



INGOMAR PACKING COMPANY, LLC

Los Banos, California

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

November 14, 2024





8801 Renner Blvd, #100
Lenexa, KS 66219
Phone: 913.643.5087

Company Name	Ingomar Packing Company, LLC
Contact Person	Jennifer Ingram
Address	9950 S. Ingomar Grade Road Los Banos, CA 93635
Phone/Fax	(209) 826-9494
Email	Jennifer.Ingram@ingomar.com
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- Certification Audit** **Recertification Audit** **Surveillance Audit**
 Scope Expansion

INGOMAR PACKING COMPANY, LLC

LH FMS AUDIT SUMMARY REPORT

November 14, 2024

INTRODUCTION

This report summarizes the results of the November 14, 2024 audit conducted for Ingomar Packing Company, LLC (Ingomar) managed production agriculture properties. The audit was conducted by Matt Armstrong, Lead Auditor for Averum. Matt Armstrong has experience with Leading Harvest throughout its development, is an assurance provider for multiple sustainability programs, and has expertise in production agriculture on multiple crop types in the United States. Site visits were conducted by Jill Brodt, Field Auditor. All senior members of the audit team hold training certificates in ISO 17021:2015 (Conformity Assessment), 14001:2015 (Environmental Management Systems), as well as IAF MD-1:2018 (Certification of Multiple Sites). The audit process and reports were independently reviewed by Holly Salisbury, who is a certified public accountant in the state of California and has expertise on multiple crop types in the United States.

SCOPE AND OBJECTIVE

In 2024, Averum was engaged by Ingomar to perform an audit of sustainability performance on 10,000 – 50,000 acres of managed agricultural operations and determine conformance to the principles, objectives, performance measures, and indicators of the Leading Harvest Farmland Management Standard 2020 (LH FMS). LH FMS objectives 1 through 12 were covered during site visits on properties in Stanislaus County and Merced County. Due to a lack of Tenant Operators on Ingomar properties, Objective 13 – Tenant Operated Operations was determined to not be applicable to Ingomar’s certification scope. Other than removing Objective 13, there was no other substitution or modification of LH FMS performance measures.

Information regarding any meetings or correspondence between the audit team and government agencies, community groups, affected Indigenous Peoples and conservation organizations: N/A

COMPANY INFORMATION

Ingomar is an industrial processor and supplier of tomato products, with supplier farms under their management. Farm operating management contractors are responsible for the day-to-day farmland management services for Ingomar’s properties. Ingomar opted to enroll 100 percent of their agricultural properties for certification to the LH FMS in 2024 and meets requirements to engage in sampling to simplify the process of meeting and maintaining certification requirements.

Ingomar contracted with Averum to provide a Stage 1 audit (or Readiness Review) on properties in California. Results of the readiness review were shared with Ingomar. During the certification audit, six (6) sites in Stanislaus County and Merced County were selected, with representation from two manager portfolios. Ingomar Managers supporting decision making and standard compliance for sample regions were contacted for evidence requests and interviews. The properties in these regions are a representative sample of current practices in place and management decision making. The primary agricultural production on the sites are tomatoes.

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AUDIT PLAN

An audit plan was developed and is maintained on file by Averum. An online portal was established for Ingomar coordinators to upload evidence and documentation securely for auditor review. An opening meeting was held on October 11, 2024, preceding site visits. Following the meeting, a document review of the provided evidence was conducted by Averum. Field sites in Stanislaus and Merced Counties were examined on October 15, 2024. A closing meeting was held on November 14, 2024.

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

Opening Meeting: Conference Call

October 11, 2024

Attendees:

(Ingomar) Jennifer Ingram, Steven Garcia, Tome Lima

(Audit Team) Matt Armstrong, Jill Brodt

Topics:

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

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Closing Meeting: Conference Call

November 14, 2024

Attendees:

(Ingomar) Jennifer Ingram, Steven Garcia

(Audit Team) Matt Armstrong, Jill Brodt, Linnea Abel

Topics:

- Opening remarks: Matt Armstrong
- Statement of confidentiality: Matt Armstrong
- Closing summary: Matt Armstrong
- Presentation of the audit conclusion: Matt Armstrong
 - Major Non-Conformances: 0
 - Minor Non-Conformances: 2
 - Opportunities for Improvement (OFI): 12
 - Notable Practices: 1
- Report timing and expectations: Matt Armstrong

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MULTI-SITE REQUIREMENTS

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

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

Region	Crop	Properties Examined During Engagement
Stanislaus County	Tomatoes	Three (3) sites visited during audit <ul style="list-style-type: none">- JEM Ranches (3 sites)- Sites represent 10% of enrolled sites- Fields 306, 334, and 335
Merced County	Tomatoes	Three (3) sites visited during audit <ul style="list-style-type: none">- Deldon Farms (3 sites)- Sites represent 10% of enrolled sites- Fields W25, W40, and W46

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AUDIT RESULTS

Overall, Ingomar's agricultural operations conform to the objectives of LH FMS. Interviews and document reviews were performed to determine procedural and documentation conformance to the LH FMS. Documentation was provided to demonstrate or support conformance with LH FMS requirements. Field visits were performed on six operating sites, with three in Stanislaus County and three in Merced County. Visits were late in the growing season, so harvest planning, crop health, yield management, and irrigation management were highlighted. Central and regional management representatives and contract growers were present and interviewed to demonstrate Ingomar'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. Ingomar's Regional Managers served as guides, were available throughout the engagement, provided logistic support, and provided responses to evidence requests.

