J.G. Boswell Company

Corcoran, California

LEADING HARVEST FARMLAND MANAGEMENT PROGRAM
AUDIT SUMMARY REPORT: 2025 SURVEILLANCE I

October 21, 2025

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AVERUM™

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EXECUTIVE SUMMARY

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Certification Date:
December 20, 2024

Recertification Due Date:
December 20, 2027

Certification ID Number:
AVERUM-LHFMS-2024-0027

J.G. Boswell Company (JGBC) has performed well in demonstrating its management system's conformance to the Leading Harvest Farmland Management Standard (LH FMS). The properties we visited were well managed with professional staff. JGBC has developed a sustainability committee to support continual improvement and closely monitors site and crop conditions with qualified staff. JGBC sites design crop rotations to improve soil suitability for tomato production. JGBC is a benefactor to several local organizations and engages and incentivizes employees to mitigate potential risks and hazards inherent in production agriculture and food production.

TEAM LEADER RECOMMENDATIONS

Audit Dates: August 22, 2025–October 21, 2025

Corrective Action Plan(s) Accepted: Yes **Date:** October 27, 2025

Follow-Up Visit Needed?: No **Date:** October 27, 2025

Proceed to/Continue Certification: Yes **Date:** October 27, 2025

All NCR Closed: Yes **Date:** October 27, 2025

AUDIT STAFF

Lead Auditor:
Linnea Abel

Audit Team Members:
Jill Brodt – Field Auditor
Matt Armstrong – Audit Team Leader
Holly Salisbury – Independent Reviewer

AUDIT SCOPE

Standard(s) Within Scope:
Leading Harvest Farmland Management Standard 2020

Surveillance of JGBC's management system of production farmland on directly operated properties to monitor conformance with LH FMS Objectives 1–12, and performance measures and indicators therein.

Accreditations: Approval by Leading Harvest to provide certification audits

Number of Certificates: 1

Proposed Date for Next Audit Event: Surveillance II should be complete prior to October 21, 2026

Audit Report Distribution: lbrown@jgboswell.com

INTRODUCTION

This report summarizes the results of the surveillance audit conducted on JGBC's managed production agriculture properties. The audit was conducted by Linnea Abel, Lead Auditor for Averum. Linnea Abel has experience with Leading Harvest, 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 2025, Averum was engaged by JGBC to perform an audit of sustainability performance on 10,000–50,000 acres of managed agricultural operations and determine conformance to the principles, objectives, performance measures, and indicators of LH FMS 2020. LH FMS Objectives 1 through 12 were covered during site visits on properties in the California regions. There was no substitution or modification of LH FMS performance measures or indicator language.

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 our audit was determined to be sufficient to address relevant indicators of LH FMS.

COMPANY INFORMATION

JGBC produces, processes, and markets crops in central California. JGBC employees are responsible for the day-to-day ranching operations for JGBC's properties. JGBC initially achieved certification for its Leading Harvest enrolled acreage in 2024.

During the surveillance audit, two (2) sites in California 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 sites is processing tomatoes and safflower.

AUDIT PLAN

Averum developed an Audit Plan which is maintained and on file. An online portal was established by JGBC coordinators to upload evidence and documentation securely. Access was granted for auditor review. An Opening Meeting was held August 22, 2025, preceding site visits. Following the meeting, a document review of the provided evidence was conducted by Averum. Field sites in California were examined on August 25, 2025. A Closing Meeting was held on October 21, 2025.

Opening Meeting: Conference Call

August 22, 2025

Attendees

JGBC:

Laura Brown, Isabel Rios, Angelica Salgado, Nick Kastle, Justin Spellman

Audit Team:

Jill Brodt, Matt Armstrong, Linnea Abel

Topics

The following topics were discussed and presented by Lead Auditor, Linnea Abel, during the Opening Meeting:

- Introductions of participants and their roles
- Introduction of audit team
- Status of the previous audits
- Audit Plan
- Expectations of program user staff
- Method of reporting

Closing Meeting: Conference Call

October 21, 2025

Attendees

JGBC:

Laura Brown, Isabel Rios, Angelica Salgado, Justin Spellman

Audit Team:

Jill Brodt, Matt Armstrong, Linnea Abel

Topics

The following topics were discussed and presented by Lead Auditor, Linnea Abel, during the Closing Meeting:

- Opening remarks
- Statement of confidentiality
- Closing summary
- Presentation of the audit conclusion
- Major nonconformances
- Minor nonconformances
- Opportunities for improvement (OFIs)
- Notable practices
- Report timing and expectations

Audit Time (Days)	Activity	Responsible
1	Opening and Closing Meetings	Auditor, Lead Auditor, Team Leader
.5	Management interview	Auditor
1	Site visits	Auditor
2.5	Engagement workpapers	Auditor
2.5	Evidence (document) review	Auditor
3	Audit Summary Report review and certification decision	Auditor, Lead Auditor

MULTI-SITE REQUIREMENTS

JGBC maintains operations on multiple properties in California. JGBC qualifies for multi-site sampling since the properties within the management system are centrally controlled and operated, with regular monitoring activities. Quality Assurance and Environmental Resources 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 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.

AUDIT RESULTS

Overall, JGBC's agricultural operations conform to the objectives of LH FMS. Interviews and document reviews were performed to determine procedural and documentation conformance to LH FMS. Documentation was provided to demonstrate or support conformance with LH FMS requirements. Field visits were performed on two operating sites in Kings County. Visits were pre-harvest or just harvested, so harvesting efficiencies and safety procedures were highlighted. Management representatives and operators 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 Quality Assurance and Environmental Resource Managers served as guides, were available throughout the engagement, provided logistic support, and provided responses to evidence requests.

Region
California represents 100% of all acreage.

Crop
Processing tomatoes and safflower

Properties Examined During Engagement
Two (2) sites visited during audit:

- Homeland
- Tulare

KEY FINDINGS

FINDINGS IDENTIFIED DURING THE AUDIT	
PREVIOUS NONCONFORMANCE	One (1)
MAJOR NONCONFORMANCE	Zero (0)
MINOR NONCONFORMANCE	Two (2)
OPPORTUNITIES FOR IMPROVEMENT	Six (6)
NOTABLE PRACTICES	Six (6)

PREVIOUS NONCONFORMANCE

7.3.2 DEFORESTATION

JGBC corrected a minor nonconformance that was issued during their initial certification by developing a deforestation policy that aligns with LH FMS requirements. The policy is appropriate to JGBC's operations and includes a commitment to avoid purchasing deforested land.

