



2026

Leading Harvest Farmland
Management Standard

**MORNING STAR PACKING COMPANY
2026 RECERTIFICATION
AUDIT SUMMARY REPORT**

June 4, 2026

Morning Star Packing Company
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Certification Date:

June 4, 2026

Recertification Due Date:

June 28, 2029

Certification ID Number:

AVERUM-LHFMS-2026-0042

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INTRODUCTION

This Audit Summary Report was developed by Averum, an accredited third-party certification body. Averum audited Morning Star Packing Company's (Morning Star) managed production agriculture properties. Averum was contracted by Morning Star in 2026 to conduct a recertification audit on 50,000-100,000 acres (20,000-40,000ha) of managed properties to determine the effectiveness of Morning Star's management system. Objectives 1–12 of the Leading Harvest Farmland Management Standard (LH FMS) were included in the scope of this audit. Objective 13 of the LH FMS was not applicable to the audit due to no tenants being included in Morning Star's Leading Harvest enrollment.

Indicator 10.3.1 was modified to capture Morning Star's motivation for certification, 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."

Executive Summary

Morning Star has successfully demonstrated its management system's conformance to the Leading Harvest Farmland Management Standard. Averum adjusted the sampling approach to better capture the number of supplier growers in Morning Star's management system, which allowed auditors to better capture the diversity of practices in place on farms. The properties we visited were well managed on their own with professional management staff, with a variety of support programs from Morning Star. Documentation was illustrative and provided by responsible staff. Interview subjects were transparent with documentation and expansive in their responses. All parties have been extremely generous with their time.

Specific Focus Areas for Next Audit:

Morning Star's management system demonstrated significant improvements in 2026 regarding risk assessments on grower sites. In future surveillance audits, ongoing grower compliance with supplying Morning Star management with completed risk assessments will be reviewed.

AUDIT TEAM RECOMMENDATION

Results of the audit indicate that Morning Star Packing Company has a management system that continues to meet the requirements of and is in conformance with the LH FMS. Morning Star's enrolled acreage is recommended for recertification. Morning Star's next surveillance audit is anticipated to take place in May 2027.

Corrective Action Plan(s) Accepted:	Not applicable
Proceed to/Continue Recertification:	Yes
All NCR Closed:	Not applicable



Certification Decision

Program User: Morning Star Packing Company

Audit Dates: April 2, 2026–June 4, 2026

Number of Nonconformances Raised (NCRs): None

Certification Date: June 4, 2026

Status: Granted

Conclusion:

Results of the audit show that Morning Star Packing Company has a management system that continues to meet the requirements of LH FMS and conforms with LH FMS criteria. Morning Star's enrolled acreage is recommended for recertification after the provision, approval, and acceptance of corrective actions related to minor nonconformances.

Standard(s) Within Scope of Audit

Leading Harvest Farmland Management Standard 2025 (Objectives 1–12)



Scope of Audit

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 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.

Accreditations:

Averum has been issued a Certificate of Accreditation by the ANSI National Accreditation Board and is accredited to ISO/IEC 17021-1, Conformity assessment - Requirements for bodies providing audit and certification of management systems, in accordance with the Leading Harvest Farmland Management Program (Leading Harvest 2025) requirements

Certification Number and Expiration:

AVERUM-LHFMS-2026-0042; June 28, 2029

Standard User Guidance–Leading Harvest Logo Usage:

Program users who are in good standing with enrolled acreage in the Leading Harvest Farmland Management Standard 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 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.

AUDIT PROCESS

Audit Staff

Matt Armstrong conducted the audit and site visits for Averum. Matt Armstrong 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. All senior members of the Averum audit team hold training certificates in ISO 17021 (Conformity Assessment Requirements for bodies providing audit and certification of management systems) and relevant IAF Mandatory Documents, including Certification of Multiple Sites. The audit processes 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.

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.

Major and Minor Nonconformances were issued during surveillance audits in 2025. As part of the nonconformance remediation process, additional documentation was provided for auditor review. Management review processes were also refined and demonstrated for auditors. Upon auditor review, it was determined that Morning Star had resolved the identified nonconformances.

During the 2026 audits, ten (10) tomato suppliers were selected for site visits. Grower-suppliers overseeing decision-making and management staff tasked with 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

Multi-Site Requirements

Multi-site organizations may be audited on a site-by-site basis (all sites visited each year) or, in some cases, on a sample basis. Multi-site certifications must adhere to the requirements of International Accreditation Forum (IAF) Mandatory Document (MD) 1.

Averum conducts sampling in conformance with IAF MD 1 and includes qualitative considerations such as the geography and proximity of sites, functional management units, crop types, and previous conformance history.

Morning Star site visits were conducted on a sample basis. Morning Star's management system provides oversight and is responsible for conformance activities of sites in California. Business development and management personnel are responsible for developing corrective action plans regarding LH FMS conformance. Morning Star's current review and monitoring process is effective and ongoing.

Morning Star 2026 Recertification Audit Plan

- Audit Criteria: Performance measures and indicators contained in the Leading Harvest Standard and the defined processes and documentation of the management system developed by Morning Star.
- Substitution or Modification of Indicators: **10.3.1 was modified to capture 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."**
- Audit Type: Recertification audit in accordance with audit standards established by the International Standards Organization framework on auditing management systems with multiple sites (ISO 17021:1-2015, IAF MD-1:2018)
- Audit Scope: Management system of 75,000 acres that are directly operated by Morning Star or their contracted growers.
- Functional Units: Management personnel responsible for developing, implementing, and overseeing management practices that support conformance to LH FMS Objectives.
- Morning Star has a Business Development team responsible for negotiating sales contracts and contract fulfillment, including acres dedicated to tomato production. Morning Star also owns and operates some tomato acres directly. Morning Star's Business Development team supports communication with growers. Business Development Officer is responsible for Leading Harvest implementation and corrective actions.



