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# Produce GAP Harmonization Initiative Technical Working Group

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May 12-13, 2010

US Foodservice, Rosemont IL



**Produce GAPs  
Harmonization Initiative**

**United Fresh**  
PRODUCE ASSOCIATION

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# Produce GAP Harmonization Initiative Technical Working Group

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Welcome and Introductions  
Suresh DeCosta  
McDonalds Corporation



Produce GAPs  
Harmonization Initiative

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PRODUCE ASSOCIATION

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# Produce GAP Harmonization Initiative Technical Working Group

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- Harmonization To-Date
- Upcoming Meetings
- Update from Las Vegas
- Agenda for this week



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# Harmonized Audit Categories

- Compliance Plan
- Field Production
- Harvesting
- Cooling
- Packinghouse
- Transportation
- Produce Storage



# Compliance Plan

- a. Management Responsibility
- b. Food Safety Plan or Risk Assessment
- c. Documentation & Recordkeeping
- d. SOPs and SSOPs
- e. Review Period
- f. Worker Education and Training
- g. Traceability
- h. Recall Programs
- i. Corrective Actions
- j. Self-audits



# Field Production

- a. Management Responsibility
- b. Field History and Assessment
- c. Worker Health/Hygiene and Toilet/Handwashing Facilities
- d. Ag Chemicals (pesticide, herbicide)
- e. Seed/Transplant/Grafting
- f. Agricultural Water
- g. Equipment, Tools (Sanitation)
- h. Animal Control
- i. Soil Amendments
- j. Vehicles and Equipment in Field
- k. Microbiological Sampling/Testing



# Harvesting

- a. Management Responsibility
- b. Preharvest Assessment
- c. Worker Health/Hygiene and Toilet/  
Handwashing Facilities
- d. Water/Ice
- e. Containers, Bins
- f. Facility, Equipment, Tools
- g. Vehicles and Equipment in Field
- h. Field Packaging and Handling
- i. Postharvest Handling
- j. Traceability



# Cooling

- a. Management Responsibility
- b. Water/Ice
- c. Containers, Bins
- d. Facility, Equipment, Tools
- e. Worker Health/Hygiene and Toilet/Handwashing Facilities (started)
- f. Temperature Control (Transportation, Produce Storage)



# 21 Categories Remaining

**g. Packaging and Handling**

**h. Pest Control**

**i. Microbiological Sampling/Testing**

**j. Traceability**

**Packinghouse**

**a. Management Responsibility**

**b. Water/Ice**

**c. Washing/Cleaning of produce**

**d. Worker health/hygiene and Toilet/Handwashing Facilities**

**e. Sanitation (Facility, Equipment, Tools, Containers, Bins)**

**f. Maintenance (Facility, Equipment, Tools, Containers, Bins)**

**g. Packaging (Materials and Handling)**

**h. Pest Control**

**i. Microbiological Sampling/Testing**

**j. Traceability**

**Transportation**

**a. Management Responsibility**

**b. Temperature Control**

**c. Equipment Sanitation and Maintenance**

**Produce Storage**

**a. Management Responsibility**

**b. Temperature Control**

**c. Sanitation and Maintenance (Facility)**

**d. Pest Control**

**e. Microbiological Sampling/Testing**

**f. Traceability**



# Next Meetings

- June 17-18, Sysco, Houston TX
- July 13-14, California Strawberry Commission, San Jose CA
- August 25-26, PMA, Philadelphia PA
- September 13, Washington DC, joint meeting with Steering Committee and Operations Committee



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# Update from April 19 meeting with Steering Committee

- Strong attendance from SC and TWG
- Commitment by SC reaffirmed
  - Praise for TWG efforts
- Recognition that operating plans must be developed
  - Operations Committee
  - Who should own; how to update; how to control use and interpretation



# Update from April 19 meeting with Steering Committee

- Operations Committee activity “must not delay efforts of the TWG”
- Will be soliciting volunteers for OC, scheduling first meeting, soon



