



A Guide to the Good Agricultural Practices (GAP) Certification Process

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Overview

The increasing incidence of foodborne illness in fresh produce in the United States 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 throughout the supply chain (to the market-place). These practices relate to water quality; soil amendments; management of wildlife, pests and livestock; worker health and hygiene; equipment and facilities; general handling; and traceability of the product.

Obtaining Good Agricultural Practices (GAP) certification is one way growers can verify their production and handling practices are aligned with recommended food safety guidelines. To become GAP-certified a farm must prepare for and pass an audit. While presently there are several different organizations with their specific GAP audits (for example, Harmonized GAP, Global GAP, among others), the guidelines described here refer specifically to the *USDA Good Agricultural Practices and Good Handling Practices (GAP & GHP) Audit*. While the actual GAP audit templates are different, the guidelines described here are useful for preparing for other audit programs. In general, all GAP audits are based on fundamental on-farm food safety principles. Additionally, the process of preparing for each audit is largely the same.

This guide will help you walk through the audit preparation process in a step-by-step manner. While the certification process can seem daunting and painstaking, this guide will assist you in navigating the process and provide the skills to be successful on audit day. Virginia Cooperative Extension's Fresh Produce Food Safety Team offers the following preparation to Virginia-based growers:

- An initial on-farm assessment
- Grower mentoring to help you develop a Plan of Action (POA) manual
- POA manual templates with assistance to modify
- Farm implementation with a pre-audit farm walk-through (mock audit)
- Post-audit visits/updates as needed



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Getting Started

Many growers, once they decide to pursue GAP certification, can feel overwhelmed at where to begin the process (how does one get started?). Based on prior experience working with dozens of growers, we have found that the first step in the process is to conduct an on-farm assessment. You can contact the Fresh Produce Food Safety Team Coordinator (A. Vallotton) or your local VCE office to set up an appointment. Information on the product flow from production to harvest to post-harvest handling to packing to storage and transport will be discussed (see packinghouse flow diagram). Other relevant information on water, soil amendments, worker health & hygiene, sanitation practices, and product traceability will also be evaluated. This information will be extremely useful as you begin to prepare your Food Safety Plan in your *USDA GAP & GHP* Plan of Action (POA) manual. This step will also help you identify documentation that you need for your POA manual, such as water testing results, training records, field maps, among other supporting materials.

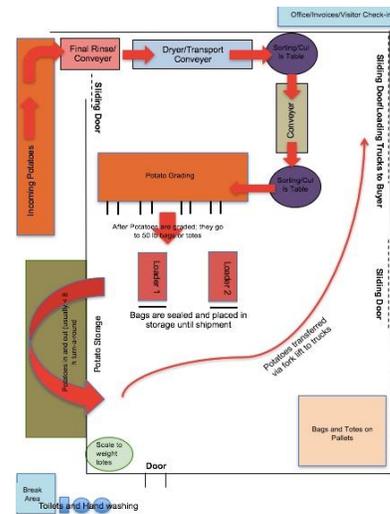


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Developing Your Plan of Action (POA) Manual

The next 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 implement it on your farm. To expedite developing your POA manual, VCE has core manual templates available, which can be modified to your specific farm. The *USDA GAP & GHP* POA manual consists of several main parts:

- Excel audit checklist questions and answers
- Standard Operating Procedures
- Record/Log sheets
- Supporting documents

Audit Checklist Questions can be downloaded from the USDA Audit website: <https://www.ams.usda.gov/services/auditing/gap-ghp/audit>. As noted, identical template questions are provided by VCE in Excel spreadsheet format. Each section has its own tab in the spreadsheet. A basic audit requires the Demographic, General Questions, and Farm Review sections at a minimum. Additionally, there are other audit sections that a farm may wish to be certified in including Field Harvest and Field Packing Activities, House Packing Facility, Storage and Transportation, Wholesale Distribution Center, and Preventive Food Defense Procedures.

USDA GAP Plan of Action Manual



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Standard Operating Procedures (SOPs) outline the farm's policies or procedures related to a food safety practice. Each SOP should detail a step-by-step description of how to perform specific operations or activities on the farm. For example, your farm's SOP for wildlife control would outline procedures for monitoring wildlife, how regularly this is performed, and what corrective actions may be executed when wildlife is observed/detected in fields. On the checklist questions, a "P" indicates that a policy/SOP document must be provided to demonstrate the question has been addressed.

Record/ Log sheets document when and who performed specific policy/SOPs, as well as the details verifying compliance with the given policy/SOP. For example, a log sheet for wildlife observation would note the specific dates fields were checked for the presence of wildlife (for example, fecal deposits), who made the observation, and what specific corrective actions were employed (for example, removing feces from field). Record/log sheets should closely match with specific policies/SOPs. On the checklist questions, an “R” indicates that a record is required to demonstrate an action was performed.

Supporting Documents help validate a response to an audit checklist question, such as farm assessment notes; traceability system including field maps, harvest dates, crop, crew, among others; drawings of packinghouse flow zones; water test results; pesticide log books, pesticide labels, safety data sheets; food safety training including certificates, agendas, presentation handouts, and trainer information; and any other supporting documentation related to specific practices. On the checklist questions, a “D”

indicates that a document is required to demonstrate compliance with the question.

