



## **BOARDMAN FOODS, INC.**

**Boardman, OR**

**LEADING HARVEST FARMLAND MANAGEMENT PROGRAM 2020  
AUDIT SUMMARY REPORT: 2024 SURVEILLANCE I  
July 30, 2024**







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<b>Certification ID#</b>	Averum-LHFMS-2023-0012

☐ **Certification Audit**    ☐ **Re-Certification Audit**    ☒ **Surveillance Audit**    ☐ **Scope Extension**

## **INTRODUCTION**

This report summarizes the results of the first surveillance audit conducted on Boardman Foods, Inc. (Boardman) managed production agriculture properties. The audit was conducted by Matt Armstrong, Lead Auditor for Averum. Matt Armstrong has had experience with Leading Harvest throughout its development, is an assurance provider for multiple sustainability programs, and has expertise in production agriculture on multiple crop types in the United States. Site visits were conducted by Jacques Werleigh, Field Auditor. Senior members of the audit team hold training certificates in ISO 17021:2015 (Conformity Assessment), 14001:2015 (Environmental Management Systems), as well as IAF MD-1:2018 (Certification of Multiple Sites). The audit process and reports were independently reviewed by Holly Salisbury, who is a certified public accountant in the state of California and has expertise on multiple crop types in the United States.

## **SCOPE AND OBJECTIVE**

In 2024, Averum was engaged by Boardman to perform an audit of sustainability performance on 0 – 10,000 acres of managed agricultural operations and determine conformance to the principles, objectives, performance measures, and indicators of the Leading Harvest Farmland Management Standard 2020 (LH FMS). LH FMS objectives 1 through 12 were covered during site visits on properties in Washington and Oregon. There were no substitution or modification of LH FMS performance measures.

## **COMPANY INFORMATION**

Boardman is an independent agricultural investment firm. Farm operating management contractors are responsible for the day-to-day farmland management services for Boardman's properties. Boardman initially achieved LH FMS certification for their contracted grower agricultural properties in 2023, allowing them to engage in broader sampling and simplifying the process of maintaining their certification in the future.

During the surveillance audits, three (3) sites in Washington and Oregon combined were selected. Managers overseeing decision making and standard compliance for sample regions were contacted for evidence requests and interviews. The properties in these regions are a representative sample of current practices in place and management decision making. The primary agricultural production on sites are onions and peppers.

## **AUDIT PLAN**

An audit plan was developed and is maintained on file by Averum. An online portal was established for Boardman coordinators to upload evidence and documentation securely for auditor review, and supporting evidence was provided to reinforce management narratives as well as auditor observations. An opening meeting was held on June 7, 2024, preceding site visits. Following the meeting, a document review of the provided evidence was conducted by Averum. Field sites in Washington and Oregon were examined on June 12<sup>th</sup>, 2024. A closing meeting was held on July 30<sup>th</sup>, 2024.

Throughout the audit engagement, information and communication technology (ICT) was employed for a variety of tasks. An online portal was provided and made available for auditee to supply documentation for review, provide feedback on observation and notes, and for multiple levels of audit team reviews and signoffs. Throughout the audit engagement, conference calling technology (including Zoom, Microsoft Teams, etc.) was leveraged for meeting with clients, conducting management interviews, follow-up interviews, and Opening and Closing meetings. As LH FMS engagements are geographically decentralized, the use of ICT was deemed not only appropriate, but necessary.

### **Opening Meeting: Conference Call**

June 7, 2024

#### **Attendees:**

(Boardman) Armando Nunez, Debbie Radie, Patrick Maag, Salvador Rivera, Holly Nielsen, Francisco Mendoza

(Audit Team) Matt Armstrong, Linnea Abel, Jacques Werleigh

#### **Topics:**

- Introductions of participants and their roles: Matt Armstrong
- Introduce audit team: Matt Armstrong
- Status of findings of the previous audits: Matt Armstrong
- Audit plan: Matt Armstrong
- Expectations of program user staff: Matt Armstrong
- Method of reporting: Matt Armstrong

## BOARDMAN FOODS, INC.

### LH FMS AUDIT SUMMARY REPORT

July 30, 2024

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#### Closing Meeting: Conference Call

##### Attendees:

(Boardman) Armando Nunez, Debbie Radie, Patrick Maag, Salvador Rivera, Holly Nielsen, Francisco Mendoza

(Audit Team) Matt Armstrong, Jacques Werleigh, Linnea Abel

##### Topics:

- Opening remarks: Matt Armstrong
- Statement of confidentiality: Matt Armstrong
- Closing summary: Matt Armstrong
- Presentation of the audit conclusion: Matt Armstrong
  - Major Non-Conformances: 0
  - Minor Non-Conformances: 0
  - Opportunities for Improvement (OFI): 1
  - Notable Practices: 5
- Report timing and expectations: Matt Armstrong

## **MULTI-SITE REQUIREMENTS**

Boardman maintains operations on multiple properties in Washington, Oregon. Boardman qualifies for multi-site sampling since the properties within the management system are centrally controlled and directed by regional management, with regular monitoring activities. Regional Managers are responsible for developing corrective action plans regarding LH FMS conformance and reporting progress to Boardman management. Boardman's current review and monitoring process is effective and ongoing.

