WASHINGTON STATE DEPARTMENT OF AGRICULTURE

USDA Good Agricultural and Good Handling Practices

An Audit Verification Program for the Fresh Fruit and Vegetable Industry

USDA
GAP & GHP
AUDIT PROGRAM
FRUIT & VEGETABLE PROGRAMS

WSDA
WASHINGTON STATE
DEPARTMENT OF AGRICULTURE

Washington State Department of Agriculture
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Introduction

Washington State Department of Agriculture's Fruit and Vegetable Inspection Program team is always seeking ways to provide services that will benefit the industry it serves. Thus, joining forces with the United States Department of Agriculture's Agricultural Marketing Service, as well as other states, Washington state adopted and offers the United States Department of Agriculture's Good Agricultural/Good Handling Practices audit program to Washington state growers, producers and shippers.

What is a USDA Good Agricultural/Good Handling Practices Audit?

The purpose of the Good Agricultural/Good Handling Practices (GAP/GHP) audit program is a voluntary, audit-based program that verifies conformance to generally recognized good agricultural practices and good handling practices as outlined in the Food and Drug Administration's *Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables*. Because the program is voluntary, an audit is only performed at the request of the auditee and is valid for one year. Participants that meet the requirements of the USDA audit program receive a certificate and are listed on the USDA website.

The information provided in this section will provide a brief overview of each scope of the audit checklist that is used to perform an audit. Sections of the audit checklist covered in this publication:

- General Questions
- Part 1—Farm Review
- Part 2—Field Harvest and Field Packing Activities
- Part 3—House Packing Facility
- Part 4—Storage and Transportation
- Part 5—Traceback
- Part 6—Wholesale Distribution Center/ Terminal Warehouse
- Part 6A—Traceback for Part 6
- Part 7—Preventative Food Defense Procedures

General Questions and Parts 1 through 6A are centered around unintentional possibilities of contamination. Part 7 covers areas of concern for intentional possibilities of contamination.

The USDA GAP/GHP Audit program also offers client-requested audits as well as audits that are commodity-specific.

Prior to the start of an audit the applicant must agree and sign an "Agreement to Participate" document. This document contains an explanation of the guidelines of the audit as well as an agreement allowing unannounced visits.

For established businesses, an unannounced visit consists of a follow up of a previously passed USDA GAP/GHP audit. The purpose of this visit is to verify that the applicant is still in compliance with a passed USDA GAP/GHP audit.

For new businesses requesting a GAP/GHP audit, unannounced visits are as follows, based on the length of time in operation. If a business has been in operation for a period of:

- 30 days or less, they may receive an unannounced visit.
- 31-90 days, they will receive a minimum of one unannounced visit.
- 91 days or more, they will receive a minimum of two unannounced visits.

For new businesses, an unannounced visit consists of a brief visit with the contact person for the facility, a walk-through of the farming/packing operation, and a review of any changes made to the Standard Operating Procedure (SOP) or verification of proper training for any newly hired employees.

A note on the audit process and scoring

Each audit contains a series of questions pertaining to each section of the audit checklist. Each question within an audit section has a point value assigned to it. Auditor answers are YES, NO, N/A (not applicable to this audit) and DOC (which means documentation is required for that question). If the question is given a YES by the auditor, the applicant receives the total points available. If the question is given a NO by the auditor, the applicant receives no points.

Each audit section requires 80 percent of the total points available for that section to achieve a passing audit score.

To contain audit costs, be prepared with all required documentation. Having all required documentation including standard operating procedures, training information, cleaning records, water tests and the like in a file or binder will allow the audit to progress more quickly.

Auditor Qualifications

All auditors must meet minimum USDA-AMS auditor standards that include specialized training in performing audits, food safety, and ethical standards. All auditors must be federal or state employees who are USDA licensed fruit and vegetable inspectors, have a minimum of 36 months of work experience in the fruit and vegetable field or a bachelor's degree, and go through specialized auditor training based on the ISO 19011 standard Parts 4 & 6. Additionally all auditors must go through yearly refresher training, be evaluated by a USDA-approved evaluator annually, and complete 80 hours of continual professional development every 3 years in order to maintain auditor status.

General Questions

This section covers the applicant's food safety program and worker health and hygiene.

Food Safety Program

This section consists of reviewing the applicant's documented food safety program addressing the GAP/GHP specifications. The food safety program would include the following items:

➢ A written standard operating procedure (SOP). The SOP will explain or demonstrate how your farm or production company complies with each audit sections.

➢ A standard sanitary operating procedure (SSOP) including written procedures for cleaning or treating areas where it is possible to reduce or eliminate the possibility of microbial contamination.

➢ Records for specific actions that are taken, such as regular cleaning of food contact surfaces, refrigeration areas or transportation machinery.

➢ A record of periodic and scheduled self-audits or internal audits of the program.