Lead Auditor: Matt Armstrong

Opening Meeting: April 2, 2026

Management Interview: May 6, 2026

Site Visits: May 13 and 14, 2026

Sites Visited/Growers Visited: Fantozzi, Thomas
Brunner Family Holding, Nova and Lucero
Pappas Family Farms, Inc
Fortune Farms
Nuss Farms, Inc.
Jonathan Dasilva
Teixeira and Sons LLC
Tom Bengard Farms
Cerutti Bros
Perez Farms-CL

Closing Meeting: June 4, 2026

Region: California represents 100% of all enrolled acreage.

Crop Types: Tomatoes

Audit Time: Offsite audit activities:
9.5 days, Lead Auditor
Onsite audit activities:
2 days, Lead Auditor

KEY FINDINGS

Audit Findings

Previous Nonconformance: None - Not Applicable

Major Nonconformance: None - Not Applicable

Minor Nonconformance: None - Not Applicable

Opportunities for Improvement: Two (2)

Notable Practices: Three (3)

Opportunities for Improvement:

1. 5.3.1 Greenhouse Gas Emissions: Scope 1 & 2 inventories are in the process of being built, with scope 3 in early stages of collection. Morning Star has included their GHG emissions inventory verification in the disclosures of the company's sustainability efforts, but those verifications are not currently underway. Morning Star could clarify language in their sustainability commitment statements regarding GHG Inventory verification and develop a plan completing verifications.
2. 6.1.1 Waste Disposal: Scrap drip tape and other waste was left out on multiple properties. Growers reported that waste management providers preferred to pick up larger portions of drip tape and could leave portions behind.

Notable Practices:

1. 5.1.2 Renewable Energy: Significant solar production was observed on grower sites, compared to prior review periods and regions. Solar arrays are installed on fields and areas with no access to irrigation water that have been removed from agricultural production.
2. 6.2.1 Food and Agricultural Product Waste: Significant protections are in place to minimize waste during harvest planning, harvesting, shipping, and processing.
3. 12.2.1 Support for Agricultural Research: Morning Star provides significant levels of research into Tomato production for growers and the industry as a whole.

Review of the Previous Audit Cycle:

Morning Star was initially certified to the LH FMS in 2023. During initial certification and surveillance audits, significant reliance was placed on alternative and compatible certification systems that Morning Star supplier farms engaged with. Initial nonconformances were issued regarding policy development and commitments to the LH FMS, due to Morning Star's motivations for enrolling grower supplier acreage with the standard at the request of their customers. Morning Star's management demonstrated a willingness to develop policies and procedures that met the requirements and intent of LH FMS over the initial audit cycle.

PERFORMANCE MEASURE SUMMARY APPENDIX

1

SUSTAINABLE AGRICULTURE MANAGEMENT

1.1: Sustainable Agricultural Stewardship

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				1.1.1 1.1.2 1.1.3	

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."

SYSCO, FSA, and Ecovadis audits have been requested by customers in addition to Leading Harvest. Results of audits are available for review by interested stakeholders. Averum auditors reviewed the results of alternative audit systems and did not note issues that would conflict with LH FMS conformance.

Morning Star's website provides mission statements that address environmental stewardship, overall company goals, and addresses resource efficiency. A sustainable sourcing commitment statement has been developed by Morning Star management as well.

Morning Star provides feedback, information, and guidance to growers regarding sustainability and addressing site concerns.

Field days and research presentations are hosted for growers to review results from trials.

Morning Star has provided guide books and worksheets for growers to fill out regarding a number of sustainability topics, including Agrochemical Safety, Soil, Water Quality, Energy, Waste Streams, and Health and Safety Risk Assessments.

Biodiversity, Waste, Energy, Soil, and Health and Safety Management Plan templates are provided to growers by Morning Star management. Plans are completed by growers for reference throughout the growing season and by auditors.

Morning Star focuses on increasing efficiency, yield, and decreasing inputs in relation to balancing cost and benefits associated with conservation and sustainability.

Morning Star supplies field preparation services on supplier farms to create ideal growing conditions.

Morning Star created and published the Tomato Growing Guide to support new tomato growers. As the number of sustainability certifications required by Morning Star's client's have grown, outreach to growers has been formalized and improved.



Growers on sites are established organizations and family teams, operating on sites for decades if not generations. Land use conversion is overseen by local Resource Conservation Districts and no history or examples of land use conversion were detected by auditors.

Morning Star field managers are responsible for developing and maintaining relationships with their growers in order to stay informed about the conditions on fields and factors impacting growers.

Morning Star growers plan and rotate crop selections to meet annual market demands. In 2026 there is an oversupply of tomatoes from 2025, so overall acres producing tomatoes are reduced.

Conformance Evidence:

Management and Grower Interviews

Site Photos

Audit Prep Packets for Growers

Tomato Growing Guide_Morning Star_2023

2023 TMSI Colleague Guidelines

GAP Evidence Checklists

Primus GFS Audit Evidence

Primus GFS Certificates

SQF Audit Evidence Binders

Sustainability and Responsible Farming Commitment Statements

Sustainable Procurement Policy

"4R's" Reference Materials



1. SUSTAINABLE AGRICULTURE MANAGEMENT

1.2 Critical External Factors

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				1.2.1	

Water management is a universal concern on all sites.

Morning Star includes grower advisers in strategy meetings to support meeting sustainability audit requirements. Direct-operated farm advisers are included to ensure critical factors are being addressed across all sites.

Growers use Professional Crop Adviser (PCA) & Certified Crop Advisers (CCA) recommendations and financial budgets for the growing season. Weather is constantly monitored by growers, management, and consultants.

Budgets have been constrained this year due to increasing input prices and reduced demands. Water allocations have been reduced by varying amounts by Federal, State, and Local regulators. In daily operations, resources are applied to crops with the most economic potential due to limitations.

Crop timing on sites with multiple crops has been a challenge, with delays in a previous crop delaying the following crop's planting. Nutrition and water can be adjusted to assist with correcting crop timing.

Grower representatives and Morning Star staff help to keep growers aware of current threats and opportunities that will need to be managed. Morning Star maintains eight (8) grower reps with a set number of farms each that report conditions to Morning Star sourcing management.

Growers rely on agronomists and consultants for news and guidance on emerging issues. Water districts, Farm Bureaus, and University of California Cooperative Extension Agents and Professors also provide emails and alerts for emerging topics at hand.