Field visits and observations are conducted based on a sample of regions each year. Sampling methodology is provided in the LH FMS. In accordance with International Accreditation Forum Mandatory Documents (IAF-MD) methodology, all sites were initially selected at random with consideration of any preliminary examinations and then coordinated to ensure representative coverage of the complexity of the portfolio, variance in sizes of properties, environmental issues, geographical dispersion, and logistical feasibility.

Region	Crop	Properties Examined During Engagement
Washington and Oregon	Onions and Peppers	Three (3) sites visited during audit <ul style="list-style-type: none"><li>- 0 – 10,000ac (0 – 4,000ha)</li><li>- Sites represent 43% enrolled acreage</li><li>- Management population: One (1) Regional Manager</li><li>- Sites visited: Warren Hutterian Brethren Farms, Easterday Land &amp; Livestock, Coleman Farms</li></ul>

## AUDIT RESULTS

Overall, Boardman's agricultural operations conform to the objectives of LH FMS. Interviews and document reviews were performed to determine procedural and documentation conformance to the LH FMS. Documentation of practices was supplied throughout the audit when requested. Documentation was provided to demonstrate or support conformance with LH FMS requirements. Field visits were performed on three operating sites in Oregon and Washington. Visits were post-planting, so weed, pest, and soil management practices were highlighted. Central and regional management representatives and growers were present and interviewed to demonstrate Boardman's conformance to LH FMS requirements and policy implementation. Central office staff with roles that impact LH FMS conformance were interviewed to determine awareness of and support for LH FMS conformance, and to illustrate company practices and procedures not performed by farm managers. Boardman's regional management served as guides and were available throughout the entire engagement, providing logistic support and honoring evidence requests wherever needed.

## KEY FINDINGS

Audit reports are written to the performance measure per LH FMS requirements. Nonconformities, OFIs, and notable practices are identified by indicator below. Indicators not listed below are deemed to be in conformance.

**Previous Non-Conformances:** Zero (0) non-conformances were identified during Initial Certification.

**Major Non-Conformances:** Zero (0) major non-conformances were identified during the audit.

**Minor Non-Conformances:** Zero (0) minor non-conformance were identified during the audit.

**Opportunities for Improvement (OFI):** One (1) opportunity for improvement was identified during the audit.

1. Threatened and Endangered Species 7.1.1
  - a. Boardman growers are currently in conformance with protective regulations regarding species of concern. Boardman has established relationships with universities and other industry leaders in sustainability. Boardman may be well-positioned and have an opportunity to leverage those relationships to conduct intentional and proactive research to determine threatened, endangered, or at-risk species in regions where growers are contracted. Further research and knowledge sharing with growers may go beyond regulatory protections currently in place.

**Notable Practices:** Five (5) notable practices were identified during the audit.

1. 1.1.2 Farmland Stewardship

## BOARDMAN FOODS, INC.

### LH FMS AUDIT SUMMARY REPORT

July 30, 2024

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- a. Boardman continues to invest in farmland improvements with growers. Boardman incentivizes grower transitions to drip irrigation systems by paying growers higher market prices for crops grown.

#### 2. 1.1.3 Farmland Conservation

- a. Boardman intentionally engages new and beginning farmers to support continuing relationships with future generations of farmers.

#### 3. 4.1.3 Pest Control Practices

- a. Site operators purchased and are trialing an AI-enabled sprayer and the use of trained hand crews, demonstrating effective weed management practices that reduce stress on cash crops.

#### 4. 9.2.1 Community Engagement

- a. Auditors noted extensive engagement with the local community and support for education. Auditors noted that surplus produce is returned to growers for community use.

#### 5. 9.3.2 Land Tenure Rights of Local Communities and Indigenous Peoples

- a. Boardman demonstrated notable community support demonstrated via grower agreements with Indigenous growers.

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**Review of Previous Audit Cycle:** No nonconformities were found during Boardman's Initial Certification in 2023. Nine opportunities for improvement were identified. No opportunities for improvement were repeated between Boardman's Initial Certification and Surveillance.

The following are summarized findings organized by LH FMS performance measure. Specific non-conformances, opportunities for improvement, and notable practices have been described in the "Key Findings" section.



## **Objective 1: Sustainable Agriculture Management**

### **1.1 Sustainable Agriculture Stewardship**

#### ***Conformance Evidence***

- Boardman Foods, Inc. (BFI) Sustainability Statement
- Sustainable Farm Practices Policy
- American Frozen Foods Institute (AFFI) - Supplier Leadership on Climate Transition (LOCT) program

