

The Goods on USDA GAP Audits



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GAP/GHP Audit Overview

GAP = **Good Agricultural Practices**

GHP = **Good Handling Practices**

- USDA Program began in 2002.
- Independent audit of systems of food safety control on produce farms.
- Purpose is to provide buyers with assurance that good farm and food handling practices are in place.
- Based on:
 - Modern food safety science.
 - 21 CFR Part 117 – the **Current Good Manufacturing Practices**.



What Does It Cover?

- Regular GAP/GHP program includes 6 scopes:
 - Part 1: Farm Review
 - Part 2: Field Harvest & Field Packing Activity
 - Part 3: House Packing Facility
 - Part 4: Storage & Transportation
 - Part 6: Wholesale Distribution Center/Terminal Warehouse
 - Part 7: Preventive Food Defense Procedures
- Other specific audits are available:
 - Mushroom Specific GAP (M-GAP)
 - Tomato Audits (multiple scopes)
 - Harmonized and Harmonized Plus+ Audits

****General Questions are answered with every audit scope except Preventive Food Defense.****



What Does It Cover?

- Preventative measures and systems of food safety control in the following areas:
 - Overall food safety program
 - Traceability
 - Worker health & hygiene
 - Toilet and handwashing facilities
 - Water quality
 - Sewage treatment
 - Animals/Wildlife/Livestock
 - Manures & Composts
 - Soil risks
 - Field harvesting equipment
 - Harvest practices
 - Packaging
 - Washing/Packing lines
 - Facility upkeep
 - Chemical control and use
 - Pest control
 - Foreign materials control
 - Ice and refrigeration
 - Transportation

And **RECORDS, RECORDS, RECORDS!**



Who Does The Audits?

- ONLY USDA trained and licensed auditors, including:
 - USDA Federal Auditors
 - Maine Department of Agriculture Inspectors
- Auditors are required to:
 - Attend and pass USDA training for each type of audit they perform.
 - Undergo yearly evaluations.
 - Uphold standards objectively and honestly.
 - Act in accordance with the USDA Rules of Conduct, which include specific standards on **bribery, discretion & confidentiality**, and **impartiality**.



How Is It Scored?

- Each audit scope is scored on a **points basis**.
- Each question is assigned a number of points:
 - 5 points = least critical
 - 10 points = critical
 - 15 points = most critical
- Each question must be answered YES, NO, or N/A. Some questions must be answered YES or NO.
 - YES = gets the points.
 - NO = gets 0 points.
 - N/A = takes question points out of the total available points.
- You must get **80% or more of available points** to pass.



How Is It Scored?

- Example of scoring:

Total Points Possible For This Section:	180 points
Points Removed From Questions Answered N/A:	- 35 points
Adjusted Available Points:	145 points (180 - 35 = 145 points)
Minimum Passing Score: (80% of Available Points)	116 points (0.8 x 145 points = 116 points)
TOTAL SECTION POINTS EARNED BY FARM DURING AUDIT:	120 points
THIS SECTION WOULD PASS	



What Are The AUTOMATIC FAILS?

- Immediate food safety risks and conditions that promote or cause produce contamination.

****LACK OF POTABLE WATER ON-SITE IS CONSIDERED AN IMMEDIATE FOOD SAFETY RISK.****

- Presence or evidence of rodents, excessive insects or other pests.
- Observed employee practices (personal or hygienic) that do or may jeopardize produce safety.
- Falsification of records.
- Lack of documented food safety program.
- No designated person in charge of food safety program.



How Does The Audit Process Work?

1. YOU:

- Choose your scopes.
- Choose your crops.
- Call or email FSIS to request an audit.
- Set up your vendor account with the USDA.

2. FSIS:

- Schedules your audit.
- Assigns an auditor.

3. TOGETHER WE:

- Meet at your farm.
- Have our opening meeting.
- Review your documents and food safety plan.
- Go over the audit questions for your chosen scopes.
- Visit your fields and facilities.
- Observe your operations.
- Talk with your staff.
- Go over your results in our closing meeting.



What Happens After The Audit?

YOU: Pay your FSIS bill before we leave your farm.

FSIS: Completes your audit report when we return to the office and submit it to the USDA.

USDA: Reviews your file and asks us for any additional info or clarification.
Determines if you pass or fail the audit.
Issues and posts your certificate if you pass.
Bills you directly for their portion of the audit.

YOU: Send your GAP certificate to any customers who require or want documentation.
Pay your USDA bill directly to the USDA.

TOGETHER: Depending on the length of your active farm season, you may get a follow-up, unannounced audit to verify your audited food safety system is still functioning properly.