➢ A person designated to oversee the food safety program.

Worker Health and Hygiene

This section covers the availability of potable water, proper training on sanitation and hygiene practices for employees and visitors, cleaning of restroom areas, smoking and eating areas, and handling of employees showing symptoms of illness or diseases.

Potable water:

➢ Is clean water that is safe to drink.

➢ Meets the quality standards prescribed in the U.S. public health service drinking water standards.

➢ Must be available for hand washing as well as drinking.

Proper Hygiene and sanitation training is very important:

➢ All staff and visitors must comply with safe practices.

➢ All staff must have documented training in this area.

➢ Training includes washing of hands, wearing outer garments, personal cleanliness, unsecured jewelry, wearing of gloves and storing of clothing.

➢ Understandable signs must be posted to instruct staff and visitors to wash hands prior to starting or returning to work from breaks or handling of product.

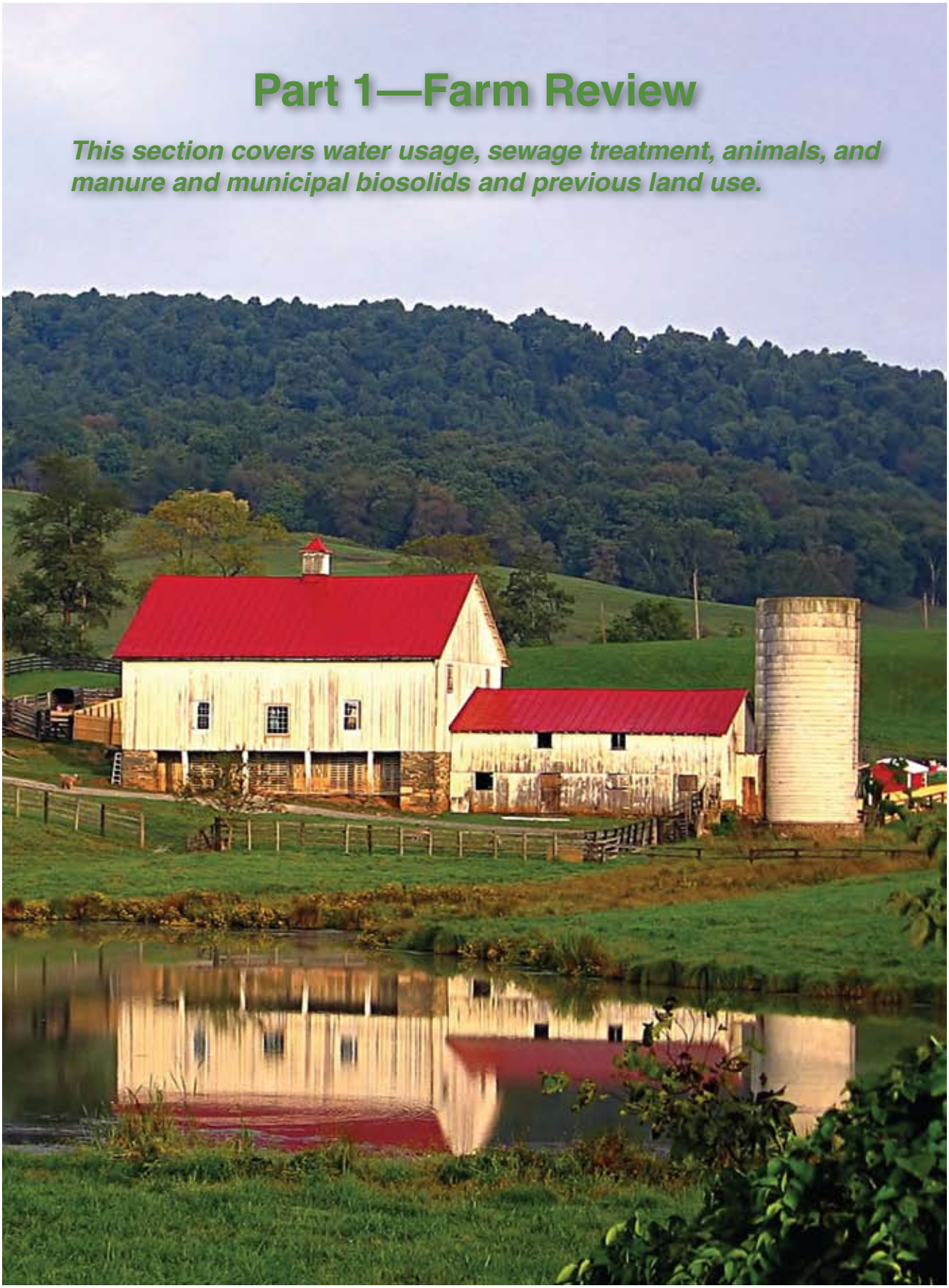
➢ Restrooms must be properly supplied with potable water, soap and single use towels.