#### ***Auditor Notes***

- Boardman's Sustainable Farm Practices Policy provides a clear written commitment and lists goals to address sustainable agriculture stewardship.
- Boardman maintains internal sustainable goals and a publicly available Sustainability Commitment statement on their website.
- Boardman is a participant in the Supplier LOCT program, which provides companies with the skills to make progress on their decarbonization strategies. Participants are led through subjects such as greenhouse gas (GHG) emissions tracking, setting GHG reduction goals, abatement, and mandatory disclosures.
- Market prices have decreased for some crops processed by Boardman for the 2024 crop season. Boardman has incentivized growers to invest and switch from overhead irrigation to drip irrigation by continuing to pay growers previously higher market prices for crops grown using the preferred system.
- Acreage using drip irrigation has grown 30% and has decreased water used to grow onions and peppers. Drip irrigation aids in nutrient management and controls erosion on sites.
- Boardman has long-standing relationships with growers who demonstrated well-managed and responsible farming practices.
- Boardman looks for historical success and farming experience when developing new strategic partnerships with growers. Boardman's Vice President of Procurement vets new growers by having them tend a plot between 5 and 10 acres. Growers demonstrate experience with specific crop types, average yield per acre, and conventional or organic farming practices. Acreage is adjusted based on grower's success.
- Boardman intentionally engages new and beginning farmers and provides them with support and an opportunity to enter the industry.

**Result:** ***In Conformance, Notable Practice***

**Objective 1: Sustainable Agriculture Management (Continued)**

**1.2 Critical External Factors**

***Conformance Evidence***

- Sustainable Farm Practices Policy

***Auditor Notes***

- Boardman identifies critical external factors through regulatory compliance such as Food and Drug Administration (FDA) Food Safety Modernization Act (FSMA), which aims to protect the public from foodborne illness. FDAFSMA now requires processors to test for heavy metals such as arsenic, mercury, lead, and cadmium.

- Boardman discusses identified factors with growers and stresses the importance of soil and maximum residue limits (MRL) tests and to engage in practices that prevent or reduce the prevalence of heavy metals. Boardman refers to the Elemental Analysis Manual to determine presence of heavy metals.

- Boardman's Sustainable Farm Practices Policy addresses external factors and highlights their commitments to implement sustainable practices and partnerships, conserve water, reduce inputs, reuse waste products, comply with regulations, and proactively engage with their community and employees.

***Result:*** ***In Conformance***

## **Objective 2: Soil Health and Conservation**

### **2.1 Soil Health**

#### **Conformance Evidence**

- Sustainable Farm Practices Policy
- Good Agricultural Practices (GAP) Certificate

#### **Auditor Notes**

- Growers test tissues weekly to ensure nutrient uptake and inform nutrient management plan.
- Third-party vendors conduct soil tests and provide analysis to growers.
- Growers use soil analysis results, crop-specific agronomic outlines from UC Davis, production guides created by Washington State University (WSU) and consult with agronomists to further inform nutrient management planning.
- Sites visited maintain application records segregated by field. Records track cost per field, facilitate tracking practices and costs year-over-year, and support the adoption of new or successful practices.
- Sites visited incorporate crop residues with strip tillage, leave residues on fields, and plant wheat, rye, and straw cover crops to manage soil erosion.
- Boardman selects growers based on experience, best management practices (BMPs) including soil health plans, certifications and licenses such as Private Agriculture Applicator licenses and certifications related to food safety such as GAP.
- Growers visited test soil frequently throughout the year. Soil is tested in the fall, in the spring or prior to planting, and when the crop enters the growth stage. Once plants have two to three leaves, soil is tested weekly.
- Boardman requires maximum residue limits (MRL) samples to be taken at least two weeks before harvest. If residue is present, it will be retested until no residue is present, or it won't be accepted by Boardman.
- Growers will plant an alternate crop after planting onions or peppers to support soil health and disrupt pest populations from become established when possible. Growers amend soil based on last year's removal if information is accessible to growers. Soil analysis supports all nutrient applications.
- Boardman grower sites visited prioritize soil microbial health and build soil tilth with organic matter. Healthy soils facilitate erosion control.
- Boardman's Sustainable Farm Practices Policy contains requirements and commitments of Boardman Foods and its growers related to sustainable management of soil, water, pest, waste, and agrochemical use and handling.

**Result:** ***In Conformance***

## **Objective 2: Soil Health and Conservation (Continued)**

### **2.2 Soil Conservation**

#### **Conformance Evidence**

- Sustainable Farm Practices Policy
- Grower interview
- Site visit

#### **Auditor Notes**

- Growers rectify soil acidity with gypsum and lime applications.
- Sites visited have sandy soils that are regularly tested to support nutrient management.
- Growers on sites are transitioning or have transitioned to drip irrigation to reduce runoff and mitigate erosion.
- Growers visited do not receive runoff from neighboring farms and use dams and dikes on fields to control runoff and erosion directly on site.
- Growers manage compaction with crop rotation or tilling. Acidification and salinization are minimal due to the water quality of the Columbia River, which is the main source of irrigation for sites visited.
- Growers use strip tillage on acreage dedicated to growing corn.
- Sites visited have been farmland since 1900s, and some of the sites originally cultivated dryland rye. Growers visited have not needed to rest soil on sites due to nutrient depletion. Nutrient and soil management practices support soil health.

