HOW TO IMPLEMENT THE UPDATED GAP AUDIT

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At least once a year an outbreak of food-borne illness is brought to the attention of the American public and serves as a reminder of the importance of food safety. As a proactive measure, many segments of the potato industry are now asking their growers to submit to inspection of provisions of the USDA Good Agricultural Practices (GAP) and Good Handling Practices (GHP) Audit procedures. This program, administered by the Idaho State Department of Agriculture, requires producers to have a documented food safety program whereby auditors complete an audit checklist by inspecting the facility (i.e. farm or storage), questioning personnel and reviewing documentation. This Audit was designed for fruit and vegetables in general and not specifically for potatoes. The University of Idaho has designed a Potato GAP Audit Organizational Material handbook to make it easier to assemble all the information needed for an Audit on potatoes.

STEPS TO GET READY

1	Download the USDA GAP & GHP Audit Checklist to see what will be needed. http://www.ams.usda.gov/gapghp and follow link
2	Contact the Idaho State Department of Agriculture (ISDA) at http://www.agri.idaho.gov or by calling Cindy Stark at 208-332-8672 or for the Magic Valley- Burley office, 208-678-8168. Discuss what scopes are relevant. Schedule the Farm Review.
3	Review and/or download U of I GAP Manual at http://www.kimberly.uidaho.edu/potatoes/gap.htm
4	Develop a written Standard Operating Procedure (SOP) and documentation to include in the manual.
5	Perform worker trainings, sample and test water used.
6	Farm Review Audit occurs.
7	Continue documentation during growing season.
8	Schedule Field Harvest Audit to occur during harvest and Storage and Transportation Audit if potatoes are not immediately processed.

STEP 4 – Develop a written SOP and documentation to include in the manual

Some questions on the Audit checklist require the auditor to review documentation in addition to their observations. The current Audit identifies the type of documentation necessary (R, P, or D) to receive a "yes" answer on that question. The letter "R" indicates

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some type of record (log, schedule, service record, weight ticket, etc.) is needed to verify that an action has been taken for a specific situation. A "P" indicates that the company/operation has a policy or written procedure (SOP) stating what will be done for a specific situation. The letter "D" indicates the requirement for both a policy stating an action will be taken and a record demonstrating the action has been taken.

Some questions may not be applicable to potatoes or to a specific operation and may be answered N/A. Points from these questions will be deducted from the total possible points and a passing score of 80% will be calculated from this adjusted total.

Traceability questions have been added to all sections of the current Audit. The General Question section requires documentation that a traceability program has been established and a mock recall conducted. The University of Idaho has developed a manual to aid in navigating through the requirements for successful completion of the USDA GAP/GHP audit. Information on this manual is provided below and also contains examples for traceability documentation and a mock recall. A mock recall is not required for the first time Farm Review or Field Harvest Audit, but evidence of completing at least one mock recall within 12 months prior to the Storage and Transportation Audit or subsequent Farm and Field audit is required.

Below are specific points reiterated from previous Winter Commodity Proceedings and incorporated with comments made during the 2011 workshop.

General Questions (USDA Audit Section G)

- The General Question section of the audit must be completed before each audit. There are typically at least 2 audit visits: Field and Harvest. Storage is included with harvest (if applicable).
- General Question P#1 and P#2 must be answered yes for the Audit to continue. This means each farm must have a written SOP for their GAP food and farm safety program and one or more persons designated to oversee this program.
- Worker sanitation training and follow-up training is required and is only good for the current (1 year duration) audit.
- Auditors will review written documentation and interview random employees for knowledge of safety and procedures.
- All toilet facilities must be clean and include toilet paper, hand wash stations with potable water, soap and single use paper towels and include hand washing signs.
- Worker signs must be in the predominant language of the workers. Most purchased signs do not state that hand washing must be done before beginning work. Therefore, additional signs may need to be made. Homemade signs are satisfactory.
- New: Question G-7 has been amended to state that employees who handle or package produce are required to wash hands before returning to work. This includes employees who pick rocks or dirt clods off conveyors.

Farm Review (USDA Audit Section 1)

