

J.G. BOSWELL COMPANY

Corcoran, California

**LEADING HARVEST FARMLAND MANAGEMENT STANDARD 2020
AUDIT SUMMARY REPORT: 2024 INITIAL CERTIFICATION**

December 20, 2024





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☒ Certification Audit ☐ Recertification Audit ☐ Surveillance Audit ☐ Scope Expansion

INTRODUCTION

This report summarizes the results of the Initial Certification audit conducted on J.G. Boswell Company's (JGBC) managed production agriculture properties. The audit was conducted by Matt Armstrong, Lead Auditor for Averum. Matt Armstrong has 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 Jill Brodt, Field Auditor. All 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 JGBC to perform an audit of sustainability performance on 10,000 – 50,000 acres of their 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 Kings and Kern Counties.

Upon review, Averum modified Indicator 10.3.1 to portray JGBC's motivation more accurately for certification. Indicator 10.3.1 was modified to read "Standard users shall provide a written commitment to the Leading Harvest Standard prepared by the program user directly or partner organizations that motivate program user conformance efforts. Commitments to the Leading Harvest Standard will be communicated throughout the entire organization, particularly to facility and farm managers." Without modification, JGBC would be required to provide a standalone commitment statement to conform with LH FMS. See LH FMS Guidance Document for further clarification.

Throughout the course of our engagement, it was determined that gathering additional information via meetings or correspondence with government agencies, community groups, affected Indigenous Peoples and conservation organizations was not required. Information provided during the course of our audit was determined to be sufficient to address relevant indicators of the LH FMS.

COMPANY INFORMATION

JGBC is a vertically integrated agricultural company that produces, processes, and markets a variety of crops and livestock. Farm Managers are responsible for the day-to-day farmland management services for JGBC's properties. JGBC qualifies for multi-site sampling, allowing auditors to determine a representative selection of sites for observation visits. Sampling based approaches will allow JGBC to simplify the process of maintaining certification in the future.

JGBC contracted with Averum to provide a Stage 1 audit (or Readiness Review) in 2024. Results of the readiness review were shared with JGBC. During the certification audits, three (3) sites in the Kings and Kern Counties regions 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 the sample sites is tomatoes, safflower, and cotton.

AUDIT PLAN

An audit plan was developed and is maintained on file by Averum. An online portal was established for JGBC coordinators to upload evidence and documentation securely for auditor review. An opening meeting was held on November 15, 2024, preceding site visits. Following the meeting, a document review of the provided evidence was conducted by Averum. Field sites in Kings and Kern Counties were examined on November 21, 2024. A closing meeting was held on December 20, 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 meetings, conducting management interviews, follow-up interviews, and the 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

November 15, 2024

Attendees:

(JGBC) Laura Brown, Isabel Rios, Howard Beau, Joey Mendonca, David McEuen, Gladys Wotring
(Audit Team) Matt Armstrong, Jill Brodt

Topics:

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

Closing Meeting: Conference Call

December 20, 2024

Attendees:

(JGBC) Laura Brown, Isabel Rios, William Prins, Nick Kastle, Joey Mendonca

(Audit Team) Matt Armstrong, Jill Brodt, 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: 1
 - Opportunities for Improvement (OFI): 7
 - Notable Practices: 6
- Report timing and expectations: Matt Armstrong

MULTI-SITE REQUIREMENTS

JGBC maintains operations on multiple properties in Kings and Kern Counties. JGBC 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 them to JGBC management. JGBC'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
Kings County	Tomatoes, cotton, safflower	Two (2) sites visited during audit. Kings County represents 85% of all acreage <ul style="list-style-type: none">- Management population: Two (2) District Managers,- Sites visited: Stevenson 32, Stevenson 6
Kern County	Tomatoes, cotton, safflower	One (1) site visited during audit. <ul style="list-style-type: none">- Kern County represents 15% of enrolled acreage- Management Population: 1 Ranch Manager- Site visited: Buena Vista District 22 North East

AUDIT RESULTS

Overall, JGBC's agricultural operations conform to the objectives of the Leading Harvest Farmland Management Standard 2020 (LH FMS). Interviews and document reviews were performed to determine procedural and documentation conformance to the LH FMS. Documentation was provided to demonstrate or support conformance with LH FMS requirements. Field visits were performed on three operating sites, with one in Kern County and two in Kings County. Visits were conducted after harvest had completed, so soil management, sanitation, erosion control, and season planning were highlighted. Central and regional management representatives were present and interviewed to demonstrate JGBC's conformance 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. JGBC's Regional Managers served as guides, were available throughout the engagement, provided logistic support, and provided responses to evidence requests.

KEY FINDINGS

Previous Non-Conformances: N/A

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

Minor Non-Conformances: One (1) minor non-conformance was identified during the audit.

1. 7.3.2 - Deforestation
 - a. JG Boswell does not have a Zero Deforestation Policy that complies with indicator language and requirements (biome specific, regions of application, etc.).

Opportunities for Improvement (OFI): Seven (7) opportunities for improvement were identified during the audit.

1. 1.2.1 – Adapting to Critical External Factors
 - a. Farm plans were referenced in interviews as mechanisms to assist in on-farm performance monitoring. However, examples of farm plans were not provided for auditor review. During surveillance audits, copies of farm plans could be provided for review to strengthen conformance demonstration and provide auditors an opportunity to compare plans with management review forms and outcomes.

