
Produce GAP Harmonization Initiative Technical Working Group

March 10-11, 2010

Taco Bell Headquarter, Irvine CA



**Produce GAPs
Harmonization Initiative**

United Fresh
PRODUCE ASSOCIATION

Produce GAP Harmonization Initiative Technical Working Group

Welcome and Introductions
Suresh DeCosta
McDonalds Corporation



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**Background: Harmonization
Process, Agenda for this week**



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Process to Harmonization

Identified a small but influential Steering Committee of major industry representatives with the ability to drive broad industry acceptance of common standards:

McDonald's

Yum Brands

Pro*Act

U.S. Foodservice

Darden

Jack in the Box

Sysco

Subway

Markon

River Ranch

Del Monte Fresh

Wegmans

Ahold

Kroger

H.E.B.

Safeway

Schnucks

Publix

Walmart

Food Lion

Supervalu

Costco

Chiquita Fresh

Sun World International

DiMare Company

Green Giant Fresh

Sunkist Growers

Castellini Co.

McEntire Produce

Dole Food Company

Tanimura & Antle

The Giumarra Companies

C.H. Robinson



Scope of work (1)

A single, generic checklist for GAP audits:

- Focused on food safety practices of pre-farm gate produce operations (as defined by the scope of the FDA GAPs);
- With clearly defined requirements that minimize opportunity for misunderstanding, misinterpretation and “standards creep” by operations and auditors;
- Globally recognized, but specifically applicable to North America operations;



Scope of work (2)

A single, generic checklist for GAP audits:

- Requirements that are risk-based, science-based, attainable, auditable and verifiable;
- Considering all microbiological, chemical and physical hazards reasonably likely to occur, consistent with potential hazards addressed in FDA regulatory guidances;
- Scalable to all size fresh produce operations;
- Considerate of regional- and commodity-specific food safety needs;
- Sufficiently non-prescriptive to be accepting of equivalent food safety practices;

