

A Guide to the GAP Certification Process



Preparing for the USDA GAP (Good Agricultural Practices) Audit

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Overview

The increasing incidence of foodborne illness in fresh produce in the U.S. has resulted in a demand for food safety assurance by minimizing the risks of microbial hazards. While there is no way to completely eliminate all of the potential risks, there are many food safety practices growers and food handlers can implement beginning at the farm level and progressing all the way through to the market-place. These practices pertain to water and soil quality, management of wildlife pests and livestock, worker health and hygiene, equipment and facilities, and general handling and traceability of product.

Obtaining Good Agricultural Practices (GAP) certification is one way growers can verify their production and handling practices are in accordance with recommended safety guidelines. To become GAP-certified a farm must prepare for and pass a GAP audit. While presently there are several different certifying entities with their specific audits, the guidelines described herein refer specifically to the **USDA GAP audit process**. While the actual GAP audit templates are different, the guidelines here are useful for preparing for the Harmonized GAP audit, since the fundamental GAP principles and the process of preparing for each audit is essentially the same.

The purpose of this guide is to help you walk through the audit preparation process in a step-by-step manner. While the certification process can seem daunting and painstaking, a multi-faceted approach has been used here to help you get through the process and have your farm successfully become GAP-certified. Preparation includes:

- An initial on-farm assessment
- Farmer training and one-on-one farm consultations to help you develop a Plan of Action (POA) Manual
- Monitoring and documenting practices in your POA Manual
- Farm implementation with a pre-audit farm walk-through (mock audit)
- Scheduling and conducting the audit, and post-audit visits/updates as needed

Getting Started

Many growers, once they decide to pursue GAP certification, can feel overwhelmed at where to begin the process, as well as what they need to do and how to do it. Based on our experience of having worked with several dozens of growers, we have found that a first very helpful step in the process is to conduct a one-on-one on-farm assessment. You can **contact the Fresh Produce Food Safety Team and local VCE office to set up an appointment**. Questions, such as the flow of product from production to harvest to post-harvest handling to packing to storage and transportation, are discussed. Water sources and manures/soil amendments applied, toilet and hand-washing facilities, worker health & hygiene, sanitation practices, and product traceability are also considered. This important information will be very useful as you begin to prepare your Food Safety Plan in your GAP Plan of Action (POA) Manual. It will also help you identify documentation that may be lacking, which you need as support material for your POA Manual.

Developing your Plan of Action (POA) Manual

The next major step is to develop and complete your POA Manual. The POA Manual is a written document that outlines your entire food safety program and how you plan to carry it out on your farm or operation. To make this process easier, we have streamlined this process by providing the core manual templates, which can then be fine-tuned to reflect your specific unique farm. The POA Manual consists of several main parts:

- Audit Checklist Questions and Answers
- Standard Operating Procedures
- Record/ Logs
- Supporting Documents

Audit Checklist Questions and Answers are identical to the USDA Audit Program checklist questions, and are provided in excel spreadsheet format. In addition to the required demographic, general question, and Farm Review section templates, there are other audit areas from which a farm may choose to be certified (if desired or needed). These areas include Field Harvesting and Field Packing, House Packing Facility, Storage and Transportation, Wholesale Distribution Center, and Preventive Food Defense.

Standard Operating Procedures (SOPs) outline the farm or company policy related to food safety. Each SOP details step-by-step how a specific operation or activity is done on the farm. For example, your farm's SOP on wildlife control would specify procedures for monitoring wildlife, how regularly this is done, and what steps you might take as corrective actions when wildlife is detected. On the checklist questions, a "P" indicates that a policy/SOP document must be provided in the food safety plan in order to show conformance to the question.

Record/ Logs document when and who performed specific standard operating procedures, as well as the details specifying compliance with the given SOP/policy. For example, a log sheet of wildlife observations would note the specific dates fields and traps were checked for the presence of wildlife, who made the observations, and what specific steps were employed (such as re-setting traps, implementing other measures, etc.). Records/logs should closely coincide with specific SOPs. On the checklist questions, an "R" indicates that a record is required to show an action was taken.

Supporting Documents help substantiate a response to an audit checklist question and includes materials such as risk assessment notes; traceability system information like farm maps, harvest dates, crop, field, and producer codes, as well as disposition records, invoices and/or market reports; drawings showing packing house flow zones; water test results; pesticide recordkeeping books, pesticide labels, MSDSs, and any other pertinent IPM-related documentation; food safety training such as certificates, agendas, presentation notes and handouts, and trainer information; and any other supporting documentation related to specific practices (i.e. fact sheet or manufacturer specifications). On the checklist questions, a "D" indicates that a document is required.