2. 7.1.2 – At-risk Species
 - a. JGBC refers to the Environmental Protection Agency’s (EPA’s) Department of Pesticide Regulation to remain informed of species of concern. JGBC could enhance research by referencing state conservation agencies or conservation services to include additional species that are vulnerable or at-risk and may not be protected by the Endangered Species Act (ESA).
3. 9.3.1 – Local Communities and Indigenous Peoples Policy
 - a. JGBC’s Local Communities Policy states their commitment to respecting the rights of Indigenous People. Conformance demonstration could be strengthened with evidence that shows how JGBC considers the land tenure rights of Indigenous People and identifies relevant parties of interest. Evidence may include due diligence procedures, policies, or cultural assessments.
4. 9.3.2 – Land Tenure Rights of Local Communities and Indigenous Peoples
 - a. This indicator requires demonstration of due diligence to prevent infringing on land tenure rights during land management and acquisition. JG Boswell should consider creating or providing standard operating procedures (SOPs) for reviewing land tenure rights, cultural assessments, or other descriptions of research conducted to ensure awareness of Indigenous communities’ land tenure rights.
5. 9.3.3 – Local Communities’ and Indigenous Peoples’ Inquiries
 - a. JG Boswell provided information regarding a historic marker of significance to the Yokuts Tribe, and reported that they had not received complaints from the community. During surveillance audits, JG Boswell should provide descriptions of the vetting process regarding what community concerns require action. Providing a formalized public inquiry process could mitigate potential conflict as well as demonstrate receptivity to Indigenous Peoples’ inquiries.
6. 12.1.1 – Performance Review
 - a. Hourly staff reviews do not appear to be on a set schedule. Hourly performance review forms were provided for review. During surveillance audits, provide additional information regarding performance review cycles.
7. 12.1.2 – Monitoring Performance
 - a. Performance review forms were provided for hourly employees as well as management. It was unclear to auditors how management utilize resource monitoring to assist in standard conformance. Additional documentation could be provided to demonstrate ongoing monitoring, such as Nutrient Management Plans, soil tests, maintenance schedules, scouting reports, and FLC license review procedures.

Notable Practices: Six (6) notable practices were identified during the audit.

1. 2.1.3 – Nutrient Management Program
 - a. JG Boswell’s use of their own laboratory facilitates expedited sampling and results, which allows site managers to act quickly and promptly to address deficiencies.
2. 3.1.3 – Water Conservation
 - a. JGBC staff includes experienced water engineers who evaluate water rights and water allocations which are considered in the farm planning each year.
3. 4.1.3 – Pest Control Practices
 - a. JGBC’s use of safflower as a trap crop is an effective and low-risk approach to pest management, which can preserve biodiversity, reduce inputs, and lower risks on farms for workers.
4. 9.2.1 – Community Engagement
 - a. Auditors recorded significant community engagement activities, undertaken under the JGBC brand.
5. 11.1.1 – Access to Compliance Information
 - a. All JGBC sites have a Human Resources (HR) representative on site. This is an effective and creative approach to ensure all staff have access to legal compliance information and the ability to have their unique situations addressed.
6. 12.2.1 – Support for Agricultural Research
 - a. Significant and notable research into Safflower implementation as a rotational and beneficial crop. Historic records of research are well documented and organized.

Review of Previous Audit Cycle: N/A

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

- Sustainability Statement
- Sustainability Policy Statement
- Ranching Org Chart
- JG Boswell Social Responsibility Statement

Auditor Notes

- JGBC provided their Sustainability Statement for review. The Statement outlines principles and key topics.
- JGBC operates within a highly regulated environment based on their geography. Compliance with legal regulations guides management decisions.
- Future outlooks, included crop selections and potential yields, are projected for several years into the future.
- JGBC owns and operates farmland directly. Farms have been operated under JGBC nearly 100 years.
- Since the environment is a shared resource, JGBC’s Social Responsibility Statement considers environmental sustainability as an aspect of social responsibility.
- JGBC’s last property acquisition was in 1997. Farms have been disposed of in the past 25 years. Supplemental farmland is sold to correctly size production farms while maintaining current production capacities.
- JGBC’s farms are contiguous acreage and are extremely close, geographically.
- All acreage stays in production as long as water resources can maintain production. Areas without water access may be fallowed.
- Crop rotation is key to maintaining soil health. JGBC is willing to risk taking a loss with planting safflower in the rotation to maintain long-term soil viability.

Result: In Conformance

Objective 1: Sustainable Agriculture Management (Continued)

1.2 Critical External Factors

Conformance Evidence

- Sustainability Management Review Form

Auditor Notes

- JGBC aligns with state regulations to identify critical external factors. Production acreage is adjusted to account for available resources, such as irrigation availability.
- JGBC sites are heavily involved with crop origin, beginning at seed sourcing and nursery development to ensure crops meet their standards prior to planting.
- JGBC considers market demands and traits such as pest resistance when making crop selections.
- Farm Plans are developed for each site, considering crop type, soil conditions and available water. Farm Plans were not presented as evidence for auditor review.

Result: ***Opportunity for Improvement (See Key Findings 1.2.1)***

Objective 2: Soil Health and Conservation

2.1 Soil Health

Conformance Evidence

- Soil Health and Conservation Policy
- Safflower Profile
- Example of a Field Synopsis
- Lab analysis - suite of tests
- Kings Heat Units 2024 (10-25-2024)
- Probe Graph - Moisture
- SOP for soil samples
- SOP for plant tissue

Auditor Notes

- JGBC has a team of agronomists on staff to manage crops and resources. Agronomists collect soil samples using a documented SOP. Samples are submitted to an in-house company lab and a third-party lab. Soil is tested at least annually. Additional samples are taken as needed.
- JGBC's lab can process samples and provide results more quickly than third-party labs, allowing deficiencies to be promptly addressed.
- JGBC has agronomists, certified crop advisors (CCAs) and pest control advisors (PCAs) on staff. The agronomy team supports the development of soil health plans, research yield maintenance, prepare nutrient management programs (NMPs), and provide guidance on crop applications and amendments.
- Crop rotation is highlighted as a key practice that reduces soil erosion, increases crop yield, and preserves soil health and fertility. Rotations include cotton, safflower, alfalfa, and wheat.
- Site Ranch Manager frequently references published UC Extension reference books for guidance on soil amendments, and monitors field history of the site. JGBC has consulted with UC Soil Scientists on soil health management best practices.
- Site management takes care to avoid having tomatoes planted for more than 2-3 years continuously to aid in soil recovery.
- Soil amendments have included gypsum as a soil conditioner and soil pH regulator.
- Field histories with historic crop production and yields are maintained for each field.
- Farm plans are created at least one year in advance and consider historical data and analysis of the sites.
- During the growing season, petiole samples are collected weekly and used to determine nutrient needs of the crop.
- Fertilizer is applied through the irrigation system. Applications take amounts applied in previous years into consideration and are documented.
- Records include nutrient levels, crop rotation, disease parameters, and are frequently referenced in the site Field Synopsis report. Each year, a Crop Schedule Map is developed for the next calendar year.
- Sites analyze five-year cropping patterns to optimize planning.
- Crop residue is left in field or reintegrated after safflower to maintain organic material. Crop residues are not burned.

