

### Changes Proposed to Pre-harvest Harmonized Standards

At their [June 5, 2012 meeting](#), the Produce GAPs Harmonization Initiative Technical Working Group (TWG) reviewed twelve recommendations for changes to the [Field Operations and Harvesting Harmonized Food Safety Standards](#) (aka Pre-harvest Harmonized Standards). The following six proposals were approved as changes to the standards. Changes to the existing standards are shown in red.

Proposal: Are subcontractors held to the relevant food safety standards as they would be as employees? TWG: Agreed. Operations shall have procedures and/or records to demonstrate that subcontractors whose activities can affect food safety have been informed of and, to the extent that can be verified, are in compliance with the relevant requirements of the Field Operations and Harvesting standards.

1.4.3	Subcontractors are held to the relevant food safety standards as they would be as employees.	Operations shall have procedures and/or records to demonstrate that subcontractors whose activities can affect food safety have been informed of and, to the extent that can be verified, are in compliance with the relevant requirements of the Field Operations and Harvesting standards.	Auditor reviews Operation's evidence that subcontractors are trained to the same food safety requirements as employees would be and, if practical during the audit, observes subcontractors for compliance.	Operation obtains evidence, trains or discontinues using subcontractors.
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Proposal: Do laboratories used for residue and other food safety chemical testing meet the same standards as for microbiological testing; i.e. GLP procedures and/or participation in Proficiency Testing? TWG: Agreed. Amend item 1.5.1 the same as changed in the Post-harvest Operations standards.

1.5.	<del>Microbiological</del> Sampling/Testing
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1.5.1.	Where <b>laboratory</b> 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 BAM, AOAC International or testing methods that have been validated for detecting or quantifying the target organism(s) <b>or chemical(s)</b> .	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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Proposal: Are records kept of all fertilizer applications, detailing the fertilizer used and where the fertilizer is used? Records must also be kept for hydroponic situations and where fertigation is used. TWG: amend 1.6.1 (traceability) to include fertilizers.

Proposal: If home made preparations, plant strengtheners, soil conditioners, or any other such substances are used, records of their contents and use have to be available. TWG: Agreed. Item 1.6.1 (traceability) amended to include homemade preparations. 1.6.1 also amended to replace "Records should include..." with "Records shall include..."

1.6.1	A documented traceability program shall be established.	Records that enable reconciliation of product delivered to recipients (one step forward) shall be maintained except for direct to consumer sales. Records shall be maintained that link product with source of the produce or production inputs, e.g., soil amendments, <b>fertilizers</b> , seeds/transplants, agricultural chemicals, <b>homemade preparations</b> (one step backward). Records <b>shall</b> include the date of harvest, quantities, farm identification (field or block), transporter and non-transporter. Additional information may be included. Contents and retention of records shall be consistent with applicable regulations.	Auditor reviews traceability program and verifies operation's ability to trace product accurately one step forward and one step back.	Operation establishes an effective traceability program.
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Proposal: Are all the biocides, waxes and plant protection products used post-harvest registered and used according to label directions and prevailing regulation? TWG: Agreed. Amend section 2.3 to include post-harvest application of chemicals.

Proposal: Are MRLs, in the U.S. and country of destination (if known) considered for all biocides, waxes and plant protection products used post-harvest? TWG: Agreed. Amend section 2.3 to include post-harvest application of chemicals.

2.3.1	Use of agricultural chemicals shall comply with label directions and prevailing regulation.	Agricultural chemicals, <b>including post-harvest chemicals such as biocides, waxes and plant protection products</b> , must be registered for such use as required by prevailing regulation, and used in accordance with label directions including application rates, worker protection standards, personal protection equipment, container disposal, storage, and all requirements specified for the chemical or compound. Records of agricultural use are maintained.	Auditor reviews agricultural chemical use records for evidence of compliance with approved uses or label directions.	Operation develops and maintains agricultural chemical use records and maintains evidence of proper use of each chemical use. Retraining is performed and documented. Affected product is evaluated for potential contamination and disposition.
2.3.2	If product is intended for export, agricultural chemical use, <b>including post-harvest chemicals</b> , shall consider requirements in the intended country of destination.	The operation shall have procedures, such as pre-harvest interval and application rate, sufficient to meet the MRL entry requirements of the country(ies) in which the product is intended to be traded, if known during production.	Auditor reviews operation's procedure for complying with agricultural chemical restrictions in countries of destination. If the country of destination is unknown during production, this item is not applicable.	Operation develops procedures, and diverts non-compliant product to a market in which the product meets standards.

Stakeholders are invited to submit comments to the proposed changes until **March 31, 2013**. Comments should be emailed to Dr. David Gombas, United Fresh Produce Association, at [dgombas@unitedfresh.org](mailto: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.