Food Safety Plan How-to for USDA AMS regular GAP

1. Workshop Packet:
    a. DACF Food Safety Plan Parts 1-4
        i. Packet cover page
        ii. USDA AMS GAP Help
        iii. USDA AMS regular GAP Checklist Parts 1-4
        iv. Farm Food Safety Plan Cover Sheet
        v. List of Farm Food Safety Plan Attachments
        vi. General Policies
        vii. List of Employee Training Topics
        viii. Food Contact Surface Cleaning Policies and Schedules, Previous Land Use – Soils Assessment, Water Assessments. *Gray highlight indicates where farm specifics are required.
    b. DACF Water Assessment Exercise and Example
    c. List of record and food safety plan templates from the Produce Safety Alliance website with notes for identifying what might work for your farm.
2. Workshop Overview
    a. Why write a food safety plan?
    b. What's the goal?
    c. Difference between regulation & third-party audits
    d. Requesting an audit & audit prep
    e. Structure & basis of a USDA AMS regular GAP audit
    f. Templates for food safety plans & records
    g. How to write your own plan without regurgitating audit requirements.
3. To learn food safety practices:
    a. Take the Produce Safety Alliance Grower Training
    b. Participate in the UMaine Extension Jumpstart Program
    c. Request an On-Farm Readiness Review from DACF
    d. Request Technical Assistance (on or off-farm) from DACF
    e. Browse the DACF Library of Resources [Food Safety Modernization Act - FSMA - Maine DACF](#)
4. Why write a food safety plan?
    a. Required for third-party audits
    b. Reference for employees & training tool
    c. Demonstrates commitment to food safety
    d. Emotional support during an inspection, third-party audit, or foodborne illness investigation. Show due diligence.
    e. May help free up your time during an inspection or audit
    f. Get the knowledge stored in your head on paper
    g. Document the work you are doing. If it isn't documented, it didn't happen…
5. What's the goal?
    a. Conduct assessments to reduce risks that can't be eliminated on produce farms.
    b. Know how you minimize the risks on your farm

      c. Demonstrate to an inspector or auditor that risks are being controlled.

      d. Stay organized so you don't miss anything important.

6. Difference between federal Produce Safety Rule regulation and third-party audits:

      a. Produce Safety Rule (PSR) regulation (21 CFR 112)

            i. Enforced through inspection every 3-5 years.

            ii. Inspections are mandatory if a farm is subject to the PSR but do not cost money.

            iii. Requires significantly less records than a third-party audit.

            iv. Considers biological hazards only (viruses, bacterial, parasites).

      b. Third-party audits:

            i. Voluntary. Farm requests them because a buyer won't buy the produce without an audit certificate.

            ii. Require a food safety plan.

            iii. Consider biological, chemical, and physical hazards.

            iv. Record heavy.

            v. Cost a lot of money.

7. Third-party audits in Maine:

      a. USDA Agricultural Marketing Service Good Agricultural Practices audits.

            i. Maine DACF has a contract with USDA AMS to conduct regular GAP and Harmonized GAP audits.

            ii. Make sure you request the specific audit (regular GAP, Harmonized, or Harmonized +) and parts of the audit your buyer wants so you don't pay for more than you need to sell your produce.

            iii. See the USDA AMS GAP Help document for tips.

      b. Audit prep:

            i. Check the USDA AMS GAP website for updates:

               https://www.ams.usda.gov/services/auditing/gap-ghp

                 1. Get the current audit checklist (questions)

                 2. Get the current audit standard (instructions)

                 3. Review resources

8. Structure of USDA AMS regular GAP:

      a. General Questions (always required)

      b. Good Agricultural Practices:

            i. Part 1, Farm Review

            ii. Part 2, Field Harvest & Field Packing Activities

      c. Good Handling Practices:

            i. Part 3, House Packing

            ii. Part 4, Storage & Transportation

9. Basis of USDA AMS regular GAP:

      a. GAPs and GHPs are based on Good Manufacturing Practices (GMPs) found in 21 CFR 117 (formerly 21 CFR 110). Farms are not legally subject to this regulation.