Premises must be kept clean and have designated smoking and eating areas away from where the product is being handled.

Staff with symptoms of illness or infectious diseases must not be allowed to work or must not handle any product and must be moved to a different work site where possible contamination of the product cannot occur.

Part 1—Farm Review

This section covers water usage, sewage treatment, animals, and manure and municipal biosolids and previous land use.



Water Usage

Source of the water must be known.

Water must come from a recognized water source with the quality known to be adequate for the crop irrigation method.

The water must not be contaminated with microbial organisms.

Water testing must be performed to verify the water quality and the testing records must be available. Testing must be done three times annually for surface water and twice annually for wells. Tests should be conducted at the start of the growing season, one mid-season, and one near the end of the irrigation season or harvest.

Measures must be taken to prevent contamination of irrigation water from outside sources at all times.

Sewage Treatment

Indicate what type of sewage system the farm uses

If a septic tank or drain field is used the location must be identified.

The auditor must check to see if a sewage treatment facility is adjacent to the farming operation.

Animals/Wildlife/Livestock

Crops and water sources must be protected from contamination from the presence of animals or livestock. Crop production areas must be monitored to verify animal absence or presence.

Feed lots or animal production facilities adjacent to crop production areas can be of a concern depending on location and drift.

Manure and Biosolids

The auditor must be made aware if the operation is using manure or biosolids. If it is, the operation must have documentation that the manure has been properly treated and stored to minimize the risk of contamination.

Manure lagoons must be maintained to prevent leaking or over flowing.