KEY FINDINGS

Previous Non-Conformances: N/A during initial certification.

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

Minor Non-Conformances: Two (2) minor non-conformance was identified during the audit.

1. 7.1.2 – At-risk Species
 - a. The LH FMS requires management to develop and operate a program to locate and protect known, variable occurrences of at-risk (i.e., rare or uncommon) species on enrolled farmland. No program appears to currently be in place.
2. 7.3.2 - Deforestation
 - a. A policy that meets the requirements of indicator 7.3.2a has not been developed and implemented. The LH FMS requires that standard users develop a policy that demonstrates a commitment to zero deforestation that addresses the regions of application, relevant natural forest types, and appropriate deforestation cut-off date(s) in areas with biome-specific or geography-specific deforestation protocols; as well as training to ensure appropriate employees understand the written zero deforestation policy.

Opportunities for Improvement (OFI): Twelve (12) OFIs were identified during the audit.

1. 6.1.2 – Resource Recovery
 - a. Some burning of paper waste was identified on sites, due to a lack of recycling providers in the area. Ingomar could identify opportunities to recycle cardboard in lieu of burning.

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2. 7.1.1 – Threatened and Endangered Species

- a. Information regarding species of concern on sites is not currently collected from each grower. Species of concern information could be included in the Good Agricultural Practices (GAP) checklist used to evaluate growers annually.
- b. Threatened & Endangered Species lists could be posted in shops/break rooms to support awareness.

3. 7.2.2 – Ecologically Important Sites

- a. Information from each grower could be included in the Good Agricultural Practices (GAP) checklist used for annual evaluations to support the identification of ecologically important sites. Documentation that specifies actions taken by Ingomar management or their growers to identify or protect natural communities or unique ecological landscape features and their involvement with relevant agencies could be provided.

4. 8.1.2 – Special Site Management

- a. Approaches to historic sites and preservation practices could be detailed beyond identification via GAP checklist provided. While the GAP checklist includes a question about special sites, additional documentation could be provided to demonstrate the appropriate mapping, cataloging, and management of identified special sites such as due diligence procedures or a description of management practices regarding special sites that recognizes their unique qualities.

5. 9.3.1 – Local Community and Indigenous Peoples Policy

- a. Ingomar maintains a Social Responsibility statement that shows a commitment to upholding the safety, health, and welfare of all persons and the public. Management shows an understanding of and acknowledgement of the rights of local communities, but the provided policy does not explicitly address the rights of local communities and the treaty rights of Indigenous Peoples. Policy language could be expanded to address indicator requirements.

6. 9.3.2 – Land Tenure Rights of Local Communities and Indigenous Peoples

- a. Additional due diligence documentation could illustrate due diligence processes to identify relevant land tenure rights or Indigenous communities near farming properties.

7. 10.2.1 – Personnel and Contract Worker Training

- a. Ingomar could develop checklists and/or provide records to demonstrate health, safety, and education for partners outside of Ingomar's managerial oversight; specifically for contract management company employees.

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8. 10.3.2 – Employee Roles and Responsibilities for Sustainability

- a. Ingomar's Grower Relations and Marketing team members interviewed demonstrated awareness and understand their roles in relation to LH standard implementation. Training or supplemental information to support growers' expectations and understanding of roles and responsibilities in relation to LH FMS implementation could be provided.
- b. Opportunities exist (such as the Fall Meeting with growers) to enhance awareness of the LH FMS requirements.

9. 10.4.1 – Wages and pay

- a. Ingomar engages in a number of wage and pay reviews and assessments. Ingomar could provide further documentation to support compensation assessments and detail collaborations with the Employment Development Department to set wages. Payroll information sheet provided was blank and did not include base rates.

10. 11.2.2 – Consistency with International Labor Organization (ILO) Conventions

- a. Ingomar's Employee Handbook addresses discrimination. Ingomar's Sustainability Statements address forced or coerced labor, and labor regulations in CA prohibit the use of child labor. Additional ILO conventions outlined in LH FMS guidance document (particularly Collective Bargaining) are not addressed, although staff are not explicitly barred from the practice. California has proposed the Senate Constitutional Amendment 7, which would protect the rights of employees to organize and negotiate with employers. Ingomar could integrate language protecting the right of labor to collective bargaining into its existing policies rather than relying on legal regulation.

11. 12.1.2 – Monitoring Performance

- a. Grower Meetings Agendas reflect some LH FMS objectives. Meetings could be formalized and enhanced to reflect the LH FMS objectives in agendas.

12. 12.1.4 – Annual Review and Improvement

- a. KPI's should be further developed to specify and address findings from LH conformance audit results and shared with audit team during future surveillance engagements.

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Notable Practices: One (1) notable practice was identified during the audit.

1. 9.2.1 – Community Engagement

- b. Ingomar encourages healthy relationships with their community, hosting events, providing sponsorships, and participating with multiple community organizations. Engagement is significant and assists in raising awareness of the company's work and role in the local agricultural community.