# Agenda for Today/Tomorrow

## Today

- Breakout groups meet until noon (lunch), then reconvene at 1:00 pm
- 4:00 pm - Breakout group leaders report
- Adjourn for the day at 5:00 pm

## Tomorrow

- Breakout groups meet 8:00 until noon (lunch)
- 2:00 pm - Breakout group leaders report
- Adjourn by 3:00 pm



# Breakout Groups

- Group #1, ● (blue), CIC  
Group Leaders: Bill Pool  
Audit categories: Packaging and Handling; Pest Control
- Group #2, ● (red), Skyline  
Group Leader: Bob Mills  
Audit categories: Microbiological Sampling/Testing;  
Traceability
- Group #3, ● (yellow), Eisenhower (8<sup>th</sup> floor)  
Group Leaders: Sharan Lanini, Chris Christian  
Audit categories: Worker Health/Hygiene and Toilet/  
Handwashing Facilities; Management Responsibility



If not pre-assigned a group...

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# Reports by Breakout Groups

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All audit expectations in the following reports are draft, based only on an initial harmonization of existing standards, and will be revised during the further process of considering application to various regions, commodities and size operations.

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# Group 1

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# Packaging - Materials and Handling (1)

- Packing containers and equipment should be stored in a manner so as not to become a source of contamination with pathogens.
- The types and construction of packing containers and equipment should be appropriate to the commodity being packed and their condition maintained so as not to serve as a source of contamination with pathogens.
- The Operation has a written policy requiring that food-contact totes, bins, other packing containers and packing equipment shall be clean and sanitary prior to use.



## Packaging - Materials and Handling (2)

- There shall be documentation verifying that this policy is being followed. When in use, containers and packing equipment shall be maintained so as not to become a source of contamination with pathogens.
- Food-contact totes, bins and other packing containers and equipment that are no longer cleanable shall not be used for packing but can be used for other non-food uses if clearly marked/labeled.
- Food-contact totes, bins and other packing containers and equipment designated for use for packing shall not be used for other purposes.



# Packaging - Materials and Handling (3)

- Pallets shall be kept clean and in good condition as appropriate for their intended use.
- Adequate space is maintained between rows of stored materials to allow cleaning and inspection. Procedures are followed to guarantee the proper cleaning, inspection and monitoring for pest activity in storage areas, where an 18 in or 45 cm inspection perimeter cannot be provided.
- All toxic chemicals, including cleaning and maintenance compounds, and non-product materials, including equipment and utensils, are stored in a separate area.



# Packaging - Materials and Handling (4)

- Pallets and other wooden surfaces are properly dried after being washed.
- The written procedures are readily available to facility personnel.
- If applicable, the facility has a written Allergen Control Program that lists the allergens in storage at the facility specific to country regulations.
- If applicable, procedures address identification and segregation of allergens during storage and handling as based on a risk assessment conducted by the facility



# Packaging - Materials and Handling (5)

- Specifications for all packaging materials that impact on finished product safety and quality shall be provided and comply with the relevant legislation. The methods and responsibility for developing and approving detailed specifications and labels for all packaging shall be documented.
- A register of packaging specifications and label approvals shall be maintained and kept current.



# Cooling, Packinghouse, Produce Storage - Pest Control (1)

- The responsible party shall exclude pests to the extent possible and appropriate to the facility. Operation has a written pest control program, performed by a trained pest control operator. The written program includes policies and procedures applicable to that operation, such as storage of outside equipment or other factors dealing with pest harborages.
- The responsible party shall minimize the availability of food items and water to animals and pests. Perimeter surrounding facility is maintained so as not to provide pest harborage.



# Cooling, Packinghouse, Produce Storage - Pest Control (2)

- The responsible party shall establish a pest-control program, which shall include regular and frequent monitoring to assess and ensure the program's effectiveness.
- It is important to have maps of the location of pest traps outside and inside the pack house.
- The responsible party shall maintain a pest-control log that includes dates of inspection, inspection reports and steps taken to eliminate any problems. Applications of pesticides (e.g., insecticides, rodenticides) shall be performed in compliance with local, state, and federal pesticide regulations.