What Are Unannounced Audits?

- The GAP program requires **unannounced audits** for most farm operations.
- **Unannounced audits** are verification checks that your food safety systems are functioning on an ongoing basis.
- These unannounced audits are a separate bill.

Farms in operation <30 days:	No unannounced audits required.
Farms in operation 31-90 days:	Minimum (1) unannounced audit required.
Farms in operation >90 days:	Minimum (2) unannounced audits required.
Farms with multiple commodities or cause for concern:	May require <u>additional</u> unannounced audits.



Is Timing A Factor?

- Audits must be done while farming activities are taking place. This means peak season for whichever scopes and crops you choose.
- FSIS needs to speak with your crew, so don't wait until the last week/days of your season.
- Each step takes time—plan accordingly.

6 months - 1 year before your audit:	Begin building food safety system and preparing for audit.
2 weeks before your audit:	Call FSIS to request audit. Make sure you have a federal account with the USDA.
Within 72 hours of your audit:	FSIS submits audit report to USDA.
~2-3 weeks - 2 months after your audit:	USDA issues certificate.



What Are The Most Common Farm Challenges?

1. WATER ISSUES
2. TRACEABILITY HOLES
3. MISSING SOPs OR LOGS
4. PRE-HARVEST RISK ASSESSMENTS
5. REFRIGERATION EQUIPMENT CLEANING



Common Farm Challenges

1. WATER ISSUES:

- ANNUAL FARM WATER TESTS:
 - **Municipal water**: 1 annual report or test result certificate.
 - **Ground/well water**: 1 annual water test per well.
 - **Surface water**: 3 annual tests staggered across growing season **per source**.
- SURFACE WATER TESTS MUST BE SPACED OVER GROWING SEASON:
 - 1st at planting.
 - 2nd at peak use.
 - 3rd at or near harvest.
- WORKERS MUST HAVE POTABLE WATER AVAILABLE TO THEM.

****LACK OF POTABLE WATER ON-SITE IS AN AUTOMATIC FAIL!****



Common Farm Challenges

2. TRACEABILITY HOLES:

- MUST HAVE AN OVERALL TRACEABILITY PROGRAM THAT LETS YOU:
 - Trace crops one step backwards and one step forward in the food chain.
 - Uniquely identify product on a case/unit level on every step along the food chain.
 - Link harvested crops to crop production areas on the farm level.
- MUST PERFORM A MOCK RECALL USING A REAL LOT OF PRODUCT THAT SHOWS YOUR TRACEABILITY PROGRAM IS EFFECTIVE.
- HARVEST PRODUCT MUST BE UNIQUELY IDENTIFIED MOVING OUT OF THE FIELDS.



Common Farm Challenges

3. MISSING SOPs OR LOGS:

- THREE TYPES OF RECORDS & DOCUMENTATION:
 - Procedures: show what will be done (SOPs, policies, etc).
 - Records: show what action has been done.
 - Documents: can require both a policy, and a record that the policy has been followed.
- RECORD REQUIREMENTS ARE EXTENSIVE
- TAKE THE TIME TO MAKE SURE YOU'VE COVERED ALL YOUR BASES.
- ALL MISSING RECORDS MUST BE SUBMITTED TO FSIS BY THE END OF THE NEXT BUSINESS DAY.

****See handout for complete list of documentation requirements.****



Common Farm Challenges

4. PRE-HARVEST RISK ASSESSMENTS:

- EACH CROP PRODUCTION AREA MUST HAVE A PRE-HARVEST RISK ASSESSMENT PRIOR TO HARVEST.
- PRE-HARVEST RISK ASSESSMENTS MUST:
 - Assess risks and possible sources of contamination.
 - **Include projected dates of harvest.**
 - Be dated and signed.



Common Farm Challenges

5. REFRIGERATION EQUIPMENT CLEANING:

- ALL REFRIGERATION EQUIPMENT MUST BE CLEANED ON A SCHEDULED BASIS, INCLUDING:
 - Compressors.
 - Evaporators.
 - Evaporator pans.
 - Flushing condensate lines.
 - Fans, etc.
- CLEANING SCHEDULE SHOULD BE IN YOUR FOOD SAFETY PLAN.



Real Costs: Audit Bills

- Average FSIS charges for GAP Audits: **\$793.**
- Average USDA charges for GAP Audits: **\$345.**

FSIS CHARGES	AVERAGE TIME ESTIMATE	HOURLY RATE	AVERAGE BILLING ESTIMATE
Admin Fee	1 HOUR	\$115/hr	\$115
Preparation Time	~0-0.5 HOURS	\$115/hr	\$0-\$57.50
Travel Time	~0.5-6 HOURS	\$115/hr	\$57.50-\$690
Audit Time	~1-2.5 HOURS	\$115/hr	\$115-\$287.50
TOTAL ESTIMATE:	~2.5-10 HOURS	\$115/hr	\$287.50-\$1,500

USDA CHARGES	2-5 HOURS	\$115/hr	\$230-\$575
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Hourly rates are set by USDA and cannot be changed.