MAJOR NONCONFORMANCE

Not applicable

MINOR NONCONFORMANCE

7.1.1 THREATENED AND ENDANGERED SPECIES

Current biodiversity monitoring does not include a comprehensive review of Threatened and Endangered Species or At-Risk Species. Documentation and research could be enhanced by referencing state conservation agencies, Point Blue reports, the NatureServe database, and U.S. Fish and Wildlife Service (USFWS) reports to ensure all relevant species are considered.

Examples of conformance could include:

- Wildlife training to inform managers of the threatened/endangered species that exist in the area
- List of threatened/endangered species in area
- Evidence of continuous monitoring, such as updated lists of threatened and endangered species
- Observation of posted wildlife information

7.1.2 AT-RISK SPECIES

Current monitoring of vulnerable or at-risk species and programs to protect these populations is unclear. Resources used to identify relevant species and communicate their potential for occurrence should be provided to farm managers. Examples could include:

- Environmental surveys referenced by JGBC Regulatory Department Manager that include vulnerable or at-risk species consideration
- Lists of vulnerable or at-risk species provided by USFWS, California Department of Fish and Wildlife (DFW), or conservation agencies such as NatureServe or Point Blue
- Biological resources assessments, NatureServe reports, or equivalent
- Agreements with conservation agencies
    - A program to locate and protect relevant species is not applicable if research indicates the potential for occurrence of vulnerable or at-risk species is extremely unlikely or there is no potential for occurrence.

OPPORTUNITIES FOR IMPROVEMENT

1.1.2 FARMLAND STEWARDSHIP

Consider expanding topics by including sustainability measures in the quarterly Boswell Bee Newsletter.

4.1.1 PEST MONITORING

JGBC could revise scouting cards to include the crop type. Field scouts are currently writing in the crop type and this could facilitate note-taking.

7.2.3 CROPLAND FOR WILDLIFE HABITAT

Evaluate the feasibility of increasing the amount of raptor perches and owl boxes across sites for pest management and predatory species habitat.

9.3.1 LOCAL COMMUNITY AND INDIGENOUS PEOPLES POLICY

JGBC's Local Communities Policy states the scope and purpose of the policy and includes a commitment to respecting the rights of Indigenous People. The procedure could be strengthened or clarified to describe how JGBC considers the land tenure rights of Indigenous People, shows consideration for cultural interests, or identifies relevant parties of interest.

JGBC could consider amending its Social Responsibility Policy to recognize and respect the rights of Indigenous Peoples.

9.3.2 LAND TENURE RIGHTS OF LOCAL COMMUNITIES AND INDIGENOUS PEOPLES

This indicator requires demonstration of due diligence to prevent infringing on land tenure rights during land management and acquisition.

JGBC could consider developing 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

10.4.1 WAGES AND PAY

JGBC could provide additional conformance evidence to support narrative response, such as salary surveys, compensation reviews, or wage scales.

NOTABLE PRACTICES

3.1.3 WATER CONSERVATION

Irrigation design trials were conducted during the 2025 harvest year, with plans to continue evaluating these trials to optimize water application efficiency, enhance uniformity, and improve irrigation performance in the peripheral zones of the farms. JGBC continues to build upon its well-established water management program with additional research.

4.1.1 PEST MONITORING

The system using field scouting cards is widely adopted and considered highly reliable by farm managers and staff.

6.1.2 RESOURCE RECOVERY

The team creatively repurposes retired tires as reflective safety markers at field intersections, reducing waste and improving visibility, with some marked by field ID numbers.

9.2.1 COMMUNITY ENGAGEMENT

JBCG regularly donates time by allowing employees to assist the local high school students on the student farm in efforts to facilitate a thriving Future Farmers of America (FFA) program.

The James G. Boswell Foundation is a significant benefactor of local environmental and health foundations. The James G. Boswell Foundation made a $3M donation to Valley Children's Hospital in Madera, California to fund essential programs, in addition to other notable gifts to healthcare organizations.

10.2.1 PERSONNEL AND CONTRACT WORKER TRAINING

A safety incentive program is in place, with suggestion boxes located in every district. The "VP Award" is given for the most impactful safety suggestion, offering either a cash prize or a trip. Crew member suggestions regularly lead to safety improvements, including equipment modifications.

12.2.1 SUPPORT FOR SUSTAINABLE AGRICULTURE

JGBC made multiple contributions to foundations and organizations dedicated to developing the next generation of farming professionals. Demonstration includes the sponsorship of the College of Sequoias Technology and Trades Department's first "Mechanized Ag" summer program. The program is designed to develop students' knowledge of hydraulics, electrical technology, engines, and emissions systems, among other significant contributions to FFA campaigns and Ag educational organizations.

REVIEW OF PREVIOUS AUDIT CYCLE

This is JGBC's first surveillance audit of its first Leading Harvest certification cycle.

FINDINGS ORGANIZED BY PERFORMANCE MEASURE

The following are summarized findings organized by LH FMS performance measure. Specific nonconformances, 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 Report
2025 Q3 Boswell Bee Newsletter

Auditor Notes

- JGBC's Sustainability Report contains a sustainability commitment and descriptions of practices that support long-term soil health and productivity.
- JGBC established a Leading Harvest Review Committee. The committee drafted the Sustainability Statement and reviewed the initial certification audit report with select members. A meeting was held to initiate JGBC's Sustainability Committee and establish a schedule to meet on a quarterly or biannual basis.
- Key concerns for ranching operations include maintaining soil health, managing pests, and achieving target crop yields. JGBC's farming approach addresses these concerns through a strong emphasis on appropriate crop rotation.
- JGBC has an internal agronomy team that implements JGBC crop management programs and integrated pest management (IPM) strategies.
- JGBC issues a quarterly newsletter to all employees that cover a wide variety of topics including access to government programs, and encourages employees to participate in company-wide events and challenges. The newsletter is available in both English and Spanish.
- JGBC uses the newsletter to circulate initiatives and provide updates to JGBC staff who support ranching operations. The newsletter could be used to support sustainability education.
- JGBC farming sites are long-established farmland. Some properties have been operated by the company for over 100 years. Land is generally maintained in production, and crop rotation practices help sustain soil health and reduce the need to remove land from production.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
				1.1.2		1.1.1 1.1.3