Risk assessments are provided to growers for risk identification and control description.

Solar powered weather stations are on sites for remote local weather information.

Many growers are multi-generation farmers, stay informed on tomato specific topics, and engage in thought leadership regarding tomato production. Examples of recent process improvements include new bed sizes, more efficient irrigation practices, and increased field trials and research.

Conformance Evidence:

Management and Grower Interviews
Site Photos
Audit Prep Packets for Growers
Tomato Growing Guide_Morning Star_2023
2023 TMSI Colleague Guidelines
Star Grower Initiative Agenda
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Sustainability and Responsible Farming Commitment Statements
Sustainable Procurement Policy
Agrochemical Safety Risk Assessments
Soil Risk Assessments
Water Quality Risk Assessments
Energy Risk Assessments
Waste Streams Risk Assessments
Health and Safety Risk Assessments
Biodiversity Management Plans
Waste Management Plans
Energy Management Plans
Soil Management Plans
Health and Safety Management Plans
"4R's" Reference Materials
California Energy Capacity Maps

SOIL HEALTH AND CONSERVATION

2.1: Soil Health

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				2.1.1 2.1.2 2.1.3 2.1.4	

Annual soil testing is conducted on all sites with year over year comparisons. Soil tests are taken post harvest to measure nutrient removals from yields.

Monocropping is avoided with crop rotations, informed by PCA recommendations and economic factors. Field managers and land owners coordinate on crop rotation decisions.

Yields can vary along with soil health factors. Yield reductions are prevented via strategic crop rotations intended to correct for soil conditions and mitigate impacts from previous crops.

Growers seek out new production ground frequently, since yields are increased on new ground.

Soil test results are documented by growers. Morning Star does not typically request soil test records unless support is requested by growers. Example soil test records were provided for auditor review.

Tissue tests are conducted throughout the growing season to determine additional nutritional requirements.

PCAs are employed for in-field testing. All PCAs are licensed with the county and state. CCAs are certified by the American Society of Agronomy.

Morning Star growers maintain Soil Management and Conservation Plans on sites.

Morning Star uses automated harvesters that measure resource input and output, further informing nutrient management plans.

There has been no engagement by growers with Carbon programs to date. Morning Star is supplying a reporting platform for growers that will assist with Carbon measurement on sites.

The California 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. NMPs are documented in multiple documents on farm, and include soil tests, PCA recommendations, application records, yield records, etc. Nutrient availability, soil types, Soil Organic Matter (SOM), nutrient requirements of crops, as well as required water are all documented.

Estimated product usage as well as actual applications are documented for comparison.

Some sites utilize Deerpoint to support precision application practices.



On select sites, non-manure based compost is applied by the ton and broadcast. Compost application is not as precise as variable applications. Compost is purchased from California Soils according to a scientifically assessed nutrient need. Compost is also applied in the fall to correct for soil structure and provide nutrition for the following year.

One grower is a beekeeper. Bees are leveraged on the sites extensively and provide pollination services.

Morning Star harvests tomatoes on multiple sites, and leaves residue out for growers.

Sites reincorporate biomass into soil profiles. Crop residues are shredded and watered to speed up decomposition and benefits to nutrient density.

On select grower sites, Organic Matter (OM) is trending up after 3 years of compost application and residue reincorporation. OM is unchanging on sites not utilizing compost.

Conformance Evidence:

Management and Grower Interviews
Site Photos
Tomato Growing Guide_Morning Star_2023
AAA Sustainability Programs Flyer
PCA Licenses
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Morning Star Gradient Services Information
Nutrient Management Plan Templates
Soil Risk Assessments
Soil Management Plans
"4R's" Reference Materials



2. SOIL HEALTH AND CONSERVATION

2.2: Soil Conservation

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				2.2.1 2.2.2	

No reported or observed concerns with annual erosion on sites, outside of flood events.

No Highly Erodable Lands (HEL) classified acreage is found on grower sites.

Cultivators are leveraged on sites to locate soil and provide structure to recently planted tomatoes.

Travel lanes on the perimeter of fields are used for heavy trailers to avoid compaction.

Bed preparations include ripping when necessary to prevent and correct occasional soil compaction. Most sites utilize minimal tillage practices in years where drip tape is not being replaced, and only rip when tape is due to be replaced. Compaction around drip tape is always a factor that weigh on yields over time.

Sites have varying soil conditions between parcels. Soil tests inform growers on necessary corrections to avoid yield drags.

Tomatoes have been farmed in the area since the 1950s. Soil health has been maintained over time to support continous production on farm sites.

Individual sites are not rested between crops. Soil health is maintained with crop rotations and informed NMPs. Select growers will not farm sites in January / February to avoid both timing and severe weather challenges.

Most soils on sites show pH neutrality in tests. Fertilizer and amendment selections are made to achieve or maintain soil neutrality. Select sites utilize Gypsum and Calcium when needed to correct for pH and improve water quality.



Conformance Evidence:

Management and Grower Interviews
Site Photos
Tomato Growing Guide_Morning Star_2023
AAA Sustainability Programs Flyer
PCA Licenses
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Morning Star Gradient Services Information
Nutrient Management Plan Templates
Soil Risk Assessments
Soil Management Plans
"4R's" Reference Materials

WATER RESOURCES

3.1: Water Use

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				3.1.1 3.1.2 3.1.3	

Morning Star provides a water planning service called Gradient that assists in irrigation decisions.

Morning Star management provides general guidance on water allocations. Irrigation needs are determined through the use of Morning Star's Gradient water savings program on select sites. Telemetry, tensiometers, and manual probing are in place on all sites.

Water use is dependent on crop requirements, evapotranspiration (ET) rates, and weather. Irrigation needs are assessed via field monitors, with irrigation occurring at night when appropriate.

Wells are utilized on very few sites and only in short water years. Some growers blend water and have 50/50 ground and surface water. The water from the wells is lower quality (saline) and not preferred by growers.

Wells on select sites are not connected to irrigation systems, but instead pump to canal systems for irrigation district credits.