The POA manual is organized with a comprehensive Table of Contents, describing what is in each section. Each of the sections (for example, General Questions, Farm Review) are divided by tabs in a binder along with the relevant supporting materials (“P”, “R”, and “D”; described above). Loose supporting materials can be placed into plastic sleeves and labeled to reflect the specific

Pest Control		Response				DOC	Notes
Questions		YES	NO	NA			
4-13	Measures are taken to exclude animals or pests from storage facilities.	Domestic animals are not allowed in storage facility and facility is enclosed. Measures have been taken to exclude pests as outlined/monitored in 3-31 a and b	YES	NO	NA	D	DOC 3-31 a and b
4-14	There is an established pest control program for the facility.	Pest control is established with several traps located around the storage facility and a bird screecher suspended from packinghouse (storage facility enclosed in packinghouse)	YES	NO	NA	D	DOC 3-31 a and b
4-15	Service reports for the pest control program are available for review.	We monitor rodent traps ourselves, checking rodent traps weekly. See 3-31 b for monitoring log doc	YES	NO	NA	R	DOC 3-31 b
4-16	Interior walls, floors and ceilings are well maintained and are free of major cracks and crevices.	Storage facility is enclosed, and well maintained in a clean condition between and before every harvest (swept daily, free of major cracks, no standing water)	YES	NO	NA		

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question number they relate to (as reflected in the Table of Contents). The POA manual represents your food safety plan, so it is the expectation you are doing what you outline in the manual. Every question should be addressed to the best of your ability. Auditors are trained to look for compliance (“that you do, what you say”); therefore, make sure you have records to support all your policies/SOPs. It is important to make recordkeeping easy; and don’t forget to follow up with your local extension office for templates.

TIP

Make Recordkeeping Easy

Place in Convenient, Accessible Locations

Use clipboards, attach pens, use plastic sleeves for records that may get wet, etc.

Separate Notebooks for Frequent Tasks

For example, monitoring toilet facilities, cooler temperature checks, among others

Keep it Simple

Combine tasks when appropriate, such as wildlife monitoring and spray applications

Make it Routine

Perform recordkeeping at the beginning or end of day, start of a task, use technology

Readying the Farm for the Audit

You have the written POA manual describing your food safety plan with all the relevant supporting materials, now it is time to prepare for the audit! To prepare for the audit, you need to put in place all the specific policies, practices, procedures, record/log sheets, and signage you have detailed in the POA manual. It is helpful to go about this systematically (for example, for each POA manual section, or by question). The following list (not exhaustive) outlines some key areas that will need to be addressed before the audit:

- Testing all water sources and implementing corrective treatment measures, if necessary
- Implementing buffers when livestock/animal operations are next to crop production areas
- Storing, containing or separating manures from crop production areas
- Applying a minimum “120 days before harvest” requirement, if raw manures are used
- Documenting the composting process (validated time, temperature and turning procedure), if composted manures are used; if purchasing composted manures obtaining a certificate of analysis (COA) showing validated process
- Monitoring for wildlife on-farm and implementing any deterrence measures
- Establishing a pest control program (especially in packing areas)
- Setting up sanitation units, handwashing stations, and designated break areas
- Installing protective covers over breakable lights and glass
- Using harvest containers and packing materials that meet GAP standards
- Establishing lidded trash receptacles for the farm
- Covering or protecting your product from contamination during transportation
- Using potable water for post-harvest activities
- Monitoring sanitizer concentrations, and other variables required by the label
- Developing your Traceability system and performing a Mock Recall



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Obtaining the Official On-Farm Audit

The last step before obtaining the official on-farm audit is to have a mock audit (or final farm walk-through). This simulates the official audit and is a great way to double-check the POA manual is correctly put together and includes all required documentation. Also, it allows you to confirm you are implementing the policies and procedures outlined in your POA manual (“that you do, what you say”). This step will bring to light any specific areas that may still require attention prior to the official audit.

After a successful mock audit, you are ready to request the official audit. In Virginia, the *USDA GAP & GHP 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 official audit. Costs associated with the audit include travel and total audit time per farm (\$108 per hour, as of Oct 2017). When possible, growers may coordinate to request the auditor do multiple farms in the area to reduce costs. In addition to reviewing the POA manual,

inspectors conduct an on-farm walk-through during farm activities (for example, harvest, packing). Upon completion of the requested audit (remember, there are several audit sections you can request, but the minimum audit includes the Demographics, General Questions, and Farm Review sections); each section is scored, with a passing score being 80%. Results are forwarded to the USDA Agricultural Marketing Service.



Post-Audit Considerations

After the official audit, growers receiving a passing score are placed on the *USDA GAP & GHP Audit Verification Program* website, which lists certified growers by state, commodity, or company name (<https://apps.ams.usda.gov/GAPGHP/reportG01.aspx>). GAP certified farms will also receive an official notification from USDA. After the initial farm audit, an unannounced site visit by an auditor is possible within the remainder of the growing season. It is important to address and correct any areas the auditor flagged during the initial audit, so you are ready for any follow-up visits. Certification under *USDA GAP & GHP* is valid for one year from the date of the audit. If your farm needs to be re-certified in order to meet specific market requirements, then you must be recertified annually. For recertification, you should review your POA manual, make needed updates, and provide appropriate documentation as needed. For example, if policies on the farm change or new employees join the farm mid-season, make sure to update your manual and include the necessary supporting material (for example, training documentation). Additionally, changes in crops, fields, locations, etc., should be reflected in modified maps and your traceback system. Records from the previous manuals, like water tests, maps, training records, etc., must be maintained for three years. These records can be stored in separate binders and labeled with by year.



Photo Credit: Amber Vallotton

References

United States Department of Agriculture. 2017. Agriculture Marketing Service Good Agricultural Practices (GAP) and Good Handling Practices (GHP). Available from: <https://www.ams.usda.gov/services/auditing/gap-ghp#Listings>. Accessed May 24, 2017.

Virginia Fresh Produce Food Safety website. <http://www.hort.vt.edu/producesafety/>