



Updated/verified: April 1, 2013

Bridging the GAPs Q&A

Answers to your Questions about Good Agricultural Practices and Good Handling Practices

If your question is not directly addressed below, please contact the WSDA [Bridging the GAPs Project Team](#).

- [Required Documentation](#)
- [Water Usage](#)
- [Hand washing and Worker Hygiene](#)
- [Production](#)
- [Harvest](#)
- [Post-Harvest Produce Washing and Field Packing](#)
- [Visitors](#)
- [Animals --Wild and Domesticated](#)
- [Traceability and Recall](#)
- [Audits](#)
- [Submit Questions/Share Ideas](#)

Required Documentation

~~What is the difference between a Food Safety Plan and a Standard Operating Procedure (SOP)?~~

A Food Safety Plan is a guideline and/or mission statement on what your food safety goals are for your operation.

A SOP is your list of policies and procedures that are part of your Food Safety Plan. The SOP needs to address the scopes or sections of the audit you will receive.

[\[Top of Page\]](#)

Is there a standard food safety plan or set of standard operating procedures that is required for passing a GAP audit?

You must have a food safety plan and standard operating procedures in place for audit to take place. Most people incorporate a food safety plan and SOP into one document. There is no standard Food Safety plan or SOP that you are required to use; rather, your food safety plan and SOP should be specific to the needs and risks on your farm. Every farm is different, and the food safety plan and SOPs should reflect your consideration of your systems and measures needed for mitigating food safety risks on your farm.

Water Usage

How many water tests are we required per year?

Well water for drinking must have at least one test per year and must state that it meets safe drinking water requirement.

Well water for irrigation must have at least one test per year.

Irrigation water from an open canal, river or pond must be tested a minimum of three times a year, once near the front end of the growing season, one mid-season and one near harvest.

Irrigation water test must be a generic e-coli test with a number attached to the findings.

Water tests from [irrigation districts](#) are acceptable. You must have a copy available during the audit.

If you have water that has been tested by the irrigation district and it is put into a pond and then pumped out for irrigation, the water from the pond will need to be tested.

If using municipal water, the municipal water test report is sufficient. You must have a copy available during the audit.

If I have a pond that serves as a watering hole for my livestock, can I use that water for irrigation?

No. If using a pond for irrigation, it must be assured that animals do not have access to the pond.

Hand Washing and Worker Hygiene

Can we use a hand sanitizer in place of antibacterial soap and potable water?

No. Anyone handling the product during the harvesting and/or packing operation must wash their hands with potable water and an antibacterial soap before beginning work, after any breaks and after using the restroom. There is no substitute for soap and water. A hand sanitizer is a good tool to use *in addition* to hand washing.

[\[Top of Page\]](#)

If I have outdoor hand wash stations, do I need to collect the water and discard it?

Water should not run freely on the ground. It could possibly run off into growing areas or create pooling where foot traffic could carry bacteria to growing areas.

A gravel drainage pad may work, as long as it has the capacity to soak up the water and not create pooling around the hand wash station.

If you do need to catch the waste water in a bucket and dump it, the dumping area should be away from the growing area and in such a place that it will not drain back into crop area or create pooling in areas that workers or visitors walk through in coming to and from the field or packing area.

How many portable toilets do I need for my operation, and what are the requirements?

- You must follow all federal, state and local requirements. More information on those requirements can be found in [Federal Occupational Safety and Health Act \(OSHA\) part 29 CFR 1928.110 and 29 CFR part 110.10](#)
- The main guideline is one facility per 20 workers.
- If it is being used in the field, it must be located within a ¼ mile walk.
- All portable units must be serviced on a regular basis and be properly supplied with single use towels, anti bacterial soap and potable water.
- The placement of the portable units must be in an area where it will not contaminate the product if it leaks or is tipped over.

How does an auditor determine if the farm sewage/septic systems are working properly?

If your farming operation has housing or a shop that has indoor plumbing, your risk assessment that should include a map of the farming operation, and the map should include the housing and shop area and clearly indicate where the drain field and septic tank is located. The auditor will ask to see the map to determine if it is in close proximity to the farming location and whether it may pose a potential risk. The auditor will observe the location of the drain field and septic tank for any signs of leaking or any surface discharge.