Review of Previous Audit Cycle: N/A

AUDIT FINDINGS BY PERFORMANCE MEASURE

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

Objective 1: Sustainable Agriculture Management

1.1 Sustainable Agriculture Stewardship

Conformance Evidence

- Sustainability Report
- Leading Harvest Statement of Commitment

Auditor Notes

- Ingomar publishes a sustainability brochure and shares their sustainability report on their website.
- Ingomar's Sustainability Report outlines their core values and details its sustainability strategy, with a focus on reducing water usage as a key priority.
- Ingomar shared their written Statement of Commitment to LH FMS objectives.
- Ingomar complies with regulatory requirements and is mindful of nitrogen management and water usage. Northern sites maintain 300-foot buffers between waterways to safeguard water quality, which is a primary management concern.
- Sites have been used for agricultural production since the late 1800s and early 1900s. Ingomar does not report any pressure to transition the land away from agricultural use.

Result: *In Conformance*

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Objective 1: Sustainable Agriculture Management (Continued)	
1.2 Critical External Factors	
Conformance Evidence	
- GAP Checklist	
Auditor Notes	
- Ingomar maintains Good Agricultural Practices (GAP) certifications and follows a GAP checklist to ensure compliance. - Ingomar’s CEO reviews market trends, using marketing reports to present expected tonnage, competing crops, and other external factors to customers. - Ingomar responds to buyer requests, reflecting market trends and buyer expectations. - Under new ownership, the strategic focus at Ingomar has shifted towards quality over quantity. - There is a strong emphasis on maintaining and valuing relationships with growers.	
Result:	In Conformance

Objective 2: Soil Health and Conservation

2.1 Soil Health

Conformance Evidence

- Soil Analysis Summary
- Soil Sample Analysis Trends
- Tissue Sample Analysis Summary

Auditor Notes

- Farms use conservation tillage, monitor nitrogen levels, rotate crops, apply soil amendments as necessary, and utilize petiole analysis to guide nitrogen use during the growing season to maintain soil health.
- Growers are knowledgeable about the specific soil amendments required for the region and have a deep understanding of local soil characteristics. Soil analysis trends, tissue samples, and soil analysis summaries were provided for auditor review.
- Soil testing is conducted in the fall to assess soil health. Compost, gypsum, potash, or sulfur may also be applied depending on soil test results. Ingomar collaborates with local Certified Crop Advisors (CCAs) and chemical company representatives to monitor soil conditions and develop Soil Health Plans after each harvest.
- Soil samples are collected by a Pest Control Advisor (PCA) or CCA from rotating locations and sent to a lab for testing.
- Ingomar growers implement formal Nutrient Management Plans (NMPs) to guide their fertilization practices. The growers are solely responsible for managing and developing their NMP each year. Fertilizer usage, rates, and amounts are recorded by field each year and tracked through the regional sustainable groundwater subbasin, since mandatory reporting is required.
- Annual Nitrogen Management Plans are developed for each growing site based on soil analysis results.
- Petiole samples are collected monthly during the tomato growing season to monitor plant health and nutrient uptake.
- A ripper equipped with a disk is used post-harvest to integrate crop residue into the soil, which enhances efficiency, helps reduce equipment emissions, and builds soil organic matter. Field leveling is conducted after the disking process. Furrows are ripped, and beds are prepared in anticipation of the next planting season.

Result: *In Conformance*

Objective 2: Soil Health and Conservation (Continued)

2.2 Soil Conservation

Conformance Evidence

- Soil Analysis Summary
- Soil Sample Analysis Trends

Auditor Notes

- Best management practices (BMPs) include crop rotations whenever possible, with larger growers more likely to rotate crops annually.
- Sites use buried drip irrigation systems to help mitigate erosion. Sites do not have highly erodible land (HEL). Sites visited are flat, with minimal or no potential for erosion.
- Sites manage soil compaction through the restriction of equipment entry when the ground is wet, using equipment with smaller footprints, minimum tillage, crop rotation practices, avoiding wet areas within the site, and using a chisel where necessary.
- Sites manage runoff through diversion from other farms and drainage canals to mitigate flood potential.
- Southern areas manage salinity issues with amendments such as sulfuric acid injections that are applied through drip irrigation systems. Irrigation systems monitor pH levels and automate the application of amendments as needed.
- Crop rotations are practiced every 1 to 3 years to maintain soil health.

Result: ***In Conformance***

Objective 3: Water Resources

3.1 Water Use

Conformance Evidence

- Field Reports
- Weather data
- Groundwater Sustainability Plan
- Sustainability Report

Auditor Notes

- Growers prevent groundwater depletion through Sustainable Groundwater Management Act (SGMA) Plans, which stipulate permitted acre-feet of groundwater used. Ingomar finds these allowances adequate to maintain crop health.
- Sites use weather stations to optimize irrigation adjustments.
- Field Reports include summaries of average soil moisture depletion. Water usage is heavily regulated in the region. Flow meters are installed, and water usage is logged and reported to local authorities.
- The GAP checklist collects information from growers regarding maintenance of wells and irrigation equipment, compliance with federal regulations, and scheduled water testing.
- Ingomar growers are situated within water management subbasins and utilize buried drip irrigation systems to conserve water.
- Ingomar's Sustainability Report states there has been a 10% reduction in on-farm water usage attributed to the implementation of drip irrigation, with 99% of their growers using this method.
- Growers test their irrigation water sources at least annually to ensure consistent water quality.
- Grower interviewed is actively involved as a member of the Del Puerto Water District.
- Growers interviewed are committed to reducing water usage and actively monitoring soil moisture to align with Ingomar's focus on water conservation among all grower suppliers.
- Growers visually monitor soil moisture using auger samples and use soil moisture and evapotranspiration (ET) monitoring devices to determine irrigation needs.
- Water allocation is managed carefully, with supply turned off at the end of the season. No additional water is brought on-site beyond what is allocated.