Result: ***In Conformance, Notable Practice (See Key Findings 2.1.3)***

Objective 2: Soil Health and Conservation (Continued)

2.2 Soil Conservation

Conformance Evidence

- Safflower Crop Profile 3-1-2016 MB
- CASafflowerPMSP2016
- Example of a Field Synopsis
- Lab analysis - suite of tests
- Kings Heat Units 2024 (10-25-2024)
- Goldberg 14 NE South Probe Graph - Moisture

Auditor Notes

- Elevation contours are used on appropriate properties. Farms are in dry lake beds or laser-leveled to minimize runoff. Trimble FieldLevel™ system automation assists with leveling fields.
- Fields are rotated with several crops on sites to support soil structure. Safflower provides natural tillage on sites via deep roots. JGBC considers safflower a “bio-tiller”.
- Management avoids soil compaction by using controlled paths, scales implement sizes to fit tractors with standardized bar widths to create more efficient passes or uses equipment with smaller footprints to mitigate compaction.
- Site managers use pre-planting flooding techniques to break up heavy clay soils and reduce compaction. Sites have sedimentary, heavy soils.

Result: ***In Conformance***

Objective 3: Water Resources

3.1 Water Use

Conformance Evidence

- Water Resources
- Tomato Sustainability Tools
- 2022 Annual Report to the California Regional Water Quality Control Board Central Valley Region
- Distribution Uniformity and Irrigation Water Monitoring spreadsheet
- Irrigation Water Locations
- Distribution Uniformity (DU) Test

Auditor Notes

- JGBC complies with the Sustainable Groundwater Management Act (SGMA). Water allotments are determined by state water authorities. Water usage is reported to state water authorities as required by regulation.
- Wells on site are used in addition to surface water. Pump sites and filter stations have flowmeters to support water accounting and reporting. JGBC prefers to use surface water as a primary source to avoid groundwater dependency.
- JGBC has an in-house water management team to determine water sources and plan water management strategies. JGBC staff includes experienced water engineers who evaluate water rights and water allocations which are considered in farm planning each year.
- Crops are categorized based on their water usage. Tier 1 includes pistachios, tier 2 includes tomatoes, and the remaining water is allocated for safflower and cotton.
- Irrigators monitor micro-irrigation at all hours. Sites have transitioned to drip line irrigation systems to reduce water usage where possible. Flood irrigation is still in use on select sites.
- Annual Reports to the California Regional Water Quality Control Board includes submission of a Drainage Operation Plan (DOP) to reduce drainage for the calendar year. The DOP summarizes district drainage yields.
- Surface water is the primary water source, supplied via the State Aqueduct along the perimeter of the ranch. Canal fed irrigation water is available on some sites.
- JGBC has historically fallowed land to conserve water, predating SGMA restrictions. Historic ranch crop maps include designated fallowed land for water-saving purposes.
- Engineers attempt to maximize water conservation by looking at crop water usage annually and evaluating efficient irrigation methods.
- Tomatoes receive subsurface drip irrigation, and systems use buried soil moisture probes and tensiometers to inform irrigation decisions. JGBC uses data from weather stations, rain gauges, buried soil moisture probes, and monitors canopy temperatures to support irrigation decisions.
- Drip stations are equipped with controls to prevent fertilizer backflow into canals.
- Regional managers in Kings County serve on the board of the Tulare Lake Drainage District, and remain engaged with local issues and concerns of farmers in the region.

Objective 3: Water Resources (Continued)

3.1 Water Use (Continued)

Auditor Notes (Continued)

- Sites have tailwater recovery systems in place to mitigate runoff and increase irrigation efficiency.
- Irrigation specialists on staff design irrigation systems for efficiency and uniformity.
- Management can purchase additional water through the water district or state, with some access to the California Aqueduct for extra water when available.
- Management conducts DU testing on irrigation lines and documents results. Results are monitored by the district. Uniformity is evaluated mid-season and corrections are made to irrigation systems.
- Sites use safflower as a rotational crop which supports irrigation reduction, since the crop is less water intensive and enhances soil structure in rotation with tomatoes.

Result: ***In Conformance, Notable Practice (See Key Findings 3.1.3)***

3.2 Water Quality

Conformance Evidence

- Distribution Uniformity (DU) Test
- DU and Irrigation Water Monitoring spreadsheet
- Irrigation Water Locations

Auditor Notes

- Agronomists scout fields multiple times per week to look for signs of crop stress.
- Water is managed to prevent runoff on-site, with isolated systems and gravity-based water movement where possible.
- Sites use injection-based fertilizer applications to avoid excessive nutrient applications.
- Minimal runoff occurs from neighboring operations.
- Sulfuric acid injections are used to adjust soil pH. Site visited has used gypsum in the past to buffer pH and combat salinity.
- Irrigation water pH is monitored weekly and analyzed annually. Chemical usage varies by crop rotation and may change within a year based on needs.
- Agronomists and District Managers oversee chemical applications, prioritizing cost, efficiency, and safety, often choosing safer but more expensive products.
- Select sites are engineered with large drain tile systems to remove excess water and return to the water table and drainage district supply.
- California Regional Water Quality Control Board discusses water quality, water management for plant production, and other related topics. Sites monitor electrical conductivity and collect water quality samples to detect selenium and other trace elements.
- JGBC manages salinity within wetlands by using a flow-through system to control the inflow of freshwater, diluting saltwater intrusion and reducing potential adverse effects.

Result: ***In Conformance***

Objective 4: Crop Protection

4.1 Integrated Pest Management

Conformance Evidence

- Soil Health and Conservation
- California League of Food Processors (CLFP) Approved Material List
- Crop Protection Program
- Field scout card
- Area-Wide Pest Management Strategic Plan for Safflower

Auditor Notes

- Sites are scouted multiple times per week by PCAs, District Managers, agronomists, agronomy interns, and bug checkers. PCAs monitor pest populations and identify management thresholds. Primary pests on sites are leaf hoppers, grasshoppers, worms, curly top virus, mold, and crickets.
- Scouting is documented and applications are logged. Scouting reports were reviewed during onsite visits.
- Sites use UC Davis Integrated Pest Management (IPM) guidelines to set thresholds and use IPM strategies.
- Pest management strategies include pheromones and mating disruption, trap crops, fungicides for mold, pesticides for worms, and canopy trimming to improve airflow and reduce mold risk.
- The frequent use of safflower as a rotational crop reduces the need for chemical insecticide since it is a trap crop and draws pests away from more profitable crops.
- Threshold evaluations are based on the life cycles of the pest and plant. Managers pay close attention to younger, more vulnerable plants.
- Petiole sampling is performed regularly to determine plant health during the growing season.
- Sites select mold-resistant and extended field storage crops (crops that can be stored in the field post-harvest), when possible, to reduce protectant applications.
- JGBC's "Crop Protection Program" outlines JGBC's crop protection strategies, including crop rotations, IPM Program for safflower, support for pesticide research programs, safety procedures and training, and more.
- Site management employs non-chemical approaches when appropriate, including canopy adjustment.
- JGBC relies on historical data to inform application, rotation, and management decisions.
- Sites adhere to the California League of Food Producers (CLFP) Approved Material List.

