

Changes Proposed to Post-harvest Harmonized Standards

At their March 13, 2014 meeting, the Produce GAPs Harmonization Initiative Technical Working Group (TWG) reviewed eight recommendations for changes to the [Post-harvest Operations Harmonized Food Safety Standards](#) (aka Post-harvest Harmonized Standards). The following five proposals were approved as changes to the standards. Changes to the existing standards are shown in red.

1. Proposal: Items 1.21.6 and 1.21.15 are almost redundant, and should be combined into one item. TWG: Agreed; Gombas will merge the two into one item.

1.21.6	If protective clothing is required by the Operation in product handling areas, it shall be handled in a manner to protect against contamination. When appropriate, racks and/or storage containers or designated storage area for protective clothing and tools used by employees shall be provided.	When employees wear protective clothing, such as aprons and gloves, the Operation shall have a policy that the clothing not be left on product, work surfaces, equipment or packaging material but hung on apron and glove racks or in designated areas. Racks shall be available and located so as to avoid potential contamination. In addition, storage containers or designated storage areas shall be provided to ensure tools used by employees are properly stored prior to entering toilet facilities. Operation shall have a policy regarding whether protective clothing can be taken home.	If employees wear protective clothing, auditor reviews protective clothing policy and observes whether clothing rack and tool storage containers or designated storage areas are available and used.	Operation develops or revises clothing policy. Operation obtains and positions racks and storage containers as necessary. Retraining is performed and documented.
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2. Proposal: In the Field Operations and Harvesting standards, item 2.2.20 requires that “Operation shall have a blood and bodily fluids policy. 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.” There is no similar requirement in the Post-harvest

Operations standards. TWG: Agreed that such a requirement is necessary. Gombas will copy the item into the Post-harvest Operations standards. Current items 1.21.10 – 1.21.14 will be renumbered accordingly.

1.21.10	Operation shall have a blood and bodily fluids policy.	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.	Auditor reviews policy and observes operation for evidence of compliance.	Operation develops and implements policy. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
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3. Proposal: In item 1.25.1, the Procedure states that “Operation utilizes laboratories that have, at minimum, passed a Good Laboratory Practices (GLP) audit or participates in a Proficiency Testing program, and utilizes BAM, AOAC International or testing methods that have been validated for detecting or quantifying the target organism(s) or chemical(s).” It was recommended that BAM be spelled out as “FDA’s Bacteriological Analytical Manual (BAM)”. TWG: Agreed.

1.25.1	Where laboratory analysis is required in the Food Safety Plan, testing shall be performed by a GLP laboratory using validated methods.	Operation utilizes laboratories that have, at minimum, passed a Good Laboratory Practices (GLP) audit or participates in a Proficiency Testing program, and utilizes FDA’s Bacteriological Analytical Manual (BAM), AOAC International or testing methods that have been validated for detecting or quantifying the target organism(s) or chemical(s).	Auditor reviews Operation’s evidence that only GLP laboratories and validated methods are used.	Operation discontinues using non-GLP laboratory and non-validated testing methods.
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4. Proposal: Items 3.1.1-3.1.4 cover “Temperature Control (When refrigerated transport is required for food safety)”. It was recommended that “When required for food safety” be removed from the header and moved to each of the four items for clarity. TWG: Agreed.

Temperature Control (When refrigerated transport is required for food safety)				
3.1.1	There is a written policy for transporters and conveyances to maintain a specified temperature(s) during transit.	When refrigerated transport is required for food safety , transporters have written, predetermined temperature ranges for commodities being transported.	Auditor reviews documentation of predetermined temperature ranges.	Operation develops, documents and implements temperature range requirements.
3.1.2	Prior to loading, the vehicle shall be pre-cooled.	When refrigerated transport is required for food safety , the proper temperature for pre-cooling is appropriate to the type of produce and as specified by documented protocol.	Auditor reviews documented protocol, shipping checklist records, and observes vehicles during loading for compliance.	Operation develops, documents and implements vehicle cooling requirements.
3.1.3	The refrigerated transport vehicles shall have properly maintained and fully functional refrigeration equipment.	When refrigerated transport is required for food safety , Operation has a written policy that refrigerated transportation equipment shall be controlled by a thermostatic device as necessary to maintain temperatures in the cargo area for the particular type of produce being transported and as specified by documented protocol.	Auditor reviews written policy and observes refrigerated transport vehicles in use at the time of the audit.	Operation develops, documents and implements a policy. Retraining is performed and documented.
3.1.4	Where required, temperatures of product are taken and recorded prior to or upon loading.	When refrigerated transport is required for food safety , Operation has a written procedure for when and how to measure product temperatures prior to or during loading	Auditor reviews written procedure and observes temperature monitoring procedures during loading	Operation develops, documents and implements a policy. Retraining is performed and documented.

5. Proposal: Item 3.2.1 requires that “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, in compliance with current industry practices or regulatory requirements for that commodity. Refrigeration units, if used, must be in working order. Procedures include prohibition of raw animal or animal product transport, or other materials that reasonably may be a source of contamination with biological, chemical or physical hazards. A responsible individual shall sign or initial the completed checklist or inspection report.” Since the item only allows for prohibition, it was recommended that it include

a requirement for vehicles to be washed between loads if prior transport included materials that reasonably may be a source of contamination. TWG: Agreed; the Procedure will be revised to allow for “the washing of shipping units between loads if prior transport included materials that reasonably may be a source of contamination.”

3.2.1	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, in compliance with current industry practices or regulatory requirements for that commodity. Refrigeration units, if used, must be in working order. Procedures include prohibition of raw animal or animal product transport, or other materials that reasonably may be a source of contamination with biological, chemical or physical hazards. Shipping units shall be washed between loads if prior transport included materials that reasonably may be a source of contamination. A responsible individual shall sign or initial the completed checklist or inspection report.	Auditor reviews cleaning procedures and inspection records and inspects produce transport vehicles for cleanliness.	Operation develops the policy and written procedures. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
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Stakeholders are invited to submit comments to the proposed changes until **September 1, 2014**. Comments should be emailed to Dr. David Gombas, United Fresh Produce Association, at dgombas@unitedfresh.org, faxed to 202-303-3433 or mailed to his attention at United Fresh Produce Association, 1901 Pennsylvania Avenue NW, Suite 1100, Washington DC 20006.