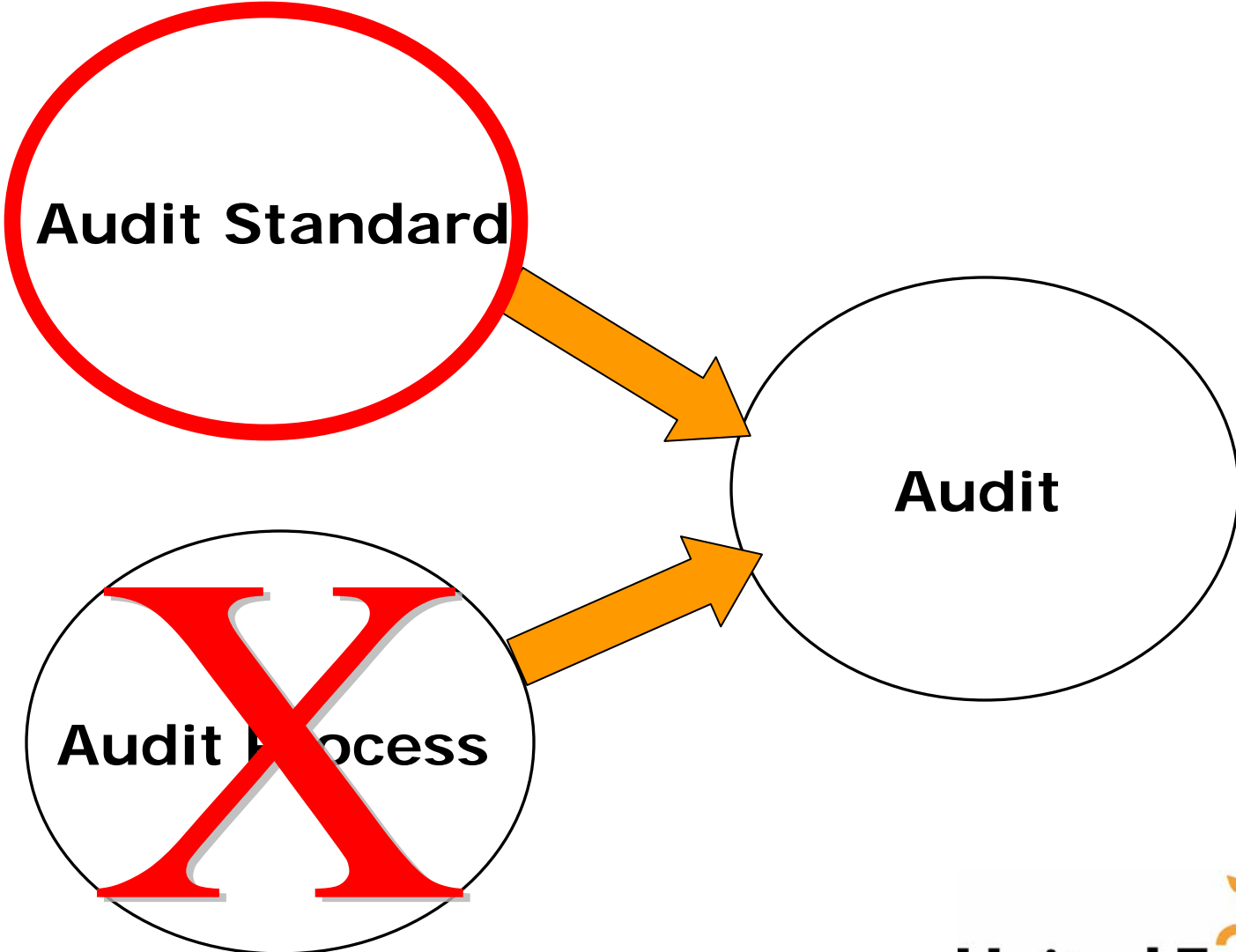


Scope of work (3)

A single, generic checklist for GAP audits:

- Acceptable to a critical mass of customers requiring general produce food safety audits;
- Freely accessible by everyone, including any 1st, 2nd or 3rd party auditor;
- Flexible to adapt as science reveals better practices and limits.
- Completed draft delivered to Steering Committee by October 1, 2010.





Prior TWG meetings

- TWG Charter



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Technical Working Group (TWG)

Sponsor

Produce GAP Harmonization Initiative ("GHI") Steering Committee

Sponsors' Direction to the TWG ("Vision")

Develop a harmonized food safety standard and checklist and a globally-acceptable auditing process for GAP audits necessary to protect consumers from potential hazards that may contaminate produce at that stage of the supply chain, and to build efficiencies into the supplier audit process. The overall goal is one audit by any credible third party that can be acceptable to all buyers.

- Focused on food safety practices of pre-farm gate produce operations (as defined by the scope of the FDA GAPs);
- With clearly defined requirements that minimize opportunity for misunderstanding, misinterpretation and "standards creep" by operations and auditors;
- Globally recognized, but specifically applicable to North America operations;
- Requirements that are risk-based, science-based, attainable, auditable and verifiable;
- Considering all microbiological, chemical and physical hazards reasonably likely to occur, consistent with potential hazards addressed in FDA regulatory guidances;
- Scalable to all size fresh produce operations;
- Considerate of regional- and commodity-specific food safety needs;
- Sufficiently non-prescriptive to be accepting of equivalent food safety practices;
- Acceptable to a critical mass of customers requiring general produce food safety audits;

Prior TWG outcomes

- TWG Charter
- Identification of audit standards to consider in the harmonization
 - SQF 1000
 - GlobalGAP F&V
 - USDA GAP
 - SENASICA GAP
 - NSF Davis Fresh
 - Georgia GAPs
 - Mushroom GAPs
 - AIB GAP
 - SCS GAP
 - Silliker GAP
 - CA LGMA
 - Commodity Specific Food Safety Guidelines for Watermelon
 - Primus GAPs v 704
 - California Strawberry Industry Food Safety Program
 - USDA National Organic Standard (food safety only)
 - CanadaGAP Combined Veg
 - AFDO Model Code for Produce Safety
 - California Tomato Farmers GAP
 - Steritech GAP/GHP



Prior TWG outcomes

- TWG Charter
- Identification of audit standards to consider in the harmonization
- Identification of major, common audit categories



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

Prior TWG outcomes

- TWG Charter
- Identification of audit standards to consider in the harmonization
- Identification of major, common audit categories
- Request audit standard owners to “divide their standards across the matrix” to facilitate comparisons



Responses Received from

- CA LGMA
- Mushroom GAPs
- SENASICA
- Silliker
- USDA
- Tomato Food Safety Audit Protocol
- Community Alliance with Family Farmers
- AFDO Model Code
- AIB
- CanadaGAP
- GlobalGAP
- SQF 1000



