

Developing a Plan for Third-Party Audits

Good Agricultural Practices (GAPs)



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Part 2 — Field Harvest and Field Packing Activities

This part relates to harvesting commodities and packing them in the field. The emphasis is on worker sanitation and harvesting activities. Harvesting equipment should be cleaned regularly. Packing equipment that comes into contact with the product should be as clean as possible.

A pre-harvest assessment must be carried out prior to harvest. This assessment helps the grower evaluate the field to be harvested and materials needed for harvest (See *Pre-Harvest Assessment Log*).

Worker Sanitation and Hygiene

Management must ensure that employees in the field take the necessary precautions to avoid microbial contamination of the produce. Growers should make sure that all state and Federal Occupational Safety and Health Administration (OSHA) and Federal Worker Protection Standards (WPS) requirements are reviewed with supervisors to ensure that the proper number of toilet facilities and potable water are available in the field. A portajohn must be within ¼ mile or 5 minute walking time. Even if field sanitation units are not required, a toilet facility must be available for all workers at a reasonable distance!

Worker sanitation and hygiene is one of the main potential sources of produce contamination. This must be stressed to workers on a regular basis through training and observation. The use of gloves does not take the place of handwashing! If gloves are used, hands should be washed prior to wearing gloves (See *Washing away misconceptions about gloves and handwashing*). Signs should be posted in the appropriate language for employees informing them to wash their hands after use of the toilet (See *Please wash your hands often!*). The hand washing stations must be placed outside the toilets so workers can be observed using them.

Portable toilets must be supplied and maintained on a regular maintenance schedule and documentation is required for this activity (See *Restroom & toilet facility maintenance log*). Include a written procedure in the Grower Food Safety Plan about how to contain spills should one occur. **Example: The service company is immediately called and a dirt barrier is constructed around the spill.** All field handwashing facilities must include potable water for handwashing, soap and single-use paper towels.

The field toilets should not be located in the field that is being harvested or near product already harvested or packed. Workers must be encouraged to use field toilets and to use them properly. Used toilet paper tissue cannot be placed in a box or other receptacle in the facility it must be put in the holding tank of the toilet. **Used toilet tissue that is disposed of on the floor or in a box will cause an unsanitary condition and will cause the audit to fail.** Signs should be placed outside and inside the toilet facility to encourage proper use, (See *Please use toilets provided in the field* and *Please put used toilet paper in the toilet*).

Field Harvesting and Transportation

This section relates to the use of harvest trays, tables, baskets, totes, bulk hauling vehicles or other harvesting containers used during the process of harvesting. Reusable harvest trays, totes, bins, etc. should be cleaned and/or sanitized appropriately, in a timely manner, and documented in the Grower Food Safety Plan (See *Harvesting container sanitization*). If the containers are stored outside, they should be sanitized before reuse. Packing containers that are damaged or soiled and no longer repairable or cleanable should be discarded in an effort to reduce microbial contamination. When harvesting, workers should not stand inside bins or carry personal food items or other non-produce items in the harvesting containers. Include a statement in the food safety plan that workers are prohibited from using harvesting containers for carrying or storing non-produce items during the harvest season and enforce the rule. All fields packing requires the use of new or sanitized containers (See *Harvesting container sanitization*) that have been stored properly. Each container must

have an identifiable label or writing to enable traceability. This can be accomplished with a label gun or writing on the container.

Field equipment should be cleaned as needed. This includes hand-harvesting equipment (knives, pruners, machetes, etc.) which must be cleaned and sanitized (See *Knife Cleaning Log and Field harvesting equipment and transportation sanitization*) on a scheduled basis. That schedule for the equipment, including hand-harvesting equipment, must be included in the food safety plan. **For example – Field knives are cleaned and disinfected at the end of each day by washing then placing in a container of bleach for at least 20 minutes.** Water that is applied to wash and clean equipment must be potable (See *Water source testing log*).

Care must be taken to remove excess dirt or protect field packed produce from contamination because of possible exposure to manure and animal fecal material in the soil. Placing another container under the harvest container or stacking on pallets will help reduce contamination. Some growers may want to consider using harvest aids to keep produce off the ground.

When using harvesting equipment, the lights and any glass surfaces must be protected so produce does not become contaminated in case of breakage. If something does become contaminated the harvest crew should have instructions on how to proceed. **For example – If there is glass/plastic breakage in the field, the contaminated area will not be harvested within five feet and any produce that had been harvested from the area will be placed in plastic bags and removed from the field.** This statement needs to be in your food safety plan. A similar procedure and statement is needed in case of contamination by chemicals, petroleum products, pesticides.

For mechanically harvested crops, devise methods to input and remove foreign objects such as glass, metal, rocks, etc. If water is used when harvesting in the field, it must be microbial safe, which means a water test is necessary.

Wagons or trailers used to transport produce from the field must be inspected for cleanliness, odors, dirt or debris before beginning the loading process. Produce should be loaded in a manner to minimize damage to the product (See *Field harvest & field packing inspecting*). Any equipment used to haul garbage, manure, or other debris should not be used to haul fresh produce or contact containers or pallets that are used to haul fresh produce without first being carefully cleaned and sanitized.

Products packed in the field should be protected (covered) when being moved to the storage or processing area. Tarping or using enclosed trailers will reduce the chance of contamination from birds and dust. When the product is unloaded at the storage area it should be done under a roof or tarp cover (not mesh cover). Include in the food safety plan a statement about covering produce during transport if a covering system is used.

Each load moving from the field should have a “trip ticket” that lists at a minimum: harvest date, field number and number of containers, i.e.: baskets, bins, boxes, etc. This ticket is passed to the receiver of the product upon delivery.