**Result:** ***In Conformance***

### **Objective 3: Water Resources**

#### **3.1 Water Use**

##### **Conformance Evidence**

- Sustainable Farm Practices Policy
- Grower and management interviews

##### **Auditor Notes**

- Sites selected use flowmeters on irrigation systems. Water is plentiful in the region and supplied by the Columbia River. Regionally, approximately 5% of the Columbia supply capacity is diverted for agricultural use.
- Boardman's Sustainable Farm Practices Policy outlines Boardman's commitment to work with regional water conservation programs to foster the responsible use and conservation of groundwater and surface water used for agriculture.
- Sites visited use a combination of drip and overhead irrigation from a center pivot to meet crop needs. Drip irrigation is mainly used especially to conserve water. Growers can pay a surcharge if their water allotment is exceeded and needs additional water to appropriately irrigate crops.
- Growers use water sourced from the Columbia River and groundwater in aquifers. Groundwater wells are equipped with flowmeters that are monitored by growers, the Oregon Department of Ecology and the Department of Water Resources in their respective jurisdictions. Growers pay the Quincy Bureau of Irrigation per gallon of groundwater used.
- Water allotted by irrigation districts are based on water rights, which is often capped around 36 inches of water annually. Most crops can be grown in 18 to 30 inches of water per year. Boardman's growers have the option to purchase additional water allotments from other growers.
- Site selected has a settling pond that collects and filters water to be reused. Site waits 24 hours after applications to irrigate.
- Crop demands vary depending on plant growth stage, weather, evapotranspiration, and current level of soil saturation. Grower interviewed engages the irrigation system in response to wind events since high winds may cause soil erosion, and an irrigated field reduces erosion associated with wind.
- Growers visited use soil moisture probes and weather stations to inform irrigation system and irrigation schedule. Growers check components of the irrigation system such as nozzles, valve, pumps, and pivots to ensure proper functioning and efficient use. Automated soil probes communicate with irrigation software that depicts data to growers via an app in real time.
- Grower visited is a member of the County Line Water Improvement District, which manages a five-year recharge program. Membership gives growers insight to upcoming program initiatives.

**Result: In Conformance**



### **Objective 3: Water Resources (Continued)**

#### **3.2 Water Quality**

##### ***Conformance Evidence***

- Sustainable Farm Practices Policy
- SQF Food Safety Audit results
- SQF Code 9 Certificate of Registration
- GAP Certificates
- USDA GAP Verification Checklist

##### ***Auditor Notes***

- Sites proactively manage water use to control nutrient uptake and avoid infiltration.
- Growers avoid excessive irrigation and remain aligned with crop demand projections.
- Sites visited test water quality for the presence of fecal coliform, nitrates, and E. coli to meet requirements of Global G.A.P. and United States Department of Agriculture (USDA) GAP.
- Site visits confirm that there are no riparian, wetland, or other water resource areas bordering production land on sites visited.

**Result:** ***In Conformance***

## **Objective 4: Crop Protection**

### **4.1 Integrated Pest Management**

#### **Conformance Evidence**

- Sustainable Farm Practices Policy
- Certification Training Plan (chemical safety)
- Micro Analysis Analytical Report
- Pesticide Residue Analysis
- Pesticide Residue Monitoring Program
- Site visit

#### **Auditor Notes**

- Sustainable Farm Practices Policy contains requirements and commitments of Boardman and its growers related to sustainable management of soil, water, pest, waste, and agrochemical use and handling.
- Growers interviewed scout fields and use sticky cards and traps to monitor for pests. Scouting is conducted daily by growers and weekly by a third-party scout. Third-party scouts provide growers with scouting reports. Growers use reports, established pest thresholds published by universities, and consult with agronomists to decide on a course of action.
- Growers use heat units or growing degree days associated with the development and life cycle of pest to anticipate presence and proactively deal with pest. Washington State University (WSU) provides guidelines on when to apply agrochemicals based on pest count.
- Growers manage pests such as aphids, loopers, thrips, nematodes, corn seed maggots, and mites with the use of insecticides, nematicides, biologicals, and fungicides.
- Crop protection strategy is determined after consultation with agronomist, review of scouting reports, and comparison with establish pest thresholds.
- Select site visited cultivates green mustard as part of crop rotation and plows it in the soil. Green mustard is a natural nematicide when plowed into the soil and helps control nematodes.
- Boardman growers focus on strategically suppressing pests as opposed to eliminating or eradicating pest.
- Select growers use hand crews to manually remove persistent weeds after herbicide application to reduce the need for additional applications.
- Select growers purchased and is trialing an AI sprayer to facilitate precision agrochemical application. The grower anticipates this harvest to be bigger and of better quality. Boardman anticipates additional growers to adopt AI sprayer technology.
- Sites reduce fungicide applications by allowing crops with fungal issues to dry completely through reduced irrigation. Irrigation resumes when fungal issues are remedied.

**Result:** ***In Conformance, Notable Practice***

## **Objective 4: Crop Protection (Continued)**

### **4.2 Crop Protectant Management**

#### **Conformance Evidence**

- Sustainable Farm Practices Policy
- Pesticide Residue Analytical Reports and analyses

#### **Auditor Notes**

- Growers visited apply chemicals themselves and maintain Private Agricultural Licenses, which include the ability to apply restricted pesticides. Unlicensed growers use qualified third-party applicators.
- Sites visited with agrochemical storage also maintain dedicated storage areas for empty containers. Containers are picked up by a third-party recycler.
- Boardman sites monitor pesticide residues via microanalysis, in accordance with their sustainable farm practices policy.
- Sites visited dispose of generated waste responsibly, reincorporate vegetative waste, and avoid waste burns.
- Boardman's Sustainable Farm Practices Policy requires hazardous waste, including used agrochemical containers are handled and disposed of according to county, state, and federal regulations.