Prior TWG outcomes

- TWG Charter
- Identification of audit standards to consider in the harmonization
- Identification of major, common audit categories
- Request audit standard owners to “divide their standards across the matrix” to facilitate comparisons
- Compile standards by audit category



Compliance Plan

Debbie Carter - Management Responsibility

Mike Villaneva - Food Safety Plan, Risk Assessment

Sonia Salas - Documentation & Verification

Susan Pheasant - SOPs and SSOPs; Review Period;

Worker Education and Training; Traceability and Recall Programs;

Corrective Actions; Self-audits

Field Production

Brian Zomorodi - Management Responsibility

Raina Nelson - Seed/Transplant/Grafting

Andy Diercks - Agricultural Water

Edith Garrett - Equipment, Tools (Sanitation)

Bill Pool - Animal Control

Drew McDonald - Vehicles and Equipment in Field

Amy McLester - Microbiological Sampling/Testing

Harvesting

Susan Pheasant - Management Responsibility; Preharvest Assessment;

Worker Health/Hygiene and Toilet/Handwashing Facilities



	A	B	C	D
1	Standard Holder (AIB, Silliker, etc)	Standard Component	Criteria	Frequency dictated by criteria
2	GlobalGAP	Ag Chemicals	Is the producer or producer's customer able to provide current evidence either of annual (or more frequent) residue testing or of participation in a third party plant protection product residue monitoring system, which is traceable to the production location and that covers the plant protection products applied to the crop/product?	
3	GlobalGAP	Ag Chemicals	Is the producer (or the producer's customer) able to demonstrate information regarding the market where the producer is intending to trade produce, and the Maximum Residue Level (MRL) of that market?	
	GlobalGAP	Ag Chemicals	Has action been taken to meet the MRLs of the market the producer is intending to trade his produce in?	

Food Safety Plan or Risk Assessment

Each operation shall have a written food safety plan with a designated individual(s) responsible for food safety. The food safety plan shall address potential physical, chemical, and biological hazards and hazard control procedures for the following areas: water, soil amendments, field sanitation, environmental practices, and worker practices.

The plan shall include monitoring and verification procedures for all areas of the operation including but not limited to the following areas: List of components agreed by all to be part of the harmonized standard.

The food safety plan shall cover all products produced, packed, sold, handled, and/or distributed by operation.



Documentation & Recordkeeping

Growers shall provide evidence of procedures and policies in place for meeting each of the food safety standards identified in a written Food Safety Plan. Names and contact information for individuals responsible for developing and implementing the food safety plan shall be established.

Documents may be maintained on-site or at an off-site location and shall be available for inspection within a reasonable time frame.

Documentation shall be maintained for a minimum period of two years, absent state or federal regulations to the contrary.



Field Production – Management Responsibility

Management authorizes and supports a qualified/trained person, staff or department to ensure farm and/or facility compliance to Food Safety Programs, and laws and regulations that apply to the product and its production in the country of its origin.

The farm and/or facility has a current and accurate organizational chart/list that shows who is responsible for ensuring compliance to regulatory laws and guidelines.



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Seed/Transplant/Grafting

The records of traceability for Seed/Transplant/Grafting of crops must be maintained.

Planting trials and plantings must comply with all applicable legislation (e.g. GMO's, pesticides) in the country of production.



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Field Production – Equipment, Tools (Sanitation)

Identify any field operations that may pose a food safety risk.

Develop appropriate means for cleaning and sanitation to minimize the possible transfer of contaminants directly from the equipment that may directly contact product.

Harvesting equipment and/or machinery which comes into contact with product is in good repair, and poses no food safety risk.



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Animal Control (1)

There shall be a seasonal written assessment of the growing fields and adjacent land focusing on domestic and wild animal activity including grazing, noting crop characteristics, type and number of animals, proximity to the growing field, water sources, and other relevant factors.

There shall be scheduled monitoring of growing fields and adjacent land for evidence of animal activity and appropriate actions shall be taken to prevent or minimize the potential for contamination of produce with pathogens from animal feces. There shall be a written procedure for monitoring and a written record of any mitigation or corrective actions.

A frequency of monitoring and assessment shall be established based on production factors, which include but are not limited to the crop, geography, and other conditions.