Result: *In Conformance*

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Objective 3: Water Resources (Continued)

3.2 Water Quality

Conformance Evidence

- Field reports
- Weather data

Auditor Notes

- Growers apply crop treatments through drip irrigation systems to minimize adverse impacts on water quality.
- In the northern regions, sites maintain a 300-foot buffer between waterways to protect water quality.
- Equipment is turned off during turnarounds to prevent overspray.
- Pest Control Advisors (PCAs) scout regularly. Scouting results are logged using app-based platforms, including Agrian. PCAs provide recommendations for crop applications, and growers proceed with treatments if necessary.
- Field reports take recent rainfall into account and adjust recommended actions accordingly.
- The San Joaquin River flows in proximity to some sites. Buffer zones are maintained between growing areas and waterways. Buffers are 35 to 50 feet wide and protect aquatic ecosystems.
- Crew members pick up debris to prevent littering nearby waterways.
- Grower interviewed has permitted access to the Department of Fish and Game to manage invasive plant species on the sites.
- Sites visited were tidy and well-maintained. Grower interviewed expresses appreciation for the riparian areas.

Result: *In Conformance*

Objective 4: Crop Protection

4.1 Integrated Pest Management

Conformance Evidence

- Restricted Materials Permits (RMPs)
- RMP Amendments
- Private Applicator Certificate (PAC)

Auditor Notes

- Operators use PCAs to scout fields and provide tailored recommendations for pest management. Growers typically contract with external applicators or conduct pest applications in-house with qualified staff.
- Pesticide applications are meticulously logged for accountability.
- PCAs scout the sites at least twice weekly during the growing season, logging their findings in the Agrian platform. PCA recommendations are subject to review by growers before any applications are made.
- PCAs establish thresholds for pest management based on Integrated Pest Management (IPM) best practices and methodologies.
- Common pests identified on the sites include thrips, leaf hoppers, and stink bugs. Sites use sticky traps to monitor leaf hopper populations and inform appropriate spray directives.
- Growers maintain Restricted Materials Permits (RMPs) to ascertain site-specific practices.
- Sites use approved pesticide lists sourced from the California League of Food Processors.
- Sprays, including herbicides and foliar applications, are conducted during the pre-planting season and when leaf hoppers pose a threat.
- Growers maintain direct interaction with PCAs to ensure comprehensive pest management strategies.
- Harvested products undergo pesticide residue testing upon arrival at the processing plant to ensure safety and compliance.
- Sites honor bans on neonicotinoids to protect pollinators.
- Most PCAs do not engage in the application process themselves.
- Systemic pesticides can be administered through drip irrigation systems to minimize tractor passes and reduce the risk of pesticide drift.
- Pest management strategies are frequently guided by recommendations from PCAs. Active ingredients in pesticides are often rotated to mitigate the development of pest resistance.
- Sites visited may introduce biological pesticides via drip systems or shanked into the soil, although their use is often considered cost-prohibitive on a large scale.
- Crop rotation practices at the sites support crop protection and pest management.
- The grower consistently aims to use the minimum necessary application materials.

Result: *In Conformance*

Objective 4: Crop Protection (Continued)

4.2 Crop Protectant Management

Conformance Evidence

- RMPs

Auditor Notes

- Licensed PCAs are responsible for applying protectants.
- Protectants are not stored on-site to ensure safety and compliance.
- Applications are conducted by either licensed in-house personnel or contracted applicators.
- Empty pesticide containers are triple rinsed and disposed of in accordance with local regulations to minimize environmental impact.
- The grower maintains an off-site (not on Ingomar properties) shop for secure storage of protectants and related materials.

Result: *In Conformance*

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

5.1 Agricultural Energy Use and Conservation

Conformance Evidence

- San Joaquin Valley Air Pollution Control District (SJVAPCD) contract
- GAP Checklist

Auditor Notes

- Sites use conservation tillage practices and minimize the number of passes to reduce diesel consumption.
- Ingomar has provided a contract that outlines funding for the acquisition of upgraded farm equipment featuring lower emissions and Tier 4 engines to replace older, less efficient machinery.
- The grower is motivated to enhance operations through increased technology utilization.
- All growing sites are established with a consistent growing configuration to optimize operational efficiency. Every tractor is equipped with GPS technology, and there is a continuous effort to expand the use of GPS to support further efficiency.
- Select production sites use solar energy to power shops and generate energy credits.
- Grower visited has an electric Gator utility vehicle.