**Result:** ***In Conformance***

## **Objective 5: Energy Use, Air Quality, and Climate Change**

### **5.1 Agricultural Energy Use and Conservation**

#### **Conformance Evidence**

- Department of Energy (DOE) letter
- Electric Cooperative: Energy Sales by Sector
- Grower and manager interviews

#### **Auditor Notes**

- Boardman provided a letter from the DOE confirming their commitment to reducing energy intensity within its facilities by 25% by 2030. Boardman will meet these goals through field practices and equipment upgrades as well as improved efficiency within processing facilities.
- Growers of select sites use Tier 4 Engines, diesel exhaust fluid (DEF) injection, and global positioning system (GPS) units on newer vehicles.
- Sites maintain an equipment inventory based on maintenance schedules, fuel levels, active temperatures, hours used, and miles driven. Additional service is provided if problems arise.
- Growers reduce energy use and fuel consumption through efficiently designed irrigation management systems, variable frequency drives (VFDs) on pumps, drip irrigation, LED lights in shops, equipment and irrigation automation, and GPS-equipped farm implements.
- Growers visited have new and used equipment. Newer equipment can use DEF. Growers focus on repairing equipment to maintain highest operating efficiency and lower emissions.
- Growers log the number of passes for farm activities such as applications and tiling if automation is unavailable.
- Grower has engineered farm-specific equipment in their machine shop and switched to bigger equipment which facilitates passage reduction.
- Growers visited reduce energy use during irrigation by using low pressure for ground water withdrawal and electric pumps instead of diesel. Employees are also trained to adjust revolutions per minute (RPM) of farm equipment based on load to increase fuel efficiency and to use the most appropriate tractor for the task at hand.
- Sites visited have small solar systems to support onsite technology such as weather stations.
- Washington's energy portfolio consists of renewable energy sources including hydropower and wind. Electricity used for pumps and irrigation is supplied by utilities companies that pull from grids powered by renewable energy sources. Boardman provided information regarding the Energy Cooperative's energy sales by sector.
- Boardman is building a new processing and packing facility in Washington. Products will no longer be shipped to Oregon which will significantly reduce transportation emissions.

**Result:** **In Conformance**

## **Objective 5: Energy Use, Air Quality, and Climate Change (Continued)**

### **5.2 Air Quality**

#### **Conformance Evidence**

- Grower interview
- Site visit

#### **Auditor Notes**

- BMPs to reduce energy include the use of higher efficiency equipment, global positioning systems (GPS) that enables the number of passes to be reduced, and more efficient irrigation systems.
- Sites use automated software or spreadsheets to track equipment usage.
- Staff are trained to operate equipment safely and efficiently.
- Sites visited don't have issues with dust. Growers spray gravel roads with water during harvest when roads are more heavily trafficked to control dust.

**Result:** **In Conformance**

### **5.3 Climate-Smart Agriculture**

#### **Conformance Evidence**

- Sustainable Farm Practices Policy

#### **Auditor Notes**

- Cover crops assist in sequestering carbon and reducing GHG volatilization.
- Growers face wind, excessive rain, hail, and heat events more frequently.
- Sites use cover crops to improve soil health, mitigate wind erosion, and increase soil's ability to absorb water and retain moisture.
- Boardman's Sustainable Farm Practices Policy details various practices and commitments that minimize emissions.
- Sites use real-time kinematic (RTK) technology to operate more precisely during planting, applications, and harvest.

**Result:** **In Conformance**



## **Objective 6: Waste and Material Management**

### **6.1 Management of Waste and Other Materials**

#### **Conformance Evidence**

- Certification training plan (chemical safety)
- Sustainable Farm Practices Policy

#### **Auditor Notes**

- Select sites maintain storage specifically for empty agrochemical jugs and recycle agrochemical containers through vendors.
- Staff are appropriately trained and certified to safely handle and apply agrochemicals.
- Sites visited reuse oil to heat shops or segregate it to be recycled through a vendor.
- Boardman's Sustainable Farm Practices Policy requires all hazardous waste to be properly handled and disposed of according to county, state, and federal regulations to protect employees, farm labor, and the environment. The policy also highlights compliant management, use, and storage of agrochemicals.
- Growers depend on third-party vendors for agrochemical or store agrochemicals off-site.

**Result:** **In Conformance**

### **6.2 Food and Agricultural Waste Resource Recovery**

#### **Conformance Evidence**

- Boardman Foods Grower Agreement

#### **Auditor Notes**

- Boardman monitors harvest and establishes grower requirements. Boardman reserves the right to refuse products if the grower is unable to meet requirements. Boardman Quality Control is involved at least two weeks prior to harvest, during harvest, during shipping, and prior to storage.
- Sites selected use chicken compost, composted yard waste, cannery byproducts, and composted fish to enhance nutrient availability.