Production

If my land floods, what are the requirements for safely planting or harvesting that land?

Fields that have been flooded should be tested for harmful pathogens prior to use to determine the suitability of its use. Flood waters can carry potential contamination from areas outside the crop production areas and spread it over a wide area. If the soil samples show no potential contaminants, there is no timeframe or waiting period before planting the land.

[\[Top of Page\]](#)

Additional considerations: Annual crop are at a greater risk than perennial crops. Root crops are at a greater risk than crops that will grow above the ground. HOWEVER - The basic rule is still that crop lands that are flooded should have the soil sampled.

Harvest

When the GAP standard says a pre-harvest assessment is needed, what does that mean? How detailed should it be? How frequently do I need to do it during the harvest season?

A pre-harvest assessment is the overall process of identifying all the risks and assessing the potential impact of each risk. It can be as simple as a checklist or a written description. The assessment needs to be done prior to the start of harvest.

It can be a walk-through to look for signs that raise concerns, such as animal waste, chemical spills, signs of garbage dumping, are toilet facilities properly placed and supplied, is their potable water available, harvesting containers properly maintained and handled, equipment in good working condition, etc.

A pre-harvest assessment should be done at least once each harvest season, before harvest begins. You may choose to do it more frequently, or periodically during the growing and harvest season.

Whatever method and frequency you choose, it should be documented in your policy and then implemented according to the policy. Best practice is to keep a log so that growers and workers can document any signs of concern, AND document a walk-through that showed no signs of concern. This will show the auditor that someone is doing an assessment as often as the policy states.

Can I let my harvest containers sit on the ground while harvesting, if I then wash and put the produce into clean bins for storage and delivery?

Allowing the harvesting containers to come into contact with the ground is an acceptable method only if you do not stack any of your harvesting containers on top of one another. Stacking containers that have come in contact with the ground allows the possibility of contamination of the product. It might be acceptable to allow the harvesting containers to sit on the ground if you had an acceptable cleaning process. You would have to have potable water at first use and then be able to maintain microbially safe water throughout the process. The auditor would have to observe the process to verify if it is acceptable.

Can I re-use my harvest containers?

Harvesting containers are designed to be used over and over. They need to be cleaned and sanitized prior to use and kept as clean as practicable to prevent cross contamination. Harvest containers are usually controlled by the company whereas shipping containers are delivered to another source and they lose control of the shipping containers while they are delivered to the consumer.

[\[Top of Page\]](#)

If so, what are the requirements for sanitizing or washing harvest containers?

Sanitize means you use a chemical compound designed kill microorganisms. Two of the most common practices are the use of chlorine bleach or quaternary ammonium compounds (quats). Mixing the appropriate amount as per the label with potable water create a sanitizing solution.

Post-Harvest Produce Washing and Field Packing

What are the requirements for draining or containing water that has been used for produce washing, bin cleaning, etc. in a field packing shed?

Water that has been used for field packing and produce washing must be drained out of the packing area and other high-traffic areas. The drainage may not create areas where water pools for long periods of time or where foot traffic could possibly contaminate the fields and/or other work areas. You must also make sure that water that is being drained does not affect your irrigation water source.

Are we allowed to re-use waxed boxes for packing and shipping product to customers?

The GAP standard requires that new and/or cleaned and sanitized containers be used for packing and delivering produce. It is not good practice to re-use boxes that have been out of your control (i.e. with the customers) because it means you cannot control where the box has been used or what it may have come in contact with during that time.

If you want to reuse boxes, using them with new plastic liners, without perforations, is acceptable.

What are the requirements for a post-harvest produce washing facilities and packing areas?

Any produce that is washed prior to packing must be done in water that is microbially safe. Microbially safe means that it is agricultural water which meets the microbial requirements of the EPA drinking water standards. Water at first use must be microbially safe and if re-used its quality and/or content of antimicrobial agents should be monitored. Note that water potable (a higher standard) must be used for hand washing and drinking purposes.

