



# Morning Star Packing Company

Los Banos, CA

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

March 13, 2026



## EXECUTIVE SUMMARY

**Morning Star Packing Company**

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**Certification Date:**

6/28/2023

**Recertification Due Date:**

6/28/2026

**Certification ID Number:**

AVERUM-LHFMS-2023-0008

***Morning Star's management system has demonstrated continuing conformance to the Leading Harvest Farmland Management Standard (LH FMS).***

***Morning Star does not own nor directly operate production sites. In past audits, Morning Star has relied on other certification and sustainability programs to provide information on sites that is not normally collected. On sites that are not involved in these other programs, collecting evidence can be duplicative and time consuming. As less support programs are able to be considered, Morning Star will be required to develop additional policies and construct a stand alone body of evidence that will support continued enrollment in the Leading Harvest Farmland Management Standard.***

***However, challenges at the management system level regarding on farm documentation should not be misconstrued to be a reflection of the quality of the production sites and farms visited during the audit. The properties the audit team visited were well managed, and Morning Star has demonstrated a clear commitment to support agricultural research and efficiency on sites. It was made obvious to the audit team that Morning Star values their relationships with their growers and provides multiple resources to assist and inform growers on efficient management practices.***

***To remain in good standing with the LH FMS, Morning Star is due to have their recertification completed by June 28, 2026. Given the short amount of time before recertification is due, Morning Star may consider either continuing the certification cycle as planned, or request a new certification cycle, depending on the timing required for corrective actions to be completed and implemented.***

**TEAM LEADER RECOMMENDATIONS**

**Audit Dates:** 10/9/2025 – 03/06/2025

**Corrective Action Plan(s) Accepted:** Yes

**Date:** March 6, 2026

**Follow-Up Visit Needed:** No

**Date:** March 9, 2026

**All NCR Closed:** Yes

**Date:** March 6, 2026

**Proceed to/Continue Certification:** Yes

**Date:** March 9, 2026

**AUDIT STAFF**

**Lead Auditor:**

Matt Armstrong

**Audit Team Members:**

Hannah Schiek, Linnea Abel, Holly Salisbury

**AUDIT SCOPE**

**Standard(s) Within Scope:**

Leading Harvest Farmland Management Standard 2020

**Accreditations:** Approval by Leading Harvest to provide certification audits

**Number of Certificates:** 1

**Proposed Date for Next Audit Event:** May-June 2026

**Audit Report Distribution:** rrianda@morningstarco.com

### INTRODUCTION

This report summarizes the results of the 2025 audit conducted on Morning Star Packing Company's (Morning Star) managed production agriculture properties. The audit was overseen and concluded 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 Hannah Schiek, Field Auditor. Documentation reviews and management interviews were overseen by Linnea Abel, Senior 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 Morning Star to perform an audit of sustainability performance on 50,000-100,000 acres of managed agricultural operations and determine ongoing 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 the California regions. Objective 13 of the LH FMS was removed from the scope of our audit due to a lack of tenant operated operations.

10.3.1 was modified to accurately reflect Morning Star's motivation for certification. Indicator 10.3.1 was modified to read: "Standard users shall provide a written commitment to the Leading Harvest Standard prepared **either 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 organization, particularly to facility and farm managers."

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

Morning Star is a tomato processing and packing company in California, providing diced, sauced, stewed, paste, and other tomatoes for many consumer packaged goods brands. Independent supplier farms are responsible for day-to-day farmland management services for Morning Star. Morning Star initially achieved certification for 100 percent of its agricultural properties in 2023. In the 2025 audits, eight (8) sites in California were selected for site visits, with two (2) tomato suppliers included. Managers overseeing decision-making and standard compliance were contacted for evidence requests and interviews. The properties visited are a representative sample of current practices in place and management decision-making on supplier farms. The primary agricultural production on the sites is tomatoes.

**AUDIT PLAN**

Averum developed an Audit Plan which is maintained and on file. An online portal was established for Morning Star coordinators to upload evidence and documentation securely for auditor review. An Opening Meeting was held October 9, 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 October 14, 2025. A Closing Meeting was held November 21, 2025, where two (2) non-conformities were issued.

In accordance with ISO 17021-1 and Leading Harvest requirements, the audit was closed and Morning Star was temporarily suspended pending corrective actions. Corrective action plans were developed and put into place during early 2026 within agreed upon timeframes, and corrective action plans were determined to be effective and approved March 6, 2026. A post-closing review meeting was held on March 9, 2026, to confirm findings from reviews after the closing meeting and assess Morning Star's expectations for monitoring of previously identified nonconformances.

**Opening Meeting: Conference Call****10/9/2025****Attendees**

Morning Star:

Renee Rianda

Audit Team:

Matt Armstrong, Linnea Abel

**Topics**

The following topics were discussed and presented by Averum's Lead Auditor 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****11/21/2025****Attendees**

Morning Star:

Renee Rianda

Audit Team:

Linnea Abel, Hannah Schiek

**Topics**

The following topics were discussed and presented by Averum’s Lead Auditor during the Closing Meeting:

- Opening remarks
- Statement of confidentiality
- Closing summary
- Presentation of the audit conclusion
- Issuing of Major Nonconformances

**Post-closing Review: Conference Call**

3/6/2026

**Attendees**

Morning Star:

Renee Rianda

Audit Team:

Matt Armstrong

**Topics**

The following topics were discussed and presented by Averum’s Lead Auditor during the Closing Meeting:

- Updated status of the audit
- Statement of confidentiality
- Audit summaries
- Audit conclusions
- Major Nonconformance resolutions
- Minor Nonconformance resolutions
- Opportunities for Improvement (OFIs)
- Notable Practices
- Report timing and expectations

<b>Audit Time (Days)</b>	<b>Activity</b>	<b>Responsible</b>
1	Opening and Closing Meetings	Auditor, Lead Auditor, Team Leader
1.5	Management interview	Auditor
2	Site visits	Auditor
2	Engagement workpapers	Auditor
4	Evidence (document) review	Auditor
3	Audit Summary Report review and certification decision	Lead Auditor

**MULTI-SITE REQUIREMENTS**

Morning Star maintains operations on multiple supplier properties in California. Morning Star qualifies for multi-site sampling since the properties within the management system are treated as a single population and directed by regional management, with regular monitoring activities. Morning Star Management is responsible for interacting with certification and verification programs on behalf of supplier growers, collecting documentation, and developing corrective action plans regarding LH FMS conformance. Morning Star's current review and monitoring process is effective and ongoing.

