

## Food Safety Plan How-to for USDA AMS regular GAP



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*Quality Assurance & Regulations*

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## Workshop Overview

- Why write a food safety plan?
- What's the goal?
- Difference between regulation & third-party audits.
- Requesting an audit & audit prep.
- Structure & basis of a regular GAP audit.
- Templates for food safety plans & records.
- How-to write your own plan without regurgitating audit requirements.



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## To learn food safety practices:

- PSA Grower Training Course
- UMCE Jump Start Program
- DACF On-Farm Readiness Review
- DACF Technical Assistance Farm Visit
- DACF Library of Resources
- Other resources on the Resources Slide



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## Why write a Food Safety Plan?

- Required for 3<sup>rd</sup> party audits.
- Reference for employees & training tool.
- Demonstrates commitment to food safety.
- Emotional support
  - During inspections or audits
  - During foodborne illness investigations, shows due diligence



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## Why write a Food Safety Plan?

- May help free up your time during an inspection or audit.
- Gets the knowledge stored in your head on paper.
- Documents the work you are doing.
  - If it isn't documented, it didn't happen...



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## What's the goal?

- Conduct assessments to reduce risks that can't be eliminated on produce farms.
- Know how **you** minimize the risks on **your** farm.
- Demonstrate to an inspector or auditor that risks are being controlled.
- Stay organized so you didn't miss anything important.



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## FSMA Produce Safety Rule (PSR)

### Does NOT require a food safety plan

- FSMA PSR is an FDA regulation (21 CFR 112)
  - Enforced through inspection every 3-5 years.
  - Inspections are mandatory but do not cost money.
- PSR requires significantly less records than USDA GAP audits.
- PSR considers **biological** hazards only (viruses, bacteria, parasites).



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## Third Party Audits

- Audits are **voluntary**. You request them because a buyer won't buy your produce if you don't have an audit certificate.
- Audits require a food safety plan.
- Audits consider **biological, chemical, and physical** hazards.
- Audits are more record heavy than the FSMA Produce Safety Rule.
- Audits cost a lot of \$\$\$\$\$.



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## USDA Agricultural Marketing Service (AMS)

### GAP Audits

- USDA GAP audits are third party audits commonly requested in ME.
- Maine DACF conducts USDA **regular** GAP and **harmonized** GAP audits.
- **Make sure you request the specific audit and audit parts your buyer wants.**
- Requesting an audit? Use the USDA AMS GAP Help document in the workshop packet.



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## USDA Audit Prep

- Check the USDA AMS GAP website for updates:
  - <https://www.ams.usda.gov/services/auditing/gap-ghp>
    - Get the current audit checklist (questions)
      - **The 2024 version is in your workshop packet**
    - Get the current audit standard (instructions)
    - Review resources



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## Structure & Basis of regular GAP

### GAPs/GHPs

- Good Agricultural Practices
  - GAP General Questions
    - Always required
  - GAP Part 1, Farm Review
  - GAP Part 2, Field Harvest & Field Packing Activities
- Good Handling Practices
  - GAP Part 3, House Packing
    - No re-pack (GMP audit?)
  - GAP Part 4, Storage & Transportation

### GMPs

- Good Manufacturing Practices
  - 21 CFR 117 subpart B, formerly 21 CFR 110.
  - Referenced in the GAP General Questions.
  - Farms are not legally subject to this regulation.
  - Part 6, Warehouse Distribution Center, and 7, Food Defense, are not offered by USDA anymore.



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## Basis of GAPs

- FDA Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables
- Regulations
  - 29 CFR 1910.141 (OSHA)
  - 29 CFR 1928 – field sanitation units (OSHA)
  - 42 CFR 72 – drinking water standards (FDA or EPA?)
  - 40 CFR 503 – biosolids (EPA)
  - 40 CFR 170 – Worker Protection Standards (pesticides, EPA)
  - Bioterrorism Act of 2002 – traceability



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## Pesticide Applicator License

- In Maine, a pesticide applicator license is required if you sell more than \$1000 of produce annually and apply EPA registered or unregistered minimum risk pesticides to produce when growing, washing, storing, even if OMRI listed. These chemicals must be registered for use in Maine by the Board of Pesticides Control. Note: Not enforced if only application is to food contact surfaces for sanitizing or disinfecting but is enforced for produce wash water use.