Objective 1: Sustainable Agriculture Management

1.2 CRITICAL EXTERNAL FACTORS

Conformance Evidence
Farm Synopsis Example
Sustainability Statement

Auditor Notes

- Farm synopsis spreadsheets track historical data and are used to develop annual farm plans. JGBC provided a farm synopsis example with data beginning in 1999. Yields, soil health metrics, amendments, and select pest pressures were recorded.
- JGBC reviews its farms and generates reports based on crop type. For tomatoes, a pack plan is utilized to guide seed procurement and related planning. JGBC uses an ArcGIS database to generate seed estimate reports.
- Multiple calendars are maintained to track irrigation schedules, fertilizer applications, and input use throughout the season.
- JGBC's Sustainability Statement shares its commitment to exceed regulatory expectations. The statement also shares its commitment to traceability, which supports customers' requests to understand where its produce comes from.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						1.2.1

Objective 2: Soil Health and Conservation

2.1 SOIL HEALTH

Conformance Evidence

Soil Sampling Standard Operating Procedure
Plant Tissue Sampling Standard Operating Procedure
Safflower Crop Profile
Soil Health and Conservation Management Plan
Heat Unit Record
2025 Plant Tissue and Soil Analysis Results
Field Synopsis Example Spreadsheet
Irrigation and Fertility Template
Sustainability Report

Auditor Notes

- Crop rotation continues to be a key practice that JGBC uses to reduce soil erosion, increase crop yield, and preserve soil health and fertility. Tomato crops are rotated with cotton and safflower.
- JGBC's internal agronomy team collects soil samples at least once a year and sends them to the in-house laboratory and a third-party laboratory for analysis.
- JGBC maintains a soil sampling SOP and a tissue sampling SOP to ensure collection processes are consistent from year-to-year. Necessary equipment is outlined in the SOPs as well as collection methods.
- JGBC provided a description of safflower's impacts on crop rotations and soil health. Safflower is drought-tolerant, improves soil structure, and facilitates salts movement from root zones of subsequent crops.
- JGBC maintains a formally adopted soil health and conservation management plan.
- JGBC internal agronomists are engaged in all phases of farm site planning. Agronomists are licensed as Pest Control Advisors (PCAs) and Certified Crop Advisors (CCAs), which require completion of annual continuing education units to maintain credentials.
- JGBC provided a record of heat units (or growing degree days), which can directly impact tomato crops. JGBC monitors soil moisture and manages moisture closely in relation to accumulated degree days.
- JGBC provided 2025 plant tissue and soil analysis results for sites visited as supporting evidence of soil health and nutrient monitoring.
- JGBC applies nitrogen during growing season via spoon-fed liquid nitrogen. Precise application supports efficiency.
- JGBC's plant tissue and soil sampling SOPs support nutrient management plans (NMPs).
- Field synopsis reports include nutrient management data including soil analysis (nitrate testing), amendment applications, and historical yield data.
- JGBC provided copies of its irrigation and fertility templates, which are used to record data by field. These templates provide a place for irrigation hours, nitrogen and phosphorous applications, and petiole analysis results to be recorded throughout the growing season.

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

2.1 SOIL HEALTH

Auditor Notes

- JGBC shreds crop residues during harvest and returns them to the field to build organic matter, enhance nutrient cycling, and support long-term soil health.
- JGBC's Sustainability Report describes how 100% of tomatoes are used. After processing, tomato pomace and wet paste byproducts are reused. Some byproduct are further processed into animal feed.

	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
RESULT						2.1.1 2.1.2 2.1.3 2.1.4

Objective 2: Soil Health and Conservation

2.2 SOIL CONSERVATION

Conformance Evidence

Energy Use, Air Quality, and Climate Change Policy
Field Synopsis Example Spreadsheet
Soil Health and Conservation

Auditor Notes

- Sites visited are located on dry, flat lake beds, where the potential for runoff and erosion is minimal.
- JGBC reduces soil compaction by restricting field entry when soils are wet or muddy. Farm managers select equipment appropriately sized for each task, avoiding the use of oversized machinery.
- JGBC states in its Energy Use, Air Quality, and Climate Change Policy that it adopts low-till passes on fields where soil composition and terrain allow.
- JGBC prevents soil mismanagement through a structured crop rotation program that includes tomatoes, cotton, and safflower. This approach maintains soil productivity without the need for extended fallow periods.
- Farm managers utilize field synopsis spreadsheets to track historical data—including crop type, yield, and soil analysis results—to evaluate soil conditions and guide planning for the upcoming crop year.
- JGBC provided an outline of its soil management practices, which rely heavily on crop rotations that support soil erosion and increase commodity crop yields. JGBC's internal agronomy team supports continuous soil management.

	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
RESULT						2.2.1 2.2.2

Objective 3: Water Resources

3.1 WATER USE

Conformance Evidence

System Monitoring Spreadsheet
2025 Tulare District Probe Graph - Soil Moisture Data
Irrigation Design Trial Maps (Shared On-Site)
2023 Distribution Uniformity Monitoring Spreadsheet
Water Resources
Tomato Sustainability Tools - Water

