



FOOD SAFETY

GOOD AGRICULTURAL PRACTICES

If you are a produce grower wanting to access retail, wholesale, or institutional buyers, you're likely to hear about Good Agricultural Practices, or GAP Certification, as a requirement. GAP is a voluntary, third-party verification program. While there is no guarantee that produce from a GAP certified farm will be 100% free from disease-causing organisms, certification assures buyers of your farm's commitment to food safety and proven practices that reduce chemical, physical, and microbial contamination.

OPTING IN

Unlike the FDA Food Modernization Act's Produce Safety Rule, GAP is a voluntary program. Growers choose to participate in GAP to access many retail, restaurant, school, and wholesale markets for their products. While the practices, documentation, and requirements of GAP are similar to those of the Produce Safety Rule, they are different programs. A FSMA inspection does not certify you for GAP, and likewise a successful GAP audit does not exempt you from a FSMA inspection if you meet the definition of a covered farm.

It is important to note two other important differences between FSMA inspections and GAP audits. There are audit fees associated with GAP certification that the grower pays, based on standardized USDA rates. This hourly rate covers the auditor's preparation, travel, and on-site time, as well as their review, certification, and posting of results. GAP also requires that a written Farm Food Safety Plan be in place.

What can be GAP certified?

GAP certification is available for fruits and vegetables, tree nuts, dried fruits, horticulture, and nursery crops (including floriculture), defined by USDA as specialty crops. This definition includes many crops

such as pumpkins, potatoes, and sweet corn, that are not covered by the FSMA Produce Safety Rule.

GAP audit services and certification may also cover additional crops or products including culinary herbs, dried beans, edamame, edible flowers, fresh tea leaves, maple sap, hops, microgreens, pea shoots, and wheat grass.

GAP certification does not cover medicinal herbs, sprouts, mint or other oils, forage and grain products or seaweed. Visit the FDA website for a complete and up-to-date list of which products can be covered by a GAP certification.

Should you be GAP certified?

The decision to pursue GAP certification for your farm should be carefully made. If your current buyers do not require certification, it might be difficult to justify the time, expense, and record-keeping involved. However, basic GAP training can be very beneficial for all farms in evaluating and improving their on-farm food safety practices. If you see a future for your farm in sales to restaurants, retailers, institutions, or wholesale distributors, you might begin the process of preparing for an audit now, so that the transition to certification will be familiar and less overwhelming when you're ready to make the jump into larger scale markets.

Types of GAP Audits

There are several levels of GAP audits available to growers and groups of growers, depending on your operation, what you grow, and what your buyers demand. Growers may certify individually for GAP or together using Group GAP if they participate in a centrally managed group.

There are two additional categories of GAP that some buyers may require. Harmonized GAP is

aligned with and includes the metrics required by the FSMA Produce Safety Rule (but does not replace a FSMA inspection). Harmonized GAP Plus+ is designed to meet Global Food Safety Initiative (GFSI) Technical Equivalence Requirements. These levels are more expensive, time-consuming, and complex. Which audit category is appropriate for your farm will depend on the standards your potential buyer has set for their suppliers.

a crop ready to sell, as the application and audit process can be time consuming and dependent on the availability of auditors. The time to think about GAP certification is when you are planning your production, researching your markets, and determining if selling into these markets is a good fit for you and your farm's goals.

What is involved in GAP Certification?

Auditors will review your farm, your practices, and your documentation of food safety practices. The audit will be focused on the primary sources of fresh produce contamination linked to foodborne illness outbreaks. These sources include humans, soil and soil amendments, agricultural water, animals, equipment and tools, and facilities. The audit will review these sources in the context of your farm's pre-season, production, harvest, post-harvest, and market handling activities. Auditors refer to a standardized, comprehensive checklist that you can access and use as a guiding tool in evaluating your operation and implementing best practices, whether you choose to become certified or not.

If you choose certification, begin by researching the process and reviewing the requirements. You may even decide to take an online or in person preparation course. We have listed several sources for this information in the Who Can Help section at the end of this chapter. When you're ready, you can schedule an audit. The auditor will observe and ask questions about your operation and review your food safety plan and records. Following a successful audit, your auditor will prepare their report and post results to USDA, as well as send you a certificate and a copy of your audit report to share with buyers.

When should you pursue GAP certification?

Often when a grower approaches a new buyer, they find out that the buyer requires GAP certification as part of their contractual agreements. The time to start the GAP process is not when you have