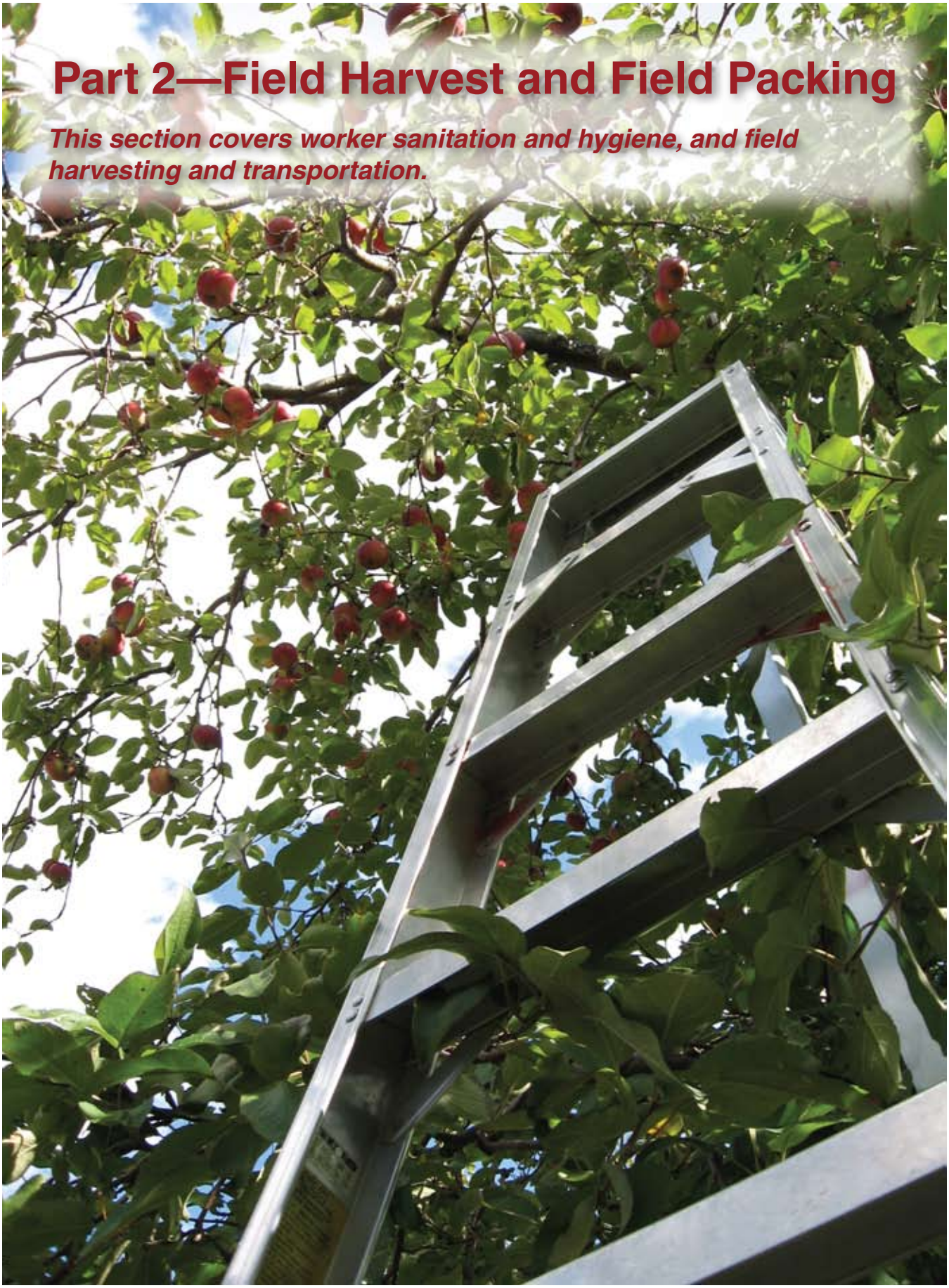
Soils

Auditors must review the previous use of the land with the applicant. In most cases the land has been used for farming for long periods of time and has minimum risk for contamination.

If previous land use indicates prior use as a waste site, feed lot, old homestead, subjected to flooding or something that might cause concern for contamination, the applicant must have the soil tested for microbial contaminants and adjust the use of the land for crops that have minimal contact with the surface.

Part 2—Field Harvest and Field Packing

This section covers worker sanitation and hygiene, and field harvesting and transportation.



Worker Sanitation

Applicant must ensure that all employees are properly trained and take necessary precautions to avoid microbial contamination of the product.

Applicant should make sure that all State/Federal safety and health standards have been met.

Restrooms or portable toilets must be properly supplied and maintained on a regular basis and this must be documented.

All sanitation facilities must include potable water to wash with, soap and single-use towels.

Applicant must have a response plan if a spill were to occur as to how they would clean it up or contain it.

Signs should be posted in the appropriate language for the employees to instruct them to wash their hands after the use of the restroom facility.

Field Harvesting and Transportation

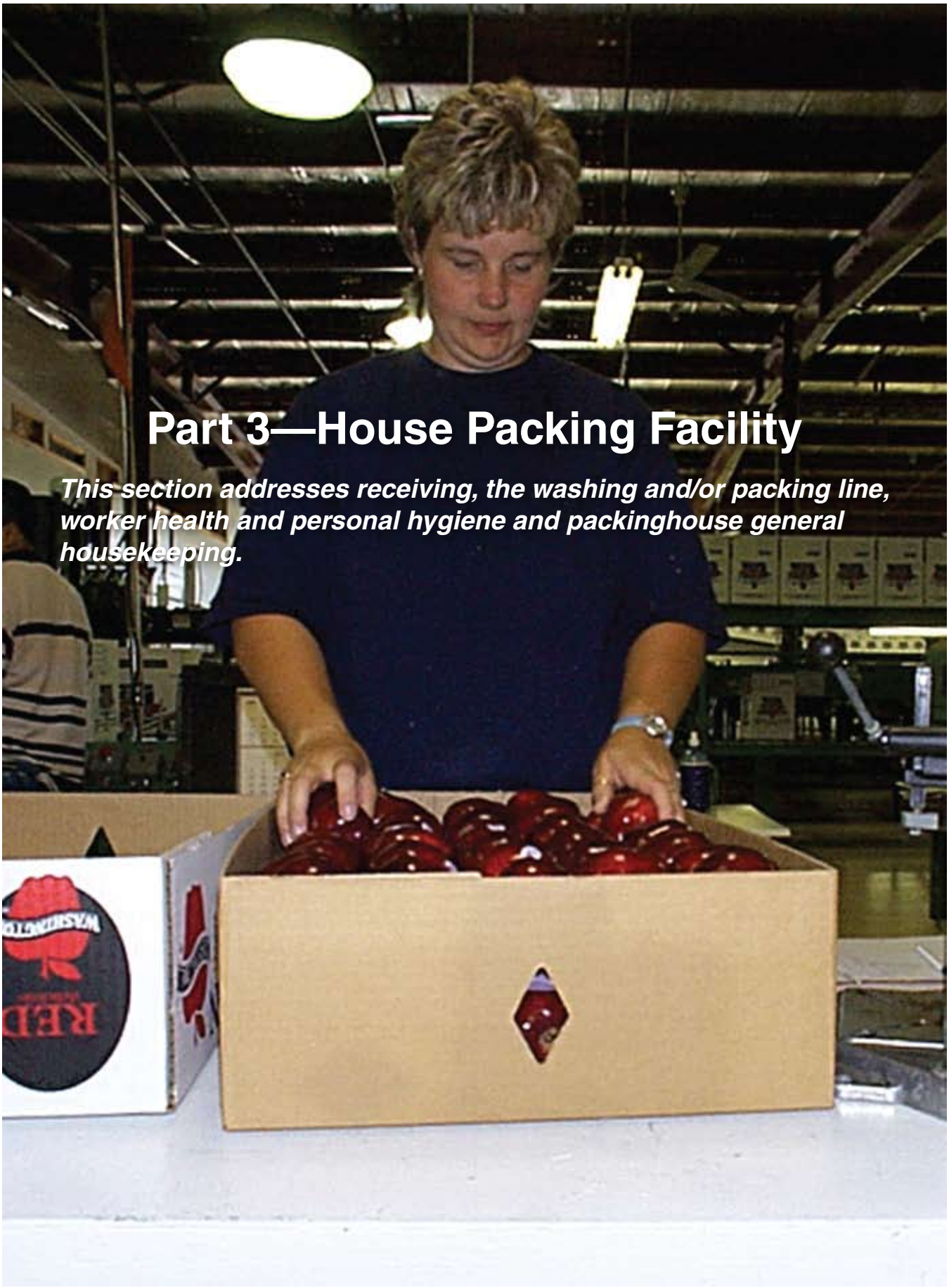
This section covers harvesting trays, tables, baskets, totes and other harvesting equipment used during harvesting and transportation.