# Cooling, Packinghouse, Produce Storage - Pest Control (3)

- List the chemicals used (they are required to be approved by the relevant authority and their Material Safety Data Sheets (MSDS) made available or prevailing chemical information sheets); Outline the methods used to make employees aware of the bait control program and the measures to take when they come in contact with a bait station; and Outline the requirements for employees awareness and training in the use of pest and vermin control chemicals and baits.



# Cooling, Packinghouse, Produce Storage - Pest Control (4)

- Domestic animals are prohibited from pack house, cooling, and storage facilities. Procedures are in place to exclude wild animals to the degree practical.
- When using pesticides, protect against the contamination of the produce, food contact surfaces and packaging materials. All procedures should be written and all agrichemicals must be registered for use in food handling establishments per the prevailing authority. Use only non-toxic traps and pest control devices inside the packing house or storage facility.
- Make sure that bug zappers are located so as to not contaminate produce or food handling surfaces.



# Transportation - Equipment Sanitation and Maintenance (1)

- The operation shall have a policy, written procedures, and a checklist to verify cleanliness and functionality of shipping units (e.g., trailer).
- Shipping units shall be clean, functional and free of objectionable odors before loading.
- When refrigeration is required for food safety, units must be in working order.
- Unless dedicated vehicles are used, procedure requires transport history for immediate past 3 loads, or that trailer must first be cleaned and sanitized and accompanied by a wash ticket.



# Transportation - Equipment Sanitation and Maintenance (2)

- A responsible individual shall sign the completed checklist. Checklist includes prohibition of animal or animal product transport, or other materials that may be a source of contamination with pathogens. Results of these inspections, and any corrective actions, shall be documented.
- Personnel responsible for the loading and unloading of produce shall take steps to minimize the potential of physical damage to produce, which can introduce and/or promote the growth of pathogens.



# Transportation - Equipment Sanitation and Maintenance (3)

- Forklifts and other motorized transport vehicles shall be clean and well maintained and of suitable type to avoid contamination through emissions.
- Trash removed from field packing operations shall be transported out of the field in a separate vehicle. Trash shall not come in contact with cases of fresh produce.



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# Group 2

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# Cooling, Produce Storage - Microbiological Sampling/Testing

- Where microbiological analysis is required in the food safety plan, testing shall be performed by a certified laboratory using official methods.
- Where tests are required, samples shall be in accordance with the established lab sampling SOP.
- Tests and their results must be documented.



# Packinghouse - Microbiological Sampling/Testing

- Where microbiological analysis is required in the food safety plan, testing shall be performed by a certified laboratory using official methods.
- Microbial testing shall be performed, as appropriate to the specific operation, to demonstrate that acceptance criteria have been met.
- Where tests are required, samples shall be in accordance with the established lab sampling SOP.

Tests and their results must be documented.



# Cooling – Traceability

- There shall be a documented identification and traceability system that allows produce to be traced back to the farm and tracked forward to the next immediate recipient.
- Records shall be retained and readily retrievable for at least two years or as required by prevailing regulation.
- Records may include the date of cooling, quantities, cooler identification, transporter and non-transporter. Additional information may be included.



# Packinghouse – Traceability

- There shall be a documented identification and traceability system that allows produce to be traced back to the farm and tracked forward to the immediate customer.
- Records shall be retained and readily retrievable for at least two years or as required by prevailing regulation.
- The methods and responsibility for identifying product during all stages of production and storage shall be documented and implemented. The product identification system shall be implemented to ensure: Product is clearly identifiable during all stages of receipt, packing, storage, transport and in compliance with prevailing regulation.



# Produce Storage– Traceability

- There shall be a documented identification and traceability system that allows produce to be traced back to the farm and tracked forward to the immediate customer.
- Records shall be retained and readily retrievable for at least two years or as required by prevailing regulation.
- The methods and responsibility for identifying product during all stages of production and storage shall be documented and implemented. The product identification system shall be implemented to ensure: Product is clearly identifiable during all stages of receipt, packing, storage, transport and in compliance with prevailing regulation.