Field visits and observations are conducted based on a sample of growers 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.

**AUDIT RESULTS**

Overall, Morning Star's agricultural operations conform to the objectives of the 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 observations and conformance with LH FMS requirements. Field visits were performed on eight (8) operating sites, with four (4) sites operated by Park Farming and four (4) operated by JAW GP. Farms visited had been harvested for the season, so water, field, and soil management were highlighted on sites. Management representatives and growers were present and interviewed to demonstrate Morning Star'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. Morning Star's management served as guides, were available throughout the engagement, provided logistic support, and provided responses to evidence requests.

**Region**

California represents 100% of all acreage. Growers are organized into four (4) subregions; North, South, North & South, and Organic.

**Crop**

Tomatoes

**Properties Examined During Engagement**

Eight (8) sites visited during audit, representing 5.3% of the total number of supplier sites. Grower regions included in site selections represent 50% of Morning Star's total.

**Sites Visited:**

- Field 22 (Park Farming - Organic)
- Field 4 (Park Farming - Organic)
- Field 35 (Park Farming - Organic)
- Field 38 (Park Farming - Organic)
- Moonbend (JAW GP - North)
- F2 (JAW GP - North)
- F3 (JAW GP - North)
- F545 (JAW GP - North)

**KEY FINDINGS**

FINDINGS IDENTIFIED DURING THE AUDIT	
PREVIOUS NONCONFORMANCE	One (1)
MAJOR NONCONFORMANCE	N/A
MINOR NONCONFORMANCE	N/A
OPPORTUNITIES FOR IMPROVEMENT	Six (6)
NOTABLE PRACTICES	Six (6)

**PREVIOUS NONCONFORMANCE**

**9.3.1 Local Community and Indigenous Peoples Policy:** Morning Star's Colleague Guidelines outlines conduct expectations and considers "Human Respect" a core principle. However, there are no provisions that specify expectations regarding a commitment to recognize and respect the treaty rights of Indigenous Peoples.

**MAJOR NONCONFORMANCE**

N/A

**MINOR NONCONFORMANCE**

N/A

**OPPORTUNITIES FOR IMPROVEMENT**

**5.1.1 - Energy Conservation:** Documentation regarding on-farm energy usage would be helpful in illustrating additional areas where energy may be conserved.

**7.1.2 - At-Risk Species:** Morning Star does not own or conduct due diligence on the sites where growers produce crops. There are potential protection strategies that could be implemented on sites. Morning Star may consider assessing opportunities for species protections on sites and building an inventory of potential species.

**10.3.2 - Employee Roles and Responsibilities for Sustainability:** As other certification programs expire and get cancelled, Morning Star could develop a conformance package of documentation that does not rely on other standards such as Unilever or FSA. Additional support for audits within Morning Star could also assist with demonstrating conformance in an efficient manner.

**10.5.1 - Farm Labor Monitoring Program:** Additional support documentation demonstrating Morning Star's research into FLC's would assist in demonstrating conformance to this indicator.

**12.1.1 - Performance Review:** Further documentation of the review processes and outcomes would assist in demonstrating conformance to this indicator.

**12.1.4 - Annual Review and Improvement:** As Unilever certifications expire and sunset, Morning Star should take the opportunity to prepare for Leading Harvest audits with direct evidence, as opposed to relying on documentation from other standards.

## NOTABLE PRACTICES

**2.1.2 - Soil Health Monitoring:** Auditors noted strong use of biological soil testing (specifically the Haney test), which reflects a system-based approach and more comprehensive soil health assessment.

**2.1.3 - Nutrient Management Program:** Auditors noted very high achievements in soil quality, demonstrated through multiple soil health aspects being measured in the "ideal" range in soil testing.

**4.1.2. - Crop Protection:** Auditors noted that due to efforts balancing factors that encourage beneficials and discourage pests, the organic farms have not applied herbicides, insecticides, pesticides, or nematodes on tomatoes destined for Morning Star.

**4.1.3. - Pest Control Practices:** Auditors noted extensive use of hedgerows not only as a non-chemical solution to pest control, but also in providing corridors for wildlife and improved soil structure.

**7.2.1 - Native Habitats and Natural Communities:** Organic sites featured extensive conservation efforts on sites. Restored areas of non-productive or difficult to farm areas are allowed to grow naturally and provide excellent habitats for biodiversity on sites, including birds, beneficial insects, and mammals.

**9.2.1 - Community Engagement:** Auditors noted extensive efforts to engage the local community in education around sustainable agriculture and serve several local organizations.

**KEY FINDINGS**

*(Continued)*

**MORNING STAR PACKING COMPANY**

LH FMS AUDIT SUMMARY REPORT

**REVIEW OF PREVIOUS AUDIT CYCLE**

N/A

## FINDINGS ORGANIZED BY PERFORMANCE MEASURE

The following are summarized findings organized by Leading Harvest Farmland Management Standard (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

Management and Grower Interviews  
 Tomato Growing Guide\_Morning Star\_2023  
 2023 TMSI Colleague Guidelines  
 2025 Park Organic Purchase Contract  
 JAW Farmland Stewardship Commitment