Result: ***In Conformance, Notable Practice (See Key Findings 4.1.3)***

Objective 4: Crop Protection (Continued)

4.2 Crop Protectant Management

Conformance Evidence

- Overview of Worker Protection Standard (WPS) training

Auditor Notes

- Sites visited have chemical storage on site. County commissioners inspect storage facilities regularly. Safety data sheets (SDS) are stored in binders and are available for immediate retrieval.
- No empty containers are kept on site at ranch locations. Containers are taken to shop areas for proper rinse and disposal.
- Applications are conducted by contracted third party providers. Applications are made by contracted aerial applicators when appropriate. Ground applications are made by licensed in-house and 3rd party staff.
- Applications are tailored to specific sites or varieties as needed.
- Sites use chemicals according to label instructions, and consider pre-harvest intervals, re-entry restrictions, and compliance with restricted material lists.
- Staff receive WPS training relevant to their department. WPS document prepared by the Pesticide Educational Resources Collaborative (PERC) outlines regulations and safety requirements related to chemical handling, application, and personal protective equipment (PPE).
- Emergency response locations are identified on site maps, which are shared with local emergency response agencies. Maps include information of available decontamination sites.

Result: ***In Conformance***

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

5.1 Agricultural Energy Use and Conservation

Conformance Evidence

- Energy Use, Air Quality and Climate Change Policy
- Tractor Work Order details
- Tractor Inspection Record

Auditor Notes

- JGBC sites use standardized large equipment that facilitate uniform passes.
- Tractors have global positioning system (GPS) and auto-steer technology to reduce passes and reduce fuel consumption.
- Management uses an equipment schedule to reduce field passes and equipment usage. JGBC's service department tracks fuel and oil usage.
- Plant status dictates which fields are ready for harvest. Locations of fields determine which processing facilities the tomatoes are destined for.
- JGBC's Energy Use, Air Quality, and Climate Change Policy outlines different means of energy conservation, including the adoption of one pass tillage, and processing facilities in close proximity to farms, which streamlines transportation and reduces emissions.
- JGBC is adopting new technologies to improve air quality, such as converting to Tier 4 tractors and using compressed natural gas (CNG) fleets.
- Farms use drip siphon irrigation to reduce the need for pumps, which is energy efficient and cost-effective.
- JGBC evaluates new equipment to optimize energy savings across operations. A skilled in-house team maintains equipment, capable of adapting farm equipment to be more efficient.
- Custom-designed harvesters have been assembled with shredder attachments to eliminate additional passes.
- JGBC has not identified renewable energy opportunities that presented a higher cost/benefit than crop production.

Result: ***In Conformance***

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

5.2 Air Quality

Conformance Evidence

- Energy Use, Air Quality and Climate Change Policy

Auditor Notes

- JGBC submits an annual Conservation Management Plan to the San Joaquin Valley Air Pollution Control District to demonstrate ongoing efforts to reduce dust. The Conservation Management Plan provides guidelines for road watering.
- Staff is trained on equipment use during safety trainings, according to manuals and guidance from ranch managers.
- JGBC's Energy Use, Air Quality, and Climate Change Policy states their compliance with San Joaquin Valley Air Pollution Control District regulations.
- Sites use newer trucks that automatically shut off when they stop. Idling is monitored via OnStar, and high-idle instances are flagged and addressed with farm crews. A "low-idle" award is being considered for the end of each season/year to encourage efficiency and award good practices.
- JGBC evaluates equipment efficiency and provides data and feedback to manufacturers to highlight areas for improvement.
- Cover provided by Safflower rotation assists with dust control during the summer. Vines provide additional cover to prevent dust.
- At the time of site visits (post-harvest with exposed fields), the region is dealing with significant dust and particulate matter (PM). Dust is increased by neighboring ag operations, weather patterns and construction of a high-speed railway.

Result: **In Conformance**

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

5.3 Climate-Smart Agriculture

Conformance Evidence

- Energy Use, Air Quality and Climate Change Policy

Auditor Notes

- Sites repurpose crop residues in many ways to enhance soil structure and health. Examples include leaving out residue to armor the soil, cutting safflower short with roots intact, and shredding and reincorporating vines.
- Modern equipment uses auto-steer technology and use automation to increase efficiency.
- Equipment and fleet storage is kept close to fields to reduce hours and mileage. Service trucks are deployed to fields to service equipment as opposed to moving large equipment back to shops.
- Sites use renewable diesel, which has lower emissions than petroleum diesel.
- JGBC considers emissions when planning harvest strategies and attempts to keep drives short between fields and processing plants.
- Sites visited successfully use crop rotations to reduce inputs and enhance soil health.
- Farm Managers choose heat-tolerant seeds and monitor for potential frost events early in the growing season. Tomato placement is carefully planned to prevent susceptible varieties from being planted in low or cold spots.
- Weather stations are in place on fields to monitor weather patterns.
- Farms are in a flood plain. Sites with identified flood risks plant tomatoes in safer locations.
- Field foreman oversees field operations, monitors for efficiency, uses GPS guidance systems to assist with efficient operations, and looks for opportunities to reduce passes.
- Site Managers collaborate with agronomists and share institutional knowledge to learn more efficient management practices.