Result: *In Conformance*

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

5.2 Air Quality

Conformance Evidence

- Management interview

Auditor Notes

- Growers use updated farm implements to minimize emissions and safeguard air quality.
- Farm equipment is equipped with GPS technology to ensure more efficient operational passes.
- Burning of agricultural material such as crop residues and vines is prohibited in the San Joaquin Valley to reduce emissions and particulates that have negative public health effects.
- The grower opts for smaller-footprint equipment and restricts the number of vehicles utilized on-site.
- Equipment passes are minimized to the essential number needed to enhance efficiency.
- Equipment undergoes regular inventory checks and is maintained according to a preventative maintenance (PM) schedule.
- Roads are regularly sprayed to minimize dust generation.
- Minimum tillage practices are implemented to reduce airborne dust.
- Drip irrigation systems decrease agrochemical drift and volatilization.

Result: ***In Conformance***

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

5.3 Climate-Smart Agriculture

Conformance Evidence

- Weather data

Auditor Notes

- Growers use equipment with diesel exhaust fluid (DEF) and regeneration cycles to enhance efficiency.
- Sites use conservation tillage practices and reincorporate crop residues to support soil health, quality, and increase soil organic matter (SOM).
- Emissions are considered during planning meetings.
- All equipment is maintained on a preventive maintenance (PM) schedule and inventoried regularly. Equipment maintenance logs are diligently maintained.
- Sites conserve water to address regional climate impacts in wet and dry years to maintain consistent water usage. Drip irrigation is employed to minimize evapotranspiration.
- Growers utilize sensors and rely heavily on weather stations integrated with irrigation systems to determine appropriate application rates and water amounts.
- Growers and staff visually monitor soil moisture during site visits.
- Crop selection considerations are made to choose varieties that will perform well following the previous harvest.
- Ingomar provides recommendations to growers on seed selection based on performance from the prior year.

Result: ***In Conformance***

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Objective 6: Waste and Material Management

6.1 Management of Waste and Other Materials

Conformance Evidence

- Vendor invoices
- Grower Meeting Agenda

Auditor Notes

- Growers interviewed triple-rinse, store, and recycle containers appropriately. Used oil filters, drums, and oil are recycled. Sites recycle drip tape once it is baled.
- No waste is left on site; the crew ensures that it is taken to the dump or stored properly. Sites visited appeared tidy, with no debris observed.
- Crop residues, such as vines, are shredded and reincorporated into the soil.
- The local agricultural community organizes collection days for empty containers. Sealed, unused products can be returned to suppliers for credit at the end of the season. Grower interviewed takes care to avoid excessive ordering of products.
- Burning of cardboard waste was observed on-site.
- Sites participate in recycling programs. Waste and recycling opportunities are discussed during annual meetings.
- Ingomar management reports that fuel storage on sites is appropriately contained.
- No regulated materials are stored on-site. Items are brought on-site as needed by the crew.
- The grower provided proof of hazardous waste pickup by a recycling vendor.

Result: *In Conformance, Opportunity for Improvement (See Key Findings 6.1.2)*

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Objective 6: Waste and Material Management (Continued)

6.2 Food and Agricultural Waste Resource Recovery

Conformance Evidence

- Grower Meeting Agenda

Auditor Notes

- Ingomar maintains rules regarding appropriate handling and transportation during harvest, with no intermediate storage to reduce crop loss.
- Set schedules are coordinated between the grower, trucking company, and processing plant to ensure accurate timing for the harvest operation.
- Excessive crop loss is typically related to pests or disease, which is mitigated by changing the products used to combat these issues in addition to crop rotation.
- Varietals are selected based on site specifications, with recommendations from Ingomar that consider site characteristics and knowledge from prior harvests.
- Frequent visits to the site by the grower and PCA or CCA are conducted to monitor the crop as harvest approaches. Ingomar advises growers on the timing of harvest and provides instructions on when to turn off irrigation to prevent mold.
- Annual Meeting Agendas include discussions regarding seed varieties and timing of harvests to support improved inventories and desired varieties.
- In the past, growers have experienced excessive crop loss due to heat, late planting, and plugged emitters, prompting modifications to operations to prevent these issues in the future.
- Select sites use composted chicken manure and other amendments, with no use of municipal sludge.
- Plant residue is incorporated into the soil through disking following crop harvest. Leftover seeds and skins are sold and repurposed for pet food. Tomato tops and vines received during delivery are used for cattle feed.

Result: *In Conformance*

Objective 7: Conservation of Biodiversity

7.1 Species Protection

Conformance Evidence

- Management interview
- GAP checklist

Auditor Notes

- County Agricultural Commissioners maintain and distribute lists of threatened and endangered species within their respective counties and inform growers of species in the area.
- Grower interviewed demonstrated some awareness of threatened and endangered species, but detailed knowledge was lacking due to species not being present on sites.
- Site operators avoid using chemicals that adversely impact bee populations.
- There is currently no program in place to identify and protect at-risk species. Processes are unstructured and reliant on the grower's motivations.