Animal Control (2)

Based on the assessment, there shall be measures to exclude domestic animals from growing fields, packinghouses, and all storage areas. Whenever domestic animals are used in farming operations, measures shall be put in place to prevent or minimize the potential for contamination of produce with pathogens from animal urine and feces.

All local, state and federal regulations concerning animal control shall be observed.



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Agricultural Water (1)

A water system description shall be prepared. This description can use maps, photographs, drawings or other means to communicate the location of permanent fixtures and the flow of the water system (including any water captured for re-use). Permanent fixtures include wells, gates, reservoirs, valves, returns and other above ground features that make up a complete irrigation system should be documented in such a manner as to enable location in the field. Water sources and the production blocks they may serve should be documented.

All local, state and federal regulations concerning water source shall be observed.



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Agricultural Water (2)

There shall be a written description of the water system in use. This description shall be sufficient to facilitate an assessment of the risk of introduction of human pathogens. This description may use maps, photographs, drawings (hand drawings are acceptable) or other means to communicate the location of water source(s), permanent fixtures and the flow of the water system (including holding systems, reservoirs or any water captured for re-use).

An initial assessment shall be performed, followed by a review (or new assessment) any time there is a change made to the system or a situation occurs that could introduce an opportunity to contaminate the system.

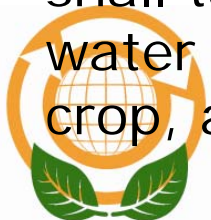


Agricultural Water (3)

Water systems intended to convey untreated human or animal waste shall be separated from conveyances utilized to deliver agricultural water.

In the event that the assessment identifies conditions that may result in contamination with human pathogens, action shall be taken to correct these conditions. Corrective actions will be documented.

Scheduled water testing shall be part of the water source plan. The frequency of water analysis shall be carried out in accordance with the risk assessment. The risk assessment shall take into consideration the historical testing results of the water source, the characteristics of the crop, the stage of the crop, and the method of application.



Agricultural Water (4)

There shall be an SOP for water testing which includes frequency of sampling, who is taking the samples, and the site where sample is taken. If there is no baseline of historical information, one shall be established. For any given water source one sample per water source should be collected prior to use. If prior test results are available, they can be used to establish the baseline. If previous test results are not available, a testing regime shall be implemented to establish the baseline. The testing regime shall include point of use sampling, standard testing protocols, and multiple test results. If results of the first test demonstrates acceptable water, water from that source may be used for any agricultural production purpose. Subsequent tests may be necessary depending on the crop characteristics. For example, a crop that will undergo repeat foliar application within its crop cycle would require additional samples to establish sufficient data.



Next Meetings

- April 7-8, Darden, Orlando FL
- April 19, The Venetian, Las Vegas NV
- May 12-13, US Foodservice, Rosemont IL
- June 17-18, Sysco, Houston TX
- July 13-14, California Strawberry Commission, San Jose CA
- August TBD,



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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

- GlobalGAP National Technical Working Group

— Dr. Elmé Coetzer



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Breakout Groups

- Group #1, ● (blue), room 1B
Group Leaders: Bob Mills
Audit categories: Review Period, Traceability and Recall Programs, Corrective Actions
- Group #2, ● (red), room 1C
Group Leaders: Bill Pool, Drew McDonald
Audit categories: Agricultural Water, Compliance Plan/Management Responsibility
- Group #3, ● (purple), room 1D
Group Leaders: Chris Christian, Sharan Lanini
Audit categories: Self-audits, Worker Education



If not pre-assigned a group...

Reports by Breakout Groups

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.

Group 1

Review Period

The Company shall be responsible for reviewing their Food Safety Plan at least annually and documenting the review procedure



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Traceability (1)

- A documented traceability program shall be established.
- Records that demonstrate recipients shall be maintained except for direct to consumer sales. (One step forward)
- Records that demonstrate product sources and associated finished packaging material shall be maintained. (One step backward).
- Contents of records shall be consistent with applicable regulations.



Traceability (2)

- Records are retained and readily retrievable for at least two years or as required by applicable regulation.
- A trace back and trace forward exercise shall be performed at least annually.
- The trace back and trace forward exercise shall achieve accurate reconciliation as stated in the program and in compliance to applicable regulations.



Recall

- A documented recall program, including written procedures, shall be established.
- The recall program shall have a designated recall team.
- A mock recall exercise shall be performed at least annually.
- The mock recall shall include the trace back and trace forward exercise and shall be completed as stated in the program and in compliance to applicable regulations.