Auditor Notes

- Fields are irrigated with canal water through subsurface irrigation tape. Flow meters are used to measure total usage.
- JGBC uses crop rotations to rebalance water use across farm sites. Safflower is especially important as it does not require irrigation or fertilizer and is useful to pull moisture and salts further down into the soil.
- JGBC monitors irrigation system efficiency. Valve pressures, pH, chlorine, and flow are recorded.
- Tomatoes receive subsurface drip irrigation, with lines installed approximately 10 inches below the plants. Each tomato field is equipped with two buried soil moisture monitoring devices. Probe data is accessible to farm managers through the 'Probe Schedule' software system, which provides continuous soil moisture readings. Farm managers and agronomists use this data to determine irrigation scheduling.
- Flow meters are installed at all pump sites and filter stations to monitor water delivery.
- Water is supplied from the Kings River, and usage is managed by the JGBC Water Department. The source originates from the Kings River Dam, operated by the U.S. Army Corps of Engineers. The primary objective of the dam is flood prevention.
- In some scenarios, JGBC must accept water deliveries to ensure that the dam operates as intended.
- JGBC staff historically includes experienced water engineers who evaluate water rights and water allocations, which are considered in the farm planning each year. The engineers strive to maximize water conservation by looking at crop water usage annually and evaluating efficient irrigation methods in relation to yield performance.
- JGBC regularly evaluates irrigation performance, including total water usage and uniformity at every farm site.
- JGBC provided distribution uniformity (DU) testing data for review.
- JGBC's Water Resources document outlines their water management program. JGBC has a technical water staff dedicated to irrigation, including two designated water design specialists who specialize in drip irrigation. Crop rotations, precision farming technology, electromagnetic resonance surveys, and soil moisture monitoring support its water management program.
- JGBC has conducted irrigation design trials to optimize water delivery. Trials using longer irrigation runs with pressure-compensating tape were performed. While this approach showed potential, it did not outperform the current system. Extra care was taken during these trials because tomatoes are highly sensitive to water stress. These trials provided valuable insights into irrigation procedures, and the team continues to refine the process.

Objective 3: Water Resources *(Continued)*

3.1 WATER USE

Auditor Notes

- Peripheral field areas that historically received insufficient water were evaluated using different types of irrigation tape.
- JGBC sites use drain tiles to remove subsurface water and redirect to holding ponds for later use.
- Efficiency is assessed to ensure that irrigation does not exceed crop demand, using evapotranspiration data and soil moisture probe readings to supply water according to plant needs.
- JGBC maintains irrigation lines and flushes them to remove algae or buildup.
- JGBC uses data from multiple weather stations, including those from Western Weather Group, in combination with soil moisture monitoring, to guide irrigation management.
- JGBC uses irrigation and monitoring technology that supports water usage efficiency. This technology includes the CropSights platforms, which tracks soil moisture probe locations and supports irrigation mapping.
- JGBC uses additional soil monitoring tools and devices that measure soil water content, temperature, and salinity at multiple depths. Photos of technology used are included in JGBC's Tomato Sustainability Tools - Water document.
- Irrigation design trials were conducted during the 2025 harvest year, with plans to continue evaluating these trials to optimize water application efficiency, enhance uniformity, and improve irrigation performance in the peripheral zones of the farms. JGBC continues to build upon its well-established water management program with additional research.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
					3.1.3	3.1.1 3.1.2

Objective 3: Water Resources

3.2 WATER QUALITY

Conformance Evidence

Field Scout Cards
2025 Tomato Harvest Crew Training Records Sign-In Sheet
2024 Training Slide Decks and Sign-In Sheet

Auditor Notes

- Farm managers, agronomists, and field scouts record scouting observations on field scouting cards, which are submitted to the agronomy team at the end of each day. The agronomist reviews the findings to evaluate the need for any treatments or interventions.
- Sulfuric acid is applied to irrigation water to lower pH, helping fertilizers remain in solution.
- Farm teams manage total dissolved solids (TDS) in irrigation systems, which can become an issue as the season progresses and water is recirculated. Sand filters are recharged annually with new sand media to manage TDS levels.
- JGBC sites evaluate irrigation systems at least annually to monitor irrigation pressure and ensure optimal performance.
- JGBC's in-house laboratory staff monitors water quality weekly. Samples are collected from surface water and soil pits.
- There are no riparian or wetland areas near the sites visited.
- Spill prevention, containment, and clean-up protocols are included in annual training.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			3.2.1 3.2.2

Objective 4: Crop Protection

4.1 INTEGRATED PEST MANAGEMENT

Conformance Evidence
JGBC Crop Protection Program
Safflower Crop Profile
Field Scouting Card
JGBC Crop Protection Program

Auditor Notes

- JGBC field scouts are trained using University of California (UC) IPM resources. Scouts begin monitoring during planting to assess plant health and guide spot or whole-block treatments.
- JGBC's Crop Protection Program describes components of its pest management, including the influence of safflower in crop rotations regarding pest management. Due to safflower's early emergence, it serves as a trap crop by the time tomatoes emerge. JGBC worked with UC extension specialists to develop the safflower crop profile.
- The Crop Protection Program also describes sanitation practices and credentials of JGBC employees, including 21 PCAs.
- The safflower crop profile was developed for California safflower production with involvement from the California Department of Pesticide Regulation, PCAs, apiculturists, and UC extension specialists, and is now archived in the Western IPM Center, which is a project awarded by the United States Department of Agriculture's National Institute of Food and Agriculture.
- Beet leafhoppers are the primary pest of concern, with occasional pressure from stink bugs, cabbage loopers, and beet armyworms. The beet leafhopper program is led by an internal JGBC employee with a strong entomology background.
- JGBC uses trapping when gophers become an issue.
- Field scouts use scouting cards, in-field observations, and sticky traps to support pest monitoring, Plants that exhibit symptoms of particular viruses, such as beet curly top virus (BCTV), are submitted for testing through California Department of Food and Agriculture (CDFA) laboratories.
- JGBC has participated in the CDFA's BCTV Program since the early 2000s. Whole-plant samples are collected, and regional results are tracked via cooperative weekly reports.
- JGBC follows UC Davis IPM guidelines to set thresholds, with adjustments made based on site-specific needs or crop varieties.
- The system using field scouting cards is widely adopted and considered highly reliable by farm managers and staff. The cards document identified pests, their locations, and counts. Although the format is simple, the system's value lies in its consistent use. Cards are completed regularly, cataloged annually, and retained for future reference and review.
- JGBC could revise scouting cards to include the crop type in the heading. Auditor noted scouts were writing in crop type. This addition could support field scouts.
- JGBC bases mitigation strategies on scouting data.
- JGBC addresses fungal diseases including powdery mildew and black mold by opening vine canopies or sulfur and fungicide applications.