All equipment used should be cleaned or sanitized prior to use and kept as clean as practicable during harvest to prevent contamination.

All equipment should not be used for any other purpose during harvest.

Any damaged or soiled harvesting containers that are not repairable must be discarded to reduce the possibility of microbial contamination.

Water used during the harvesting operation must be potable.



Part 3—House Packing Facility

This section addresses receiving, the washing and/or packing line, worker health and personal hygiene and packinghouse general housekeeping.

Receiving

Products that are transported from the field to the packing house in both bulk and packed form that leaves the immediate growing area and travels on a county or state highways, must be covered.

Products must be protected from contamination from other vehicles, overhead contamination from overpasses, from birds or other means during transport.

Tarping of loads or hauling in enclosed containers is a good practice.

Harvested product must be properly stored after delivery to the packing facility.

Mesh-type coverings are not considered adequate cover.

Washing/Packing Line

Water used during washing or packing must be potable **during first use**.

Water that is used for processing of fresh fruit and vegetables either for washing or as a way to dilute and apply cleaners, waxes, fungicides or other processing chemicals must be potable.

Re-use of washing or packing water is acceptable as long as there are measures in place to ensure and maintain water quality.

Periodic water sampling or changing of the water as necessary should be done to maintain sanitary conditions.

Clean and sanitized water-contact surfaces such as dump tanks, flumes, wash tanks and hydro coolers as often as necessary to ensure the protection of the produce against possible contamination.

Install backflow devices and legal air gaps, as needed, to prevent contamination of clean water with potentially contaminated water.

Water treatment strength levels must be tested and records of this testing must be available.

The packing facility should be cleaned on a daily basis. Documentation of cleaning is required.

Other areas of possible contamination could include open-mesh catwalks over the product flow zone, motors without catch pans, dirty ceiling and pipes.

If ice or hydro cooled water is used for cooling of the product, the water needs to be from a potable source in order to prevent possible contamination.

Worker Health and Personal Hygiene

Areas within the packing facilities that are designated for the employees to prepare for work, taking of breaks and eating of lunches must be kept clean and in an area away from the production line.

Employee areas may be within the packing room and designated by signs, lines painted on the floor or may be a separate room.

Employee designated areas outside of the packing facility is also an acceptable practice.

An applicant may have a written policy in its SOP that refers to wearing of hair and/or beard nets and the wearing of, or restriction of, the type of jewelry they will allow to be worn by the employees. If this policy is in an applicant's SOP, the policy must be followed by everyone.

Packinghouse General Housekeeping

General Housekeeping is very important. Poor sanitation practices can significantly increase the risk of contamination to the product being handled. Packers should employ good sanitization practices as a standard operating procedure to maintain control throughout the packing operation.

Food grade approved lubricants must be used in areas where lubricating agents may come into contact or have the potential to contaminate the product.

- ➢ Lubricant containers must state that they are an approved food grade lubricant or make reference that they meet applicable FDA or other government standards.
- ➢ Non-food grade lubricants may be used as long there is no risk for contamination or there are safeguards in place to prevent contamination, such as catch pans under gear boxes.

Food grade and non-food grade lubricants must be stored separately either in separate rooms or segregated within the same room to prevent misuse or accidental use of the products.

The grounds in the immediate vicinity of the packing facility should be kept clear of waste, litter and reasonably free of standing water.

- ➢ Garbage receptacles and dumpsters need to be maintained and emptied on a regular basis.
- ➢ All receptacles/dumpsters that are located outside and located sufficiently close to the facility entrances must have a closure.

The area surrounding the garbage receptacles/dumpsters must be maintained in a clean and orderly manner.

Packing facilities must be enclosed to exclude or reduce the possibility of contamination from rodents and pests.

- ➢ Doors that are used for forklift, foot traffic, and the like and are left open during normal working hours are considered part of the normal packing operation and this is acceptable.