# Packinghouse - Water/Ice (1)

- If water or ice directly contacts the produce or is used on food-contact surfaces, the water or ice when applied meets the microbial standards for drinking water according to standard of the country of production and of the countries in which the product is intended to be traded. Ice shall be manufactured, transported, and stored under sanitary conditions.
- Document water source and delivery system. The description shall include the type of water source(s) and the transfer and transport of the water where applicable.



# Packinghouse - Water/Ice (2)

- Documented scheduled assessment of water system including delivery equipment shall be performed (i.e. Water Management Plan). Water installations and equipment are constructed and maintained to prevent back siphonage and backflow. Back siphonage and backflow prevention units are identified in a Preventive Maintenance Program. Routine checks verify that back siphonage and backflow prevention units are functioning properly. Results are documented.
- The sewage disposal system is adequate for the process and maintained to prevent ~~direct or indirect~~ product contamination.



# Packinghouse - Water/Ice (3)

- Re-circulated water or water from a source whose condition requires it shall be treated using an approved disinfectant at sufficient concentration to prevent cross contamination to achieve those standards and monitored appropriately according to standard of the country of production and of the countries in which the product is intended to be traded.
- Microbial and or physical/ chemical testing shall be performed, as appropriate to the specific operation, to demonstrate that acceptance criteria have been met.



# Packinghouse - Water/Ice (4)

- The water-delivery system shall be maintained so as not to serve as a source of contamination of produce, water supplies or equipment with pathogens, or to create an unsanitary condition.
- For produce demonstrated as being susceptible to microbial infiltration from wash water, wash water temperature during immersion shall be considered.
- Standard Operating Procedures (SOPs), including water-change schedules and testing frequency, shall be developed for all uses of water.



# Packinghouse - Water/Ice (5)

- Testing shall be performed and documented using established food safety risk criteria. The criteria shall be based on the results of the risk assessment or as defined in existing commodity specific guidance. When monitoring shows that the water meets the criteria for the intended use, then water from the source may be used. When monitoring shows that water does not meet established criteria or standards, the corrective actions noted in the water management plan shall be followed until the conditions have been mitigated and the non-conformity has been resolved.



# Packinghouse – Maintenance (Facility, Equipment, Tools, Containers, Bins) (1)

## Facility, Equipment, Tools

- General
  - Packinghouse facilities and/or field sheds shall be designed, located, constructed and maintained so as to minimize damage and/or contamination to incoming produce.
  - Maintain equipment and tools in a manner that protects against contamination of the product, food contact surfaces and packaging materials.
  - A Master Preventative Maintenance schedule, with related SOP's, shall be established.



# Packinghouse – Maintenance (Facility, Equipment, Tools, Containers, Bins) (2)

## Containers, Bins

- Containers and bins shall be sufficiently maintained so as not to become a source of contamination.
- The types and construction of containers and bins shall be appropriate to the commodity being packed and suited for their intended purpose.



# Packinghouse – Sanitation (Facility, Equipment, Tools, Containers, Bins) (1)

## Facility

- A Master Cleaning and Sanitation schedule, with related SSOP's, shall be established.
- All cleaning agents shall be approved for their intended use on food contact surfaces.
- Cleaning equipment and tools are clean, in working order and stored properly away from product handling areas.
- Prior to use, the lines used for washing, grading, sorting, or packing shall be cleaned and sanitized as appropriate per risk assessment. When in use, the lines shall be maintained so as not to be a source of contamination with pathogens.



# Packinghouse – Sanitation (Facility, Equipment, Tools, Containers, Bins) (2)

- Waste materials and their removal are managed to avoid contamination with non-waste product.

## Equipment and Tools

- All tools are designed and made of materials that are easily cleaned, inspected, and maintained.
- Ingredient, product-holding, packaging, conveying, and bulk equipment are designed, installed and made of materials that are easily cleaned, inspected, and maintained.
- Catwalks above product zones are protected to prevent produce or packaging contamination.