The Bureau of Reclamation, Department of Water Resources Control Board, and Local Irrigation Districts determine allocations for farms. The Central California Irrigation District (CCID) has kept costs reasonable and have not reduced allocations. In southern water districts, water allocations for grower sites have been restricted to 20-25% allocations. Northern sites have not seen reductions in allocations. Water on fallowed or retired (typically almond) sites is reallocated to Tomato sites. Allocations vary due to seasonal rains and weather in the area.

In past years on some sites there have been 0% allocations (full reductions), leading growers to seek out secondary markets and increasing irrigation expenses.

Site operators provide quarterly reporting to SGMA regarding well extractions where applicable.

The end of the growing season is determined by rainfall and conditions on sites. Irrigation is cut 30-45 days prior to harvest.

Annual water withdrawal on sites visited in 2026 is within tolerances set by Morning Star's provided grower guidance.

Supplementary audit results indicate that Morning Star growers approach water management in alignment with requirements for efficient water use tailored to crop needs and in consideration for environmental factors like salinization and pollution.



Supplementary audit results show sites maintain Irrigation Management Plans that optimize crop productivity and water use efficiency.

All sites are on drip tape, with in ground water monitors to control against waste. Drip tape is buried to varying depths (8-14"), depending on other crops grown on sites.

All wells are metered and pumps have Variable Frequency Drives (VFDs). Well pumps have soft starts to pressurize drip tape efficiently.

In the case where they do have an excess of water, growers will flush the ground or run recharge irrigation to ensure that they are given the same allocation the following year.

Westland Irrigation District in the southern region is 100% SGMA compliant and maintains ground water sustainability plans. When areas are fallowed by growers, water rights are reallocated to different sites.

Different acids have been applied to irrigation water to correct pH balances and recover from negative impacts of fertilizers.

All wells are tested for nitrates, regardless of pump type. Nitrates in run off water is measured by PCAs and reported to the county by water companies or water districts.

Select growers have on-staff PCAs and Irrigation Consultants

Conformance Evidence:

Management and Grower Interviews
Site Photos
Tomato Growing Guide_Morning Star_2023
Water use records
MS Gradient Services Flyer
AAA Sustainability Programs Flyer
PCA Licenses
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Morning Star Gradient Services Information
Agrochemical Safety Risk Assessments
Water Quality Risk Assessments



3. WATER RESOURCES

3.2: Water Quality

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				3.2.1 3.2.2	

Tensiometers, moisture meters, and soil probing are used on all sites, daily if possible.

Select sites knife in starter fertilizer prior to transplanting (planting).

PCAs provide weekly scouting for pests and other issues, and will make recommendations for pests, weed, and fungicides.

Tissue and petiole tests assist in correcting or adjusting applications through the growing season.

Correction for pests have been well managed, chemical use is flat on most issues and down on early pest detection.

Chemical use on sites using compost have seen some increases in needs for control, due to increased nutrition in the field. Growers are developing row applications to assist in controlling against pressures.

Robotic weeders have been tested on some sites to reduce chemical usage, with promising results.

No riparian areas are located near the majority of farms. Surface water canals are in the proximity of production farmland and are protected by irrigation district managed setbacks.

Open drainage is limited on sites. Drain lines on sites are piped and located underground.

Surface water is tested for safety as part of Primus/GFS requirements. Testing results have been within acceptable tolerances.

On select sites where riparian and wildlife areas are located nearby, buffers, hedgerows, and barriers are established.

Conformance Evidence:

Management and Grower Interviews
Site Photos
Tomato Growing Guide_Morning Star_2023
AAA Sustainability Programs Flyer
PCA Licenses
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Morning Star Gradient Services Information
Agrochemical Safety Risk Assessments
Water Quality Risk Assessments
Management and Grower Interviews
Primus / GFS Audits records and results
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Morning Star Gradient Services Information
Water Quality Risk Assessments

CROP PROTECTION

4.1: Integrated Pest Management

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				4.1.1 4.1.2 4.1.3	

Scouting is conducted daily by farm staff, and at least weekly by PCAs.

Leaf hoppers, thrip, worms, stink bug, wire worms, and mites are common insect pests requiring control.

Fusarium has been a concern to the industry in the past. Threats have been controlled by altering tomato variety selections the year following detection in the vicinity. Disease patterns in the region are monitored by growers to prepare strategic tomato planting locations.

Owl Boxes are on sites where vertebrate pests are present. Gophers have become a more present pest on southern sites and are controlled with owls, carbon monoxide, acid application, and traps.

Vine variety selections are made by Morning Star based on customer demands. Varieties are selected that feature disease resistances. Targeted spray applications, late season fungicide, or mold preventatives are applied as needed.

PCAs determine thresholds when pests and diseases are identified. PCAs also provide recommendations and prescriptions for weed control, with hand weeding when appropriate.

Select sites control for weeds mechanically in addition to chemical controls.

Morning Star management provides opportunities for sharing pest control practices during grower meetings.

PCA recs provide Integrated Pest Management (IPM) compliant documentation, in accordance with Dept of Pesticide Regulations (DPR). Applications are required to be recorded by DPR.

There are no prophylactic applications of pest prevention products on sites. Some usage of predatory mites, lace wings, and other beneficials on sites assists in pest prevention.

Application methods vary between ground applications, in line injections, and aerial applications. Aerial applications have been replaced with drones on select sites.

Laser weeders are being used on an increasing number of grower sites.

Department of Pesticide Regulation (DPR) reports identify product amounts used.

Conformance Evidence:

Management and Grower Interviews
Tomato Growing Guide_Morning Star_2023
Star Grower Initiative Agenda
AAA Sustainability Programs Flyer
Site Photos
Grower IPM records and reporting
QAL Licenses
PCA Licenses
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Sustainable Procurement Policy
Nutrient Management Plan Templates
Agrochemical Safety Risk Assessments
Soil Risk Assessments
Water Quality Risk Assessments
Health and Safety Risk Assessments
Health and Safety Management Plans
"4R's" Reference Materials



4. CROP PROTECTION

4.2: Crop Protectant Management

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				4.2.1	

Products are applied both by farm staff and third parties, all licensed for chemical applications.