Result: *Opportunity for Improvement, Minor Non-Conformance (See Key Findings, 7.1.1 and 7.1.2)*

7.2 Wildlife Habitat Conservation

Conformance Evidence

- Management interview
- GAP checklist

Auditor Notes

- Sample site visited is surrounded by a wildlife refuge. Growers maintain buffer zones around this conservation area. Conservation areas near sites are documented.
- The County Ag Commissioner provides guidance when filing chemical permits, which includes maintaining appropriate buffer zones and relevant practices. Riparian areas are closely monitored, with the County Ag Commissioner enforcing regulations related to ecologically important areas.
- The growers demonstrated awareness of the nearby wildlife preserves and local biodiversity.
- The grower engages with the Department of Fish and Game regarding the management of riparian areas. The grower demonstrates awareness of sensitive areas such as waterways, riparian areas, and wildlife preserve zones, and maintains these spaces.
- Documentation could be improved to specify actions and involvement with the Department of Fish and Game and other agencies, including the County Agricultural Commissioner.
- Sites use bird boxes to provide habitats for raptors.
- Care is taken to avoid chemical applications that could harm the nearby ecosystem, using only approved materials.

Result: *In Conformance, Opportunity for Improvement (See Key Findings 7.2.2)*

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Objective 7: Conservation of Biodiversity (Continued)

7.3 Avoided Conversion

Conformance Evidence

- GAP Checklist

Auditor Notes

- Ingomar sample sites have been established as long-term farmland.
- Production acreage is left to rest, with forage crops potentially planted in the winter to enhance soil recharge capacity. These crops may be baled for livestock or reincorporated into the soil.
- The GAP checklist captures the necessary information related to farming practices. GAP checklists are collected regularly.
- There is currently no Deforestation Policy in effect.
- Clear cutting of buffer zones are prohibited by Ingomar.

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

7.4 Crop Diversity

Conformance Evidence

- Grower Meeting Agenda

Auditor Notes

- All sites use crop rotation, generally maintaining tomatoes for about two years before rotating to other crops such as beans, garlic, onion, melons, or corn. A grower interviewed expressed a preference for planting tomatoes for only one year at a site before implementing rotation.
- Different genetic varieties of tomatoes are rotated to promote diversity.
- Decisions regarding rotational crops are influenced by economic considerations, disease pressures, and weed pressures, and discussed during Annual Meetings. Ingomar is responsible for selecting the tomato varieties to be planted and offers recommendations to growers. Only non-GMO, hybrid seed varieties are utilized.

Result: *In Conformance*

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Objective 8: Protection of Special Sites

8.1 Site Protection

Conformance Evidence

- Management interview
- GAP checklist

Auditor Notes

- Selected sites hold historical significance, including Williamson Act properties. Sites of historic significance are identified in GAP checklists.
- Ingomar reported the historic significance of the region where farms are located on the development of agriculture and California's history.
- While growers did not have any mapping of special sites, Ingomar management was aware of sites with historical or natural significance.
- Documentation of special sites on properties could be developed beyond GAP checklists. Approaches to historic sites and preservation practices could be detailed in additional documentation.

Result: *In Conformance, Opportunity for Improvement (See Key Findings, 8.1.2)*

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Objective 9: Local Communities

9.1 Economic Wellbeing

Conformance Evidence

- Dispute Resolution Agreement
- Training reports
- Employee Handbook
- Hiring checklists
- Industrial Welfare Commission Order
- Employee Withholding Allowance Certificate

Auditor Notes

- The Employee Handbook contains written policies to support legal compliance.
- Sites visited use posters to inform workers of their rights.
- During the growing and harvest season, there are close to 500 employees, with approximately 150 employees on-site at any given time. While Ingomar does not employ farm labor contractors or H2A workers, individual growers may do so.
- The Industrial Welfare Commission Order outlines the requirements that Ingomar must meet concerning record-keeping practices and employment conditions.
- Fertilizers and chemicals are sourced from local vendors.
- Ingomar employs compliance officers to oversee adherence to regulations.

Result: *In Conformance*

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Objective 9: Local Communities (Continued)

9.2 Community Relations

Conformance Evidence

- Tomato Festival flyer
- Tastes of the Valley Sponsorship Letter
- Golf Tournament Sponsorship

Auditor Notes

- Ingomar emphasizes community involvement for both the organization and its employees.
- Ingomar is involved in local communities and sponsors the Tomato Festival in Los Banos. Last year, Ingomar hosted the Chamber of Commerce to discuss wetland conservation initiatives.
- The company sponsors a local baseball team. Both the Plant Manager and Director of Field Operations coach a local baseball team.
- Grower interviewed is involved with a local 4-H chapter and has been a long-standing farmer in the region.
- The Director of Field Operations is a member of the Merced County Farm Bureau and participates in various local events.
- Ingomar makes annual donations to the Heritage Foundation and participates in the Los Banos County Fair.

Result: *In Conformance*

9.3 Local Communities and Indigenous Peoples

Conformance Evidence

- Social Responsibility Statement
- Company website

Auditor Notes

- Ingomar's Social Responsibility Statement demonstrates a commitment to social responsibility and ethical supply chain practices. The statement does not explicitly acknowledge the rights of local communities and the treaty rights of Indigenous Peoples.
- Due diligence on property ownership reviews land tenure rights of local communities to ensure that land tenure rights are not infringed upon.
- There have been no questions or feedback from the community regarding Ingomar's practices.
- Ingomar hires locally, sponsors local events, and maintains a positive relationship with the community.
- A contact form is available on Ingomar's website for community inquiries.

