

# Developing a Plan for Third-Party Audits

## Good Agricultural Practices (GAPs)



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## Introduction

This Training Manual is intended to help New Jersey farms and produce operations conform to Good Agricultural and Good Handling Practices (GAP/GHP) and prepare for a successful GAP/GHP audit. Good Agricultural and Handling Practices are common sense. Many practices are already occurring on farms and in produce operations. The next step is to document what is already occurring. The objective of this Training Manual is to help operations review their practices and help them identify areas where improvement may be needed. The guidance offered in this Training Manual will help you craft a plan that addresses all parts of the audit. It is not a guarantee of a passing score; however, it will aid in helping you ultimately achieve that goal.

Because the GAP/GHP audit is important, this Training Manual is arranged according to the specific sections of the audit on which your farm or operation may be assessed.

They include "General Questions" as well as these four specific areas:

- 1) Farm Review
- 2) Field Harvest and Field Packing Activities
- 3) House Packing Facility
- 4) Storage and Transportation

The farm or production operation can be certified in any one or all four audit areas noted above; however, the general questions section must be completed before other areas are audited.

During a GAP/GHP audit, you will be asked to explain and demonstrate how your farm or production company complies with each of these areas. Documentation will be required in some instances, as indicated by the letter "D" in the same section of the audit questions. A document may be a combination of standard operating procedures (SOP) that explains the company policy and the log that shows the actions taken. An "R" requires a log showing the action and a "P" requires a policy/standard operating

procedure must be documented in the plan. Examples of the required documents are included in each section and on the enclosed CD which can be modified to fit individual operations.

Any question in the audit where N/A is shaded out must be answered either yes or no. Any shaded box in the “NO” column must be answered “YES”. If the question can not be answered “YES”, the audit will be reported as an “automatic unsatisfactory” and the audit will be stopped.

Two areas which must be completed before requesting an audit are:

- a) Developing a Grower Food Safety Plan to explain your food safety program - the plan should contain everything that is included in the farm's food safety program, but do not include anything which can not be accomplished.
- b) Designating a lead person in your organization - one individual in the organization must be designated by name to implement and oversee the food safety program.

During an audit, the following conditions will result in an automatic "unsatisfactory" assessment and the audit will be stopped:

- a) “An immediate food safety risk is present where produce is grown, processed, packed or held under conditions that promote or cause the produce to become contaminated.” Examples of this would be the use of non-potable water in the product washing process or a leaky sewer pipe in the production or storage area.
- b) “The presence or evidence of rodents, or an excessive amount of insects or other pests in the production area during packing, processing or storage.” This can be evidence on the floors, outside buildings or other places in the production or storage areas when the pest may come in contact with the produce.
- c) “Observation of employee practices (personal or hygienic) that jeopardize or may jeopardize the safety of the produce.” Examples include putting used toilet tissue

on the floor or in a container in the lavatory; observing that employees do not wash their hands after toilet use; eating on the grading line, etc.

- d) "Falsification of records"
- e) "A documented (written) food safety program is not in place"
- f) "The operation has not designated someone to implement and oversee the food safety program."

## Getting Started

A documented food safety program that incorporates what the farm does to implement the program is the first step to complete before considering an audit. This Grower Food Safety Plan tells the auditors what you have been doing, outlines procedures and has examples of all forms used to verify GAPs. Things to include are:

**First**, develop a Mission or Vision Statement. Write it down and place it at the beginning of your plan. This statement should address briefly and generally your company's commitment to food safety, food quality, food sanitation and worker hygiene. Note: Statements in bold are examples of wording that may be used in the grower's food safety plan.

**Example: Management and employees of Fruit and Vegetable Incorporated are committed to producing and marketing a safe product through good agricultural and handling practices that focus on principles of food safety and quality.**

**Second**, create a Table of Contents that corresponds to the specific sections of the audit. These sections are noted on page 1 of this Training Manual under "Introduction."

**Third**, for each section (Part) in the Table of Contents for which you will be audited, explain in writing as clearly as possible how your farm complies with that section. Make sure standard operating procedures are used and examples of the corresponding document forms are included in each section.

## General Questions

### Implementation of a Food Safety Program

This section consists of a review of the food safety program and the Grower Food Safety Plan that has been designed for your operation. **Management must indicate who has been designated to implement and oversee the program and also who is named as the backup in case this person is not available.** The company may be asked for the Grower Food Safety Plan to review before the day of the audit. This will speed up the process and reduce time for everyone on the day the actual audit is held.

### Traceability

Traceback is the ability to track food items, including fresh produce, back to their original source. This cannot prevent an initial food borne outbreak, but it may help speed up the process to pinpoint the source. The faster the source is located the faster the rest of the produce industry can get back to normal. Hopefully, this will help ensure that the public will have greater confidence in the produce industry.

A written procedure must be included in the Grower Food Safety Plan on how the farm will track individual containers one step forward and one step back. Maintain as many detailed records as possible including the harvesting dates, specific field and product location within the field or orchard, number of packages within a lot, packing and shipping date and harvesting crew. Each container must contain some type of identification to maintain its integrity throughout the harvesting and marketing process. The label on the box generally is sufficient to trace the product to the farm or packing house, but each wholesale box must have a harvest/packing date stamp or code with the date incorporated on the box. Placing a label on the wrapped pallet will not meet this standard. If packing in more than one shed or packing under someone else's label, additional identification is needed to trace the product back to the packinghouse. A hand-labeling gun can be used to code each box where a series of numbers can identify the container. For example – 1 655616 9:

167 = (date harvested) this could be the first day a grower picked or the Julian calendar date such as 165 for June 14 or use the calendar date 614. This reserves the first 3 digits numbers for dates.