How do I know if my packing operation will be considered “field packing” or a “house packing operation”?

A Field Pack operation is when the entire packing operation is completed at the time of harvest in the field. If the product is being harvested and transported outside of the field to a sorting and packing location then it will be considered to be a house packing operation.

[\[Top of Page\]](#)

Visitors

What are the requirements for minimizing risk in situations where the public will be entering growing areas, such as harvest celebrations and u-pick operations?

Farms must clearly communicate policies and rules for all visitors entering farm fields or packing areas. The rules and policies must be included in your Standard Operating Procedures, and you will need to document that you regularly communicate the rules to those entering your farm.

In many cases, visitors will appreciate that you are working to provide a safe product for them to consume and will gladly comply with your rules. Minimize frustration and plan ahead by thinking through likely visitor scenarios and be prepared with answers, advice and solutions to issues that may arise.

Remember that auditors are visitors to your farm. They should be advised of and held to the same practices required of other visitors.

Rules should include:

1. Hand washing with soap and water is required before entering fields and after using the restrooms. [Hand washing facilities and restrooms should be provided in an easily accessible location. Remember to consider the likely volume of use and be sure that portable toilets are serviced frequently and that water from outdoor hand washing facilities is adequately drained to keep water from pooling or creating a situation where foot traffic can spread any contaminants in the water.]
2. No smoking, except in designated areas.
3. No pets allowed on the farm or in the fields.
4. All u-pick buckets or harvest containers clean and sanitized before entering fields. [One farm in WA provides sanitized buckets for picking and visitors then transfer the produce into their own containers to take home.]
5. If you have other policies or procedures in their SOP they must apply to everyone, including visitors, unless otherwise noted.

[\[Top of Page\]](#)

Best Practice Examples:

Have all visitors enter through one farm entrance, where they must pass a sign with the rules posted, and have staff stationed there during potentially busy hours (such as u-pick hours or during events) to ensure that visitors follow the rules. You may also require visitors to sign in, and review a food safety rules list. Some farms have required visitors to watch a short video presentation about food safety measures on the farm, including the visitor rules.

In order to ensure that visitors are following the rules, farm staff should observe visitors throughout the day and if any appear to be breaking the rules, staff should remind them and require them to follow the posted and stated farm rules for food safety.

Will people have to wear special clothing when they come on my farm?

Only if you require it in your policies. The same with jewelry and hairnets, if you have it in your policies then the auditor will verify that you are in compliance with your policies.

Animals -- Wild and Domesticated

What am I required to do about birds flying over my farm?

No one can control birds flying over their farm. If you have un-harvested crops and the birds are landing in your field then you will need to have measures in place to reduce the opportunity for them to land in your field with some type of device to keep them away. A few methods that are being used are the use of noise cannons, scare balloons or the use of reflective ribbons.

Do I need to fence in my entire growing area or farm to keep animals out?

No. You are never going to be able to keep all animals completely out of your operation. You should make every effort to limit the access to the production areas. Occasional entry by normally seldom-seen animals is tolerable, but if there are high concentrations as observed by game trails or paths entering your operation you should have measures in place to reduce access.

Traceability and Recall

How do I implement traceability on my small farm?

Traceability, or trace-back, is the ability to track food items back to their source.

You should be able to trace your product one step forward and one step back. The operation shall be able to track the product (one step back) to the grower or field and the production area from which it has come from. The traceability program must also provide documentation regarding where a product has been sent (one step forward) once it leaves the facility.

[\[Top of Page\]](#)

Box or container label on produce sent to customers should identify the farm name and pack date, at a minimum, so that the customer can reach you and so that you know when it was sent. On a very small farm, this may be enough information to successfully isolate the product lot and notify others who may have received produce from that lot.

Farms should keep delivery records containing, at a minimum, the product type, date of harvest and shipping, and the customers who received it.

Remember that the more detail you can pull up about the contaminated product, the more accurately you will be able to identify which additional product may be contaminated and recall it. If you choose to keep more limited information, such as only knowing the pack date, you may need to recall all product of that type from that pack date if an incident occurs. If you can identify which field and which packing line, then you may only need to recall product from those areas.