Objective 4: Crop Protection *(Continued)*

4.1 INTEGRATED PEST MANAGEMENT

Auditor Notes

- Third-party applicators conduct ground and aerial spray applications during ideal spray conditions. JGBC's internal agronomists and farm managers make chemical selections.
- JGBC uses farm management and compliance software such as Agrian and Tellus to prepare recommendations based on evidence recorded on field scouting cards. Effective mitigation measures are documented.
- JGBC records aerial applications with geotags using global positioning systems (GPS). Applications are routinely evaluated to ensure sprays are accurately conducted according to plan.
- Agronomists are required to hold professional certifications and licenses such as PCAs, Qualified Applicator Licenses, or Pesticide Applicator Licenses. Some agronomists are also CCAs. PCA licensure or the ability to obtain a license shortly after hiring is a prerequisite for the agronomy positions.
- JGBC has developed specialized equipment to mitigate the presence of the parasitic weed, dodder. The tool is only able to be used in safflower production, but it provides benefits to subsequent tomato crop rotations by reducing the amount of harmful and persistent dodder in the field. If dodder is left unchecked, it could lead to crop loss.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
				4.1.1	4.1.1	4.1.2 4.1.3

Objective 4: Crop Protection

4.2 CROP PROTECTANT MANAGEMENT

Conformance Evidence

Worker Protection Safety Training Slide Deck
JGBC Crop Protection Program

Auditor Notes

- Third-party custom applicators conduct all spray applications via aerial or ground methods. No spray materials are stored on farm sites.
- Agronomists distribute spray application maps to all farm crew members, and maps are also posted at the main shop.
- JGBC ranches have established a system to post field information. A notification bag is placed at treated fields to restrict entry after crop applications to support field safety. Fields remain closed until the agronomist removes the posting, indicating safe re-entry.
- JGBC holds an annual meeting with a meteorologist to address spray drift mitigation. The meteorologist conducts a presentation to discuss weather data relevant to application planning.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						4.2.1

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
Work Order Details
Pre-Shift Tractor Inspection Record

Auditor Notes

- Farms are close to processing plants, reducing the mileage and subsequent fuel emissions needed to transport harvested crops to plants.
- JGBC tests Irrigation pump efficiency at least once per season to monitor system performance.
- JGBC's maintenance crew oversees the preventative maintenance schedule for all equipment. JGBC provided historic work orders for a tractor which documents repairs and maintenance.
- JGBC tractor operators complete pre-shift inspections of equipment to ensure optimal operating efficiency and safety.
- No renewable energy generation opportunities are located on the farm sites visited.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						5.1.1 5.1.2

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

5.2 AIR QUALITY

Conformance Evidence
Energy Use, Air Quality, and Climate Change Policy

Auditor Notes

- JGBC's maintenance shops are working to update equipment to ensure engines meet upcoming state regulations regarding emissions.
- JGBC maintenance staff experiment with new equipment to enable tractors to make fewer field passes.
- JGBC delivery trucks use natural gas, which emit less particulate matter compared to diesel vehicles
- JGBC controls airborne dust by regularly watering the roads. Internal staff operate water-pulling tractors. Crews focus on high-traffic areas.
- Sites have speed limit signs posted to support dust mitigation.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						5.2.1 5.2.2

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

5.3 CLIMATE-SMART AGRICULTURE

Conformance Evidence
JGBC Energy Use, Air Quality, and Climate Change Policy Written Plan

Auditor Notes

- Farm managers use low tillage practices to reduce soil disturbances and increase soil organic carbon.
- JGBC's farm team frequently evaluates opportunities to implement new equipment or improve on existing equipment with the goal to reduce passes and increase efficiency.
- JGBC uses custom-designed harvesters equipped with shredder attachments. The custom harvesters reduce fuel use and soil disturbance by eliminating the need for an additional field pass.
- JGBC uses precision agriculture technologies, including GPS-guided autopilot systems, nonchemical treatments, and informed drainage design to mitigate climate impacts.
- JGBC frequently develops or collaborates with manufacturers to produce customized equipment to support these initiatives.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						5.3.1 5.3.2

Objective 6: Waste and Material Management

6.1 MANAGEMENT OF WASTE AND OTHER MATERIALS

Conformance Evidence

Waste and Material Management - Ranching Operations
2024 Spill Prevention, Control and Countermeasure Plan
Feasible Alternatives Considered
Approved Pesticides List

Auditor Notes

- JGBC's Waste and Material Management Policy for its ranching operations states Good Agricultural Practices certifications support waste and agricultural material management. Hazardous material communications plans and spill prevention, control, and countermeasure (SPCC) plans are maintained for each site.
- JGBC sites bring trash to shop areas for proper disposal in dumpsters.
- Sites reuse irrigation tape for about four years prior to replacement. Field crews make sure not to mishandle the tape and damage it so it can be reused. Exhausted tape is sent for recycling.
- The farm team has developed a creative way to repurpose otherwise exhausted tires by converting them into safety markers. Tires are placed at key intersections, painted reflective yellow, and fitted with screw-in reflectors to improve visibility. Some markers also display field ID numbers, and the team is working to expand this identification system.
- JGBC retains and reuses materials whenever possible. Irrigation tubes, equipment, piping, and other items were observed in the storage yard for future repurpose.
- JGBC provided a document that outlines adopted practices that have a lower impact than conventional methods. JGBC uses organic and nonrestricted pesticides, hand-weeding, mowing, and other low-impact activities to reduce overall chemical reliance.
- JGBC maintains instructions for crews to access materials approved for tomato processing in an approved pesticides list.
- JGBC uses designated shop areas to store some regulated materials. The shop areas have 24-hour security present for added safety and surveillance. Designated personnel is assigned to dispense chemicals for field crews at the shop areas.
- Auditor observed proper labeling and secondary storage for some regulated materials present (diesel and chlorine). An SPCC plan is in place and reviewed every five years. The plan contains detailed information about proper handling of regulated materials.
- Districts visited use third-party applicators for spray applications. Materials are brought onto farm sites as needed for immediate use.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
					6.1.2	6.1.1 6.1.3