# Packinghouse – Sanitation (Facility, Equipment, Tools, Containers, Bins) (3)

## Containers and Bins

- Written policies which shall be in compliance with appropriate regulations for Packaging Materials, (bins, boxes etc.) These policies shall include:
- Harvesting and packing containers shall be stored in a manner so as not to serve as a source of contamination to the extent feasible and appropriate.
- Packaging materials should never have direct contact with the soil.
- Food-contact totes, bins, other harvest containers, and pallets shall be visually inspected, clean, intact and free of any foreign materials prior to use.



# Packinghouse – Sanitation (Facility, Equipment, Tools, Containers, Bins) (4)

- Containers shall be sufficiently maintained so as not to become a source of contamination.
- Food-contact totes, bins and other containers shall not be used for other purposes unless clearly marked or labeled for that purpose.



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# Group 3

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# Cooling, Packinghouse - Worker Health/Hygiene and Toilet/Handwashing Facilities

- Each facility (operation) shall establish their own written policies for their specific operations, which shall be in compliance with appropriate regulations. These policies shall cover the following:



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# Toilet (1)

- Restrooms shall be designed, constructed, and located in a manner that minimizes the potential risk for product contamination.
- Toilet facilities shall be of adequate number, easily accessible to employees and be in compliance with applicable regulation.
- There shall be a plan for immediate control and treatment of any effluent in the event of leakage or a spill. Leakages or spills shall be managed and disposed of in accordance with applicable federal, state and local laws and regulations, and in a manner that prevents or minimizes contamination of the packing facility or produce with pathogens.



# Toilet (2)

- The practice of disposing of used toilet tissue on the floor, in trash receptacles, or in boxes is prohibited.
- Toilet and wash stations shall be maintained in a clean and sanitary condition. Toilets shall be sufficiently stocked with toilet paper. Wash stations shall include hand wash basins with clean, microbially potable water, hand soap, disposable single use towels, and trash receptacle. These stations shall be provided inside or adjacent to toilet facilities.
- Signage in applicable languages and/or pictures shall be provided adjacent to hand wash basins requiring people to wash their hands after each toilet visit.



# Toilet (3)

- When appropriate, racks and storage containers for protective clothing (including gloves where applicable) and tools used by employees shall be provided to ensure employees remove and properly store prior to entering toilet facilities.



# Hygiene (1)

- Employees and visitors shall follow all personal hygiene practices as designated by the company.
- Workers and visitors who show signs of illness (e.g. vomiting, jaundice, diarrhea) shall be restricted from direct contact with produce or food-contact surfaces.
- Personnel with exposed cuts, sores or lesions shall not be engaged in handling product. Minor cuts or abrasions on exposed parts of the body shall be covered with a bandage and clean gloves.
- First aid supplies shall be provided to treat minor injuries.



# Hygiene (2)

- Eating, drinking chewing gum and using tobacco shall be prohibited except in clearly designated areas. Operation has a policy to permit employee personal items (e.g. employee lunches, drinks, clothing) only in designated, non-production and non-product storage areas.
- Workers shall be required to wash their hands properly before starting work, after using the toilet, after each break, and at any other time when their hands may have become a source of contamination. Hand sanitizers shall not be used as a substitute for hand washing.



# Hygiene (3)

- If gloves are used, they shall be used as stated in the company food safety plan.
- Clothing, including footwear, shall be effectively maintained, stored, laundered and worn so as to protect product from risk of contamination.
- Aprons and gloves shall not be left on product, work surfaces, equipment or packaging material but hung on apron and glove racks provided.
- The use of hair coverings (e.g., hair nets, beard nets, caps) shall be in compliance to company policy and applicable regulation.



# Hygiene (4)

- The wearing of jewelry, body piercings, and other loose objects (i.e. false nails) shall be in compliance to company policy and applicable regulation.
- Designated break areas shall be located away from food contact/handling zones.



# Produce Storage, Packinghouse - Management Responsibility (1)

- A policy statement shall outline a commitment to food safety and define the methods used to comply with and continually improve the food safety management system. The Policy Statement shall be signed by Senior Management and communicated in language understood by all employees.
- There shall be a policy that establishes consequences for employees who violate established food safety policies or procedures.