HR consultants and CAL AG Safety provide the majority of trainings for Morning Star field staff.

Supplier farms provide trainings for applicators. Pesticide Safety Training for fieldworkers is conducted on sites and strictly mandatory for staff.

Chemicals that are stored on farms are segregated and secured appropriately. Some grower sites monitor sites with cameras and traffic control for safety and material security.

Conformance Evidence:

Management and Grower Interviews
Site Photos
Training records from Morning Star and Grower programs
Product Use Reports
AAA Sustainability Programs Flyer
QAL Licenses
PCA Licenses
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Sustainable Procurement Policy
Nutrient Management Plan Templates
Agrochemical Safety Risk Assessments
Soil Risk Assessments
Water Quality Risk Assessments
Health and Safety Risk Assessments
Health and Safety Management Plans
"4R's" Reference Materials

ENERGY USE, AIR QUALITY, AND CLIMATE CHANGE

5.1: Agricultural Energy Use and Conservation

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				5.1.1	5.1.2

Autosteer and GPS is installed on all tractors for efficient field passes.

Well pumps have been converted to electric where possible and equipped with VFDs.

Maintenance is provided by shop staff, following a service interval schedule.

Renewables are featured heavily in the utility power mix.

Solar panels are present on multiple sites for well pumps. Weather stations are powered by solar panels and are remotely accessible.

There are significant solar production areas on supplier farms. Texiera has a 1.2mWh solar production facility to offset power consumption. Cerutti Bros has two large solar facilities on sites. Multiple solar properties on Pappas Bros support shops, filter stations, well pumps, and support buildings. A 497kW solar station supplies the power for all well pumps on Fortune Farms sites.

Farms are able to develop solar generation on sites, and convey water rights from the fallowed acres to other production lands.

Conformance Evidence:

Management and Grower Interviews
Tomato Growing Guide_Morning Star_2023
AAA Sustainability Programs Flyer
Solar Array Photos
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Energy Risk Assessments
Energy Management Plans
California Energy Capacity Maps



5. ENERGY USE, AIR QUALITY, AND CLIMATE CHANGE

5.2: Air Quality

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				5.2.1 5.2.2	

Equipment is sized appropriately for both the field and operation at hand. A variety of horsepower are kept in fleets for use when needed. When larger equipment is required, specialized providers will be contacted. Current equipment has Tier 4 engines with DEF capabilities.

No waste burning is permitted on sites. Ag exemptions and permits are not sought out by tomato growers.

The local (San Joaquin Valley) air board monitors and regulates air quality by monitoring pollution levels, establishing regulations, and implementing air quality programs.

Diesel well pumps are being upgraded to electric well pumps where and when possible. Growers with remaining diesel pumps have plans for full electric conversions.

State Water Efficiency and Enhancement Program (SWEET) grants have been utilized to assist in converting diesel pumps to soft start electrics.

No issues with dust have been reported on most sites. On sites with dirt roads, water trucks will be run to control dust. Dust Off (mag chloride) can be applied when necessary, with proper precautions regarding runoff.

Conformance Evidence:

Management and Grower Interviews
Tomato Growing Guide_Morning Star_2023
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Energy Risk Assessments
Energy Management Plans



5. ENERGY USE, AIR QUALITY, AND CLIMATE CHANGE

5.3 Climate Smart Agriculture

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
			5.3.1	5.3.2 5.3.3	

Carbon assessments will be underway in the coming weeks through a Telus platform to prepare for State of California reporting. Full Scope 1 and 2 inventories are being prepared by Morning Star staff, and Scope 3 data is being collected from growers.

Farm equipment is maintained to run efficiently and reduce additional emissions. Maintenance logs are kept by shop staff.

DEF, GPS ,and autosteer is available on all equipment to allow for efficient passes on fields. Harvests are planned to be as efficient as possible through planned routes, speed control, and automatic navigation.

Additional Diesel fuel is stored on hand and secured in appropriate containers.

Morning Star regularly conducts research and trials on tomato varieties.

Soil moisture monitoring is a major part of reducing a growers climate impact.

Crop shield sprays can be applied during heat waves to protect growing plants.

Compost applications on select sites have improved soil structures and water retention on sites.

Crop insurance is maintained on crop production for all sites.

Crop residues are reincorporated into soil profiles to improve structures and resilience.

Select lands are fallowed to provide water rights to production properties.

Conformance Evidence:

Management and Grower Interviews
Site Photos
Tomato Growing Guide_Morning Star_2023
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Energy Risk Assessments
California Energy Capacity Maps

WASTE AND MATERIAL MANAGEMENT

6.1: Management of Waste and Other Materials

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
			6.1.1	6.1.2 6.1.3	

The primary waste generated is drip tape, chemical jugs and totes, engine oil, and other shop fluids.

Waste drip tape is coiled on the edges of fields. Some scrap drip tape is left out for a period of time until a collable amount makes it worthwhile for pick up.

Removal of drip tape varies from annual to multiple years on sites, with an average of 3-5 years. Drip tape is kept in the ground for extended periods on select sites to maximize the usable life of materials.

Waste is collected for pickup and sequestered, triple rinsed and slashed , and recycled. Recycling is provided by the county on a varying schedule where available.

Some counties have directed growers to dispose of triple rinsed containers in regular trash.

Contractors will pick up used oil and shop waste for reuse or recycling.

Select growers will take their own recycling into recycling facility. PAC Sun will pick up drip tape for recycling.

Chemical products are sequestered and stored in secured containers on shop sites, where applicable.

Fertilizers are stored in appropriate containers, and staged for use in portable containers (bubbles).

Conformance Evidence:

Management and Grower Interviews
Site Photos
Star Grower Initiative Agenda
Waste tracking records
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Morning Star Gradient Services Information
Tomato Growing Guide
Waste Streams Risk Assessments
Waste Management Plans



6. WASTE AND MATERIAL MANAGEMENT

6.2: Food and Agricultural Surplus and Waste Resource Recovery

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				6.2.2	6.2.1

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.

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 feed.

Morning Star will process organic tomatoes first, and any batch that fails quality standards will be redirected to the conventional line, reducing tomato waste.