Result: *In Conformance, Opportunity for Improvement
(See Key Findings 9.3.1 and 9.3.2)*

Objective 9: Local Communities (Continued)

9.4 Public Health

Conformance Evidence

- GAP Checklist
- Safety Tailgate Meeting Sign-in Sheet template
- Safety Training Program

Auditor Notes

- Ingomar sites adhere to OSHA regulations to ensure workplace safety. Safety training records are maintained by Ingomar.
- No trespassing signs are posted on the premises. Sites visited are not fenced.
- The grower and team do not store equipment or chemicals on-site to mitigate the risk of theft.
- There is cooperative communication with adjacent farm operations regarding local area issues.
- Information related to chemical and fertilizer exposure is documented on the GAP checklist.
- The grower has provided records of safety trainings and attendance logs.

Result: ***In Conformance***

Objective 10: Employees and Farm Labor

10.1 Safe and Respectful Working Environment

Conformance Evidence

- Hiring checklists
- Employee Handbook
- California Employment Development Department posters
- California Civil Rights Department posters

Auditor Notes

- Ingomar is an equal opportunity employer.
- The Employee Handbook includes policies designed to promote safe work environments.
- Signage is posted in break rooms and bathrooms to support safety, including provisions for shade.
- Training is provided through the Tomato Processing Advisory Board.
- Hiring checklists are utilized to inform employees about relevant policies and notices.
- Ingomar facilities comply with legal requirements, including protections for employees who are transgender or gender nonconforming, as mandated by California law.
- Ingomar conducts internal training sessions for in-house staff.
- Ingomar's Employee Handbook supports the safety and well-being of all employees, establishes Ingomar as a smoke-free workplace, and outlines conduct requirements, standards, and potential responses.

Result: *In Conformance*

10.2 Occupational Training

Conformance Evidence

- GAP Checklist
- Employee Handbook
- Safety Tailgate Meeting Sign-in Sheet template
- Safety Training Program

Auditor Notes

- Ingomar conducts annual safety training in the winter and in-season tailgate training during the growing season, with attendance recorded. Ingomar is not requesting documentation from growers related to these trainings.
- Some information pertaining to occupational safety is captured on the GAP checklist.
- The verification of Farm Labor Contractor (FLC) license information is not performed annually by Ingomar. FLC reviews are the responsibility of growers on sites.
- An example of safety training logs and attendance records was provided by the grower during an onsite visit.
- Safety training is conducted once a year with a contracted company.
- Employee Handbook addresses health, safety, and educational opportunities for Ingomar employees.

Result: *Opportunity for Improvement (See Key Findings 10.2.1)*

Objective 10: Employees and Farm Labor (Continued)

10.3 Supporting Capacity for Sustainability

Conformance Evidence

- Leading Harvest Statement of Commitment
- Hazard Analysis and Critical Control Points (HACCP) Certification

Auditor Notes

- Ingomar provided a policy statement committing to LH FMS.
- The Director of Grower Field Operations at Ingomar actively encourages growers to meet required certification standards. Growers who are unwilling to comply with these requirements are advised to consider alternative crop options.
- Ingomar has clarified expectations from local agricultural experts who work closely with growers and have a deep understanding of field practices.
- Growers lack awareness of the detailed objectives of LH FMS, although Ingomar management is committed to supporting adoption of LH FMS requirements.
- Ingomar holds HACCP SCS Global Certification. HACCP certification activities may support food waste and energy usage reduction and support other sustainable practices.
- The management team at Ingomar possesses advanced degrees in agriculture and business-related fields.

Result: *In Conformance, Opportunity for Improvement (See Key Findings 10.3.2)*

10.4 Compensation

Conformance Evidence

- Management interview
- Payroll information template

Auditor Notes

- Ingomar conducts annual performance reviews for its employees.
- The company collaborates with the Employment Development Department to research competitive wage rates.
- Payroll information sheet provided is incomplete and does not describe wages or wage scale.
- Ingomar maintains an approximately 70% return rate for seasonal employees each year.

Result: *Opportunity for Improvement (See Key findings 10.4.1)*

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Objective 10: Employees and Farm Labor (Continued)

10.5 Farm Labor

Conformance Evidence

- Management interview
- Site visit

Auditor Notes

- Ingomar's growers utilize licensed Farm Labor Contractors (FLCs) as needed for operation and harvest, working alongside the in-house crew. FLCs are listed in good standing with State regulators.
- FLC reviews are the responsibility of growers on sites. Ingomar management does not interact with the FLC's.

Result: *Not Applicable*

Objective 11: Legal and Regulatory Compliance

11.1 Legal Compliance

Conformance Evidence

- Site visit
- California Employment Development Department posters
- California Civil Rights Department posters

Auditor Notes

- Legal compliance posters are prominently displayed in break rooms.
- Ingomar conducts both onboarding and annual training for employees.
- Ingomar's HR department and safety professionals are responsible for maintaining the training curriculum. OSHA posters for the growers are in central shop buildings, where workers report daily.
- Internal HR personnel ensure compliance with relevant regulations.
- Training certificates, such as those for anti-sexual harassment, are prominently displayed in offices. Growers interviewed maintain HACCP certification.
- Farm Labor Contractor (FLC) regulation posters are displayed on-site during field operations.

