

A Guide to the GAP Certification Process



Preparing for the USDA GAP (Good Agricultural Practices) Audit

Amber D. Vallotton
Horticulture Agent
VCE-Rockingham County
965 Pleasant Valley Road
Harrisonburg, VA 22801

540-564-3080 (Office)
540-209-4434 (Cell)
avallott@vt.edu

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, and general handling and traceability of product.

Adopting 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**. It should be noted that a harmonized GAP audit is forthcoming (projected for 2013) and will replace all current GAP audits. Nonetheless, fundamental GAP principles will not change, and the process of preparing for the 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 pre-assessment, farmer training meetings 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 final farm walk-through, 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, we have found that a first very helpful step in the process is to conduct a one-on-one consult to get a good sense of the farm and/or processing operation. During this time, a farm self-assessment is started in order to help review and organize information needed as you prepare for the audit.

In the farm self-assessment, questions relate to farm history and land use, crop records, water sources/quality, manures and soil amendments, toilet and hand-washing facilities, worker health, hygiene, and sanitary practices, harvesting, packing, and transportation, worker training, and product traceability. 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 to 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 notebooks, which can then be tweaked to reflect your specific unique farm. The POA Manual consists of five main sections:

- Section One- Written Plan of Action
- Section Two- Standard Operating Procedures
- Section Three- Record/ Log Sheets
- Section Four- Supporting Documents
- Section Five- Other Materials

Section One (Written Plan of Action) provides all of the templates for the USDA Audit Program questions. In addition to the required demographic and general question sheets, there are several other audit areas from which to choose to be certified (in any or all areas). These areas include Farm Review (Part 1), Field Harvesting and Field Packing (Part 2), House Packing facility (Part 3), Storage and Transportation (Part 4), Wholesale Distribution Center (Part 6), and Preventive Food Defense (Part 7). In the POA, the required questions and additional audit area questions are answered, as well as noting references to policies/standard operating procedures, records, supporting documents, and other materials contained in other sections of the POA Manual.

Section Two (Standard Operating Procedures) outlines the farm or company policy related to food safety. Each standard operating procedure (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, and what steps you might take as corrective actions when wildlife is detected. In the POA section, a "P" indicates that a policy/SOP must be documented in the food safety plan in order to show conformance to the question.

Section Three (Record/ Log Sheets) documents when and who performed specific standard operating procedures, as well as any data related to what actions were taken to be in 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.). Thus, records/logs should closely coincide with specific SOPs. In the POA section, an "R" indicates that a record is required to show an action was taken.

Section Four (Supporting Documents) helps substantiate a response to an audit question and includes farm maps with field codes, drawings showing packing house flow zones, certificates of training, water test results, signage, etc.. In the POA section, an "D" indicates that a document is required.

Section Five (Other Materials) includes any supplemental information that supports the overall POA Manual, such as product info sheets, pesticide record books, disposition reports, self-assessment work sheets, any pertinent training materials, etc..

A final note on the POA Manual is to realize that it 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 ever looking for compliance with the stated policies, so if you say you will 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 the documentation part 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 safe place as a reference, and keep the log sheets separate.

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 actually starting to document those practices in your logs/records. 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 where 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 the minimum “120 days before harvest” requirement is met; if using composted manure, documenting the turning, monitoring temperatures, and mixing to insure manure is properly 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, designated eating areas
- Installing any protective covers over breakable lights
- Incorporating 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 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 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.

<http://www.ams.usda.gov/AMSV1.0/GAPGHPAuditVerificationProgram>

To facilitate growers, Virginia Cooperative Extension agents have 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 and offering growers assistance as needed.

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. Certified farms also receive an official USDA GAP certificate. After the initial farm audit, an unannounced site visit is possible during the year 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 continue to be followed and documentation maintained. This includes any changes to policy, which should be noted in the POA Manual. Any new workers should be trained as per the POA Manual, making sure that they are familiar with specific standard operating procedures.

Acknowledgments

A very special thanks to Wythe Morris, VCE-Carroll County, for his support materials and resources.