- Arrange for this portion of the Audit to occur as soon after the crop has emerged if possible.
- Farming operations should evaluate their surroundings for possible contamination of water sources and production areas. There should be appropriate distance or barriers to protect these sites from possible pollutants. (eg. manure piles, livestock, etc.)
- Farming operations will never be able to prohibit all animals from entering production areas but the presence or non-presence of animals should be monitored and documented at least every couple weeks. Even make a note that no animals were present when visiting the field.
- Application of composted manure will require documentation of the composting procedure or test reports from the composting company.
- New: Laboratory testing is required for irrigation water and for water used in chemical or fertilizer applications. Off-site applicators must provide a copy of their companies' water test.
  - Well water irrigation samples must be tested once a year and the well treated if fecal coliforms are present.
  - Surface water irrigation samples must be collected from each water source soon after planting, at peak use and near harvest. Samples should be collected close to where the water leaves the source to be applied to the crop. Multiple production areas may be irrigated from one source but auditors will look for possible sources of contamination between areas and look for additional water tests if the possibility of contamination exists.
  - Enumerated results from a laboratory should be 576 *E. coli* organisms/100ml of sample or less. The operation's SOP should include the steps that will be taken if the results are higher than allowed.
  - Number of documented tests auditors will ask to see for Farm Review:
    - 1 test if audited before July 16
    - 2 tests if audited July16-September 15
    - 3 tests if audited after September 15
  - Auditors are also instructed to check for backflow devices when required by code or evaluation.

Field Harvest and Field Packing (USDA Audit Section 2)

- New: An auditor will verify that a pre-harvest assessment of possible sources of crop contamination has been done but not the validity of the assessment. The UI handbook has an assessment checklist (R#12).
- If an operation has less than 11 employees, no field sanitation unit is needed as long as they have easy access to facilities.
- Portable field sanitation units will be inspected and assessed for location with respect to potential potato contamination, accessibility for servicing and emergency clean-up. The sanitation of these units remains the responsibility of the farm operation even if contracted out to a private company.

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- Hand sanitizers are not a substitute for hand washing with soap and potable water. Employees wearing gloves must remove and leave the gloves outside the sanitation unit before entering.
- Auditors will look for documented procedures and schedules for cleaning implements, containers, equipment etc. that come in contact with potatoes.
- There should also be a SOP or action plan in the case of glass or plastic breakage and/or other contamination in harvested potatoes. An example of this SOP is included in the UI GAP manual.

Storage and Transportation (USDA Audit Section 4)
- There should be documentation that the storage facility, handling equipment, conveyances, etc. are checked and maintained for cleanliness and condition. Lubricants (grease guns, aerosol cans, etc.) should be kept away from equipment except when being used.
- A proactive effort to exclude pests and pets in and around the storage facility needs to be documented.
- New: Question 4-7 asks for a policy describing procedures which specify handling finished product that comes into contact with the floor. This will be answered N/A for potatoes in Idaho even though it is not shown to be an option on the printed audit checklist.

University of Idaho GAP manual

The UI manual is not required to pass the USDA GAP Audit. It was designed to simplify the collection of information necessary to pass the USDA GAP Audit and is now available for download at the UI Kimberly R&E Potato Storage website: http://www.kimberly.uidaho.edu/potatoes/gap.htm. The complete manual or only parts of the manual can be used and tailored to your farming operation. It is merely a template.

The UI handbook is written so that the Farm Standard Operating Procedure (SOP) is coordinated and referenced directly to the USDA GAP Audit Checklist and the required documentation. Each bullet point of the SOP is referenced to the Audit Checklist and also given a documentation number if necessary. Examples of preformatted documentation for all mandatory requirements are included. These documents can be downloaded and adjusted to fit an individual operation, for example, in the SOP:

- Potable water is available to all workers.   G3, R#2

G3 indicates that this question is found in the General Information section of the Audit and is question 3. R#2 indicates that the appropriate record is found in the Document section of the UI handbook and is the 2nd document. This record (R2) also has the reference to G3 to refer to the specific question it answers. This makes it easier to understand why a particular piece of information or document was included in the UI Manual and if it is needed for an individual operation. The UI SOP is meant to be a template only and each operation should tailor their SOP to include their specific procedures.

Website information

The afore mentioned website provides information describing: What is GAP; the GAP manual layout; how to use the manual; a step-by-step procedure on how to compile the manual; and photos showing what the manual should look like when completed. The GAP manual provided on the UI website is available in both PDF and Microsoft Word format. The PDF version is available to use as an example. It is not intended to be used in its present form as the manual for each and every farming operation. It is primarily an example of what could be necessary in a manual. The UI Potato GAP Organizational Manual needs to be **tailored** to each specific farming operation since some SOP wording and documentation may not be applicable to all operations. The Microsoft Word version can be saved to a computer and then edited to make it specific for each individual operation. Once the necessary changes have been made and saved on a computer it is ready to be printed and assembled in a 3 ring binder as explained in the procedures on how to compile the manual. The manual also includes sections to insert maps, the current USDA Audit Checklist, and other miscellaneous information so that the edited manual includes all information the GAP Auditor may ask for at the time of the audit. It is important to follow the most current version of the USDA Good Agricultural Practices (GAP) Audit Verification Checklist. This can be found at U.S. Department of Agriculture (USDA): Fresh Product Grading and Quality Certification: www.ams.usda.gov/gapghp . The UI manual and website will be updated as the Audit Checklist version changes.