##### Auditor Notes

- Morning Star Colleague Guidelines provide a mission statement reading "Our Mission is to produce tomato products and services which consistently achieve the quality and service expectations of our customers in a cost effective, environmentally responsible manner."
- Morning Star's website provides additional mission statements that address environmental stewardship, overall company goals, and addresses resource efficiency.
- Morning Star has previously been audited and found in compliances with Unilever’s Sustainable Agriculture Code 2017 and the Sysco Sustainable/IPM | Sysco Sustainable/IPM v09.03 standards.
- Morning Star provides feedback and guidance to growers regarding sustainability and any site concerns.
- Field days and research presentations are hosted for growers to review results from trials.
- Morning Star prioritizes grower relationships through changing market conditions. Maintaining sustainability certifications and growing organic tomatoes is becoming more commonplace in the grower population.
- Morning Star focuses on increasing efficiency, yield, and decreasing inputs in relation to balancing cost and benefits associated with conservation and sustainability. The industry now provides a great deal of data to support sustainability efforts and initiatives.
- Morning Star supports farms with field preparation to create ideal growing conditions.
- Morning Star sources tomatoes from growers responsible for on-farm operations, including potential land use conversions. The state of California heavily regulates land use conversion. Parcels farmed by Morning Star growers have been in agriculture for decades.
- Morning Star created and published the Tomato Growing Guide to support new tomato growers.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	None	1.1.1
						1.1.2
						1.1.3

## Objective 1: Sustainable Agriculture Management

### 1.2 CRITICAL EXTERNAL FACTORS

#### Conformance Evidence

Management and Grower Interviews  
 Tomato Growing Guide\_Morning Star\_2023  
 2023 TMSI Colleague Guidelines  
 Park soil health parameters Prof. Gaudin 2025  
 Star Grower Initiative Agenda

#### Auditor Notes

- Growers work directly with advisers and consultants to ensure long-term profitability and sustainability of agricultural production.
- Morning Star includes grower advisers in strategy meetings to support meeting sustainability audit requirements and strategic information gathering on all sites.
- Growers and Morning Star management communicate regularly (especially during harvest) to discuss on-farm practices.
- Morning Star representatives monitor and inspect planting and harvesting operations.
- Morning Star hosts grower meetings where critical external factors are identified and discussed.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	None	1.2.1

**Objective 2: Soil Health and Conservation**

**2.1 SOIL HEALTH**

**Conformance Evidence**

Management and Grower Interviews  
Tomato Growing Guide\_Morning Star\_2023  
2025 Park Organic Purchase Contract  
25 JAW GP Purchase, Harvest, Broomrape  
Park letter explanation 02122026  
Park PFO Fields with CC and Fert 2025  
Park Prof Gaudin microbe analysis 2025  
Park soil health parameters Prof. Gaudin 2025  
JAW CCFS ResearchPDFreport\_pdf373-374  
JAW Nutrient Management Plan  
JAW PCA Recommended Nutrient Program  
JAW PDFreport\_pdf137-138  
JAW Ranch Systems Screen Shot

**Auditor Notes**

- Sites rotate crops with adviser guidance to support soil health and nutrient balance.
- Organic sites visited utilize cover crops for weed suppression and increased soil organic matter.
- Organic sites visited utilize locally sourced compost which is tested for moisture and nitrogen levels. Seaweed and microbes are also incorporated into the soil to support soil health.
- Sites reincorporate biomass into soil profiles, and crop residues are shredded and watered to speed up decomposition and benefits to nutrient density.
- Sites visited minimize soil disturbance by only operating tractors in furrows between beds of plants.
- Organic sites visited utilizes approximately 1,000 sheep to provide weed control and soil structure benefits.
- Organic sites visited engage in minimal tillage (only in the area of each bed for weed control), as well as making cover crop planting decisions based on what will require the least tillage.
- Sites visited regularly performs both chemical and biological soil testing, including the Haney test. Attention is given to micronutrients and mineral levels in addition to typical NPK.
- Sites have outside Professional Crop Advisers (PCAs) or internal Certified Crop Advisers (CCAs) who perform soil testing.
- Select growers monitor soil health through a holistic lens with multiple considerations, including Soil Structure, Pests, Yield, GHG reductions, conservation, and natural resource preservation. The Park Farming Soil Health System has been presented and illustrated to educate other growers and conservation groups.
- Morning Star growers maintain Soil Management and Conservation Plans on sites.
- Morning Star uses automated harvesters that measure resource input and output.
- State Water Resources Control Board requires the use of Nutrient Management Plans (NMPs) that justify which crops are grown, the nutrients needed for plant health, and nutrient replacements required.

**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

**MORNING STAR PACKING COMPANY**

LH FMS AUDIT SUMMARY REPORT

(Continued)

- NMPs start from the previous year’s removals and assess current need per crop selected. CCA's are employed to scout and inform NMPs.
- Growers visited record fertilizer used, the date, and at what rate application occurred.
- Amendments are applied based on upcoming crop to be planted and are tailored to crop needs to avoid excess application.
- Site visited checks compost applications and recommendations for appropriateness prior to application. Operators have applied less than recommendations in the past.
- Even with reduced applications, on the Park sites all soil health indicators are in the ideal or highly desirable range of results.
- Sites visited maintain formal Soil Health Plans that consider nutrient availability, soil type, soil organic matter (SOM), nutrient and site requirements of crops, as well as required water for crops.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	2.1.2 2.1.3	2.1.1 2.1.4

**Objective 2: Soil Health and Conservation**

**2.2 SOIL CONSERVATION**

**Conformance Evidence**

- Management and Grower Interviews
- Tomato Growing Guide\_Morning Star\_2023
- Park letter explanation 02122026
- Park PFO Fields with CC and Fert 2025
- Park Prof Gaudin microbe analysis 2025
- Park soil health parameters Prof. Gaudin 2025
- JAW CCFS ResearchPDFreport\_pdf373-374
- JAW Nutrient Management Plan
- JAW PCA Recommended Nutrient Program

**Auditor Notes**

- Sites visited reduce compaction by operating tractors only in furrows between beds of plants. Most tractors are equipped with GPS for efficient routing.
- Auditors noted no runoff or erosion issues on sites.
- Growers maintain a log of on-field operations.
- The State Water Resources Control Board requires NMPs on production sites.
- Sediment and Erosion Control Plans are on hand for sites identified with highly erodible lands (HEL).
- A visited site has reported salinization issues from rice fields of neighboring farms, which is mitigated by planting rice in those affected fields. No salinization issues are present on the tomato fields.
- Sites visited are long-term farmland.
- Sites maintain Soil Health Plans to maintain agricultural land.