Result: **In Conformance**

Objective 6: Waste and Material Management

6.1 Management of Waste and Other Materials

Conformance Evidence

- Waste and Material Management
- Good Agricultural Practices Policy
- Hazardous Communication Program Plans
- Spill Prevention, Containment, and Cleanup (SPCC) Plans
- Feasible Alternatives Considered for Pesticide Management

Auditor Notes

- Sites have designated storage areas for hazardous materials and waste while waiting for pickup.
- Universal and Hazardous waste trainings are held annually for staff.
- Compliance with food safety regulations requires close control of waste management.
- SPCC plans are documented per site.
- Good Agricultural Practices require staff to be appropriately trained for duties related to their assigned tasks.
- Management will frequently reuse or repurpose materials for future projects. Sites reuse drip tape two or three times prior to recycling.
- Drip tape, waste oil, and containers are recycled with appropriate vendors. Recycling facilities are located nearby. Valves are rebuilt and reused, and tires are reused for safety markers or recycled with state programs.
- Company can send back unused, sealed materials to vendors to reduce onsite storage.
- Standard practice is to bring materials to field close to application, so storage is minimal (materials may come straight from manufacturer).
- Crews only burn invasive weeds with appropriate permits issued by the local air district.
- JGBC's Waste and Material Management document outlines their approach to waste management, which is supported by their Good Agricultural Practices (GAP) Policy. Ranches visited maintain current Hazardous Material Communication, SPCC plans, and maps with locations of hazardous materials.
- Telus system is used to log product use reports (PURs), fertilizer applications, and safety maps.

Result: *In Conformance*

Objective 6: Waste and Material Management (Continued)

6.2 Food and Agricultural Waste Resource Recovery

Conformance Evidence

- Waste and Material Management
- Good Agricultural Practices Policy
- Hazardous Communication Program Plans
- SPCC Plans
- Feasible Alternatives Considered for Pesticide Management

Auditor Notes

- Ranches communicate with processing facilities and canneries to coordinate planting and harvest with processing capabilities and eliminate waste.
- Projected yields are based on historic averages per field to determine the eventual need at the season's end.
- JGBC uses an internal database to track tractor-to-plant movement using radio frequency identification (RFID) technology on trailers.
- Crops are processed within 4 hours of harvest. JGBC's variety evaluation lab assesses color and quality to determine the optimal harvest time.
- Crop residues including cotton stalks, pistachio prunings, and vines, are shredded and reincorporated to reduce waste and support soil health.
- No manure or litter is used on sites to avoid food safety concerns.
- Tomato processing byproduct is sold to a hauler and goes to cattle feed or pet feed. No organic waste goes to the landfill.

Result: ***In Conformance***

Objective 7: Conservation of Biodiversity

7.1 Species Protection

Conformance Evidence

- Conservation of Biodiversity Policy

Auditor Notes

- The California Department of Pesticide Regulation (DPR) provides a public website with information on threatened or endangered species in the areas of the farm.
- No history of encounters with species of concern on sites.
- Site staff has some awareness of species of concern. Staff references the US EPA website and county websites for endangered species lists.
- Area of sample sites is known as a potential habitat for the Buena Vista Shrew, which is an endangered species. Knowledge is shared via discussions, and management watches EPA lists to provide input for crews.
- "Bee-Aware" practices are in place to ensure sprays are not made near sensitive bee habitats. Software is used to notify local beekeepers when pesticides are applied to protect pollinators.
- Management is not aware of any other active sensitive species in the region.

Result: *In Conformance, Opportunity for Improvement (See Key Findings 7.1.2)*

7.2 Wildlife Habitat Conservation

Conformance Evidence

- Conservation of Biodiversity Policy

Auditor Notes

- The company employs crop rotation to maintain soil health and reduce erosion, which indirectly supports local ecosystems and biodiversity.
- JGBC has a habitat compensation agreement with the State Water Resources Control Board and the Department of Fish and Wildlife to maintain a compensation habitat for two bird species along the Tulare Lake Drainage District.
- JGBC participates in the Lake Tulare drainage district which supports wildlife habitat conservation.
- JGBC's Conservation of Biodiversity Policy outlines their use of technology to communicate with local apiarists and other management strategies, including the use of federal and state resources to monitor protected species.
- Areas are fallowed in non-productive areas, with wildlife encouraged into the area.
- An annual bird abundance survey is conducted for over 40 bird species.
- Owl boxes are present in some crop fields for pest management and predatory species habitat.

Result: *In Conformance*

Objective 7: Conservation of Biodiversity (Continued)

7.3 Avoided Conversion

Conformance Evidence

- Management interview

Auditor Notes

- No conversion into new farmland on ranches is conducted; farms have been in production for nearly 100 years.
- JGBC is able to expand and contract farmland within the boundaries of properties based on water availability each year.
- JGBC does not have an effective deforestation policy in place. JGBC is not actively acquiring farmland, and sites are long standing farmland areas located on the historic lakebed of Lake Tulare. JGBC has been farming the region since the 1960's. There is no historic presence of naturally forested areas near farm sites.

Result: *In Conformance, Minor Non-Conformance (See Key Findings 7.3.2)*

7.4 Crop Diversity

Conformance Evidence

- Good Agricultural Practices Policy
- Safflower Crop Profile
- Soil Health and Conservation

Auditor Notes

- Current rotations include tomatoes, pistachios, safflower, cotton, and forage crops. Rotation decisions are primarily based on water availability.
- Tomato varieties are selected based on disease resistance and soil health requirements.
- Large variety trials are present on multiple fields of every ranch with differing soil chemistries to determine potentially productive varieties. Large variety trials include up to 100 varieties that can span several years.
- Staff is focused on long term viability of the sites and is willing to incur loss some years to maintain productive soil health.
- Staff chooses crop varieties that are resistant to regional pests.

Result: *In Conformance*

Objective 8: Protection of Special Sites

8.1 Site Protection

Conformance Evidence

- Protection of Special Sites
- Tulamniu Site Historical Marker Information

Auditor Notes

- JGBC uses existing heritage data in identifying and selecting Special Sites.
- JGBC provided a specific example of a historical marker indicating the presence of the Old Yokuts village of Tulamniu, which has been recognized and preserved due to its historical significance. Documentation provided indicates the appropriate use of available natural heritage data.
- Upon identification of a special site, farming on and near the area is not permitted. Direct management of the special site is left to the appropriate authorities.

