

USDA GAP/GHP and HGAP Recertification: Guidance for Producers

USDA GAP and Harmonized GAP (HGAP) recertification is a yearly process since the certification is only good for one year from the date that the audit paperwork is verified. In terms of preparing the producer for recertification, there are two main areas of focus: (1) Plan of Action (POA) manual revisions, and (2) on-farm implementation of practices (as necessary). The manual is the food safety plan of your farm and documents the policies and practices that you are using to mitigate food safety risks of contamination to your fresh produce. The manual will detail what the farm is doing, when, and by whom. *The manual is a fluid document since the farm is never static, and as such, it must be regularly updated when and if any changes occur on the farm, i.e. new crop locations, crops grown, how they are grown and harvested, how they are handled, workers changing, etc..*

The first step in the POA manual update is to get a broad overview of any changes that have occurred on your farm, as compared to last year, which will help provide some orientation as to what needs to be updated in the manual. Once this initial step is done, then it is important to work through the POA questions for each pertinent section, one by one, and as needed, update the manual accordingly. Other tasks include taking all records from the previous seasons, placing into files or notebooks (or whatever system works best) and label them for that growing year. Additionally, any changes to policies for the current growing season need to be reflected in updated SOPs and accompanying record log sheets to support the POA manual. Important documentation will need to be updated including obtaining new water analyses for irrigation and wash water sources; records for handling of soil amendments such as manure and compost; employee training; updating and/or replacing any signage; replenishing first aid kit contents; facilities and equipment changes; and updates to the traceability system.

Once you have accomplished all these tasks, it is important to schedule a time to do a pre-audit walk through, which you can do with a VCE agent from the Fresh Produce Food Safety Team. The idea of the walk through is to insure that everything is up to date in your manual and that any changes are reflected in your on-farm practices. At least one month before the anticipated audit, it is important to FAX an audit request form to VDACS, in order to make sure the inspectors are aware and can set you up in the queue. The main point of contact at VDACS for the audits is Dennis Clary, Dennis.Clary@vdacs.virginia.gov.



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Plan of Action (POA) Manual Update Process

Initial Questions

These questions will help provide some orientation as to what needs to be updated in the manual. Some questions to ask are:

- Are there additional fields as compared to last year? If so, where are they located (you will need to get additional Google Earth or FSA maps in order to notate)?
- What crops are being grown this year? Are there additional crops as compared to last year, or are there crops that were grown last year that are not being grown this year?
- Has anything changed in your production, harvesting, and post-harvest handling processes? If so, what has changed (soil amendments, irrigation water sources, packing procedures, wash line procedures, storage, transport)?
- Does your farm have new or different workers than it had last year? If so, along with new workers, you and any previous workers who are still working will need to be trained this year.
- Are there any new facilities or structures?

Plan of Action Manual Questions

- Work through the POA questions for each pertinent section, one by one, and as needed, update (not all sections will relate to a particular farm):
 - Sections
 - Demographics Questions
 - General Questions
 - Farm Review Questions (Section 1)
 - Field Harvest and Field Pack (Sect. 2)
 - House Packing (Sect. 3)
 - Storage and Transportation (Sect. 4)
 - With each of the sections remember that you will need a response to
 - Each question
 - A yes/no/ NA (in some cases)
 - Supporting documentation such as Standard Operating Procedures (SOPs), Record log sheets, and any other supporting documents, if required
 - Make sure that you check between your POA question response and your SOP, Record log sheets, and other documents (if there are supporting docs needed), to make sure they are consistent
- Other things to work on:
 - **Obtain required documents** outlined in next main section below
 - For all records from the previous seasons, place into files or notebooks (or whatever system works best) and label for that growing year.
 - Remember the inspectors can and will often look at the previous records, so it is important to have them handy; previous records must be kept for 3 years
 - **Update** specific policies (SOPs and accompanying record log sheets) to support POA manual

- The SOPs and record log sheets reflect the farm’s processes and records for the **CURRENT season**
- It is important to review any comments from the previous year’s audit and to make sure all comments have been addressed and are reflected in the current answers, SOPs, record log sheets, Supporting documents, and on-farm practices and implementation
- Regardless of last year’s comments, it is important to re-read through each SOP and make sure it is up-to-date and reflects the farm’s current policy
- In the case where there are new procedures for which an SOP does not exist, a new SOP will need to be written that spells out step-by-step the specific procedure; typically this also means having a record log sheet to document when and who has performed that procedure during the growing season.