(Continued)

- Crop rotations are planned to compliment previous cycles and avoid depletion on sites.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	None	2.2.1 2.2.2

**Objective 3: Water Resources**

**3.1 WATER USE**

**Conformance Evidence**

- Management and Grower Interviews
- Tomato Growing Guide\_Morning Star\_2023
- JAW Ranch Systems Screen Shot
- JAW Midseason Apollo Report
- Water use records
- Star Grower Initiative Agenda
- MS ad Gradient Services

**Auditor Notes**

- Water use is dependent on crop requirements, evapotranspiration (ET) rates, and weather.
- Morning Star management provides general guidance on water allocations. Actual allocations are determined with irrigation consultants and the state of CA.
- Sites visited plant cover crops to retain soil moisture and increase infiltration using crop rotations.
- Sites visited engage in furrow irrigation and composting, which allows water to hold in soil through the winter and enables grower to stop irrigating 40 days before harvest.
- Sites visited extensively use drip line irrigation to conserve water.
- Sites visited rely on a combination of wells, surface water, and canals. Many pumps are equipped with variable frequency drives which allow motors to turn on slowly, thus preventing overwatering.
- End of season is determined by rainfall and conditions on sites. Water is cut 30-45 days prior to harvest.
- Reported annual water withdrawal on sites visited in 2026 is within tolerances set by Morning Star's provided guidance.
- Morning Star growers approach water management in alignment with requirements for efficient water use, tailor water use to crop needs, and consider environmental factors including salinization and pollution.
- Sites maintain Irrigation Management Plans that optimize crop productivity and water use efficiency.
- Weather conditions on sites influence irrigation planning. Years with timely rainfall after transplanting helped to offset 1-2 irrigations.

**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

**MORNING STAR PACKING COMPANY**

LH FMS AUDIT SUMMARY REPORT

(Continued)

- Site visited has an irrigation system that can be monitored through a mobile app, allowing for continual oversight of water pressure and control over usage.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
None	None	None	None	None	None	3.1.1 3.1.2 3.1.3

**Objective 3: Water Resources**

**3.2 WATER QUALITY**

**Conformance Evidence**

- Management and Grower Interviews
- Tomato Growing Guide\_Morning Star\_2023
- JAW Ranch Systems Screen Shot
- JAW Midseason Apollo Report
- Park PFO Fields with CC and Fert 2025
- Park letter explanation 02122026

**Auditor Notes**

- Sites visited are scouted either daily or five times per week by either internal staff or PCAs.
- Sites visited consult with PCAs regularly on necessary applications and other pest control measures.
- Site visited maintains records of NMP and soil samples, which are made available to Morning Star.
- Growers with organic purchase contracts maintain organic certifications.
- Sites visited have water quality regularly tested by PCAs and use acid injection to adjust pH levels.
- Organic sites have UC Davis test water quality to monitor the effects of compost usage on nitrogen levels in the water.
- Water is sourced from a mix of ground and surface water and applied via either drip line irrigation or furrow irrigation.
- Drip irrigation prevents run off and excessive applications of water.
- Furrow irrigation is carried out in areas with native planted ditches and waterways for collection and recharge.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
None	None	None	None	None	None	3.2.1 3.2.2

**Objective 4: Crop Protection**

**4.1 INTEGRATED PEST MANAGEMENT**

**Conformance Evidence**

Management and Grower Interviews  
 Tomato Growing Guide\_Morning Star\_2023  
 Park PFO Fields with CC and Fert 2025  
 Park letter explanation 02122026  
 Star Grower Initiative Agenda

**Auditor Notes**

- Sites visited are scouted either daily or five times per week by either internal staff or external PCAs for weeds and other pests.
- Grower is currently testing prevention techniques for viruses that impact tomatoes.
- Sites regularly consult with external PCAs to develop Integrated Pest Management (IMP) plans.
- PCA will determine thresholds when pests and diseases are identified. Growers use recommended guidelines from UC Davis Extension.
- Due to efforts balancing factors that encourage beneficials and discourage pests naturally, the organic farms have not applied herbicides, insecticides, pesticides, or nematodes on tomatoes destined for Morning Star.
- Organic sites visited use targeted tillage to address weeds while minimizing disruption to crops.
- Site visited utilizes finger weeders and weed electrocution to prevent the spread of weeds.
- Morning Star management provides opportunities for sharing best pest control practices during grower meetings.
- Sites engage in healthy crop rotation and use cover crops in order to prevent certain weed pests from becoming established.
- Site visited uses a non-toxic scented bar to deter mice from chewing on wiring of tractors used in operations.
- Site visited cultivates hedgerows which provide a distraction for pests that would otherwise feed on crops. Hedgerows serve as not only a non-chemical solution to pest control, but also improve soil structure and provide corridors for wildlife

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	4.1.2 4.1.3	4.1.1

**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

(Continued)

**MORNING STAR PACKING COMPANY**

LH FMS AUDIT SUMMARY REPORT

**Objective 4: Crop Protection**

**4.2 CROP PROTECTANT MANAGEMENT**

**Conformance Evidence**

Management and Grower Interviews  
Park PFO Fields with CC and Fert 2025  
JAW PCA Recommended Nutrient Program

**Auditor Notes**

- Spraying on sites visited is conducted by internal employees with the appropriate experience and credentials.
- Site visited coordinates spraying with the apiary in order to protect pollinators. Wind is monitored before spraying to avoid drift into surrounding fields and wetland/riparian areas.
- Sites visited post safety procedures at chemical tanks, and any staff that would be applying chemicals are properly trained by experienced employees.
- Sites store empty chemical containers in a designated area. Containers are triple rinsed, slashed, and are regularly collected by the city for recycle.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None			

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

**5.1 AGRICULTURAL ENERGY USE AND CONSERVATION**

**Conformance Evidence**

Management and Grower Interviews

**Auditor Notes**

- Site visited engages in furrow irrigation, which reduces the need for lift pumps.
- Organic site visited keeps tractors under 350 horsepower. Most tractors are Tier 4 and have modern efficient equipment.
- Tractors on sites are almost all equipped with GPS for efficient routing.
- Wells pumps on sites visited are equipped with soft start variable frequency drives (VFD) and run on propane pumps. Electric power is not viable at the field locations.
- Site visited maintains solar panels on top of a shop on their property.
- No other renewable power is generated on sample sites.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None			