# Produce Storage, Packinghouse - Management Responsibility (2)

- Management shall designate a qualified individual who has the responsibility and authority for food safety and provides adequate resources for management of the food safety plan, including a provision for the absence of key personnel. Twenty-four hour contact information shall be available for these individuals in case of food safety emergencies.
- There shall be a description of the organization that identifies the job functions, responsibilities, and reporting relationships related to food safety. This shall be communicated within the organization.



# Produce Storage, Packinghouse - Management Responsibility (3)

- The operation shall have a policy and take affirmative steps to ensure that all produce that is packed or stored in the facility is grown following GAP requirements.
- Operation shall have an Approved Supplier program for all incoming materials, including packaging. Operation shall maintain a current list of approved raw material suppliers. Approved Supplier program shall include a procedure for accepting materials from alternate sources.
- There shall be programs in place to monitor the effectiveness and implementation of the food safety programs.



# Packinghouse – Washing Cleaning of Produce (1)

- If produce is washed, an initial risk assessment of the washing process shall be performed that takes into consideration the commodity, type of wash system, type of sanitizer, and water quality. The facility shall control the wash-water temperature for certain produce to prevent internalization of microorganisms from the water into produce tissue.
- Only water that meets the microbial standards for drinking water shall be used for washing or contact with produce and to clean any surfaces that may come in contact with produce or that could contribute to contamination.



# Packinghouse – Washing Cleaning of Produce (2)

- Debris and damaged produce shall be removed from wash areas/dump tanks to the extent possible.
- Only sanitizers or sanitizer systems registered or approved by EPA or the prevailing regulatory agency for their specific intended use may be used in the dump tank wash water, on the spray line or other food contact purposes.



# Packinghouse – Washing Cleaning of Produce (3)

- If wash water sanitizer is used it shall be used in accordance with operational procedure, manufacturer instructions, and regulatory requirements. Records shall be kept. Operation shall have a procedure that includes minimum limits for sanitizer in wash water for food safety. Procedure shall include how to control, monitor and record use of wash water sanitizer as needed to assure compliance with minimum limits. Operation shall have a procedure as to what corrective actions are taken if criteria are not met.



# Packinghouse – Washing Cleaning of Produce (4)

- All instruments used to measure temperature, pH, sanitizer levels and or other important devices used to monitor requirements in this section shall be calibrated at a frequency sufficient to assure continuous accuracy. Records shall be kept. If an ORP system is used, an independent measurement shall be used to verify compliance. Test methods or test strips used to monitor requirements shall be appropriate to their use and sufficiently sensitive to their intended purpose.



# Packinghouse – Washing Cleaning of Produce (5)

- All water lines and fixtures shall be in proper repair, protected against back flow, siphonage, and cross connections.



# Produce Storage - Sanitation And Maintenance (Facility) (1)

- Fresh produce storage facilities, equipment, and tools shall be cleaned, maintained and sanitized on a scheduled basis to protect against contamination of the product. Documentation shall be available.
- Produce shall only be stored in clean and sanitary containers.
- Containers and bins shall be sufficiently maintained so as not to become a source of contamination.



# Produce Storage - Sanitation And Maintenance (Facility) (2)

- The types and construction of containers and bins shall be appropriate to the commodity being packed and suited for their intended purpose.
- Label, handle, and store cleaning compounds, sanitizers/pesticides and other sanitation tools in a manner that does not pose a risk of contamination to the produce, food contact surfaces and packaging materials. These products must be used in accordance with manufacturers' label instructions and all federal, state and local requirements.



# Produce Storage - Sanitation And Maintenance (Facility) (3)

- There is a written cleaning and sanitation schedule for all food and non-food contact surfaces including floors, drains, walls, ceilings and other surfaces that may pose a source of product contamination. A Master Preventive Maintenance schedule, with related SOPs, shall be established.



# Produce Storage - Sanitation And Maintenance (Facility) (4)

- Outside garbage receptacles/dumpsters are closed or are located away from facility entrances and the area around such sites is reasonably clean.
- The plant grounds are reasonably free of litter, debris and standing water.

