

# Report from the Orange Group

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# Thank you

- To the Orange group participants for a lively and open discussion
- To Mark Schonbeck for a remarkable set of notes that will be submitted along with this presentation.

# Our starting Question

- We were asked to discuss the GAPS recommendations-requirements from two perspectives: imported products and domestic products with special reference to:
  - Special considerations or exemptions
  - Evidence of compliance

# Recommendations or Requirements

- Should they just be guidance or should they be regulations
- The room was split on this matter
- There were strong voices in favour of a mandatory approach
- Other voices were deeply concerned about what this would mean to small producers
- All were agreed that there really are a minimum set of food safety practices that all should follow

# Application to imports (1)

- Current situation was reviewed – there are limits to FDA’s legal authority to enforce US requirements in sovereign countries and even more so for just guidance
- Alternate ideas included:
  - Making importers responsible
  - Benchmarking foreign programs & accrediting certification bodies, etc

# Application to Imports (2)

- Issues identified:
  - How do importers demonstrate compliance after they have been put on import alert or taken off a certification list
  - What confidence can we have in foreign certification bodies (& domestic for that matter)
  - Compliance problems arise out of both bad practice and things happening
  - What applies at the border applies inside it

# Application to Domestic production (1)

- Question was asked: do we really need the GAPs Guide and if so does it need revising
- Some interesting discussions occurred
  - Agreement that minimum practices are necessary by all
  - Recognition that GAPs guide is partial & may not meet all of private sector requirements
  - Recognition that private sector may not stop demanding more even if GAPs guide revised to meet current private sector (e.g. GlobalGAP or GFSI)

# Domestic Production (2)

- Buyer recognition – a different view
  - Others noted that CLGA had to some degree limited the demand for more
- General consensus that a revised GAP Guide is needed
  - Still open question at meeting end as to whether or not it needs to cover more than micro practices

# Domestic production (3)

- Demonstrating compliance
  - There are size & scalability issues
  - Key barrier awareness that small systems can demonstrate compliance in simple ways
    - Restaurants do it under the food code
  - Need for a common audit & certification approach
  - Questions around who accredits the CBs – is it government or the accreditation bodies
  - Examples noted of current systems for shellfish, dairy & CLGA

# Domestic production (4)

- What should be in the GAP Guide
  - 90% common elements
  - 10% commodity specific
- No clear resolution about how to develop or include the 10%
  - Need for small producers to be involved
  - Industry led (e.g. Mushrooms, leafy greens)
  - Need for more than just guidance
  - Should they be piloted
  - What should the review process be (Cdn, CLGA)

# GAPs Guide Specifics

- Flooded land recommendations
- Micro testing – protocols, methods, etc
- Harvest equipment cleaning & disinfection
- Improve advice, use examples in key areas
- Make the recommendations auditable or enforceable
- Ensure science-based & agronomically appropriate

# GAPs Guide Revision Process

- Set a clear timetable
- Include balance of stakeholders
- Clarify how commodity-specific guides or annexes to be developed & added
- Develop audit tools at same time
- Develop implementation tools (e.g. Extra guidance or training materials)

# Implementation suggestions

- Insure infrastructure is ready
  - Audit & certification
  - Qualifications, competency, training
- Plan for transition time – be realistic
- Explore alternate approaches to audit & certification
  - Group as well as individual
  - Cost reduction approaches (e.g. Pooling as in CLGA)
- Build on examples that work (domestic & foreign)