**Result:** **In Conformance**

## **Objective 7: Conservation of Biodiversity**

### **7.1 Species Protection**

#### **Conformance Evidence**

- Grower interview
- Management interview
- Site visit

#### **Auditor Notes**

- Growers reported no endangered or threatened species on sites. Growers are aware of Kangaroo rats, an endangered species in the state of Washington, but have not seen any in the area.
- Growers are not aware of at-risk species occurrences in production areas.
- The area is managed and regulated by Washington State Fish and Wildlife who, in concert with agronomists, associations, and other network members, provide guidance to growers and the public at large on at-risk species identification and information.

**Result:** *In Conformance, Opportunity for Improvement (OFI)*

### **7.2 Wildlife Habitat Conservation**

#### **Conformance Evidence**

- Grower interview
- Management interview
- Site visit

#### **Auditor Notes**

- Grower interviewed had no awareness of any protected areas, native habitats, or natural communities.
- Select sites manage and maintain pollinator habitats and native plant species.

**Result:** *In Conformance*

## **Objective 7: Conservation of Biodiversity (Continued)**

### **7.3 Avoided Conversion**

#### **Conformance Evidence**

- Grower interview
- Management interview
- Site visit

#### **Auditor Notes**

- Growers visited manage farmland sustainably through an NMP and focusing on soil health, tilth, and increasing soil organic matter.
- Regulations in Oregon and Washington provide protection for forested areas. Grower agreements require compliance with federal, state, and local regulations.
- Boardman carefully selects growers to fulfill contracts and research growers' history and qualifications to choose reputable growers.
- Boardman Sustainable Farm Policy contains a Zero-Deforestation Policy that states their commitment to preventing deforestation of natural forests.

**Result:** **In Conformance**

### **7.4 Crop Diversity**

#### **Conformance Evidence**

- Grower interview
- Management interview
- Site visit

#### **Auditor Notes**

- Growers visited rotate crops regularly depending on previous crop grown on site and based on market demand.
- Growers alternate cultivating potatoes, onions, peppers, grass, wheat, and corn as cash crops, and plant cover crops such as rye or alfalfa.

**Result:** **In Conformance**

**Objective 8: Protection of Special Sites**

**8.1 Site Protection**

**Conformance Evidence**

- Grower interview
- Management interview
- Site visit

**Auditor Notes**

- No Special Sites were near sites visited.
- Boardman sites selected use information from the Bureau of Land Management, the Department of Ecology in Washington, and the Department of Environmental Quality in Oregon to determine the presence of natural heritage sites.
- Each parcel farmed by Boardman growers is registered with the United States Department of Agriculture (USDA) to prevent farming on special sites.
- The Lower Columbia Irrigation District maintains water maps. Boardman downloads maps and scans for potential issues and risks, such as livestock operations that may increase risks for crop safety, especially during rain events. Boardman discusses mitigation plans with growers to ensure proactive management of foodborne pathogens, such as E. coli.

**Result:** *In Conformance*

## **Objective 9: Local Communities**

### **9.1 Economic Wellbeing**

#### **Conformance Evidence**

- Sustainable Farm Practices Policy
- Grower and management interviews

#### **Auditor Notes**

- Boardman's Sustainable Farm Practices Policy states its commitment to pay all taxes and source locally when appropriate.
- Boardman is focused on automating tasks in the processing plant to reduce temporary labor needs by 50% by the end of 2025.

**Result:** **In Conformance**

### **9.2 Community Relations**

#### **Conformance Evidence**

- Grower interview
- Management interview
- Site visit

#### **Auditor Notes**

- Boardman sponsors scholarships to employees' children that finish high school and are pursuing a degree.
- Boardman supports local 4H groups, an Equine Therapy Horsemanship Center, local playground updates including the installation of a rock climbing wall, and a VR headset for a local school district.
- Boardman growers sponsor local event such as a local rodeo, wrestling programs, golf fundraisers, and silent auctions.

**Result:** **In Conformance, Notable Practice**



## Objective 9: Local Communities (Continued)

### 9.3 Local Communities and Indigenous Peoples

#### **Conformance Evidence**

- Sustainable Farm Practices Policy
- Short-form proposal objectives
- Boardman Foods Grower Agreement

#### **Auditor Notes**

- Boardman's Sustainable Farm Practices policy stresses a commitment to "recognize and respect the rights of local communities and treaty rights of Indigenous Peoples."
- Boardman has grower agreements with the Yakima Nation to grow zucchini. Further contracts are planned to source additional produce. Produce will be grown on acreage within the reservation. Produce will go to fresh market. Imperfect produce that is not accepted by buyers is donated back to the Nation. Any remaining produce will be used for livestock feed.
- Boardman provided a project proposal that outlines community engagement with rural and Tribal communities, partnership opportunities for business development (with a focus on byproducts), and education regarding sustainable food systems. This document demonstrates a positive approach towards supporting local and Indigenous communities.
- Boardman maintains a website to allow the community to find information, look for job postings, and contact the company

