

United Fresh Produce GAPs Meeting

Questions Considered by Breakout Groups

1. The GAPs Guide has been high level and generic, with details to be determined in commodity, regional or operation-specific plans. Name the top five actions that would make any farm safer from the food safety perspective. Are these adequately captured in the GAPs Guide today? What would be the best way to organize the GAPs Guide to be user friendly, practical, understandable and an enhancement to adoption? What current content is not needed or should be changed? What content is missing, e.g., operational assessments, greenhouse operations, non-conventional or non-U.S. practices, recordkeeping? Why would it be important to add, delete, or change content in this way?
2. There are still operations not operating according to GAPs. Are there operations at which GAPs are not necessary and, if so, what criteria determine which ones? For example, should the implementation of food safety practices only be focused on large companies who supply multiple states? Should they be focused only on commodities that have been implicated in foodborne illness outbreaks? If not, what incentives or pressure, by FDA or others, would encourage adoption at all operations? What are the obstacles to adoption? What are the benefits to adoption? Is there a way to prioritize the importance of adoption, whether by operation, commodity, risk or operational practice?
3. Would the GAPs Guide benefit from more specific recommendations and, if so, what kind (e.g., metrics, testing) and how detailed should they be? Should the GAPs Guide include produce safety standards? Is it appropriate to adopt standards that are not based on agricultural production but which may be the only scientific data available (e.g., irrigation water standards based on recreational water standards)? Should the GAPs Guide include produce standards that apply to all commodities or should some standards be specific to certain commodity characteristics, regions or production practices? Provide examples.
4. There seems to be general agreement that GAPs recommendations/requirements should apply to foreign as well as domestic growers and packers, but are there special considerations or exemptions for application and implementation of GAPs by foreign growers and packers? What evidence should foreign growers and packers provide as evidence of compliance with the GAPs Guide? What evidence should domestic buyers require that imports were grown and handled in compliance with GAPs? Are there special considerations or exemptions for application and implementation of GAPs by non-conventional operations within the U.S. (e.g., Amish, Mennonite)?
5. There seems to be general agreement that scientific data, particularly microbiological testing data, are lacking to support specific metrics and food safety standards. What are the top five data gaps where research data are needed? There have been comments that produce companies actually have the data from their own testing, but are reluctant to share the data. Do the data that would fill these gaps exist and where? What obstacles are preventing the sharing of such data, and what incentives would encourage companies to share these data?