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## Writing a Food Safety Plan

- Templates beware:
  - There is no required or standard format.
  - Examples on Produce Safety Alliance website: <https://cals.cornell.edu/produce-safety-alliance>
    - Some of the examples are for Harmonized audits rather than regular GAP.
    - None of the examples are the **bare minimum**... They are teaching through templates which can cause issues.
    - **Take the PSA Grower Training, know the audit standard.**



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## Different Formats

- ISO numbering
- By audit question
- By topic
- Fillable
- Checklist/write in
- With or without instructions to be deleted out



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## Historically in Maine farms have used:

- Linda Titus' (AgMatters) plan
  - Southern Maine
  - Diversified farms
- Steve Johnson's plan
  - Northern Maine
  - Potato farms



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## The Bare Minimum 😊

1. In the audit checklist you will see a “D”, “P”, or “R” next to most audit questions.
  - This means that the audit question requires a Document, written Policy, or Record to satisfy the question.
2. Questions without a letter are what the auditor will visually confirm
  - The food safety plan does not need to include these questions. Use them as a checklist for audit preparedness. **\*EXAMPLE G-8**



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## Example of visual question G-8

- Question G-8 says “Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work.”
  - Linda’s plan includes it in Field Harvest Log.
  - Steven Johnson’s plan includes it in the Hygiene, safety, illness section.
  - Henderson plan includes it.



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## The Bare Minimum 😊

3. Attach required records and other supporting documents.
  - These are listed in the workshop packet after the Farm Food Safety Plan cover sheet.
4. Know that auditors are trained to hold you to what your food safety plan says.
  - This is why it is important to tailor templates to your specific farm.



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## The General Policies

- Lindsay went through the General Questions & Parts 1-4 and made generalized policies.
  - These are available in the workshop packet.
  - Use as-is or tweak if necessary.
- Using the general policies will allow you to focus on the parts of the food safety plan that really matter.



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## Employee Training

- There is a list of required employee training topics in the workshop packet.
- It is worth investing more effort in your employee training program.
- Writing Standard Operating Procedures for your employees to follow can be helpful.
  - No special formatting required, write out the task steps like a recipe.



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## Activity Time

- Do you like any of the templates?
  - Food Safety Plan Templates (PSA website)
  - Record Templates (from plan templates)
- Write your own Standard Operating Procedures
  - Employee Training Topics \*Employee training is important!
  - Equipment and general cleaning
    - List food contact surfaces and group them by method/frequency of cleaning
    - Write up how you clean them and make a cleaning schedule
    - Don't pressure wash when packing or reuse uncleanable containers or chemical containers
- Previous Land Use Assessment
  - Considering adjacent and nearby is best practice.
- Water Assessments → Next slide...



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## Pre-harvest Water

- Use the instructions in the workshop packet to complete a water assessment for your farm.
- The GAP audit standard does not specify what microbial level is safe for irrigation or pesticide application water.
  - You do not need to use the recreational water standard of 126 MPN/100mL generic *E. coli*.
  - If your food safety plan says you do use 126, your testing results need to be below that cutoff or corrective action taken.



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## Water Assessment Exercise

- Look over the Water Assessment Exercise in the workshop packet.
  - How does your farm interpret testing results?
  - How does your farm determine appropriate use?
  - Microbial reduction by commercial washing must be supported by a study specific to the farm.
  - Microbial die-off between last application of water and harvest is supported by the science referenced in the Produce Safety Alliance Grower Training Manual. You can use it.



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## Water Assessment Exercise

- Continued...
  - Microbial die-off between harvest and end of storage must be supported by a study specific to the farm.



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## Other Resources

- Cornell CALS National GAPs
- Food Safety Begins on the Farm (Cornell & UC Davis)
- Produce Safety Alliance, part of Cornell CALS
- NECAFS Food Safety Clearinghouse
- Research:
  - USDA Agricultural Research Library
  - UC Davis: <https://ucfoodsafety.ucdavis.edu>
  - USDA Ag Research Service



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