The packinghouse interior must be clean and maintained.

- ➢ During packing operations some evidence of dirt and debris will be visible, but there should be no evidence that it has accumulated over time and been ignored on walls, ceilings, equipment and the like.
- ➢ All floor drains must be free of obstructions to prevent water build-up and harboring of pests.

All glass material that is in the product flow zone must be protected in case there is a breakage. This can be done with the use of shatter proof bulbs, a protective sleeve around the bulbs or covers that will protect the bulb.

There must be a documented and established pest control program in place.

- ➢ The program may be a self-designated program or by a commercial operator.
- ➢ Traps may be numbered and a map available to show the location of the traps.
- ➢ There should be a pest control log that includes dates of inspection, inspection report and steps that are taken to eliminate any problems.

Part 4—Storage and Transportation

This section covers the use of containers and pallets, pest control, ice, storage and/or temperature control and transportation and loading.

Containers and Pallets

Packing containers and other packing material should be stored and properly covered to prevent the possibility of contamination from birds, rodents and other outside elements.

Packing containers should not be stored directly on the floor.

Pallets should be in good repair and clean. There should be no foreign material present on the pallets while being used.

Pest Control

There must be a documented and established pest control program in place.

➢ The program may be a self-designated program or by a commercial operator.

➢ Traps may be numbered and a map available to show the location of the traps.

There should be a pest control log that includes dates of inspection, inspection report and steps that are taken to eliminate any problems.

Ice

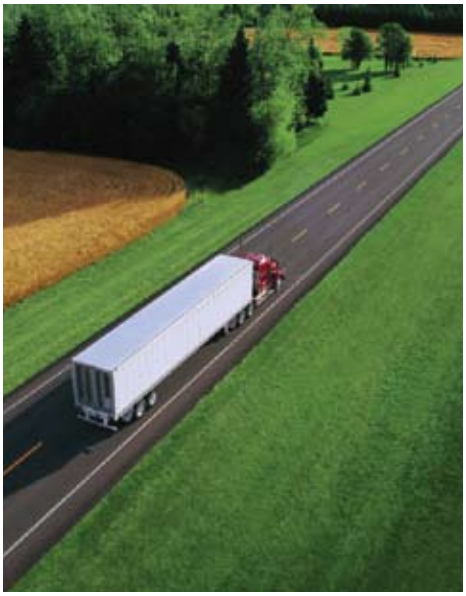
Ice or cold water used to cool the product must come from a potable water source.

Storage and Temperature Control

Storage areas need to be cleaned on a regular basis.

All visible debris needs to be cleaned and non-produce items removed from the storages.

Refrigeration systems must be working properly and the probes or thermometers must be checked or calibrated on a regular basis.



Transportation and Loading

Produce items should be shipped only with other produce items. There are cases when this is not feasible, but precautions must be taken to minimize the risk for contamination.

Prior to loading, the trailer must be inspected to ensure it is clean, in good condition, free from disagreeable odors and free from dirt and debris.

The desired temperatures of the product while being transported must be stated on the bill of lading.

Trucks and trailers should be loaded in a manner to minimize damage to the product.

All Transportation and Loading items above require documentation.

Part 5—Traceback

This section covers the applicant's ability to recall a product.

