prepared when future assessments are conducted.