(Continued)

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

**5.2 AIR QUALITY**

**Conformance Evidence**

Tomato Growing Guide\_Morning Star\_2023

**Auditor Notes**

- Site visited has invested in new tractors with advanced filtration systems.
- Growers noted there is zero tolerance for employees burning waste.
- Applicable equipment on sites is equipped with Tier 4 engines and DEF capabilities.
- Appropriately sized equipment with smaller engine sizes are selected for use on sites.
- No dust issues noted on sites visited, roads are paved or graveled.
- Wind blocks and hedgerows provide cover for wind events.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
None	None	None	None	None	None	5.2.1 5.2.2

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

**5.3 CLIMATE-SMART AGRICULTURE**

**Conformance Evidence**

Management and Grower Interviews  
Tomato Growing Guide\_Morning Star\_2023  
Park letter explanation 02122026

**Auditor Notes**

- Organic sites intentionally engage in multiple climate-smart ag practices. Cover crops and rotations are extensively implemented, residues are reincorporated to increase soil organic matter, and water management is designed to minimize withdrawal. Tillage has been reduced on many sites except for weed control when needed.
- Smaller appropriately sized equipment is used on sites, with Tier 4 engines and DEF where possible. Pumps are equipped with VFDs.
- Organics sites avoid additional passes by reducing the number of applications conducted every year and keeping weed control tillage to a minimum.
- Most tractors on sites visited have GPS to provide efficient routing.
- Morning Star regularly conducts research and trials on tomato varieties and shares findings with growers.
- Growers manage operations in response to regional climate impacts such as excessive rain in winter and spring, an overall lack of rainfall during the growing season, hail, and frost. Excessive heat can cause tomato growth to accelerate, which makes the fruit unusable for the diced tomato market. Product may still be used for tomato paste or sauces.

**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

**MORNING STAR PACKING COMPANY**

LH FMS AUDIT SUMMARY REPORT

(Continued)

- Growers use temperature sensors and weather monitoring systems to remain informed of potential weather damage. Morning Star management verifies and confirms reported crop loss so growers may claim crop insurance.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	None	5.3.1 5.3.2

**Objective 6: Waste and Material Management**

**6.1 MANAGEMENT OF WASTE AND OTHER MATERIALS**

**Conformance Evidence**

Management and Grower Interviews  
 Star Grower Initiative Agenda  
 MS Ad Gradient Services  
 Waste tracking records

**Auditor Notes**

- Growers take oil to recycling center as needed or is picked up once or twice a year.
- Growers hire an outside party to dispose of waste from portable bathrooms.
- Growers are contracted with a tire company that will pick up and dispose of tires.
- Site management regularly maintains existing equipment to mitigate the need to purchase new equipment.
- Sources of waste are categorized and tallied by Morning Star staff. Amounts of waste that are reused and recycled are measured and tracked separately.
- Recycling capabilities depend heavily on available programs in the county of operation.
- Site visited triple rinses chemical containers and stores them securely until they are picked up by city for recycling.
- Growers engage in a recycling program for drip tape.
- Site visited posts safety procedures at chemical tanks, and any staff that would be applying chemicals are properly trained by experienced employees.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	None	6.1.1 6.1.2 6.1.3

(Continued)

**Objective 6: Waste and Material Management**

**6.2 FOOD AND AGRICULTURAL WASTE RESOURCE RECOVERY**

**Conformance Evidence**

Management and Grower Interviews  
 Tomato Growing Guide\_Morning Star\_2023  
 Park letter explanation 02122026  
 Park Prof Gaudin microbe analysis 2025

**Auditor Notes**

- Morning Star maintains weekly communication with growers during harvest to monitor crop stages and schedule harvesting at the optimal time for each grower’s tomatoes, reducing rejects.
- Growers and Morning Star staff monitor harvests to observe and provide quality control. Morning Star has operational control over harvests and transportation. Once harvested, crops are transported directly from the field to the processing facility.
- Harvest procedures are designed and managed to prevent losses and deterioration of the quality of crops through effective and efficient field edge staging for transport, transportation schedules, and container filling.
- Morning Star uses a barcode system on packing bins to identify characteristics and timing of packed tomato paste.
- Morning Star incorporates green tomatoes into production so good tomatoes are not wasted.
- Morning Star will convert any harvested material unsuitable for production into animal feed.
- Morning Star will process organic tomatoes first. Any batch that fails quality standards will be redirected to the conventional line, reducing tomato waste.
- Growers reincorporate crop residue into the soil after harvest.
- Site visited utilized sheep to help graze cover crop fields, whose manure is reincorporated into the soil.
- Site visited uses locally sourced compost that has been tested to ensure safety and determine nutrient content.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	None	6.2.1 6.2.2

(Continued)

**Objective 7: Conservation of Biodiversity**

**7.1 SPECIES PROTECTION**

**Conformance Evidence**

Management and Grower Interviews  
ArcGIS maps  
Park letter explanation 02122026

**Auditor Notes**

- Morning Star management indicated no threatened and endangered species have been reported on sites.
- Growers on sites expressed knowledge of threatened and endangered species in general in California and were aware of what to remain vigilant for. However, Growers also indicated no known threatened or endangered species in the area of the sites. Additionally, Growers indicated no known at-risk species in the area of the sites.
- Auditor reviews of site locations with species of concern maps showed no reported occurrences on locations.
- Growers receive information regarding species of concern from county, Farm Bureau, and online resources.
- Grower sites have easements, conservation areas, and riparian areas. No organized efforts by Morning Star is conducted to assess protection strategies on sites in the case that occurrences are identified on sites.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	7.1.2	None	7.1.1

**Objective 7: Conservation of Biodiversity**

**7.2 WILDLIFE HABITAT CONSERVATION**

**Conformance Evidence**

Management and Grower Interviews  
Park letter explanation 02122026

**Auditor Notes**

- Organic growers maintain 40 acres of natural land and have not engaged in tree removal in over 50 years. Areas are planted with native species and left fallow over time.
- Site visited cultivates hedgerows between fields and riparian areas and streams. Areas are cultivated with the stated goal to maintain Native Habitats for biodiversity.
- No known farmland conversion was indicated on any sites visited.
- Organic growers consider beneficial crops for pollinators when deciding cover crop rotation.
- There is an apiary on select sites. California requires permitted grower operations to register locally and with the state, who also keep track of beehive locations.