Crop loss has been experienced from heat. Growers coordinate with Morning Star and attempt to time planting and harvest activities to avoid heat. Pre-irrigations assist with mitigating heat damage.

Sun protectant (crop shield) is applied prior to heat events. Mold preventatives are applied late season to protect harvest ready crops.

During severe rain events, additional fungicides are applied to protect against potential loss.

Pricing for product varies based on quality, providing motivation for growers to provide the highest quality crops possible.

Larger bins hold 3 more tons on trailer frames than traditional fiberglass tubs. Reduced tomato transport trips assist in reducing the amount of lost crop from the harvest bins during transport.

On sites with compost applications, improvements to soil structures further improve heat resistance through water retention. Sites utilizing compost test materials to ensure safety and determine nutrient content.

Crop residue and vine debris from harvests are reincorporated into fields during bed prep.

Conformance Evidence:

Management and Grower Interviews
Site Photos
Star Grower Initiative Agenda
Waste tracking records
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Morning Star Gradient Services Information
Tomato Growing Guide
Waste Streams Risk Assessments
Waste Management Plans

CONSERVATION OF BIODIVERSITY

7.1: Species Protection

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				7.1.1 7.1.2	

State conservation agencies identifies species of concern in the area. No growers had received notices from conservation groups or the state regarding instances of special status species on sites.

Growers are able to identify relevant protected species in the region and areas around them.

Auditor reviews of site locations with species of concern maps showed no reported sighting on locations.

Conservation easements are maintained on select sites to allow for migratory bird and animal habitat.

Conformance Evidence:

Site Photos
 ArcGIS maps
 AAA Sustainability Programs Flyer
 GAP Evidence Checklists
 Primus GFS Audit Evidence
 Primus GFS Certificates
 SQF Audit Evidence Binders
 Biodiversity Management Plans



7. CONSERVATION OF BIODIVERSITY

7.2: Wildlife Habitat Conservation

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				7.2.1 7.2.2 7.2.3	

Most farms do not have natural habitat or communities in the proximity of the farms. Select sites maintain conservation easements on the perimeter of production farmland which have been established by grower suppliers.

No known farmland conversion was indicated on any sites visited.

Wildlife areas on the borders of surface waterways have been enhanced to allow for wildlife to access water and shelter, with mature native trees and shrubs.

Morning Star's Management includes members of the California Association of Pest Control Advisers (CAPCA) and worked with counties to start and activate the Beewhere Program.

County Ag Departments require growers 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.

Sycamore Slough, White Slough, and San Jacinto Rivers are on the perimeter of the farms. Levees, gates, and roads prevent direct access to the water ways.

Water ways are not interfered with. Slopes are not shaped or developed, and native growth is allowed to flourish on sites.

Seals, Salmon, and other wildlife have been observed in the nearby canals on select sites.

Areas fallowed by irrigation districts border select sites. Areas are off limits and cannot be accessed.

Native species have been planted into conservation easements for animal and migratory bird habitat.

Bird boxes are present on some sites, installed and maintained by growers.

Coyotes, owls, and snakes are welcomed on grower sites to assist with pest and gopher control.



Conformance Evidence:

Management and Grower Interviews
Site Photos
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Morning Star Gradient Services Information
Biodiversity Management Plans



7. CONSERVATION OF BIODIVERSITY

7.3: Avoided Conversion

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				7.3.1 7.3.2 7.3.3	

Grower sites have been family operated for multiple generations.

On sites where they are present, wildlife habitats have been expanded and are planned for development.

Crop rotations on sites have allowed farm land to remain in production continuously.

Morning Star does not currently maintain a written policy reflecting a commitment to eliminating deforestation, as production sites are not located in areas with biome- or geography-specific deforestation protocols.

Production sites are delineated as agricultural land and not forested areas as defined in the Food Security Act of 1985.

Morning Star remains certified to multiple supplementary audit standards with deforestation prevention requirements, with no issues identified in past audits.

Directly managed farmland was established and active farmland when acquired.

Some acreage has been purchased for greenhouse development, which was not previously designated farmland and was not converted out of agricultural production.

Conformance Evidence:

Management and Grower Interviews

Site Photos

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

LoA Certificate 06132023 received- THE MORNING STAR

Global Forest Watch

AAA Sustainability Programs Flyer

GAP Evidence Checklists

Primus GFS Audit Evidence

Primus GFS Certificates

SQF Audit Evidence Binders

Biodiversity Management Plans



7. CONSERVATION OF BIODIVERSITY

7.4: Crop Diversity

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				7.4.1	

Rotations on sites include Garlic, lima beans, peppers, tomatoes, watermelon, cantaloupes, onions, jalapenos, basil, triticale, silage corn, broccoli. The primary crop grown on enrolled properties is solely tomatoes.

Market conditions, buyer demand, and soil health/nutrient needs primarily determine crop and parcel selections.

Morning Star has an internal research and development unit that conducts trials on an extremely high number 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.

Conformance Evidence:

Management and Grower Interviews
Site Photos
Tomato Growing Guide_Morning Star_2023
Star Initiative Agenda
Processing Tomato Variety Guide
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders

PROTECTION OF SPECIAL SITES

8.1: Special Site Management

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				8.1.1 8.1.2	

A local cemetery is in the proximity of one site. The steward of the cemetery is on the grower's board and maintains protections for the site.

Multiple growers have been on sites for generations.

Farmland Sustainability Assessment (FSA) audits require Management Systems to collect evidence for consideration regarding natural heritage data and expert advice in the management and identification of protected areas. No nonconformances were identified during Morning Star's FSA Audits.

Production fields were examined by auditors, no areas with natural heritage were identified.

Conformance Evidence:

Management and Grower Interviews

Site Photos

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

LoA Certificate 06132023 received- THE MORNING STAR

GAP Evidence Checklists

Primus GFS Audit Evidence

Primus GFS Certificates

SQF Audit Evidence Binders

Biodiversity Management Plans

LOCAL COMMUNITIES

9.1: Economic Well-Being

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				9.1.1	

Morning Star department heads handle compliance issues related to their business units. Operations addresses program or standard compliance and HR handles employer legal issues.