Corrective Actions

- A documented Corrective Action is required for an observation or audit that contains a written non-conformance.
- The responsibility, methods, and timelines to address Corrective Actions shall be documented and implemented.



Worker Health/Hygiene and Toilet/Handwashing Facilities (1)

Field sanitation units shall be designed, constructed, and located in a manner that minimizes the potential risk for product contamination and are directly accessible for servicing.

Toilet facilities shall be of adequate number, easily accessible to employees and in compliance with applicable regulation.

When appropriate, racks for protective clothing used by field employees shall be provided.



Worker Health/Hygiene and Toilet/Handwashing Facilities (2)

Toilet and wash stations shall be maintained in a clean and sanitary condition. Toilets shall be sufficiently stocked with toilet paper. Wash stations shall be located with the field sanitation units and include hand wash basins with clean, microbially potable water, hand soap, disposable towels or hand drying device, towel disposal container, and a tank that captures used hand wash water for disposal. 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.



Worker Health/Hygiene and Toilet/Handwashing Facilities (3)

Employees and visitors shall follow all personal hygiene practices as designated by the company.

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.

Smoking, chewing, eating, drinking (other than water) or spitting is not permitted in any growing areas including on field preharvest equipment.



Worker Health/Hygiene and Toilet/Handwashing Facilities (4)

Personnel shall wash their hands after each visit to a toilet, after using a handkerchief/tissue, after handling dirty or contaminated material, after smoking, eating or drinking and at any other time when their hands may have become a source of contamination.

If rubber or disposable gloves are used, they shall be used as stated in the company food safety plan.

Protective clothing shall be effectively maintained, stored, laundered and worn so as to protect product from risk of contamination.



Worker Health/Hygiene and Toilet/Handwashing Facilities (5)

The wearing of jewelry and other loose objects shall be in compliance to company policy and applicable regulation.

Provision shall be made to store employees' personal belongings away from crops and field equipment.

Areas for meal breaks shall be designated and located away from food contact/handling zones and field equipment.



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Worker Health/Hygiene and Toilet/Handwashing Facilities (6)

Potable drinking water shall be available to all field employees. Drinking water stations shall be easily accessible to employees and in compliance with the company's Food Safety Plan and applicable regulation.

First aid kits shall be present at all permanent sites and in the vicinity of field work. The kits shall be maintained in accordance with local and national standards and/or recommendations.



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Worker Health/Hygiene and Toilet/Handwashing Facilities (7)

Workers and field personnel who show signs of illness (e.g., vomiting, jaundice, diarrhea) shall be restricted from direct contact with produce or food-contact surfaces.

Workers shall receive health and safety training as specified in the company's food safety plan. (Note: This may already be covered under worker training)

There shall be a written policy specifying the procedures for the handling/ disposition of food or product contact surfaces that have been in contact with blood or other bodily fluids.



Group 2

Agricultural Water

- If water is used in the production of the crop, then:
 - Water System Description
 - Water System Risk Assessment
 - Water Management Plan



Water System Description (1)

A water system description shall be prepared.

- Water sources and the production blocks they may serve shall be documented.
- The description shall include one or more of the following: maps, photographs, drawings (hand drawings are acceptable) or other means to communicate the location of water source(s), permanent fixtures and the flow of the water system (including holding systems, reservoirs or any water captured for re-use).



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Water System Description (2)

Permanent fixtures include wells, gates, reservoirs, valves, returns and other above ground features that make up a complete irrigation system shall be documented in such a manner as to enable location in the field.

All local, state and federal regulations concerning water source shall be observed.

Water systems intended to convey untreated human or animal waste shall be separated from conveyances utilized to deliver agricultural water.



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Water System Risk Assessment (1)

An initial risk assessment shall be performed that takes into consideration the historical testing results of the water source, the characteristics of the crop, the stage of the crop, and the method of application.

A review or new assessment shall be conducted seasonally and any time there is a change made to the system or a situation occurs that could introduce an opportunity to contaminate the system.



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Water System Risk Assessment (2)

The risk assessment shall address potential physical, chemical, and biological hazards and hazard control procedures for the water distribution system.

The risk assessment shall be used to develop a water management plan. In the event that the assessment identifies hazards or conditions likely to result in contamination, actions shall be taken to correct these conditions.