The POA Manual is organized starting with a comprehensive Table of Contents, detailing what is found in each section. Each of the sets of audit checklist template questions are divided into separately labeled sections, with all SOPs, records/ logs*, and other supporting documents immediately provided within that section, in chronological question order. Loose supporting documents can be placed into plastic sleeves and labeled to reflect the specific question number they pertain to (as reflected in the Table of Contents).

The POA Manual represents your comprehensive farm food safety plan and adherence to your POA is an implicit expectation. It is also important to remember that like any certification, documentation of all actions taken is absolutely crucial! **The auditors are looking for compliance with the stated policies, so if you say you do something as a part of your written policy, you will need the proper documentation to support having done it!** As the auditors say, **“Document, Document, Document!!”** One way to perform and maintain your documentation is to create separate notebooks with your record/log sheets, keeping them in a location that all farm workers have access to. Routine, frequently performed tasks log sheets can be kept on a clip board, if desired, then placed into their respective notebooks when filled in. However you decide to organize your system, it is best to keep the POA Manual in a protected place as a reference, and keep the frequently used log sheets separate (one-time logs can be kept in the main reference manual)*.

Readying the Farm for the Audit

While the written POA Manual tells how you will carry out your food safety plan and contains related documentation, **implementing what the manual says is the next major step for preparing for the audit.** This means systematically putting into place all the specific practices, procedures, and signage you have detailed in the POA and documenting those practices in your records/ logs. The following list, while not exhaustive, lists some of the key areas that need to be addressed:

- Testing all water sources and taking corrective treatment measures if warranted
- Implementing fencing or buffers when livestock are next to crop production areas and pose a risk of contamination
- Making sure manures are properly stored and contained
- If applying raw manures, making sure a minimum “120 days before harvest” requirement is met; if using composted manure, documenting the turning, monitoring temperatures, and mixing to insure manure is actively composted
- Monitoring production areas for wildlife and implementing any deterrence measures
- Establishing a rodent control program in packing areas and other pertinent areas
- Setting up sanitation units or in-home restrooms, hand washing stations, and designated eating areas
- Installing any protective covers over breakable lights and glass
- Buying and using harvest containers and packing materials that meet standards
- Making sure processing water for packing is potable and establishing monitoring system

- Establishing lidded trash receptacles for the grounds
- Implementing a way to cover and protect product from harvest to transport
- Developing your Traceability system and performing a Mock Recall

Obtaining the Official On-Farm Audit

It is a **wise idea to have a final farm walk-through (mock audit) once the POA Manual is put together**, including having all the required documentation and paperwork up-to-date, and implementing the policies and procedures on the farm. Doing so will bring to light any specific areas that may still require attention prior to the official USDA GAP audit.

Once everything is in order, the next step is to request the actual audit. In Virginia, the USDA GAP audit is administered through the Division of Marketing of the Virginia Department of Agriculture and Consumer Services (VDACS). As an independent third party, VDACS inspectors act on behalf of the USDA to perform the audit. In addition to reviewing the POA Manual, inspectors conduct an on-farm walk-through at the time of the audit. Once all desired audit sections are completed by the inspector, each section is scored, with a passing score being 80% of the possible points. These results are then forwarded to the USDA Agricultural Marketing Service, where the paperwork is processed. Note that scoring for the HGAP is more complicated.

To facilitate grower needs, Virginia Cooperative Extension has worked very closely with VDACS inspectors to coordinate inspector and grower schedules to minimize individual audit costs. Costs for the audit include travel and total audit time per farm (\$92 per hour), so when possible, it is best to coordinate several different nearby farms seeking certification at the same time. Because of the very positive working relationship with VDACS and VCE, inspectors have been very favorable to VCE agents attending the actual audits, assuming the grower is comfortable.

Post-Audit Considerations

After the actual audit, growers receiving passing scores are placed on the USDA GAP/GHP Audit Verification Program website noting certified growers from Virginia:

<http://www.ams.usda.gov/services/auditing/gap-ghp>

Certified farms also receive official notification from USDA. After the initial farm audit, an unannounced site visit is possible within a year that the farm was certified. It is important that any areas needing attention, which were flagged during the audit, be addressed and corrected so as to be ready for any follow-up visits. Certification is valid for one year from the date of the audit, and the farm will need to be re-certified the next year and thereafter.

Of course, the POA Manual needs to be updated as policy changes occur and necessary documentation included. Any new workers should be trained as per the POA Manual, making sure that they are in compliance with the food safety plan. All records must be maintained for three years.