5 = (grower)

6 = (field picked or picker)

169 = (packing date)

The other numbers can be used for more information or be zeros. At the end of each packing day record the beginning and ending numbers in a book or computer. The code for these numbers needs to be recorded once and filed. The code is to assist the grower if there is a question about a shipment.

Recall procedures must be included in the Grower Food Safety Plan. Mock recalls should be scheduled at least every six months to ensure the system works properly. The farm must document the customers contacted, the amount of product remaining from the original shipment and the disposition of product which could not effectively be recalled. This may include sales to customers or reshipment to other customers who could be contacted if necessary. Auditors will review the traceback procedures and reports from the mock recall. **Note: this does not mean you take control of the product. The auditors want to see if you have the ability to take control if a recall is requested!**

### **Worker Health & Hygiene**

This section requires management to describe how workers are trained and instructed to practice proper hygiene.

**Example: Potable water is available to all employees in the packing shed and through portable water stations located in the harvest fields.** The company must document that the water was tested at least once a year and indicate it is potable or what corrective measures were taken to make it potable (See *Water source testing log*).

**Note: statements in parenthesis and in italics refer to a log, sign or additional information at the end of each section. If municipal water is provided a copy of the test can be obtained from the municipality.**

Signs should be posted at wash stations to inform employees that they must wash their hands before going to work, after breaks, or anytime they leave their work station and return (See *Please wash your hands often!*). The location of the hand washing station must be visible to the employer or supervisor. Just having a sink in the rest room is not acceptable. Signs should be posted to inform visitors that they are required to follow good hygiene/sanitation practices (See *Visitor sign in sheet* and *Health & safety notice*). If the auditor observes an employee not washing their hands before beginning work or returning to work, the audit will be an “automatic unsatisfactory” and the audit will be stopped.

All employees must receive documented training on proper sanitation and hygiene practices (See *Employee food safety education and training log*). This can be through formal presentations, videos, one-on-one instruction or demonstrations. Periodic refresher or additional sessions may be needed as new employees are hired. The training should include, at minimum, methods of hand washing, method of scrubbing fingernails and proper use of toilet facilities.

The portable toilets/restrooms should be cleaned on a regular basis and properly stocked with toilet paper, single use paper towels, potable water for handwashing and soap. The use of hand sanitizers is not a substitute for soap. They do not do as good a job as soap in agricultural situations. Also, hands must be washed prior to putting gloves on hands. A supervisor should keep a record of when the facility was cleaned and by whom. If a commercial service is used to maintain the toilet facilities make sure they record visits and do proper maintenance! In some instances, the grower will need to designate an employee to service the facilities between the commercial operators' visits. (See *Use Toilets Properly, Please put used toilet paper in the toilet* and *Restroom and toilet facility maintenance log*).

Smoking and eating areas must be separate from production or packing areas. In the field, eating and smoking should be confined to roadways or edges of the field. In

packing house, it should be in designated areas away from the receiving/loading or packing lines. The area should be separated by painted lines or partitions. Signage in packing and storage areas designating either no smoking or smoking areas is encouraged.

Workers with diarrhea disease or symptoms of other infectious diseases should not work with fresh produce. They should be given the opportunity to work in other areas if physically capable. Growers should encourage employees to report any illness at the beginning of the work day. A policy must be included in the Grower Food Safety Plan on procedures if someone is sick.

**Examples from Good Manufacturing Practices for food processing establishments under 21 CFR, 110.10 state “(a) Disease control. Any person who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination by which there is a reasonable possibility of food, food-contact surfaces, or food-packaging materials becoming contaminated, shall be excluded from any operations which may be expected to result in such contamination until the condition is corrected. Personnel shall be instructed to report such health conditions to their supervisors.”**

Following are some symptoms. (See the quick reference guide for additional pathogen and symptoms).

| Pathogens Often Transmitted by Food Contaminated by Infected Employees |  |
|--|--|
| Pathogen   | Symptoms   |
| Hepatitis A virus  | Fever, jaundice, vomiting                        |
| Salmonella species   | Nausea, vomiting, diarrhea, fever                |
| Shigella species   | Diarrhea, fever, cramps                          |
| E. coli 0157:H7  | Severe abdominal pain, watery diarrhea, vomiting |
| Staphylococcus aureus  | Diarrhea, nausea, vomiting                       |
| Streptococcus pyogenes   | Fever, Sore throat with fever                    |



The Grower Food Safety Plan must contain a written procedure that describes what action is taken should blood or other bodily fluid come in contact with the product, how the product will be destroyed, or removed from the packing line and how food contact surfaces will be cleaned and sanitized. A statement similar to the following should be included in the plan:

### **Blood and Bodily Fluid Procedures**

**When blood or bodily fluid comes in contact with produce, the product will be immediately removed from the area in sealed plastic bags and destroyed. All surfaces that came in contact with the contaminated produce will be cleaned and sanitized before using those surfaces for produce.**

Employees must be instructed verbally or through signs posted at various locations throughout the facility that they should seek proper first aid treatment if they receive cuts or abrasions. The responsible person should then determine whether the employee could return to their work area or be assigned to another task which does not bring them in direct or indirect contact with produce. This policy should be documented in the Grower Food Safety Plan. **For example – employees are instructed to contact their supervisor for first aid treatment. All cuts are treated and the supervisor determines the employee’s ability to continue with their work.**

Employees should be shown through practical application or videos the proper use of pre-harvest and/or post-harvest application materials. Any individual applying materials should have a pesticide license or be under the supervision of someone who has the license.

Once the General Question part has been audited, the auditor will calculate the score. The passing score for this part is 180 points (each part will have different points). The auditor will first subtract any points that were not applicable (N/A) then calculate the percent score. 80% is a passing score for each part. This part must be passed before any other section can be audited.