Corrective actions will be documented.



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Water Management Plan (1)

There shall be a water management plan to identify and mitigate risks associated with the water system on an ongoing basis.

The water management plan shall include the following: preventive controls, monitoring and verification procedures, corrective actions, and documentation.

Water testing shall be part of the water management plan.



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Water Management Plan (2)

As part of the monitoring and verification procedures for crops using water in the production of the crop, there shall be an SOP for ongoing water testing during the production and harvest season, which includes frequency of sampling, who is taking the samples, where sample is taken, how the sample is collected, type of test and criteria.

The frequency of testing and point of water sampling shall be determined based on the water source, its particular history, and the outcome of the risk assessment.



Water Management Plan (3)

The monitoring and verification schedule shall be decided by the risk assessment, best practices within country of production, or applicable legislation.

As part of the water system plan, the water shall be tested prior to initial use. For water already in use, water sampling shall be conducted and a testing regime shall be established and in place. Water sampling should be done to establish the baseline for identifying control limits and action levels. If prior test results are available, they can be used to establish the baseline. If previous test results are not available, a testing regime shall be implemented to establish the baseline.



Water Management Plan (4)

The testing regime shall be consistent with the water testing SOP. Subsequent tests may be necessary depending on the crop characteristics. For example, a crop that will undergo repeat foliar applications within its crop cycle would require additional samples to establish sufficient data.



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Water Management Plan (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.



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Compliance Plan, Harvesting – 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.



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Compliance Plan, Harvesting – 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.



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Compliance Plan, Harvesting – Management Responsibility (3)

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.

There shall be programs in place to monitor the effectiveness and implementation of the food safety programs. This shall include the names and locations of farming operations and harvest crews.



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Group 3

Worker Education and Training

All workers involved in growing operations shall receive training in food safety, sanitation, and/or personal hygiene appropriate to their assigned responsibilities and supervisory level.

Training material is documented and available for review. Documentation to include the name of the person delivering the training, date and individual names and signatures of attendees.

Training programs shall educate workers of their responsibility in protecting food from intentional or unintentional microbial, chemical, and physical hazards.



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Self Audits

Self-Audits will be conducted at a minimum annually by an assigned individual who is knowledgeable in this standard, utilizing this standard to assist in the self-audit.

All aspects of the GAP program will be audited and a written record of required corrective action will be documented.



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SOPs and SSOPs

Standard operating procedures (SOPs) shall be developed and documented, according to the food safety plan to provide specific instructions and procedures that describe a process that shall be performed.

These procedures (SOPs) also must provide a means by which employees shall be trained.



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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.



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Vehicles and Equipment in Field

Identify equipment/vehicles used in farming operations that may pose a risk for cross-contamination.

A program shall be developed and documented with appropriate means of reducing and controlling the risks of possible transfer of physical, chemical or biological contaminants to growing area, agricultural water sources, and product as identified in the food safety plan.



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Soil Amendments (1)

Soil amendments, such as properly treated manure or biosolids, can be an effective and safe fertilizer. Untreated, improperly treated, or recontaminated manure or biosolids may contain pathogens of public health significance that can contaminate produce.

The food safety plan shall address soil amendment risk, preparation, use, and storage. Soil amendment preparation and use shall be based on scientific principles that reduce risk of contamination by potentially harmful microorganisms, and in accordance with applicable federal, state, or local regulations.



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Soil Amendments (2)

If treated soil amendments are used, records of composition, dates of treatment, methods utilized, application dates and letter of guarantee, certificate of analysis (COA) or any test results or verification data demonstrating compliance with process or microbial standards must be documented.

If a soil amendment containing raw or incompletely treated manure is used, it shall be used in a manner so as not to serve as a source of contamination of produce. If such a product is used, there shall be documentation of the composition, and time and method of application.



Field History and Assessment

The food safety plan shall evaluate and document the risks associated with land use history and adjacent land use, including structures and equipment. When land use history or adjacent land use indicates a possibility of physical, chemical or biological contamination, preventative measures shall be performed and documented to mitigate food safety risk.

The assessment is re-performed, and documented, for environmental conditions that have changed since the last assessment.



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Preharvest Assessment

Prior to harvest, the production environment shall be evaluated for changes in conditions that may be reasonably likely to result in physical, chemical, or biological contamination of the produce. Results of the evaluation shall be documented.



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