Objective 6: Waste and Material Management

6.2 FOOD AND AGRICULTURAL WASTE RESOURCE RECOVERY

Conformance Evidence
Sustainability Report

Auditor Notes

- JGBC leverages its closed-loop system, internally farming and processing tomatoes. Tomatoes are transported field-to-plant immediately after harvest for processing, eliminating the need for on-farm storage. Delivery schedules are coordinated between plant operations and farm managers to optimize harvest efficiency. JGBC's Sustainability Report shares that tomatoes are often processed within four hours of harvest.
- JGBC reported that only one field needed replanting due to some hail damage this year.
- JGBC incorporates all crop residue into the field during the mechanical harvest.
- JBGC's tomato byproduct is sold to haulers for cattle feed or pet feed. No organic waste is sent to landfills.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						6.2.1 6.2.2

Objective 7: Conservation of Biodiversity

7.1 SPECIES PROTECTION

Conformance Evidence

Conservation of Biodiversity Plan
Prescribe database search example screenshot
List of feasible alternative practices
Approved Pesticides List

Auditor Notes

- The JGBC conservation of biodiversity plan states that the federal and state designation of protected species in the growing region is monitored. JGBC uses a database from the California Department of Pesticide Regulation (CDPR) that will identify threatened, endangered, and at-risk species when certain chemicals are applied.
- PCAs must reference the pesticide use limitations using the CDPR database.
- JGBC provided an example of a search result that would cause species of concern to populate in relation to a particular pesticide selection using the "Prescribe" website from the CDPR for monitoring.
- Referring to the CDPR database is an effective practice to determine if pesticides may have a negative impact on threatened and endangered species, but does not extend awareness of threatened and endangered species beyond the context of conducting applications.
- The Tulare Lake Drainage District borders a JGBC ranch. The district maintains a series of large ponds to fulfill an agreement with the State Water Resources Control Board and DFW to provide habitat for two bird species of concern.
- JGBC's Environmental Regulatory Department Manager tracks information provided by the Environmental Protection Agency based on environmental surveys and maintains regular communication with local agricultural commissioners and DFW, who would provide notifications if needed. Survey results were not provided for auditor review.
- DFW, CDPR, and State Water Resources Control Board frequently visit the area due to recreational fishing in canals near the farms. However, it is unclear how this information from these efforts is communicated to farm managers or what research has been conducted. Documentation demonstrating monitoring activities and communication process was not provided for auditor review.
- JGBC's list of alternatives considered includes habitat modification or preservation to limit impacts on biodiversity.
- JGBC maintains lists of approved products for tomato crops. Organic and selective chemicals are used whenever feasible.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
			7.1.1 7.1.2			

Objective 7: Conservation of Biodiversity

7.2 WILDLIFE HABITAT CONSERVATION

Conformance Evidence
Management Interview

Auditor Notes

- JGBC creates site maps outlining production and nonproduction areas.
- Site visited is longtime farmland and JGBC is not aware of any ecologically important sites in the region of farm sites, other than the Tulare Drainage District.
- There are no natural wetland, grassland, or forests near the farm sites visited. Sites remain unfenced, allowing for passing of animals.
- The Tulare Lake Drainage District, near the Corcoran ranch sites, is monitored for two bird species in agreement with the State Water Resources Control Board and DFW and bird surveys are conducted annually.

	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
RESULT	PREVIOUS	MAJOR	MINOR			
				7.2.3		7.2.1 7.2.2

Objective 7: Conservation of Biodiversity

7.3 AVOIDED CONVERSION

Conformance Evidence
J.G. Boswell Company Deforestation Policy

Auditor Notes

- Farm sites are long-time farmland areas, some in production for about 100 years.
- Crop rotation is used as an alternative to having to "rest" the soil.
- A policy was developed following the 2024 audit. The policy outlines some of the history of the region where JGBC land is situated and notes the company's "commitment to zero deforestation by avoiding any future purchases of deforested land."

	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
RESULT	PREVIOUS	MAJOR	MINOR			
						7.3.1 7.3.2a 7.3.2b

Objective 7: Conservation of Biodiversity

7.4 CROP DIVERSITY

Conformance Evidence
Conservation of Biodiversity
Safflower Crop Profile

Auditor Notes

- Crop rotation at the sites visited includes tomatoes, safflower, and cotton.
- JGBC relies on historical knowledge of the sites to determine appropriate rotations. JGBC provided the safflower crop profile supported by the Western IPM Center which describes some benefits of safflower in crop rotations. Water usage and soil health are key factors in developing the rotation schedule.
- The farm team prioritizes long-term soil productivity, accepting potential short-term yield reductions to maintain soil health.
- Crop varieties are carefully selected for resistance to regional pests.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						7.4.1

Objective 8: Protection of Special Sites

8.1 SITE PROTECTION

Conformance Evidence
Protection of Special Sites
Tulamniu Site Historical Marker

Auditor Notes

- JGBC uses existing heritage data in identifying and selecting special sites. There are no special sites near the farms visited.
- JGBC provided a description of special sites on the southwest border of one of its ranches. An historical marker identifies a Yokuts village. The Smithsonian excavated the site in the 1930s. The site has never been farmed. Construction for the State Water Project in the 1960s impacted the area west of the marker.
- 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.
- JGBC provided information from the California State Parks website and the Historical Marker Database regarding the Tulamniu Site historical marker. The information includes a map, site photos, and photos of the marker itself, and demonstrates JGBC's historical awareness.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						8.1.1 8.1.2

Objective 9: Local Communities

9.1 ECONOMIC WELL-BEING

Conformance Evidence
Management Interview

Auditor Notes

- Retailers and vendors JGBC works with are local, located well within a 300 mile radius of the farms.
- District Managers typically use the same contractors each year, providing a benefit because repeat crew members who return have familiarity with operations and equipment.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						9.1.1