Result: **In Conformance**

Objective 9: Local Communities

9.1 Economic Wellbeing

Conformance Evidence

- Local Communities Policy
- Withholdings Form

Auditor Notes

- JGBC has a designated HR department that supports full-time and seasonal employees.
- JGBC's statement on local communities describes their approach to contributing to the economic well-being and social networks and health of local communities, as well as their recognition and respect for the rights of local communities and Indigenous Peoples.
- HR maintains legal and social compliance. Payroll department manages financial compliance using ADP software.
- JGBC works with local chemical and fertilizer suppliers.
- The company has long-standing relationships with farm labor contractor (FLC) workers, who undergo the same safety training as JGBC staff.
- An anonymous employee hotline is also available for staff to report concerns and issues on job sites.

Result: **In Conformance**

Objective 9: Local Communities (Continued)

9.2 Community Relations

Conformance Evidence

- Local Communities Policy

Auditor Notes

- JGBC was a founding member of the California Ag Leadership Foundation and continues to support the foundation.
- JGBC supports five endowed chairs in the Department of Plant Science at local universities.
- JGBC makes financial contributions to hospitals, local 4H groups, FAA Programs, agricultural mechanic programs at local schools, supports career days, and hosts farm tours. JGBC engages with community non-profits and community events such as cotton festivals, Christmas tree lightings, and coaching local sports teams.
- The JG Boswell Foundation, established in 1947 by the Boswell family, focuses on local health and education. The 501(c)(3) nonprofit is involved with local communities, investing over \$1 million per year in local communities, health clinics, rebuilding school facilities, after school programs, youth athletics, and summer school programs.
- JGBC has made donations of land to local schools for their ag program and provided equipment. Currently, alfalfa is being planted on the student farm.
- Outreach by employees is encouraged by JGBC and supported throughout the organization.
- JGBC hosts an annual meeting with local junior college professors and the California Agricultural Teachers Association.
- A district manager is on the Bakersfield College Plant Advisory Board, and ranch managers serve on various Agriculture Advisory Boards (seed, cotton ginner, Tulare Lake District board, Corcoran irrigation district, etc.).
- JGBC offers a highly competitive scholarship that covers four years of tuition for two Corcoran students per year.
- Company time is donated to support various initiatives, including CPR and first aid training.
- Staff volunteers time to serve as judge at cotton competitions at the local high school.
- District Manager is the current President of the local recreation association (facility was built by the Boswell Foundation), and offers all JGBC employees a discounted membership rate.
- The Boswell Community Foundation is a major contributor to the Corcoran Community Foundation.

Result: ***In Conformance, Notable Practice (See Key Findings 9.2.1)***

Objective 9: Local Communities (Continued)

9.3 Local Communities and Indigenous Peoples

Conformance Evidence

- Tulamniu Site Historical Marker Information
- Local Communities Policy
- Tachi Yokuts Tribe website
- JG Boswell Social Responsibility Statement

Auditor Notes

- Local Community and ranching operation guidelines outline the company's methods to operate safely and responsibly, contributing to the economic well-being, social networks, and health of local communities. The policy also contains a commitment to respect the rights of Indigenous People in the regions of agricultural operations.
- The Social Responsibility Policy identifies altruism as a guiding principle and supports JGBC's decisions to support education and healthcare and medical advancement.
- Provided documents demonstrate community involvement and engagement with educational and agricultural groups.
- JGBC does not purchase additional land; thus, no new due diligence efforts are made and JGBC does not provide training on acquisition analysis. It is not clear when JGBC's Local Communities Policy component that addresses the rights of local communities and Indigenous people would be leveraged without additional supporting information such as a cultural assessment.
- A historical monument in Kern is mapped and untouched. The historic marker identifies a village established by the Yokuts Tribe. The Tachi Yokuts Tribe's website has an "About" page with descriptions of land acquisition that could be perceived as a complaint. While there is no history of formal complaints being made, it is not clear to auditors how Indigenous rights or concerns are addressed, or how effected parties are identified.
- JGBC states historical tribes of the Tejon and Chumash are no longer present around sample sites. It is not clear if JGBC has considered the Tachi Yokuts a local presence.
- Tejon and Chumash people performed a ceremony on JGBC property after the 2023 floods. This is an example of collaboration and respect for Indigenous People that could be documented to support conformance in lieu of due diligence materials.
- Crop sites are not designated territory for tribal land.
- All pest advisors and crop advisors are identified in publicly available materials.
- JGBC maintains contacts with emergency services for identification if the public has a concern.
- Operating policy of JGBC management indicate that calls from neighbors or agencies are forwarded to appropriate parties by JGBC's Resources Manager. Interview responses indicate no complaints from neighbors have been registered. JGBC could provide additional process or procedure descriptions to demonstrate their receptivity of community concerns.
- Sites are in rural areas. Management carefully monitors interactions with any potential neighbors.

Objective 9: Local Communities (Continued)

9.3 Local Communities and Indigenous Peoples (Continued)

Auditor Notes (Continued)

- Site management states that outreach and identification has been performed with emergency services. Maps are provided to emergency services.
- Emergency contact information was observed during site interviews.
- Office site manager maintains close communications with local Ag crime units.

Result: Opportunity for Improvement: 3 (See Key Findings 9.3.1, 9.3.2, and 9.3.3)

Objective 9: Local Communities (Continued)

9.4 Public Health

Conformance Evidence

- Local Communities Policy

Auditor Notes

- Visitors must comply with the visitor policy prior to entering the farm and adhere to safety requirements.
- Visitor logs are kept in ranch offices.
- The public is protected by controlled applications by licensed applicators.
- Any people in the area of an application are cleared prior to application
- Applications are stopped in the case of any intrusion during application.
- JGBC was an early adopter of California's Spray Safe program, which is an intensive training program.
- Warnings regarding safe entry are posted at ranches during and after spray activities.
- Records of applications are publicly available at the county ag commissioners' offices and also on a publicly available website.
- Site Managers communicate with neighbors via phone call or text to inform them of relevant spray activities.
- County Notice of Intent (NOI) requirements are in place and followed by site manager.
- No major issues with trespassing have been reported.
- Safety training is mandatory and attendance is logged.