Result: *In Conformance*

Objective 11: Legal and Regulatory Compliance (Continued)

11.2 Legal Compliance Policies

Conformance Evidence

- Employee Handbook

Auditor Notes

- Employee Handbook contains social compliance policies in conformance with LH FMS requirements and supports alignment with the fundamental rights of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, except for the right to collective bargaining.
- Ingomar employees sign the Employee Handbook annually.
- US and California regulations bar the employment of forced, compulsory, or child labor.

Result: *In Conformance, Opportunity for Improvement (See Key Findings 11.2.2)*

Objective 12: Management Review and Continual Improvement

12.1 Farm Review and Continual Improvement

Conformance Evidence

- Grower Meeting Agenda
- Sustainability Report
- Management interview

Auditor Notes

- Reviews are conducted and documented by each department annually.
- Ingomar hosts the Fall Grower Meeting, which includes a review of harvest results. Goals are established for the upcoming growing season during this meeting. The Fall Meeting includes reviews of past season performance. Grower Meetings could incorporate LH FMS implementation to support continual alignment.
- Ingomar utilizes internal key performance indicators (KPIs) to monitor performance, including natural gas usage and energy efficiency in production. KPIs should be further developed to specify and address LH conformance.
- Annual meetings focus on discussions related to fruit form and quality, particularly sugar levels. There is an assessment of overall grades for overall quality.
- Sustainability reporting and documentation are updated and reviewed annually.
- The Sales and Environmental Resources Supervisor is involved in providing updated reports and identifying opportunities to improve sustainable practices; for example, Ingomar has discovered a way to recycle steam used during processing.
- Ingomar advocates for bridging traditional farming methods with new technologies to achieve optimal performance.

Result: *In Conformance, Opportunity for Improvement (See Key Findings 12.1.2 and 12.1.4)*

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Objective 12: Management Review and Continual Improvement (Continued)

12.2 Support for Sustainable Agriculture

Conformance Evidence

- California League of Food Producers (CLFP) Tomato Processing Research document

Auditor Notes

- Ingomar donates annually to UC Extensions, funding projects such as broomrape removal initiatives.
- Ingomar participates in assessments conducted by the California Tomato Research Institute.
- The Director of Grower Field Operations is involved in several agriculture organizations, including local Farm Bureau membership, is a Board member of the Processing Tomato Advisory Board, and holds a Private Applicator License.
- Field Operations Supervisor interviewed is HACCP certified.
- Ingomar hosts the Los Banos Tomato Festival and makes contributions to the Heritage Foundation for the Los Banos County Fair. Ingomar is a member of the CLFP, which sponsors research initiatives.
- Ingomar offers internships through California State University, Stanislaus (CSUS) at their plant, and qualified interns are employed post-internship. Ingomar has also made donations to the CSUS Agriculture program.

Result: ***In Conformance***

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CONCLUSIONS

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

STANDARD USER GUIDANCE

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

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

SPECIFIC FOCUS AREAS FOR NEXT AUDIT

It is Averum's desire to observe Ingomar sites during a different stage of crop development in 2025. Surveillance visits are estimated for July, to allow auditors to observe tomatoes during development. Another round of surveillance audit activities would take place in 2026, with recertification audits taking place in 2027.

INGOMAR PACKING COMPANY, LLC

LH FMS AUDIT SUMMARY REPORT

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Summary of Audit Findings					
Program User	Ingomar Packing Company, LLC				
Audit Dates	October 11, 2024 – November 14, 2024				
Non-Conformances Raised (NCR):	<table border="1"><thead><tr><th>Major</th><th>Minor</th></tr></thead><tbody><tr><td>0</td><td>2</td></tr></tbody></table>	Major	Minor	0	2
Major	Minor				
0	2				
Follow-Up Visit Needed?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Date(s)				
Audit Report Executive Summary					
<p>Ingomar performed well and was able to achieve conformance and certification to the Leading Harvest Farmland Management Standard. Ingomar used findings from their Readiness Review to minimize conformance gaps and delivered an effective package of conformance evidence. Minor nonconformities were promptly addressed and nonconformance reports and corrections are retained to support next year’s surveillance activities. The properties we visited were professionally managed, and Managers are professionally qualified for their roles. Ingomar’s Management team and growers were gracious hosts who were transparent and expansive in their interview responses. All parties have been generous with their time and are appreciated.</p>					
Team Leader Recommendations					
Corrective Action Plan(s) Accepted	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 11/14/2024				
Proceed to/Continue Certification	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 11/14/2024				
All NCR Closed	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 11/14/2024				
Standard(s) Audited Against					
Leading Harvest Farmland Management Standard 2020 (Objectives 1 through 12)					
Audit Team Leader	Audit Team Members				
Matt Armstrong	Linnea Abel, Jill Brodt, Holly Salisbury				
Scope of Audit					
Management of production farmland on direct operated properties.					
Accreditations	Approval by Leading Harvest to provide certification audits				
Number of Certificates	1				
Certificate Number	AVERUM-LHFMS-2024-0025				
Proposed Date for Next Audit Event	July 2025				
Audit Report Distribution	Jennifer Ingram: jennifer.ingram@ingomar.com				