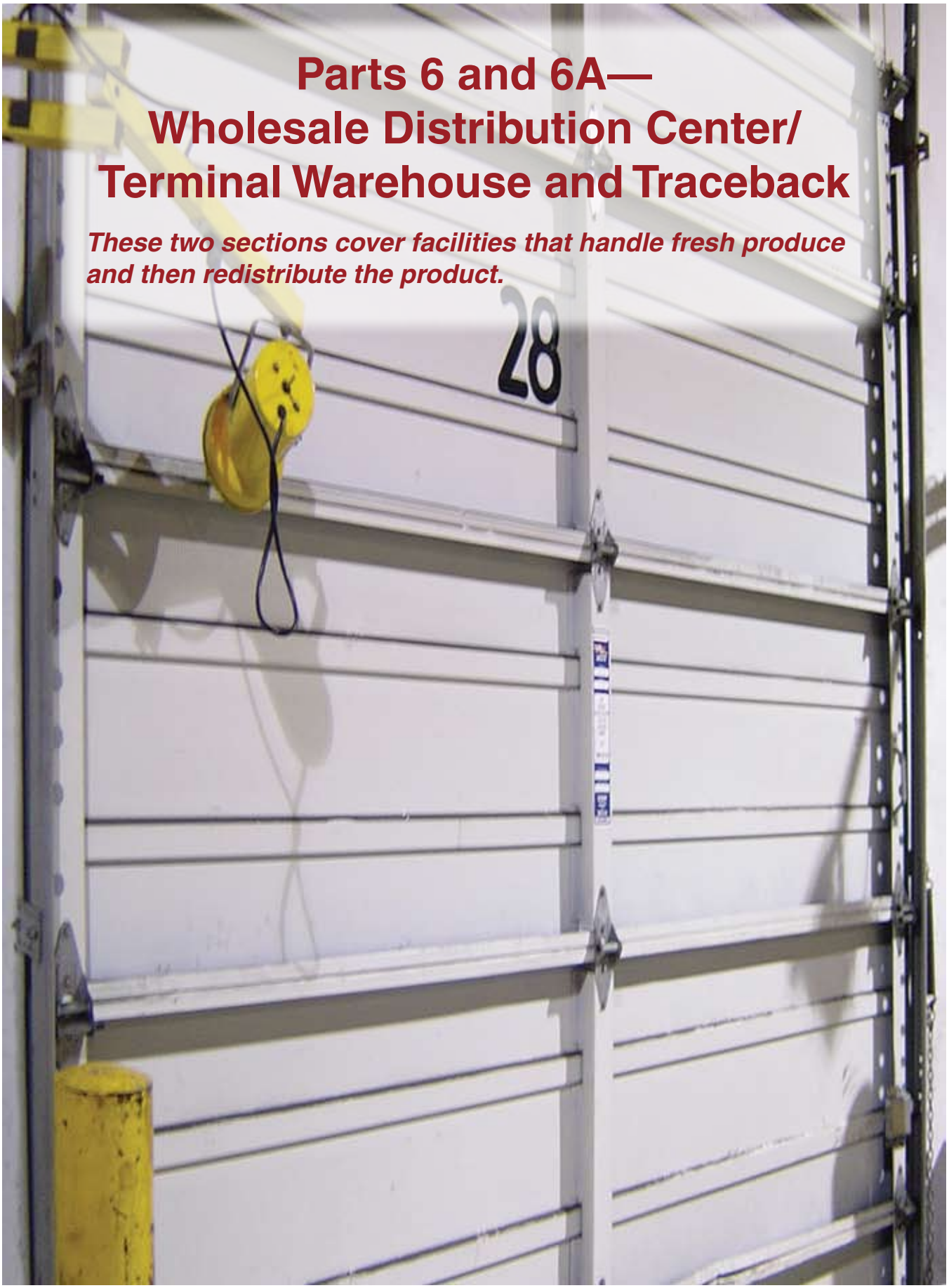
Traceback

Traceback is the ability to track the product back to the source. This includes the traceback to the packinghouse, to a group or to a specific grower, to a group or to a specific orchard or field, to a group or to a specific harvest date and the date the product was packed.

The applicant is required to perform a practice recall of a product within six months prior to an audit. An applicant must have documentation to show the effectiveness of its traceback program.

Parts 6 and 6A—
Wholesale Distribution Center/ Terminal Warehouse and Traceback

These two sections cover facilities that handle fresh produce and then redistribute the product.



Wholesale Distribution Center/ Terminal Warehouse

Major focus of concerns:

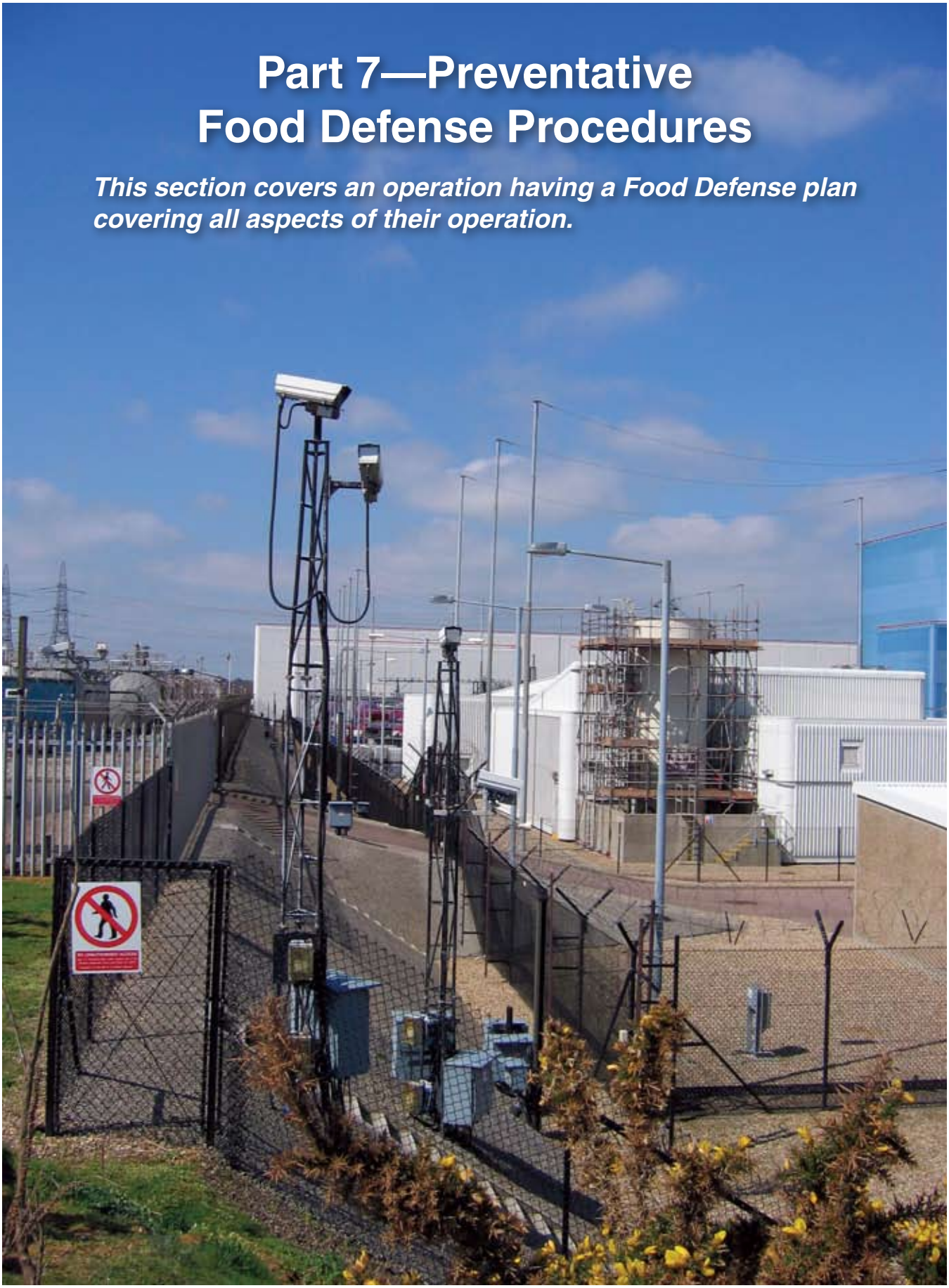
- ➢ Cleanliness of conveyances delivering product
- ➢ Refrigeration and temperatures for both conveyances and facility
- ➢ Cleanliness of facility and employee break rooms
- ➢ Location of break rooms
- ➢ Proper handling of product
- ➢ Product flow zones properly protected from sources of contamination
- ➢ Pest control
- ➢ Potable water for all uses, water treatment being monitored
- ➢ Policy regarding the use of hair nets and jewelry
- ➢ Shipping and transportation

Traceback

See section 5 for information on implementing a traceback program.

Part 7—Preventative Food Defense Procedures

This section covers an operation having a Food Defense plan covering all aspects of their operation.



Food Defense Training/Access Control

All personnel must have proper training on Food Defense, including knowing who the assigned contact person is.

The facility must have a visitor check in log. Staff must know the purpose of the visit and have someone escort all visitors while on the premises.

The facility must control all vehicles coming and going from their operation, and this must include staff vehicles.

Assigned staff must perform routine security checks of the entire facility.

The perimeter of the operation must be secured by fencing or other deterrent.

Assigned staff must control the deliveries and returns of products.

Segregate product from outside of the United States. Also, segregate all known allergens, such as peanut oil.

Management must have a floor plan and product flow chart available.

Employee Access

The facility's management must know which employees are allowed on the premises, limit staff access to the area of their job function, where they store their personal belongings and issue I.D. badges. I.D. badges and issued uniforms or name tags should be collected at the termination of employment with the facility.

Management must control all computers and mail room.

All keys to the facility must be accounted for.

The majority of the issues in this section require documentation.

Audit Results

Reporting the Results of the Audit

At the conclusion of the audit, there will be an exit interview:

- An interview will be conducted with the operation contact person to present and discuss the findings of the audit.
- A detailed copy of the audit checklist will be delivered to the applicant and it will report any non-conformities along with the final scoring of the audit.
- The audit report will have a detailed explanation for any question answered “No” or “Not Applicable”.
- The report may provide recommendations for improving an area of concern.
- It is important to remember the audit is not designed to find fault. It is to present to management areas where the system can be improved or corrected.

A successful audit shows commitment by management and employees to follow and maintain the guidelines to help minimize the potential risk for microbial contamination of the product.

Additional Sources

Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables

http://www.cfsan.fda.gov/~dms/prodguid.html

Fresh Produce Audit Verification Program

http://www.ams.usda.gov/fv/fpbgapghp.htm

USDA-AMS GAP & GHP Audit Verification Program Information and Checklist

http://www.ams.usda.gov/gapghp

Good Manufacturing Practices for the 21st Century – Food Processing

http://www.cfsan.fda.gov/~acrobat/gmp-rpt.pdf

For More Information

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