      b. Part 6, Warehouse Distribution Center and Part 7, Food Defense are GMP sections no longer offered by USDA AMS.

    c. FDA Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables (resource available on USDA AMS website)

    d. Other regulations (not comprehensive):
- i. 29 CFR 1910.141 (OSHA)
- ii. 290CFR 1928, field sanitation units (OSHA)
- iii. 42 CFR 72, drinking water standards
- iv. 40 CFR 503, biosolids (EPA)
- v. 10 CFR 170, Worker Protection Standards (pesticides, EPA)
- vi. Bioterrorism Act of 2002, traceability

10. Pesticide application in Maine:

    a. An applicator license is required if you sell more than $1000 of produce annually and you apply EPA registered or minimum risk pesticides (no EPA registration) when growing, washing, storing. OMRI listed pesticides are not exempt. Pesticides must be registered by the Maine Board of Pesticides Control. Equipment sanitizing does not require a pesticide license.

11. Writing a Food Safety Plan:

    a. Beware of templates, there is no required or standard format.

    b. Template examples are available on the Produce Safety Alliance website: https://cals.cornell.edu/produce-safety-alliance
- i. Some of the templates are for a Harmonized rather than regular GAP audit.
- ii. None of the templates are the bare minimum, they teach best practices through the template which can cause issues.
- iii. Farms should take the Produce Safety Alliance Grower Training and know their audit standard.
- iv. Templates have different formats: ISO numbering, by audit question, by topic, fillable, checklist/write-in, with or without instructions to be deleted out.

    c. Historically in Maine farms have used:
- i. Linda Titus' plan (AgMatters)
- ii. Steve Johnson's plan (UMaine, intended for potato farms)

    d. How to get down to the bare minimum:
- i. In the audit checklist you will see a "D", "P", or "R" next to most audit questions meaning the question requires a Document, written Policy, or Record to satisfy the question.
- ii. Questions without a letter are what the auditor will visually confirm and do not need to be written into the food safety plan. An example of this is regular GAP question G-8, "Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work." This question does not need to be stated in the food safety plan or appear on any farm records.
- iii. Attach required records and other supporting documents. These are listed in the workshop packet after the cover sheet.
- iv. Know that auditors are trained to hold farms to what their plan says they do. This is why it is important to tailor templates to your specific farm and practices.

e. General Policies have been provided in the workshop packet as a starting point so farms can focus on the important parts of their plan:
  i. Employee Training: There is a list of required employee training topics in the worksheet packet, but it is worth investing more effort in your training program.
  ii. Previous Land Use Assessment: Considering adjacent and nearby land is best practice.
  iii. Water Assessments: Use the workshop packet to complete a water assessment for your farm. *The regular GAP standard does not specify what microbial level is safe for irrigation or pesticide application water. The recreational water standard is 126 MPN/100mL generic E. coli and water science supports recreational water being safe for produce contact up to day of harvest. How does your farm interpret water testing results? How does your farm determine appropriate use?
    1. Microbial reduction by commercial washing must be supported by a study specific to the farm.
    2. Microbial die-off between last application and harvest is supported by the science referenced in the Produce Safety Alliance Grower Training manual. Farms can use it for decision-making.
    3. Microbial die-off between harvest and end of storage must be supported by a study specific to the farm.
  iv. Equipment and general cleaning: List food contact surfaces and group them by method/frequency of cleaning. Write Standard Operating Procedures (SOPs) and make a cleaning schedule.
    1. SOPs can be helpful as a reference and for training employees. There is no required formatting. Just write out how tasks are performed like a recipe with numbered steps.

12. Other Resources:
  a. Cornell CALS National GAPs
  b. Food Safety Begins on the Farm (Cornell, UC Davis, and other universities)
  c. Produce Safety Alliance (part of Cornell CALS)
  d. NECAFS Food Safety Clearinghouse
  e. Research:
    i. USDA Agricultural Research Library
    ii. US Davis: https://ucfoodsafety.ucdavis.edu
    iii. USDA Ag Research Service

Lindsay Werner, Inspection Process Analyst Coordinator with the Maine Department of Agriculture, Conservation & Forestry (DACF). 207-592-2687 or Lindsay.werner@maine.gov