Objective 9: Local Communities

9.2 COMMUNITY RELATIONS

Conformance Evidence
FFA Honorary Chapter Degree
2024 Foundation Giving Recap

Auditor Notes

- JGBC's Foundation Giving Recap outlines contributions JGBC made in 2024. The James G. Boswell Foundation made several notable contributions to agricultural, healthcare, education, and environmental organizations. JGBC made a $3M donation to Valley Children's Hospital, located in Madera.
- JGBC offers employee wellness benefits and runs challenges. Challenges are established per department to encourage employee participation.
- JGBC offers a highly competitive Boswell Scholarship, covering four years of college tuition for two Corcoran High School students.
- Some scholarship recipients and many interns have returned to the JGBC company to become full-time employees.
- A JGBC foreman was awarded the Corcoran FFA Honorary Chapter Degree for his outstanding voluntary contributions to the local FFA organization.
- JBCG regularly donates time by allowing employees to assist the local high school students on the student farm in efforts to facilitate a thriving FFA program.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
					9.2.1	

Objective 9: Local Communities

9.3 RIGHTS OF LOCAL COMMUNITIES AND INDIGENOUS PEOPLES

Conformance Evidence
Local Communities Statement - Ranching Operations
Social Responsibility Policy

Auditor Notes

- A reservation is located approximately 30 miles away; however, employees reported no regular interactions. As JGBC has not acquired new land in recent years and has no plans for future acquisitions, assessments have not been conducted.
- JGBC provided a statement on local communities that contains a commitment to recognize and respect the rights of local communities and Indigenous Peoples.
- The statement could be strengthened by including SOPs regarding how requests from Indigenous People regarding land access or other inquiries are addressed and identifying responsible management staff.
- JGBC's Social Responsibility Policy does not include language regarding Indigenous Peoples or land tenure rights. JGBC's legal department is willling to review policies and has requested a definition of land tenure rights from the scheme owner (Leading Harvest).
- During their initial certification, JGBC management described a time when they were approached by the Tejon and Chumash, who requested access to the land to perform a ceremony. JGBC was receptive to these requests and granted access.
- JGBC could further strengthen its demonstration of conformance by documenting interactions with local Indigenous Peoples, developing a procedure that describes how inquiries from Indigenous Peoples are received, or conducting a cultural assessment that demonstrates awareness of Indigenous Peoples within their region and their cultural interests.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
				9.3.1 9.3.2		9.3.3

Objective 9: Local Communities

9.4 PUBLIC HEALTH

Conformance Evidence

Training Record Slide Deck and Attendance Sheet
Worker Protection Standard Training

Auditor Notes

- JGBC uses surveillance and has security measures in key areas to deter trespassing. Key areas include where supplies and regulated materials are stored.
- JGBC only applies chemicals during ideal conditions to avoid drift and keep the public safe.
- JGBC maintains safety records.
- JGBC provides Worker Protection Standard (WPS) training to employees.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						9.4.1

Objective 10: Personnel and Farm Labor

10.1 SAFE AND RESPECTFUL WORKING ENVIRONMENT

Conformance Evidence
JGBC 2025 Employee Handbook
Personnel and Farm Labor - Ranching Operations

Auditor Notes

- JGBC maintains an equal employment opportunity statement in its Employee Handbook.
- JGBC employees receive annual training. Attendance records and sign-in sheets are maintained. Discrimination and gender equity training is included in required annual training.
- JGBC assigns Safety Leaders for each team to monitor for safety compliance, provide feedback, and train.
- Employee Handbooks contain anti-discrimination and harassment policies, including racial, gender, sexual orientation, and veteran status protections.
- Employees are required to report injuries to the closest available supervisor as soon as possible.
- JGBC's Personnel and Farm Labor - Ranching Operations document outlines its onboarding plans for new employees that support worker health and safety. In addition to onboarding training, employees are provided with mental health services, employee health benefits, wellness challenges, annual health and wellness fairs, access to a confidential whistleblower hotline, financial health services, and addiction support services.
- JGBC provides company vehicles for field scouts to use so employees have reliable and air-conditioned vehicles during job tasks.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						10.1.1 10.1.2

Objective 10: Personnel and Farm Labor

10.2 OCCUPATIONAL TRAINING

Conformance Evidence

2024 Spill Prevention, Control, and Countermeasure Plan
Training Record Slide Deck and Attendance Sheet
2025 Tomato Harvest Crew Training Slide Deck
VP Safety Suggestion Winners Announcement

Auditor Notes

- All employees receive annual WPS training. Safety training is primarily conducted in-house, with specialty training provided as needed.
- District managers emphasize the importance of tracking safety metrics, including near-miss incidents and trends. The District Manager interviewed has requested forklift certification for staff.
- JGBC uses stand-down trainings, where work is temporarily paused to discuss potential job hazards. Lockout/tagout procedures are in place to ensure worker safety. Disciplinary actions have been taken when accidents occurred.
- JGBC has a safety incentive program in place, with suggestion boxes located in every district. The "VP Award" is given for the best safety suggestion, offering either a cash prize or a trip. Crew member suggestions regularly lead to safety improvements, including equipment modifications. Suggestions may also be submitted anonymously.
- Annual harvest safety training references employee training on the injury and illness prevention plan and includes details regarding application materials and accidental exposure protocols, pesticide safety, and personal protective equipment. Additional training includes rattlesnake safety.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
					10.2.1	

Objective 10: Personnel and Farm Labor

10.3 SUPPORTING CAPACITY FOR SUSTAINABILITY

Conformance Evidence
Sustainability Policy Statement
Organizational Chart
Continued Education in Leading Harvest

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 provided its Sustainability Policy which expresses a commitment to sustainable farming.
- Staff interviewed demonstrate an understanding of the LHFMS. JGBC provided its organizational chart for ranching operations.
- JGBC frequently conducts training on various topics related to sustainability from an operational perspective. Training is not classified as sustainability.
- JGBC participated in the 2024 Leading Harvest Summit and hosted a site visit tour for Leading Harvest staff and partners.

	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
RESULT						10.3.1 10.3.2 10.3.3

Objective 10: Personnel and Farm Labor

10.4 COMPENSATION

Conformance Evidence
Management Interview

Auditor Notes

- JGBC conducts annual reviews of compensation ranges. Every other year, a third party conducts additional reviews of compensation structures.
- JGBC could provide copies of wage scales or wage assessments to support conformance demonstration.