Growers source supplies, chemicals, and other materials from local providers.

No H2A labor is used on grower sites.

Labor on smaller family operations are full time employees. Farm Labor Contractor (FLC) labor is used on other grower sites for harvest and processing support. Listed FLCs were researched by auditors and are in good standing with state regulators.

Conformance Evidence:

Management and Grower Interviews
2023 TMSI Colleague Guidelines
LoA Certificate 06132023 received- THE MORNING STAR
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Safety Training Agendas & Rosters



9. LOCAL COMMUNITIES

9.2: Community Relations

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				9.2.1	

Morning Star and grower staff are sourced from local communities.

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

Select growers have provided a corn maze in the community for 20+ years, operate fruit stands, and host podcasts regarding sustainable agriculture.

Growers provide donations to the Farm Bureau, Lions Club, FFA, and other community orgs.

Growers host field days for local and international students on sites to demonstrate and educate the public on sustainable farm operations.

Additional field days were hosted on Pappas Bros sites with Morning Star regarding weed control and new technology.

Morning Star's Sustainability Coordinator is the incoming President of the Native Daughters of the West.

Conformance Evidence:

Management and Grower Interviews
Commitment Statement by James Sherwood for Tribes 02122026
2023 TMSI Colleague Guidelines
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Agrochemical Safety Risk Assessments
Health and Safety Management Plans



9. LOCAL COMMUNITIES

9.3: Local Communities and Indigenous Peoples

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				9.3.1 9.3.2 9.3.3	

Morning Star's website includes statements regarding their mission to maintain relationships based on mutual respect.

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.

No active Indigenous populations are present in the regions of the sample farm sites.

Morning Star maintains purchase contracts with multiple growers in Indigenous communities on other regions of their operations.

Growers have received some questions from communities regarding development in the area, but there has been no pressure to redevelop farm sites out of ag production.

Morning Star's central office is able to receive comments, concerns, and complaints from the public. Complaints would be directed to the Office Manager.

Past complaints or concerns about growers have regarded vehicle safety during harvest (speeds, scrapes, collisions, etc.). Corrections are made via additional training.

Conformance Evidence:

Management and Grower Interviews
Commitment Statement by James Sherwood for Tribes 02122026
2023 TMSI Colleague Guidelines
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Health and Safety Risk Assessments
Health and Safety Management Plans



9. LOCAL COMMUNITIES

9.4: Public Health

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				9.4.1	

Growers maintain employee contracts which includes general safety guidelines.

Trespassing is rare on sites visited, and security systems are in place at shop and office locations.

Safe operating procedures are included in Morning Star's Colleague Guidelines.

On crops (non-tomatoes) adjacent to schools, alerts are given for spraying events. Events are held on the weekend whenever possible.

Conformance Evidence:

Management and Grower Interviews
2023 TMSI Colleague Guidelines
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Safety Training Agendas & Rosters
Agrochemical Safety Risk Assessments
Health and Safety Risk Assessments
Health and Safety Management Plans

PERSONNEL AND FARM LABOUR

10.1: Safe and Respectful Working Environment

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				10.1.1 10.1.2	

Morning Star is as an Equal Opportunity Employer as stated in their Colleague Guidelines document.

Approaches to Equal Opportunity Employment are well addressed in Morning Star Colleague Guidelines.

Vendor questionnaires have been issued regarding the elimination of forced labor. No issues have been identified by growers.

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 staff roles.

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.

Conformance Evidence:

Management and Grower Interviews
2023 TMSI Colleague Guidelines
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Safety Training Agendas & Rosters
Health and Safety Risk Assessments
Health and Safety Management Plans



10. PERSONNEL AND FARM LABOUR

10.2: Occupational Training

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				10.2.1	

Training is provided by growers on the safe application of agrochemicals.

Cal Safe Ag provides chemical handling and field safety trainings on multiple sites.

Trainings and attendance are documented by growers. Staff that are not able to attend trainings are given materials and time to catch up.

Morning Star staff are expected to become subject matter experts in at least 2 of 20 crop types to serve as internal resources and business development leads.

Conformance Evidence:

Management and Grower Interviews
Tomato Growing Guide_Morning Star_2023
2023 TMSI Colleague Guidelines
Fieldworker and pesticide handler training materials and certificates of completion
Training agendas and attendance rosters
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Safety Training Agendas & Rosters
Agrochemical Safety Risk Assessments
Health and Safety Risk Assessments
Health and Safety Management Plans

10. PERSONNEL AND FARM LABOUR

10.3: Supporting Capacity for Sustainability

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				10.3.1 10.3.2 10.3.3	

Morning Star has developed a Sustainable Sourcing Policy stating their commitment to multiple verification and certification standards, including Leading Harvest.

Morning Star is engaged in LH FMS certifications at the direction of a partner organization.

Responsibilities for maintaining LH FMS certifications have been communicated 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, with support from additional staff as needed.

Management responsible for LH FMS demonstrations are also responsible for Morning Star's other certification programs and grower education on standard participation.

Efforts have been made to educate business development teams (fieldmen) on their responsibilities for maintaining Leading Harvest certifications. Fieldmen are tasked with assisting growers as well as Morning Star management with Leading Harvest conformance where necessary.

LH FMS objective achievements are overseen by staff responsible for 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.

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



Conformance Evidence:

Management and grower interviews
Tomato Growing Guide_Morning Star_2023
2023 TMSI Colleague Guidelines
Sustainable Sourcing Policy
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Safety Training Agendas & Rosters
Health and Safety Risk Assessments



10. PERSONNEL AND FARM LABOUR

10.4: Compensation

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				10.4.1	

Growers maintain staff at competitive pay rates with some offering year round employment. Pay rates are determined by researching prevailing and competing wages.

Morning Star provides housing and food truck access for all employees on factory locations.

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 and appropriate prevailing industry standards. Compensation terms established by collective bargaining agreements are implemented and adhered to.

Morning Star prepared a Wage Analysis of pay, as well as demographic analyses of compensation by gender, race, and ethnicity is prepared to assist in assessments of Morning Star's workforce.