One simple method for small farms: You may prepare a daily “Pick Order” to instruct your field workers on what to pick and which field to pick from. That pick order, when combined with your shipping invoices, can be the way that you trace field origin of your product. If you do not pack and ship the same day as harvest, you may want to find a way to identify which pick order items were shipped on which day and the invoices that apply to them. All of the records should be kept in an organized way that can be shown to the auditor and clearly represent your ability to trace and recall product if a concern arises.

How do I conduct a mock recall on my farm?

Recall is a means to return product to its origin.

A mock recall is a practice exercise that is used to determine where the product is shipped and whether or not it can be returned to the origin or removed from the marketing chain.

A mock recall is required for all audits. If this is your first year requesting an audit, you will not be required to perform a mock recall. You will need to perform a mock recall every year thereafter. You must have evidence that you have performed a mock recall within the 12 months prior to the audit.

In a mock recall, you want to be able to track all potentially affected produce to anyone you have sold it to. This can take different forms, depending on your farm’s operation.

EXAMPLE:

An example of a mock recall would be to pretend that one of your customers calls you to say that they noticed motor oil on some lettuce you delivered to them yesterday.

[\[Top of Page\]](#)

Ask yourself whether they would be able to know who the lettuce came from (Is the box marked clearly enough that the customer could easily know to call you?)

Once they have called you, can you identify what “Lot” that product came from? This is the information that will allow you to identify any other product from the same field, the same packing line, or the same date that may also have been contaminated, so you can notify other customers to recall that product. Depending on the size of your farm, that might be date of packing, which field it came from, date of harvest, or other identifying information.

Audits

Do I have to comply 100% with all the areas of GAP audit in order to qualify for certification?

No- You need 80% of the total possible points for each section requested of the audit to have a passing score. Each audit must start with the General Question section of the audit checklist and you must pass this section before moving onto any other requested section of the audit.

Can a Good Agricultural Practices (GAP) Audit be done anytime during the year?

A GAP audit can be done anytime during the year but it must also include the harvest. It is more practical to have the entire audit done during harvest instead of having it done at different times and have to pay for an auditor to come twice to your operation. The auditor guidelines state that an audit must be performed prior to two weeks from the completion of harvest. This is not always practical because of different size of farming operations and the auditors will take this into consideration.

Does my audit have to be done during the first few days of harvest?

No. An audit must be done at least two weeks before the completion of the harvest. This is not practical if you have a short harvest season; therefore you should have it as soon as possible when you start your harvest. This is a good practice for even operations that have a long harvest season because if you happen to have issues during an audit, it will give you time to make the necessary corrections and have the audit re-done prior to the end of the season.

I grow more than one type of fruit and vegetable crop, do I need a separate audit for each crop grown?

No. We can combine multiple types of produce into one audit. If there is a long growing or harvesting time frame between the different crops, there is a possibility that we might include an un-announced visit to verify compliance with their food safety plan.

[\[Top of Page\]](#)

EXAMPLE:

If you grow cherries and apples and your harvest season is from June through October, the ideal situation would be to schedule your audit during the front end of cherry season. The audit can include all crops that you are growing at this time. Since there are usually different types of harvesting practices for cherries than apples (harvesting containers, water applied to harvested produce, etc.) we would come back during apple harvest to do an un-announced visit to verify that the operation is still in compliance with their food safety plan.

If I have more than one farm or ranch, do I need a separate audit for each?

No. We can include all operations into one audit, if requested. All can be included in one set of documents such as the Food Safety Policy and Standard Operating Procedures. One word of caution, if you include multiple sites into one audit, if one fails they all fail.

How much lead time do I need to give WSDA to schedule an audit?

The ideal amount of time is at least two weeks. If you have a short harvest season, you can contact WSDA and give them a tentative date of harvest, two weeks ahead of time and then communicate with them as harvest time approaches to re-schedule if necessary.

Will an auditor report other non-compliance issues to other agencies if they are noticed during an audit?