**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

**MORNING STAR PACKING COMPANY**

LH FMS AUDIT SUMMARY REPORT

(Continued)

- Morning Star Manager is a member of California Association of Pest Control Advisers (CAPCA) and worked with counties to start and activate the Beewhere Program.
- CAPCA requires growers in the counties to participate in the Beewhere Program to mitigate negative impacts to pollinators. Program participants report pesticide use and post notices of intent to apply certain chemicals.
- Organic sites maintain ecologically important sites on borders, riparian areas, conservation areas, and other non-productive areas in manners that take advantage of their unique qualities.
- Water ways are not interfered with, slopes are not shaped or developed, and native growth is allowed to flourish on sites.
- Conservation areas provide substantial amounts of habitat for local wildlife. Growth is allowed to proceed unchecked, and areas are not mowed nor cleared for any reason.
- Site visited uses cover crops which provide temporary habitat to variety of species.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	7.2.1	7.2.2 7.2.3

**Objective 7: Conservation of Biodiversity**

**7.3 AVOIDED CONVERSION**

**Conformance Evidence**

Management and Grower Interviews

Unilever Diploma- Morning Star Growers - The Morning Star Packing Company - Expires 11112026

LoA Certificate 06132023 received- THE MORNING STAR

Global Forest Watch

**Auditor Notes**

- Organic sites visited has been farmland for over 100 years, and all land is leased by growers.
- Morning Star does not currently have a written policy reflecting a commitment to eliminating deforestation, as production sites are not located in areas with biome- or geography-specific deforestation protocols. Morning Star has pledged to develop a Deforestation Policy in the case that tomato production becomes located in a higher risk area or purchases land requiring due diligence.
- Production sites are delineated as agricultural land and not forested areas circa the Food Security Act of 1985.
- Morning Star remains certified to Unilever's Sustainable Agriculture Code 2017, including section 5.1 regarding Land Conversion. Additionally, Morning Star remains certified to the Farm Sustainability Assessment, scoring 97% Gold and 3% Silver.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	None	7.3.1 7.3.2

(Continued)

**Objective 7: Conservation of Biodiversity**

**7.4 CROP DIVERSITY**

**Conformance Evidence**

Management and Grower Interviews  
 Tomato Growing Guide\_Morning Star\_2023  
 JAW Farmland Stewardship Commitment  
 Park letter explanation 02122026  
 Star Initiative Agenda  
 Producer purchase contracts

**Auditor Notes**

- Growers grow multiple varieties in the field with varying characteristics such as yield and disease resistance.
- Morning Star has an internal research and development unit that conducts trials on countless tomato varieties with distinctive characteristics such as viscosity, pest and disease resistance, and yield.
- Results from variety trials are shared with growers at Morning Star's grower meetings.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None			

**Objective 8: Protection of Special Sites**

**8.1 SITE PROTECTION**

**Conformance Evidence**

Management and Grower Interviews  
 Unilever Diploma- Morning Star Growers - The Morning Star Packing Company - Expires 11112026  
 LoA Certificate 06132023 received- THE MORNING STAR

**Auditor Notes**

- Grower identified one historic site in the area of farms. A buffer area surrounds the site, and care is taken to not disturb the site when operating on the adjacent fields.
- FSA requires Management Systems to collect evidence for consideration regarding natural heritage data and expert advice in the management and identification of protected areas. Morning Star is currently certified to 97% Gold status and 3% Silver status.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None			

(Continued)

**Objective 9: Local Communities**

**9.1 ECONOMIC WELL-BEING**

**Conformance Evidence**

Management and Grower Interviews  
2023 TMSI Colleague Guidelines  
LoA Certificate 06132023 received- THE MORNING STAR

**Auditor Notes**

- Department heads handle compliance issues related to their business units. Operations addresses program or standard compliance and HR handles employer legal issues.
- Staff at production facilities and farms are hired from the local population. Morning Star is a significant opportunity provider in the Los Banos area.
- Morning Star also maintains non-agricultural production businesses in the region, such as hotels and Agri-tourism providers, which are also staffed with local workforces.
- Supplies and services are sourced from the local communities in the areas of operations or farms.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None			

**Objective 9: Local Communities**

**9.2 COMMUNITY RELATIONS**

**Conformance Evidence**

Management and Grower Interviews  
Commitment Statement by James Sherwood for Tribes 02122026  
2023 TMSI Colleague Guidelines

**Auditor Notes**

- Morning Star buys livestock from county fairs, supports the tomato festival, and provides training and demonstrations for camps and schools on tomato production.
- Morning Star employees provide donations and volunteer time with several local organizations. Morning Star donates to local sport teams, food banks, and hosts community events at grower farms.
- Morning Star's participation in numerous research projects supports and benefits the tomato industry.
- Morning Star supports conservation efforts and research through a UC Davis Century Farm.
- Grower provides tours of farm for local boy scout troops.
- Grower speaks at numerous conferences and partners with surrounding universities for farm tours. Grower is also a board member of the California Tomato Research Institute.
- Growers sets up community gardens for public to pick produce for free.