	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
RESULT				10.4.1		

Objective 10: Personnel and Farm Labor

10.5 FARM LABOR

Conformance Evidence
Training Records for External Employees and Farm Labor Contractors

Auditor Notes

- District managers typically use the same contractors each year, providing a benefit because repeat crew members who return have familiarity with operations and equipment.
- JGBC provided slide decks and training records to support external employes and farm labor contractor (FLC) employees. Training topics include hazard communication and SPCC procedures.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
						10.5.1

Objective 11: Legal and Regulatory Compliance

11.1 LEGAL COMPLIANCE

Conformance Evidence

Social Responsibility Statement
Legal and Regulatory Compliance Policy
Employee Handbook
Boswell Bee 2025 Q3 Newsletter
Employee Status Report Template

Auditor Notes

- JGBC has issued "Know Your Rights" information and statements to use with Immigration and Customs Enforcemnt (ICE) agents, police, or law enforcement officers to employees via the Boswell Bee Quarterly newsletter.
- JGBC's Employee Handbook contains relevant policies. Handbooks are developed for hourly and salaried employees.
- JGBC's human resources (HR) team provides employment legal counsel.
- HR representatives are located at all regional sites, and a safety department representative is assigned to both the ranch and plant offices.
- JGBC's legal and regulatory compliance SOP identifies regulatory agencies. JGBC complies with reporting and schedules inspections related to governing agencies and regulatory bodies.
- JGBC's Legal and Regulatory Compliance Policy states it trains staff extensively on regulatory updates.
- Sites visited have current Occupational Safety and Health Administration (OSHA) and other regulatory posters posted.
- JGBC uses employee status reports (ESRs) to document work events, including disciplinary action taken in response to a safety or compliance violation.

	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
RESULT						11.1.1 11.1.2 11.1.3

Objective 11: Legal and Regulatory Compliance

11.2 LEGAL COMPLIANCE POLICIES

Conformance Evidence
Social Responsibility Statement

Auditor Notes

- JGBC's Social Responsibility Statement contains commitments to the Ethical Trading Initiative Base Code. JGBC agrees to comply with all applicable laws and regulations.
- The statement also says JGBC will not use forced labor under any circumstances, engage in human trafficking, and clarifies employees' rights to freedom of association and collective bargaining.

	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
RESULT						11.2.1 11.2.2 11.2.3*

**Indicator 11.2.3 is not applicable to directly operated properties.*

Objective 12: Management Review and Continual Improvement

12.1 FARM REVIEW AND CONTINUAL IMPROVEMENT

Conformance Evidence

Employee Status Report Template
Employee Performance Evaluation Form
SMART Goal Review Template
Farm Synopsis Spreadsheets
Management Review and Continual Improvement

Auditor Notes

- Farm Managers rely on the ESR process for evaluations and corrective actions. ESRs are also used to document performance issues, set follow-up dates, and initiate performance improvement plans for skilled workers (typically structured at 30-, 60-, and 90-day intervals).
- Positive performance is incentivized through ESR recognition, safety-related gift cards, and, when appropriate, merit-based wage increases.
- JGBC requires requests to be submitted to the company president for salary increases, which are not tied to a fixed schedule or cost-of-living adjustments.
- Farm Managers encourage continuing education. Staff attend programs such as the California Weed Science Society in Santa Barbara and Monterey.
- JGBC provides flexible work schedules for employees pursuing education. A Field Scout interviewed advanced to a Farm Manager role after completing a Master's degree in Occupational Health and Safety.
- Farm Managers must perform based on yield and overall performance. Some employee performance reviews are conducted on a set schedule. Shop employees receive annual safety reviews.
- JGBC's risk assessment department oversees the annual review of all contractors including FLCs and contracted spray companies. Vendors know that they must be able to meet the requirements to do business with the JGBC properties. One FLC is assigned to Corcoran tomatoes.
- JGBC's Farm Synopsis Spreadsheets provide a clear format to display historic management practices and treatments.
- JGBC conducts an agronomic seminar annually. Internal teams present trial results and share proprietary information.
- JGBC also develops new equipment, either in-house or in collaboration with vendors, to improve efficiency and reduce labor demands. One example is a robotic arm pipe mover, designed to minimize physical strain and streamline the movement of irrigation pipe both in the field and in the shop yard.
- JGBC has a variety of programs available to employees that support continuing education and learning opportunities. Examples include tuition reimbursement, in-house research and partnerships with UC cooperative extensions, management develop, shop training, and more. Programs are listed in JGBC's Management Review and Continual Improvement SOP.

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

12.1 FARM REVIEW AND CONTINUAL IMPROVEMENT

Auditor Notes

- JGBC's management review and continual improvement document outlines its SOP that states it has established a sustainability committee to support Leading Harvest standard conformance and other sustainability and regulatory requirements.

	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
RESULT						12.1.1 12.1.2 12.1.3 12.1.4

Objective 12: Management Review and Continual Improvement

12.2 SUPPORT FOR SUSTAINABLE AGRICULTURE

Conformance Evidence

Safflower Crop Profile
Management Review and Continual Improvement
2024 Foundation Giving Recap

Auditor Notes

- JGBC has a history of partnerships with universities including UC to support the development of agronomic practices that benefit the tomato industry. JGBC is a supporting partner of the Safflower Crop Profile developed by the Western IPM Center.
- JGBC identifies additional research opportunities they support in its management review and continual improvement SOP.
- JGBC has financially contributed to several agricultural organizations. Recipients include the California Ag Leadership Foundation and the College of Sequoias Technology and Trades Department, to sponsor a "Mechanized Ag" summer program that focuses on providing hands-on experience in hydraulics, electrical technology, engines, and emissions systems.

	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
RESULT						12.2.1

CONCLUSION

Results of the audit show that JGBC has a management system that continues to meet the requirements of, and is in conformance with, LH FMS 2020. JGBC's enrolled acreage is recommended for continued certification after the provision, approval, and acceptance of corrective actions related to minor nonconformances.

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 LH FMS 2020 must be substantiated by a current, valid certification by a certification body recognized by Leading Harvest.

The Leading Harvest logo cannot be used on product labels. The use of the Averum logo is not allowed without express permission from Averum.

SPECIFIC FOCUS AREAS FOR NEXT AUDIT

Key focus areas for JGBC's second surveillance audit will include performance measure: 7.1 Species Protection.