Conformance Evidence:

Management and Grower Interviews
2023 TMSI Colleague Guidelines
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders

10. PERSONNEL AND FARM LABOUR

10.5 Farm Labour

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				10.5.1	

Morning Star provides harvest support for approx. 90% of their growers. Selected FLC's are long time partners for harvest operations, with long tenured staff on harvest crews.

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.

FLC licensing was investigated by auditors. No issues with state compliance were identified with either the Department of Industrial Relations (DIR) and Division of Labor Standards Enforcement (DLSE).

Conformance Evidence:

Management and Grower Interviews
AAA Sustainability Programs Flyer
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Safety Training Agendas & Rosters
Agrochemical Safety Risk Assessments
Health and Safety Risk Assessments

LEGAL AND REGULATORY COMPLIANCE

11.1: Legal Compliance

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				11.1.1 11.1.2 11.1.3	

Farm operators receive emails, farm bureau messages, county ag departments, and notifications from Morning Star regarding regulatory requirements.

Morning Star is conducting outreach with growers to determine Scope 3 GHG emissions and comply with CA SB 253.

Morning Star has a culture of cross communication among business units regarding legal compliance and industrial expertise.

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.

Sites visited had OSHA and workers' rights posters in their breakroom.

Morning Star providers engage with USDA Domestic Origin Verification (DOV) certifications annually. DOV compliance requires engagement with growers to determine domestic origins.

Growers engage in Global GAP, Organic, Primus/SQF, Wonderful, and Fresh produce audits.

Morning Star engages in multiple sustainability oriented certifications, including SYSCO, FSA, and Ecovadis in addition to Leading Harvest.

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.

All growers are required to have Restricted Pesticide Use Permits as required by Counties.

Commitments in Morning Star's Colleague Guidelines reflect a commitment to compliance with regional, state, and federal law

Fuel storage is in appropriate containers and walled in. Shops appeared clean and organized.



Conformance Evidence:

Management and Grower Interviews
2023 TMSI Colleague Guidelines
AAA Sustainability Programs Flyer
QAL Licenses
PCA Licenses
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Safety Training Agendas & Rosters
Sustainability and Responsible Farming Commitment Statements
Sustainable Procurement Policy
Agrochemical Safety Risk Assessments



11. LEGAL AND REGULATORY COMPLIANCE

11.2: Legal Compliance Policies

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				11.2.1 11.2.2 11.2.3	

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 is in place for all relevant workers.

Colleague Guidelines addresses compliance with social laws, worker rights, and health and safety.

Anti-slavery assessment questionnaires are available on Morning Star's website.

Multiple supplementary certifications and audits include consideration of the ILO Conventions. No negative observations were noted regarding forced, compulsory or trafficked, or indentured labor.

Conformance Evidence:

Management and Grower Interviews
2023 TMSI Colleague Guidelines
AAA Sustainability Programs Flyer
QAL Licenses
PCA Licenses
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Safety Training Agendas & Rosters
Sustainability and Responsible Farming Commitment Statements
Sustainable Procurement Policy

MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT

12.1: Farm Review and Continual Improvement

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
				12.1.1 12.1.2 12.1.3 12.1.4	

Morning Star described their Colleague Letter of Understanding (CLOU) & "Combat Letter" that works as a peer-to-peer review of commitments and progress towards goals.

Sustainability audits provide an opportunity to assess and review sustainability program performance.

Customer surveys are implemented to gain insight from the grower's perspectives and become more efficient.

Quarterly meetings have been established to help spread annual commitments across the calendar year.

Letters to Review Committees, Master Task Lists, and Qualifications Lists are prepared for leadership to inform them on current activities and achievements.

Morning Star record and track growers who win awards or are recognized as leaders in sustainability.

Senior management collects information on progress towards goals and for staff during performance reviews.

Annual reports store data from year to year and enable management to compare advances from previous periods.

Morning Star provides additional financial support for resource use improvements such as irrigation or field preparation.

Internal R&D work is provided through Morning Star's network of companies and support teams.

R&D is assessing technology California Tomato Research Institute (CTRI), including laser weeders, automated mechanical weeders, and automated irrigation.

Drones are permitted to spray materials with stronger chemistries that are not allowed to be aurally applied.

Weed control technology demonstrations have been held on select sites.

Growers helped to develop the first compost turner in the US. Improvements have also been made to algae extract applications in the late season to modulate plant growth and prepare for harvests.



Supplementary audits results on grower sites require 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 stakeholder communications.

Annual Leading Harvest audits provide feedback on performance for Morning Star's management to continually improve their conformance demonstration.

Conformance Evidence:

Management and Grower Interviews
Audit Prep Packets for Growers
2023 TMSI Colleague Guidelines
Star Grower Initiative Agenda
Field Trials Photos and Test Plots
Research and Development Records
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Sustainable Procurement Policy

12. MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT

12.2: Support for Sustainable Agriculture

Previous Audit Nonconformance	Major Nonconformance	Minor Nonconformance	Opportunities for Improvement	In Conformance	Notable Practice
					12.2.1

UC Extension offices and seed developers will test seed varieties on grower sites.

Morning Star continues to conduct extensive research in a number of topics, including tomato varieties, fertilization practices, water management, soil health, and chemical use.

Significant investment has been made into greenhouses to support crop production as well as research improvements in Pepper, Melon, and Tomato production.

Growers have engaged in pilots for new ag product offerings (fertilizer, etc.), and field trials for new varieties, and seed trials for yield comparisons.

Morning Star's Masterplant research facility will develop and test scion and rootstock combinations for potential testing in field.

Agrology Carbon Cycle Monitoring is testing real time carbon benefits from practice changes on select sites.

TS&L (Seed Dealer), Ag Seeds, and internal Morning Star variety trials are in place on select sites.

Conformance Evidence:

Management and Grower Interviews
Star Grower Initiative Agenda
Tomato Growing Guide_Morning Star_2023
Annual Research Report & Executive Summaries
Research and Development Records
Field Trials Photos and Test Plots
GAP Evidence Checklists
Primus GFS Audit Evidence
Primus GFS Certificates
SQF Audit Evidence Binders
Sustainable Procurement Policy