Real Costs: Unannounced Audit Bills

- Average FSIS charges for unannounced audits: **\$173 - \$403**.
- There are **no** additional USDA charges for unannounced audits.

FSIS CHARGES	AVERAGE TIME ESTIMATE	HOURLY RATE	AVERAGE BILLING ESTIMATE
Preparation Time	~0-0.5 HOURS	\$115/hr	\$0-\$57.50
Travel Time	~0.5-6 HOURS	\$115/hr	\$57.50-\$690
Audit Time	~0.5-1.5 HOURS	\$115/hr	\$57.50-\$172.50
TOTAL ESTIMATE:	~1-8 HOURS	\$115/hr	\$115 - \$920

Hourly rates are set by USDA and cannot be changed.



Real Costs: Water Tests

- Average cost of farm water test: **\$35-\$55/test.**
- Average cost for drinking water test: **\$50-\$75/test.**

WATER TESTS	# OF TESTS REQUIRED	AVERAGE COST OF TEST	ESTIMATED COST OF WATER TESTS
SURFACE WATER	3/SOURCE	\$35 - \$55	\$105 - \$165 PER WATER SOURCE
GROUND WATER	1/SOURCE	\$35 - \$75	\$35 - \$75 PER WATER SOURCE

- Plus:
 - Wages for sampling time (can be up to 1 day's wages depending on number of water sources).
 - Shipping & cold chain costs, or driving time to get samples to lab within 30 hours of sampling.



Real Costs: Labor

1. TRAINING:

- You will need to plan for training time for your crew to meet the GAP Audit requirements. You can estimate needing:

~2 hours per employee per growing season

PLUS: your time to deliver the employee trainings

- Some of that training should be on an ongoing basis as situations come up that call for retraining.



Real Costs: Labor

2. LOGS & DOCUMENTATION:

- You will need to plan time for you or your crew to fill out logs and records. You can estimate needing:
 - ~1 labor hour per week during the growing season
 - PLUS: ~1-2 hours of your time per week to review and verify records during the growing season**
- You will need to plan time to do an annual or seasonal review of your food safety plan and processes, and to update any materials. You can estimate needing:
 - ~ 1 week-span of work reviewing and updating your food safety plan and materials. (Unlikely to be 40 hrs, but will take time.)**



Real Costs: Labor

3. CLEANING & MAINTENANCE:

- You will need to plan time for you or your crew to complete **AND** document any cleaning and maintenance you do.
- Start with the cleaning schedule you build for your food safety plan.
- Work out your labor needs based on how much time each cleaning and maintenance task will take.
- Estimate your labor costs based on your wages and cleaning schedule.



What Are Some Real Benefits?

- GAP Audits can open markets for your farm.
- Food safety systems protect your customers, and protect your farm.
- Food safety systems help make your routine, routine!
- Preventive measures can save you \$ money \$ in surprise breakdowns, repairs, corrective actions.
- Records and documentation help minimize risk or loss.
- Traceability requirements can give you data on crop quality and yields.



Where Can I Find Free Resources?

- Download the **USDA's GAP/GHP User's Guide**:
https://www.ams.usda.gov/sites/default/files/media/GAPGHP_Audit_Program_User%27s_Guide%5B1%5D.pdf
- Call or email **Fed/State Inspection Service** for questions and clarifications:
207-764-2100
leah.cook@maine.gov or jeff.gagnon@maine.gov
- Ask **Linda Titus** and **AgMatters** for FREE help preparing:
 - Food safety programs
 - Logs and records templates
 - On-farm consultation.

<http://www.agmattersllc.com>



Connecting With Low-Cost Resources

- Download an *Illustrated Guide* to GAP from **ATTRA/National Sustainable Agriculture Information System:**

<https://attra.ncat.org/product/an-illustrated-guide-to-growing-safe-produce-on-your-farm/>

- Work your GAP costs into your business planning through several workshop series and technical advisors:

<https://www.maineFarmlandtrust.org/farm-viability/workshops/>

<https://www.farmsmartmaine.com/ag-business-planning-class.html>

<https://extension.umaine.edu/beginning-farmer-resource-network/find-resources-and-assistance/>



THANK YOU!

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CONTACT US WITH QUESTIONS ANY TIME!

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