Result: In Conformance

Objective 10: Employees and Farm Labor

10.1 Safe and Respectful Working Environment

Conformance Evidence

- JG Boswell Social Responsibility Statement
- Employee Handbook
- Social Responsibility Training Slide
- Personnel and Farm Labor - Ranching Operations
- 2024 Paragon & JGBC Sign in Sheet Annual Risk Management Review Meeting
- Tomato Harvest Crew Training
- Employee Status Report template
- Training Records

Auditor Notes

- JGBC's Employee Handbook contains an equal opportunity employment statement.
- Annual trainings are held for all employees.
- Records of attendance are kept on sign in sheets.
- Daily monitoring on farms for safety compliance, safety leaders are assigned for each team and discipline to interact with staff and provide training opportunities.
- Employee handbooks contain anti-discrimination and harassment policies, including racial, gender, sexual orientation, and veteran status protections.
- Discrimination and gender equity training is included in required annual training.
- Employees are required to report injuries to the closest available supervisor as soon as possible.
- Site management interviews indicate that ethics and integrity is a pillar of the company while placing high value on a culture of innovation and efficiency.

Result: ***In Conformance***

Objective 10: Employees and Farm Labor (Continued)

10.2 Occupational Training

Conformance Evidence

- Training Records
- Overview of the WPS training
- VP Safety Suggestion Winners - Safety Announcement 2023-2024
- FSA Training Program
- The Coca-Cola Supplier Requirements

Auditor Notes

- Trainings are held with AgSafe for all safety leaders, involving safety, risk management, workers compensation and rights. Certification is provided after training is successfully completed.
- JGBC provided emails that document training provided or requirements such as Safe Quality Food (SQF) certification to meet supplier demands.
- In the past JGBC participated in the Golden Gate certification program through California's Division of Occupational Safety and Health (CalOSHA). The program is no longer in place, but JGBC still implements best practices from the program.
- Safety trainings are held weekly, including Monday morning "tailgate" sessions, to discuss relevant topics. Annual trainings are also conducted, and absences are recorded to ensure all trainings are completed.
- Management keeps a set calendar in InteleX which sends training reminders. Monthly and quarterly safety inspections and absences are logged in InteleX.
- JGBC designates 2 days specifically for safety training. New employees are required to complete necessary training during onboarding.
- Operators are trained to complete an inspection card before each shift, identifying issues such as fluid leaks, broken parts, or poor performance, which are submitted to the shop for maintenance.
- Each ranch has a designated Safety Manager, who conduct random inspections.
- A safety suggestion program is on sites. Boxes are located around the ranch where submissions can be made (either anonymous or by name). Management reviews these suggestions and implements approved suggestions accordingly.
- JGBC's safety team choose about five suggestions that had the most impact for the year. The safety team hosts a safety lunch and brings in JGBC vice presidents and executives to award prizes. Gift cards are awarded for safe operations.
- JGBC encourages safety reporting, even "near misses". Managers must hold a special meeting when a safety incident has occurred.
- JGBC provided an overview of the WPS, which outlines frequent and in-depth training, including protocols for handling spills or leaks, activating an emergency action plan, and using spill kits and tools like shovels for containment.

Result: ***In Conformance***

Objective 10: Employees and Farm Labor (Continued)

10.3 Supporting Capacity for Sustainability

Conformance Evidence

- JG Boswell Social Responsibility Statement
- Social Responsibility Training Slide
- Building a Regenerative, Resilient Food System article from Nestle's website

Auditor Notes

- JGBC's LH FMS certification efforts are in support of partner organization requests.
- Partner customers have committed to securing ingredient supply chains via the Leading Harvest certification of ingredient suppliers. JGBC has included their commitment to sustainability initiatives to their Management Review and Continual Improvement documentation.
- LH FMS staff oversees objective achievements responsible for managing on farm reporting data, field technical services, and grower relationships.
- JGBC has designated staff to support Safe Quality Food (SQF) certification and coordinated efforts at the ranch level. - JGBC has established a sustainability committee responsible for compliance with standards and regulatory requirements.
- JGBC maintains a culture of welcoming ideas for continual improvement. Employees can voluntarily provide safety trainings, offer ideas, and share information on any concerns.
- JGBC offers a safety award for staff that rewards employees for their involvement.
- Social responsibility and sustainability trainings are conducted for all staff.
- Benefits at JGBC support advanced degrees and certifications for employees.
- Employee referral programs and tuition reimbursement are offered to employees.
- Robust internship programs are offered with presentations and feedback provided by interns upon completion of the program.

Result: In Conformance

10.4 Compensation

Conformance Evidence

- Management interview

Auditor Notes

- California requires salary structures to be set for each position.
- JGBC conducts annual reviews of compensation ranges. Every other year a third-party conducts additional reviews of comp structures.
- JGBC has a high retention rate for staff, offering career counseling and fringe benefits that support long term careers within the company.
- Site management interviews indicate that participation in salary surveys is conducted.

Result: In Conformance

Objective 10: Employees and Farm Labor (Continued)

10.5 Farm Labor

Conformance Evidence

- FLC Agreement

Auditor Notes

- FLCs are selected annually and respond to a formal request for proposal (RFPs) for resources.
- Checklist scorecards are completed on FLCs prior to offering RFPs.
- FLC agreements are lengthy and detailed.
- The Intelex system houses information for both FLC and JGBC employees.
- FLC licenses are validated annually. Providers have been replaced in the past 5 years.
- Federal OSHA reviews are conducted on FLC's prior to engaging for the year.
- Reviews of written compliance and historical injury rates are conducted annually.
- Safety leaders meet with OSHA annually to conduct searches on all contractors.
- HR Vice President is involved with FLC selections, maintains positive relations with them, and reviews licenses annually.

Result: ***In Conformance***

Objective 11: Legal and Regulatory Compliance

11.1 Legal Compliance

Conformance Evidence

- JG Boswell Social Responsibility Statement
- Legal and Regulatory Compliance Policy
- Management Review and Continual Improvement

Auditor Notes

- HR provides employment counsel.
- HR representatives are located at all regional sites, and a safety department representative is assigned to both the ranch and plant offices.
- Environmental and other regulations are provided by outside legal counsel.
- Regulatory agencies are identified in communications to staff.
- Staff may contact HR reps on sites.
- Safety Data Sheet (SDS) info is posted at job site kiosks.
- Managers are members of a number of different trade associations, with tomatoes and other industry wide groups.
- JGBC engages in the rule making process that affects ag in California, both directly and via a number of industry organizations.
- State agencies will approach JGBC prior to rule determinations on regulations, due to Bowell's presence in the area and history in California agriculture.
- HR representatives are located at all sites. HR representative interviewed during site visit has an open-door policy for staff.
- HR VP is a current board member of the Agricultural Personnel Management Association.
- HR VP receives a daily review of legal HR requirements through various agencies including the National Safety Council.
- Compliance personnel on staff maintain reference libraries and contact information for regulatory agencies that may interact with operations.
- OSHA and other regulatory posters are posted and current at all job sites.
- Site Management interview indicates that posters are reviewed and updated every year.