If a WSDA/USDA employee notices an immediate food safety risk while performing their normal duties, they are obligated to report these issues to the manager of the operation. If no immediate action is taken to correct the food safety risk, the WSDA/USDA employee will

inform their management. We will not report to other agencies areas that we may feel that is in violation of other laws or requirements.

What is Part 7 of the GAP/GHP audit?

Part 7, Preventive Food Defense Procedures, addresses measures to prevent the intentional contamination by chemical, biological or radiological means by an aggressor.

Do I need to do Part 7 of the GAP/GHP audit?

Part- 7 (Preventive Food Defense Procedures) is an optional section that applies to a GHP audit. It currently does not apply to a GAP audit. The only GAP audit that requires Part-7 is for a government commodity procurement purchase such as for school lunch (USDA Foods). As a rule, most audits are being requested by the buyers and they are indicating the type of the audit and what sections they want performed.

Part 7 is not necessary unless your buyer requires it, or unless you have a house packing operation (which would be audited under Part 3, and then Parts 4 and 7 would be added, as well.)

[\[Top of Page\]](#)

What are the rates for an audit?

The federal rate for audit services is \$92 per hour/per auditor, including travel time to and from the audit site and any preparation time needed to perform the audit. Currently WSDA is charging \$75.00 per hour but will change to the USDA rate in the near future. WSDA also charges mileage to and from audit site.

What is the average cost per audit?

Since the cost is based on the hourly rate, the average cost of an audit will vary depending on the size, scope and type of audit requested, and how far the auditor needs to travel. Generally takes approximately 2-7 hours to complete an audit. The time necessary to complete an audit is dependent on many factors including the size of the operation, the number of commodities covered by the audit, and the audit type. A small family farm growing one crop might only take a couple of hours, but a large diversified operation would take significantly longer.

What is an Un-announced Verification Review?

This is a follow-up on the initial audit that was performed. The initial audit is an announced audit that has been scheduled by the applicant. The un-announced reviews are to verify that the operation is still in compliance with the initial audit requirements.

A farm/facility in operation for 30 days or less may be subject to an un-announced review. Any operation which harvests, packs, or handles produce for more than 30 days a year is subject to one unannounced verification visit, and any operation which harvests, packs or handles produce for more than 90 days a year is subject to two unannounced verification visits a year.

The number of visits may vary depending on auditor concerns about whether the business is being compliant with their plan. Some operations may need an un-announced review because of the length of their harvest season and the different harvesting practices that the operation uses. An example is that there might be an audit during cherry season in July and then another during a September apple harvest, because there are different harvesting practices used between cherries and apples.

Packing facilities with GHP audits may be more likely to receive unannounced visits than simpler GAP audits.

Is an “unannounced audit” charged to farm by the hour also?

Yes.

[\[Top of Page\]](#)

Once the first audit is complete how long does it take to be notified that we passed?

The auditor will go over the findings of the audit at a closing meeting at the end of the audit. Generally, the auditor can let you know if you met the acceptance criteria, however the audit results are not official until the audit is reviewed and approved by a USDA official. This generally takes about 2 weeks, but can be longer depending on the time of year and number of audits which are being reviewed.

How long once a grower or house fails a GAP GHP audit will they have to wait to apply for recertification?

An operation should address all the non-conformities noted on the initial audit before applying for recertification. There is no specific timeframe a grower has to wait to apply for recertification.

Does the USDA or WSDA have a system in place to remind businesses that the current audit is about to expire?

We do not have a system in place to remind businesses that their audit is about to expire.

How do WSDA and USDA let buyers and others know which farms have passed the GAP/GHP audits?

USDA posts operations with successful audits on their [GAP/GHP website](#), searchable by state or commodity (crop).

When someone visits the website, they cannot download or view the audit reports. They can only see the basic information for the audit that was conducted.

The following information is posted and available to the public:

*Company name and address

*Audit type (GAP, GHP)

*Audits conducted (i.e. which sections of the checklist were completed), date of audit and “commodities,” or crops, covered by the audit.

Will USDA or WSDA post audit results of farms or businesses that failed or do not meet the criteria?

No. The only companies that are posted to the website are those that have passed the audit standard.

[\[Top of Page\]](#)