**Result:** *In Conformance, Notable Practice*

### 9.4 Public Health

#### **Conformance Evidence**

- Sustainable Farm Practices Policy
- Management interview
- Site visit
- GAP Certificates
- SQF Audit results
- SQF Certificate

#### **Auditor Notes**

- Boardman maintains a Safety Policy applicable to all on-farm visitors, which requires visitors to sign in.
- Boardman's Sustainable Farm Practices Policy outlines practices that apply regional BMPs that protect public health and employee safety.
- Sites visited are certified Global G.A.P. and USDA GAP, ensuring certain agricultural practices protective of worker and public health. Boardman sites also participate in SQF audits.
- Boardman applies food safety regulations for on-farm operations.
- Sites visited have "No Trespassing" signs, restricted use pesticide notices, and danger signs posted. Signage is posted after applications with restricted-entry intervals.

**Result:** *In Conformance*

## **Objective 10: Employees and Farm Labor**

### **10.1 Safe and Respectful Working Environment**

#### ***Conformance Evidence***

- Management interview
- Employee Handbook
- Crisis Management Program
- Job postings
- Training plans
- SQF Audit results
- SQF Certificate
- Boardman Foods Grower Agreement

#### ***Auditor Notes***

- Boardman job posting states they are an Equal Opportunity Employer.
- SQF Audit participation and certifications support Boardman's demonstration of maintaining a safe work environment.
- Boardman's Employee Handbooks are distributed to employees during training, prohibit harassment, and clearly defines behaviors that may constitute distinct types of harassment. The Handbook prohibits retaliation and requires compliance with laws, including Oregon's Workplace Fairness Act.
- Boardman's Crisis Management Program supports work safety.
- Boardman's management are members of Eastern Oregon Women for Agriculture and work to support women working in agriculture or pursuing degrees related to agriculture.
- Boardman's grower agreement encourages contracted growers to adopt Ethical Trading Initiative (ETI) Base Code that requires certain standards are followed, including freely chosen employment, no forced, bonded, or involuntary prison labor, and no workforce discrimination.

**Result:** ***In Conformance***

## **Objective 10: Employees and Farm Labor (Continued)**

### **10.2 Occupational Training**

#### **Conformance Evidence**

- Training plans
- Photo of Oregon Bureau of Labor and Industries (BOLI) and Occupational Safety and Health (OSHA) posters

#### **Auditor Notes**

- Boardman employees receive two days of training during onboarding.
- Labor law posters are utilized to inform employees of their rights and regulations relevant to their employment and benefits.
- Boardman uses software to support its training program and includes first aid, social awareness, sexual harassment, OSHA, and state and federal requirements. Boardman requires training to be completed annually.

**Result:** *In Conformance*

### **10.3 Supporting Capacity for Sustainability**

#### **Conformance Evidence**

- Management interview
- Training plans
- Sustainable Farming Practices Policy

#### **Auditor Notes**

- Boardman's Sustainable Farming Practices Policy contains LH FMS commitment statement.
- Boardman hired a new Receiving Supervisor to facilitate LH FMS compliance and engagement.
- Boardman's Director of Continuous Improvement and Maintenance is tasked with in-house continuing education and knowledge sharing. The Director of Continuous Improvement holds monthly meetings with leadership and the Department of Energy Better Plans Bureau for updates and guidance on continual improvement.
- VP of Procurement addresses knowledge sharing between growers to develop and promote best practices in field.
- Boardman participates in GAP audits that support food safety and may reduce certification costs for producers through concerted certification efforts.
- Training plans include programs relevant to employee's position.
- Boardman's Chief Operating Officer (COO) participated in a Sustainable Symbiotic tour with Oregon State legislators and Oregon business representatives in Denmark for a week. The trip focused on water conservation, renewable energy, the implementation of biodigesters, and sustainability.

**Result:** *In Conformance*

**Objective 10: Employees and Farm Labor (Continued)**

**10.4 Compensation**

**Conformance Evidence**

- Management interview

**Auditor Notes**

- Employees can gain additional compensation increases through additional training and certifications. Once trained and certified, Boardman requires those employees to assume the responsibilities associated with the position or training.

**Result:** *In Conformance*

**Objective 10: Employees and Farm Labor**

**10.5 Farm Labor**

**Conformance Evidence**

- Management interview

**Auditor Notes**

- Boardman does not own any land or employ farm labor contract (FLC) managers. Site visit confirmed that farm labor contractors (FLCs) are utilized on site selected in Washington.  
- FLC partners are in good standing with state regulatory agencies.

**Result:** *In Conformance*

## **Objective 11: Legal and Regulatory Compliance**

### **11.1 Legal Compliance**

#### **Conformance Evidence**

- Management interview
- Photo of BOLI and OSHA posters
- Training plans
- Employee Handbook
- Sustainable Farm Practices Policy
- SQF Audit results
- SQF Certificate

#### **Auditor Notes**

- Employee Handbooks and Sustainable Farm Practices Policy contain information regarding food safety regulations and regulatory requirements.
- Boardman is a member of food processor advocacy groups such as Food Northwest to remain informed on business, labor, and environmental regulations, and governmental affairs.
- Training plans indicate employees are informed of relevant laws, statutes, and regulations.
- Boardman has labor law posters in employee lunchrooms and HR offices.
- Boardman growers meet SQF Code Edition 9 requirements that cover food sector categories and products.