(Continued)

- Morning Star hosts an annual grower appreciation lunch for their growers.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None			

**Objective 9: Local Communities**

**9.3 RIGHTS OF LOCAL COMMUNITIES AND INDIGENOUS PEOPLES**

**Conformance Evidence**

Management and Grower Interviews

Commitment Statement by James Sherwood for Tribes 02122026

2023 TMSI Colleague Guidelines

**Auditor Notes**

- Morning Star's Colleague Guidelines outlines conduct expectations and considers "Human Respect" a core principle. Morning Star's Colleague Guidelines express that all people are equal.
- Morning Star management and legal departments have developed and issued a policy statement reflecting the company's commitment to local communities and recognizing the treaty rights of Indigenous Peoples.
- Morning Star sources tomatoes from employees of a local Indigenous population in the Capay Valley. Purchase contracts are in place with multiple local indigenous communities.
- Morning Star does not directly purchase or manage operating land themselves.
- In the case that Morning Star's central office receives a complaint, they would be directed to the Office Manager.
- Past complaints or concerns about growers have been at the local level and regarding vehicle safety during harvest (speeds, scrapes, collisions, etc.).

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	9.3.2	None	None			

**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

(Continued)

**MORNING STAR PACKING COMPANY**

LH FMS AUDIT SUMMARY REPORT

**Objective 9: Local Communities**

**9.4 PUBLIC HEALTH**

**Conformance Evidence**

Management and Grower Interviews  
2023 TMSI Colleague Guidelines

**Auditor Notes**

- Growers maintain employee contracts which includes general safety guidelines.
- Trespassing is rare in sites visited.
- Site visited coordinates spraying with the local apiary and monitors wind to avoid drift.
- Safe operating procedures are included in Morning Star's Colleague Guidelines

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None			

**Objective 10: Personnel and Farm Labor**

**10.1 SAFE AND RESPECTFUL WORKING ENVIRONMENT**

**Conformance Evidence**

Management and Grower Interviews  
2023 TMSI Colleague Guidelines

**Auditor Notes**

- Morning Star is an Equal Opportunity Employer. Approaches to Equal Opportunity Employment are well addressed in Morning Star Colleague Guidelines.
- Morning Star sites follow legal requirements relating to Pre-Harvest Intervals (PHI), or the minimum time between the last pesticide application and when the crop may be harvested as required by law.
- Morning Star and growers conduct training specific to their onsite staff.
- Morning Star has a full-time employee to manage and ensure health and safety and injury reporting compliance. During peak season, additional seasonal staff are hired to support employee health and safety.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None			

(Continued)

**Objective 10: Personnel and Farm Labor**

**10.2 OCCUPATIONAL TRAINING**

**Conformance Evidence**

Management and Grower Interviews  
Tomato Growing Guide\_Morning Star\_2023  
2023 TMSI Colleague Guidelines

**Auditor Notes**

- General training is conducted covering farm health and safety, safety procedures, use of machinery guards and emergency stops, and use of PPEs for all relevant workers.
- Employees involved in the application of agrochemicals are trained in proper procedures and appropriate usage of PPE.
- Colleague Guidelines addresses compliance with social laws, worker rights, and health and safety.
- Grower's employees tend to specialize in various areas (irrigation, spraying, etc.) which reduces the need for training after initial hiring.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None			

**Objective 10: Personnel and Farm Labor**

**10.3 SUPPORTING CAPACITY FOR SUSTAINABILITY**

**Conformance Evidence**

Management and Grower Interviews  
Building A Regenerative, Resilient Food System  
Tomato Growing Guide\_Morning Star\_2023  
2023 TMSI Colleague Guidelines

**Auditor Notes**

- Morning Star is engaged in LH FMS certifications at the direction of a partner organization.
- Responsibilities for maintaining LH FMS certifications have been shared throughout the Morning Star organization. Management staff are responsible for all demonstrations of Morning Star's conformance to the Leading Harvest FMS.
- Morning Star employs a "self-management" approach to task assignment. Currently a single staff member from Morning Star is responsible for all LH FMS requirements. It was not clear to auditors how the risk of tasks remaining unaddressed or incomplete was controlled.
- LH FMS objective achievements are overseen by staff responsible for grower education on standard participation, as well as managing other certifications for Morning Star, chemical reporting data, field technical services, and grower relationships.
- Morning Star maintains a Qualifications Sheet with all colleague qualifications. Additionally, Morning Star colleagues prepare a "combat letter" describing their tasks and responsibilities for the year in order to inform leadership of their qualifications.

**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

**MORNING STAR PACKING COMPANY**

LH FMS AUDIT SUMMARY REPORT

(Continued)

- Morning Star provides training and education on sustainable ag production to local communities and partner organizations.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	10.3.2	None	10.3.1 10.3.3

**Objective 10: Personnel and Farm Labor**

**10.4 COMPENSATION**

**Conformance Evidence**

Management and Grower Interviews  
 2023 TMSI Colleague Guidelines  
 2025 Park Organic Purchase Contract  
 JAW Farmland Stewardship Commitment

**Auditor Notes**

- Organic sites visited are regenerative and organic certified and must maintain stringent social fairness requirements.
- Site visited provides full-time employees with profit-sharing, pension plan and health care. Low employee turnover is a priority.
- Morning Star provides housing and food for trucking employees.
- Morning Star workers receive a total compensation package that includes wages, overtime pay, benefits, and paid leave that meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher. Compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.
- Morning Star prepared a Wage Analysis as well as a demographic analysis of compensation by gender, race, and ethnicity to assist in assessments of Morning Star's workforce.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	None	10.4.1

**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

(Continued)

**MORNING STAR PACKING COMPANY**

LH FMS AUDIT SUMMARY REPORT

**Objective 10: Personnel and Farm Labor**

10.5 FARM LABOR

**Conformance Evidence**

Management and Grower Interviews  
2023 TMSI Colleague Guidelines

**Auditor Notes**

- Grower utilizes one FLC for weeding and digging. FLC provides grower with documentation on hours worked by each employee, when work was performed, etc.
- Grower has utilized the same FLC for over ten years of transplanting, hoeing, and harvesting. Their use of an FLC receives high scrutiny from their regenerative organic certifying body, which requires documentation of appropriate trainings (forklift operating, sexual harassment, other safety).
- Morning Star expects staff and contractors to abide by the Code of Conduct and principles within the Colleague Guidelines.
- Business development staff regularly review compliance programs with grower suppliers.
- FLCs are researched to ensure that providers are licensed and in good standing with the state.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	10.5.1	None	10.5.1

**Objective 11: Legal and Regulatory Compliance**

11.1 LEGAL COMPLIANCE

**Conformance Evidence**

Management and Grower Interviews  
2023 TMSI Colleague Guidelines  
2025 Park Organic Purchase Contract  
JAW Farmland Stewardship Commitment

**Auditor Notes**

- Morning Star has a culture of cross communication among business units regarding legal compliance.
- Morning Star staff are involved with their relevant professional organizations and are members of the California League of Food Producers, California Specialty Crop Association, and Various Organic Associations. CCAs and PCAs participate in ongoing education to maintain licensure.
- Associations share newsletters and send regular emails to keep stakeholders informed. Morning Star relays relevant information to growers.
- Site visited had OSHA and workers' rights posters in their breakroom.
- Morning Star growers undergo USDA audits every year which provide insight into any new guidelines.
- Morning Star designates HR to address legal and social compliance issues and has attorneys on staff.
- Morning Star has workers' rights information posted in sight for employees to view.