Required New Documents and Tasks to be Done

- Water test results for water supply source used for irrigation, hand-wash stations, and wash water (for post-harvest handling)
 - ◆ If municipal water, must be **current** analysis looking at *E. coli* and fecal coliform (should be available through county or municipality)
 - ◆ If well/ spring water, must obtain a **current test** with MPN count of *E.coli* (+/- test is not acceptable)
 - ◆ If surface water, must obtain MPN count test (if a baseline test from previous years is used whereby the presence of bacteria is assumed, then that test must be in the manual, as well as documentation as to how water is treated; a **current test for the treated water should be conducted in order to show that the treatment is effective**)
 - ◆ Make sure if there are multiple irrigation water sources, that each source has a current test and is labeled as such on the test
 - ◆ For wash water, the water test must indicate that the water is potable, otherwise the water must be treated, with a subsequent test to verify that the treatment is effective
- Soil Amendments such as manure and compost
 - If using compost and/or composted manure, monitoring records of process including turning, temperatures, and curing time must be provided (i.e. pile cannot be passively composted; it must be an active process with supporting documentation)
 - If raw manure applied, record of when it was done and on which fields (must be able to show a minimum of 120 days from application to harvest time)
- Employee Training
 - Updated records for any training for new and old employees including dates and signing document in manual
 - This is required for **ALL employees EACH year**

- Must include copies and /or list of content covered and certificates when applicable
- Updating any designated eating area/ break spaces (as needed)
 - Signage
 - Potable water available
 - Segregating area from any fresh produce
- Port-a-potty and hand-wash station upkeep and replenishment
 - Check running water
 - Soap (not hand sanitizer)
 - Disposable paper towels
 - Lidded trash receptacle
 - Record log sheet for cleaning/ maintenance
- Updating and/or replacing any Signage
 - How to wash hands, wash station, port-a-potty signage
 - Updated numbered field signs
 - 'Employees only' signage
 - Designated eating area signage
 - First aid kit signage
 - Visitor rules checklist
 - Other (see manual)
- Replenishing first aid kit contents
 - The kit must be monitored and readily available to all employees
 - Make sure all contents are well supplied
- Checking storage location for boxes/plastic bins and where they are stacked
 - Keeping them off ground and protected from dirt, rodents, critters
 - In case of plastic bins, washing/cleaning and sanitation/disinfection prior to all harvests
- Replenishment and/or additions of pest control measures
 - Sticky traps, live traps
 - Critter traps
 - Deterrence and other measures
 - Monitoring with record log sheets with any control measures documented
- Facilities and Equipment
 - Make sure all lights are covered to protect from glass breakage
 - Food grade lubricants (if applicable)
 - All pesticides and chemicals stored separately or segregated from packing and storage areas
 - Refrigerators, coolers, and ice machines serviced, cleaned, and sanitized and temperature monitored
 - Pest control in place and prevention of roosting spots
 - General clean-up and tidying up with lidded trash receptacles, debris, etc.
 - All drains are free of debris and draining properly (no standing water)

- Traceability System
 - **Updated or additional maps as needed** for new or adjusted fields, crops, etc. for **current year including hand-drawn and labeled fields and crops**
 - Updated or new hand-drawn flow maps as pertinent
 - Updated traceback code system to reflect any changes to previous years (field codes, crop codes, etc.)
 - Making sure produce is **identified to farm** to link to the traceback code (must have farm name with traceback number)
 - Mock Recall (MR) paperwork (needed for current year and before audit performed)
 - Sell produce to buyer and have invoice detailing transaction
 - Send letter or email to buyer requesting a MR of that product (CANNOT simply be a phone call)
 - Letter or FAX from buyer stating the disposition of product (cannot be phone call; must be signed)

Pre-Audit Walkthrough

Things to carefully review are:

- The POA manual is ready (using the checklist above) and any needed changes have been made to the manual
- Documents (record log sheets, maps, training records, supporting docs) from the previous year were removed and placed into the last year's notebook, labeled, and available during the audit, if needed
- In walking through the farm and visiting the various fields and packing area, signage has been updated and is in place, the packing and cooling area is clean and tidy, worker areas are clean, port-a-johns or bathrooms are clean, and record log sheets are being actively kept for **all tasks**
- All the tasks outlined in the previous section have been completed as needed

Scheduling the Audit

- The main point of contact for USDA GAP audits at VDACS is Dennis Clary, and can be reached at 804-768-3548 (direct) or 804-840-3934 (mobile), or at Dennis.Clary@vdacs.virginia.gov
- Dennis Clary has been faxed the audit request form (804-371-7785); Make sure to include cover sheet and put attention to Dennis Clary
- A date has been scheduled for the auditor to conduct an audit