**Result: In Conformance**

### **11.2 Legal Compliance Policies**

#### **Conformance Evidence**

- Management interview
- Employee Handbook
- Training plans

#### **Auditor Notes**

- Annual training is provided to employees regarding social compliance requirements.
- Boardman's Employee Handbooks address compliance with social laws and regulations. Handbooks are available in English and Spanish.
- Boardman's Legal compliance team addresses potential threats to fundamental rights.
- HR management and COO monitor for potential threats.

**Result: In Conformance**



## **Objective 12: Management Review and Continual Improvement**

### **12.1 Farm Review and Continual Improvement**

#### ***Conformance Evidence***

- Management interview
- SQF Audit results
- SQF Certificate
- GAP Certificates

#### ***Auditor Notes***

- Boardman has hired a new provider for services related to training the next generation of leaders. Boardman is working with the provider to develop 5- and 10-year plans.
- Boardman leverages assessments specific to job families to identify learning styles, behavioral competencies, and developmental opportunities. Assessments are available in processing facilities, and assessments are being designed for supervisors and higher-level management.
- Boardman is working to increase efficiency to create opportunities and provide training that includes all staff members.
- Boardman conducts monthly site visits to provide feedback and gain insight into anticipated yield and quality of crops. These visits inform Boardman's logistics and storage capacity.
- Boardman's quality control process during harvest informs how a product will be used. SQF audits support food safety and continuous improvement.
- Boardman tests cell structure of onions to determine their storability. If structure is firm, this indicates that onion can be safely stored for nearly a year.
- Grower visited conducts a multitude of trials on all high-value crops including peppers and onions. Trials are meant to identify plants with the best genetics for maturity, color, pest resistance, and optimal yield.
- Annual reviews are supported by monthly off-season visits to growers which are focused on on-farm performance, yield, compliance with regulatory requirements, and certifications including Global G.A.P., USDA GAP, Organic, and Regenerative Organic.

#### ***Result: In Conformance***

## **Objective 12: Management Review and Continual Improvement (Continued)**

### **12.2 Support for Sustainable Agriculture**

#### ***Conformance Evidence***

- Management interview
- Short-form proposal objectives
- Email thread
- AFFI - Supplier LOCT program

#### ***Auditor Notes***

- Boardman is working with OSU on a research project related to packaging from food waste product that is biodegradable. The project will also measure how nutrients may be extracted from vegetative waste to be reused.
- The AFFI is working with Boardman on food waste reductions.
- Boardman is working to reduce energy use in processing plant by increasing automation and managing energy associated with cold storage temperature reduction.
- Boardman is working with stakeholders in Eastern Oregon to mitigate challenges associated with agricultural use of nitrogen, which has negative impacts on water quality.

**Result:** ***In Conformance***

## **CONCLUSIONS**

Results of the audit indicate that Boardman has implemented a management system that continues to meet the requirements of and is in conformance with the LH FMS. Boardman's enrolled acreage is recommended for continued certification to the Leading Harvest Farmland Management Standard 2020.

**BOARDMAN FOODS, INC.**  
 LH FMS AUDIT SUMMARY REPORT  
 July 30, 2024

Summary of Audit Findings		
<b>Program User</b>	Boardman Foods, Inc.	
<b>Audit Dates</b>	June 7, 2024 – July 30, 2024	
<b>Non-Conformances Raised (NCR):</b>	<b>Major</b>	<b>Minor</b>
	0	0
Follow-Up Visit Needed? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Date(s)		
<b>Audit Report Executive Summary</b>		
<p>Boardman performed well and was able to demonstrate their continued conformance to the Leading Harvest Farmland Management Standard. Boardman delivered an effective package of conformance evidence. The properties we visited were professionally managed. Managers are professionally qualified for their roles and take initiative to address challenges and emerging issues. Documentation was thorough and illustrative, and continuously provided in a timely manner by staff. Interview subjects were transparent and expansive in their responses. All parties have been generous with their time and are appreciated.</p>		
Team Leader Recommendations		
<b>Corrective Action Plan(s) Accepted</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	07/30/2024
<b>Proceed to/Continue Certification</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	07/30/2024
<b>All NCR Closed</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	07/30/2024
Standard(s) Audited Against		
Leading Harvest Farmland Management Standard 2020 (Objectives 1 through 12)		
<b>Audit Team Leader</b>	<b>Audit Team Members</b>	
Matt Armstrong	Matt Armstrong, Linnea Abel, Jacques Werleigh, Holly Salisbury	
Scope of Audit		
Management of production farmland on grower operated properties.		
<b>Accreditations</b>	Approval by Leading Harvest to provide certification audits	
<b>Number of Certificates</b>	1	
<b>Certificate Number</b>	Averum-LHFMS-2023-0012	
<b>Proposed Date for Next Audit Event</b>	TBD	
<b>Audit Report Distribution</b>	Armando Nunez: Armando@boardmanfoods.com	