**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

**MORNING STAR PACKING COMPANY**

LH FMS AUDIT SUMMARY REPORT

(Continued)

- All growers require a Restricted Pesticide Use Permit as required by Counties.
- Commitments in Morning Star's Colleague Guidelines reflect a commitment to compliance with regional, state, and federal law.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	None	11.1.1
						11.1.2
						11.1.3

**Objective 11: Legal and Regulatory Compliance**

11.2 LEGAL COMPLIANCE POLICIES

**Conformance Evidence**

Management and Grower Interviews  
2023 TMSI Colleague Guidelines

**Auditor Notes**

- Formal employee grievance procedures are in place.
- General training covering farm health and safety, safety procedures, use of machinery guards and emergency stops, and use of PPEs for all relevant workers.
- Colleague Guidelines addresses compliance with social laws, worker rights, and health and safety.
- No forced labor is permitted on farms, including compulsory or trafficked labor, indentured labor, bonded labor, slave, or any other forms of forced labor.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	None	11.2.1
						11.2.2
						11.2.3

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

12.1 FARM REVIEW AND CONTINUAL IMPROVEMENT

**Conformance Evidence**

Management and Grower Interviews  
2023 TMSI Colleague Guidelines  
Star Grower Initiative Agenda

**Auditor Notes**

- Morning Star described their Colleague Letter of Understanding (CLOU) and "Combat Letter" that works as a peer-to-peer review of commitments and progress towards goals.
- Sustainability audits provide an opportunity to review program conformance and performance.
- Customer surveys are implemented to gain insight from grower's perspectives to become more efficient.

**FINDINGS ORGANIZED BY  
PERFORMANCE MEASURE**

**MORNING STAR PACKING COMPANY**

LH FMS AUDIT SUMMARY REPORT

(Continued)

- Letters to review committees, Master Task Lists, and Qualifications List are prepared for leadership to inform them on current activities and achievements.
- Morning Star keep records of growers who win awards or are recognized as leaders in sustainability.
- Senior management collects information on progress towards goals and for staff during talent reviews.
- Annual reports store data from year to year and enable management to compare advances year-to-year. Morning Star uses annual reporting to review efficiencies in all areas of the business, including trucking.
- Morning Star provides financial support for resource use improvements such as irrigation or field preparation.
- Morning Star uses software to manage all field components including growers, crop maps, anticipated yields, grower commitments, tomato varieties, and plant characteristics. The management software also has the ability to monitor trucks with location, speed, and tasks (planting, and what variety is being planted).
- Plant Performance Reports highlight product attributes and plant-specific data during processing, such as product weight and electricity usage.
- Opportunities for innovation on sites are addressed during annual grower meetings.
- Unilever Audit results requires suppliers to provide information on soil erosion control, soil health improvements, water and energy use efficiency, waste repurposing and recycling, employee and trader partner relations, employee communications, annual performance reports, and shareholder communications.
- Annual Leading Harvest audits provide feedback on performance for Morning Star's management to continually improve their conformance demonstration.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	12.1.1 12.1.4	None	12.1.2 12.1.3

(Continued)

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

**12.2 SUPPORT FOR SUSTAINABLE AGRICULTURE**

**Conformance Evidence**

Management and Grower Interviews  
Star Grower Initiative Agenda  
Tomato Growing Guide\_Morning Star\_2023

**Auditor Notes**

- Morning Star is working with UC Davis on developing an improved harvester and automatic transplanter.
- Morning Star has a program in place researching broom rape in partnership with UC Davis.
- Morning Star has sent teams to Chile and other countries to research innovation around tomato farming and pest control.
- Morning Star has donated to UC Davis for the development of a pilot plant.
- Morning Star will help UC Davis identify growers willing to host trials on their farms.
- Morning Star invests 14 cents of cost of every hundredweight (cwt) produced to research.
- Morning Star researches critical issues and shares results with grower suppliers during regular meetings.
- Research includes trials with new tomato varieties, irrigation, and fertilization practices, grafted versus control vines, spacing, and agrochemicals to determine impacts on health and yield.
- Morning Star uses data platforms to measure, collect, and enhance irrigation decision making. Management is currently trialing an AI service designed to analyze crop data and provide irrigation recommendations.
- Growers are involved in nearly all trials and research. Coordination between advisers and growers facilitate the research process, especially with measuring information and with findings.
- Morning Star has their own internal research and development division that focuses on increasing yield per acre for their growers.
- Morning Star compensates research partners and growers for negative impacts on yield as a result of the research project.
- Morning Star supports universities and colleges with financial and in-kind donations.

RESULT	NONCONFORMANCE			OFI	NOTABLE PRACTICES	IN CONFORMANCE
	PREVIOUS	MAJOR	MINOR			
	None	None	None	None	None	12.2.1

## CONCLUSION

**Results of the audit show that Morning Star Packing Company has a management system that continues to meet the requirements of, and is in conformance with, the LH FMS 2020. Morning Star's enrolled acreage is recommended for continued certification.**

## 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.

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

Corrective actions presented in this year's audit will be monitored for ongoing effectiveness during the 2026 Recertification audits. In addition to increased sample sizes, Morning Star's prepared body of evidence will be reviewed for continuous improvement during recertification audits.