Result: ***In Conformance, Notable Practice (See Key Findings, 11.1.1)***

Objective 11: Legal and Regulatory Compliance (Continued)

11.2 Legal Compliance Policies

Conformance Evidence

- JG Boswell Social Responsibility Statement
- Legal and Regulatory Compliance Policy

Auditor Notes

- Social compliance policy provided for review. Employee Handbooks contain legal compliance policies.
- Staff is trained annually on social compliance policy.
- Consistency with farmland tenant law is not applicable since all JGBC sites are directly operated.

Result: In Conformance

Objective 12: Management Review and Continual Improvement

12.1 Farm Review and Continual Improvement

Conformance Evidence

- Management Review and Continual Improvement - Ranching Operations
- Sustainability Management Review Form
- JGBC Sustainability Statement
- Performance Review Form
- Employee Status Report (ESR) template
- Specific, Measurable, Achievable, Relevant, Timebound (SMART) Goal template

Auditor Notes

- Farm labor is reviewed by managers on sites. No formal performance review process is in place for farm labor. JGBC could formalize or establish structured and scheduled reviews.
- Management is reviewed annually with a metric-based wage increase. Metrics are based on farming operations results.
- JGBC provided process documents reviewing commitments, programs, procedures, and measures of progress towards company goals.
- JGBC has established a sustainability committee responsible for compliance with standards and regulatory requirements, including LH FMS. JGBC provided their documented commitment within their Management Review and Continual Improvement process.
- JGBC has an internship program that include presentations and provide interns an opportunity to receive and deliver feedback.
- SMART Goals template may be used by managers, but use varies by site. SMART goals are used to document farm employee performance and are completed by employees along with managers.
- Employee Status Reports (ESRs) are used frequently to move employees to different departments internally. The reports include some aspects of performance review to notify the new supervisor.
- Weekly meetings are held with all ranch-related departments.
- Safety participation programs encourage employee feedback. Anonymous reporting mechanisms are available for safe feedback.
- JGBC has an employee referral program and tuition reimbursement to support growth and development.
- JGBC provides training and development programs for employees and managers. Staff are supported in attending conferences relevant to their teams.
- JGBC evaluates the effectiveness of programs and progress toward achieving goals in different areas such as employee development, agricultural input management, and environmental impact management. Results on performance metrics is collected and ranked by managers for review.

Result: ***In Conformance, Opportunity for Improvement: 2 (See Key Findings 12.1.1 and 12.1.2)***

Objective 12: Management Review and Continual Improvement (Continued)

12.2 Support for Sustainable Agriculture

Conformance Evidence

- Management Review and Continual Improvement - Ranching Operations

Auditor Notes

- JGBC management is involved with local boards, district boards, universities, and industry research bodies to identify opportunities for improvement.
- JGBC facilitates large scale varietal trials that test performance of up to 100 varieties at a time, as well as adaptive trials at larger scales to support integration into production.
- JGBC works with the United States Department of Agriculture (USDA) and UC Researchers on fungicide and material trials and testing. JGBC has been a participant in USDA trial grants to develop approaches to pathogens and weed prevention for over 14 years.
- Staff are on research boards, providing support on annual research and conferences by CA Dept of Ag.
- JGBC hosts an annual agronomic research summit to present and share ideas from trials and progress on the farms to other ranch managers. Agronomy and Irrigation Departments also share trials and research findings.
- JGBC has developed traceability for tomatoes to identify the field and row that a particular final product came from.
- Varietal trials and tests are conducted in coordination with breeders.
- JGBC maintains proprietary research, historic records and data, and reports.
- JGBC management participates in the USDA's IR4 program development for Safflower Management. IR4 programs are intended to identify and support effective pest management strategies.

Result: ***In Conformance, Notable Practice (See Key Findings 12.2.1)***

CONCLUSIONS

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

STANDARD USER GUIDANCE

Leading Harvest Logo Usage: Program users in good standing who are enrolled in the Leading Harvest Farmland Management Program 2020 for all, or a portion of their operations, may use the Leading Harvest logo. Any express or implied claim that a program user is in conformance with the Leading Harvest Farmland Management Standard 2020 must be substantiated by a current, valid certification by a certification body recognized by Leading Harvest.

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SPECIFIC FOCUS AREAS FOR NEXT AUDIT

JGBC will be required to complete their first surveillance audit prior to December 20, 2025. Averum will conduct site visits during the 2025 growing season in July 2025 to visit crops pre-harvest. Key focus areas will include Performance Measure 9.3 to provide JGBC opportunities to demonstrate further conformance.

Summary of Audit Findings			
Program User	J.G. Boswell Company		
Audit Dates	November 15, 2024 – December 20, 2024		
Non-Conformances Raised (NCR):	Major	Minor	
	0	1	
Follow-Up Visit Needed? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Date(s)			
Audit Report Executive Summary			
J.G. Boswell Company performed well and was able to demonstrate their management system's conformance with the Leading Harvest Farmland Management Standard. JGBC quickly applied discovery from the Readiness Review process to mitigate conformance gaps and are well-positioned to demonstrate continual improvement with the support of their qualified management team. The properties we visited were professionally managed. Documentation was provided in a timely manner by staff, and interview subjects provided interview responses in good faith. All parties have been generous with their time and are appreciated.			
Team Leader Recommendations			
Corrective Action Plan(s) Accepted	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	12/20/2024	
Proceed to/Continue Certification	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	12/20/2024	
All NCR Closed	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	12/20/2024	
Standard(s) Audited Against			
Leading Harvest Farmland Management Standard 2020 (Objectives 1 through 12)			
Audit Team Leader	Audit Team Members		
Matt Armstrong	Jill Brodt, Holly Salisbury, Linnea Abel		
Scope of Audit			
Management of production farmland on direct and tenant operated properties.			
Accreditations	Approval by Leading Harvest to provide certification audits		
Number of Certificates	1		
Certificate Number	AVERUM-LHFMS-2024-0027		
Proposed Date for Next Audit Event	TBD		
Audit Report Distribution	Isabel Rios: irios@jgboswell.com		