



THE BLUE GROUP

Primary Issue:
Adoption of the GAPS



Should GAPs apply to everyone?

- Applicable to all
 - Size doesn't matter, but implementation must be scalable
 - Everyone should address workers, water, and land management/wildlife
 - Everyone should have a written plan
 - Some operations must be audited
 - High risk (food born outbreaks) commodities – greater requirements



How can FDA enhance adoption?

- Look at other models:
 - LGMA: industry driven. Voluntary participation, mandatory requirements when in, gov't oversight
 - Canadian model
 - Use of a "mark"/"symbol" of adoption (organics mark)
 - Development of "Model Farm Code" (with science based variances)



How can FDA enhance adoption?

- Increase the use of Extension Service
- Outreach to the “sustainable agriculture” communities – smaller networks, smaller growers
- Better discussion of benefits
- Buyers are in control
- Consumers can drive the process (esp. for smaller growers who sell direct)



How can FDA enhance adoption?

- Keep Guidance BROAD with specifics in industry developed commodity guidance



Barriers to Adoption

- Lack of clarity on what is “acceptable” level of risk
- Concern about use of testing (increase exposure to lawsuits)
- Pressure to adopt GAPs, but “on your own” if something goes wrong (lawsuits, regulatory response)



Barriers to Adoption

- “Misuse” of science (frog=salmonella;
frog in field=salmonella in field;
=contaminated field)



Enhanced Training Needs

- Tools to help identify/assess risks
- Why GAPs are important to me, my industry
- Training for all, but different training for:
 - Worker
 - Grower/employer/manager/
 - Auditor
 - Buyer



Enhanced Training Needs

- Increased use of training delivery mechanisms – Film, CD, TV
- Testing?
- Better use of behavioral sciences to use methods that result in changes in attitudes/practices
 - Consistent, daily reinforcement
- Successful implementation is predicated upon change in “culture” towards Food safety.



GAPS Enhancements

- Better definition and discussions of risk/hazard analysis/assessment
- Greater discussion of “adequate for its intended use”
- Discussions of (science based) standards:
 - Numeric
 - Performance based



GAPS Enhancements

- Standards (cont'd)
 - When applicable
 - When to test
 - What to test for
 - How to test
 - What to do when results don't meet the standard



GAPS Enhancements

- Add examples, case studies to illustrate points
- Greater discussion on traceability
 - What is a lot
 - What is an appropriate lot size
 - How to address co-mingling of product
 - Needed throughout supply chain



GAPS Enhancements

- Reorganize to modular approach
- Provide templates, forms



Other Comments

- Need more research on alternatives to water uses (e.g. dry cleaning technologies)
- Additional research to enhance greater understanding of existing metrics and their applicability to other commodities and production practices
- Additional research on indicator organisms



Other Comments

- GAPs Guide should acknowledge food defense, other hazards – but maintain focus on minimizing microbial hazards
- Incorporate lessons learned from farm investigations/assessments – identify common themes



Summary

- Education (Examples/case studies)
- Cultural Acceptance
- Focus on the auditor
- Issues surrounding standards
- Plans/implementation commensurate with Risk –
- Scalability