



Removing **Barriers**

to USDA GAP Programs

NASDA
FOUNDATION

GROWER **TOOLKIT**

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TABLE OF CONTENTS

The USDA GAP Audit Program: Key Messaging Information	04
Audits	05
GroupGAP	06
Is GroupGAP Right for You?	07
GroupGAP Example: How it Works	08
A GroupGAP Year.....	09
Benefits and Costs of GAP Programs.....	10
Potential Advantages of Participation in GroupGAP	11
Costs: Audit Fees for an Individual Producer	12
Costs: GroupGAP Audit Fees	13
USDA GAP Misconceptions.....	16-17
Determining a Grower’s GAP Needs.....	18-22
Audit Preparation Checklist	23
Resources	24-25
Key Terms	26-27
Contributors.....	28

INTRODUCTION

THIS TOOLKIT WAS DESIGNED FOR GROWERS AS A RESOURCE FOR USDA GAP AUDIT PROGRAMS, SPECIFICALLY GROUPGAP

As a grower interested in pursuing a United States Department of Agriculture's (USDA) **Good Agricultural Practices** (GAP) certification, you may be asking yourself several questions – **How will it benefit my farm? What do I do first? Who can help?**

This toolkit will aid you in answering those questions and determining your GAP needs. It also provides important contacts, highlights available training and mentoring resources, defines key terms, and addresses misconceptions to clarify the purpose and value of GAP certification. This toolkit addresses programs and certification under USDA authority; it does not address private third-party audit entities.

By incorporating good agricultural practices on your farm, you can reduce food safety risks while working to expand your business and access new markets. Foodborne illnesses have led consumers to demand more information than ever about food safety practices. As a result, growers and handlers are more frequently asked to demonstrate a commitment to food safety through third-party audits, known as a GAP certification.

The USDA GAP audit is based on the U.S. Food and Drug Administration's (FDA) [Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables](#). Although the USDA audit is part of a voluntary program, it may help farms prepare for potential regulation from the **Food Safety Modernization Act** (FSMA) unless they are exempt. FSMA, enacted in 2011, charged the FDA with developing regulations to establish safe growing, harvesting, packing, and holding standards for farms that fall under the **Produce Safety Rule** (PSR), a regulation using a preventative approach to food safety that incorporates the GAP framework. Farms are currently exempt from FSMA if their average annual food sales are less than \$500,000 from the previous 3 years; and more than 50 percent of those food sales are to qualified end-users (restaurants, grocery or retail food establishments) located in the same state or within a 275 mile radius of their farm.

This toolkit is a source of information about USDA GAP Programs and does not establish any legal or regulatory ruling. The toolkit may be presented to the grower through education and outreach efforts conducted by State Departments of Agriculture, Cooperative Extension, or Non-governmental organizations.



THE USDA GAP AUDIT PROGRAM

KEY MESSAGING

The USDA GAP Audit Program was developed as a **market access tool** for producers to meet annual **food safety/good agricultural practices audits** required by buyers to ensure specific food safety practices are being followed based on buyer specifications and/or industry best practices.

- USDA GAP audits verify that fruits and vegetables are produced, packed, handled, and stored to minimize risks of microbial food safety hazards.
- USDA GAP audits are voluntary and are conducted by a USDA-certified auditor.
- USDA audits generally occur on a scheduled basis at least once a year during harvest or post-harvest activities; unannounced verification audits also may take place, depending on the scope of the audit and the length of the production period.

There are three different USDA GAP audits shown in the table below. Regardless of the type, all audits address hazards, identify routes of contamination, implement good agricultural practices, and document activities. The main differences are the level of complexity, stringency, and cost.

	Adherence to Industry and FDA Best Practices	Produce GAP Harmonization and FDA FSMA Produce Safety Rule Alignment	Add Global Food Safety Initiative (GFSI) Acknowledged as Equivalent
USDA GAP	X		
USDA Harmonized GAP	X	X	
USDA Harmonized GAP Plus+	X	X	X



Learn more about USDA GAP Program Audit Services

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

AUDITS

The USDA GAP Program offers two types of audit services - a process audit and a system audit.

PROCESS AUDITS

USDA Good Agricultural Practices (GAP)

GAP audits are voluntary, third-party (USDA) audits that focus on the use of best agricultural practices to verify that fruits and vegetables are produced, packed, handled, and stored in the safest manner possible to minimize risks of microbial food safety hazards.

Harmonized GAP

Harmonized Good Agricultural Practices (HGAP) audits allow farmers to demonstrate to buyers that they are implementing specific requirements set forth in the PSR. This GAP audit service was aligned with the PSR to demonstrate that all the metrics used in the USDA program meet the Rule's ultimate goals of increasing food safety. However, the USDA HGAP Audit Program is not a substitution for a PSR compliance inspection conducted by a regulatory agency.

Harmonized GAP Plus+

Harmonized Good Agricultural Practices Plus+ (HGAP Plus+) is the USDA audit service acknowledged as equivalent to the **GFSI Technical Equivalence Requirements**. Many retail, food service, and institutional buyers require their suppliers to undergo a food safety audit conducted against one of the GFSI recognized certification programs.

Mushroom GAP

The Mushroom GAP audit is a commodity-specific voluntary audit performed throughout production and the supply chain.

California Leafy Green Marketing Agreement (LGMA)

Arizona Leafy Green Marketing Agreement (LGMA)

SYSTEM AUDITS

GroupGAP

USDA established the **GroupGAP Certification Program** (GroupGAP) in 2016.

GroupGAP allows individual farmers to certify their practices together as part of a centrally-managed group, meeting the latest FSMA requirements and certifying to either GAP, Harmonized GAP, or Harmonized GAP Plus+ GFSI Equivalent audit standards.

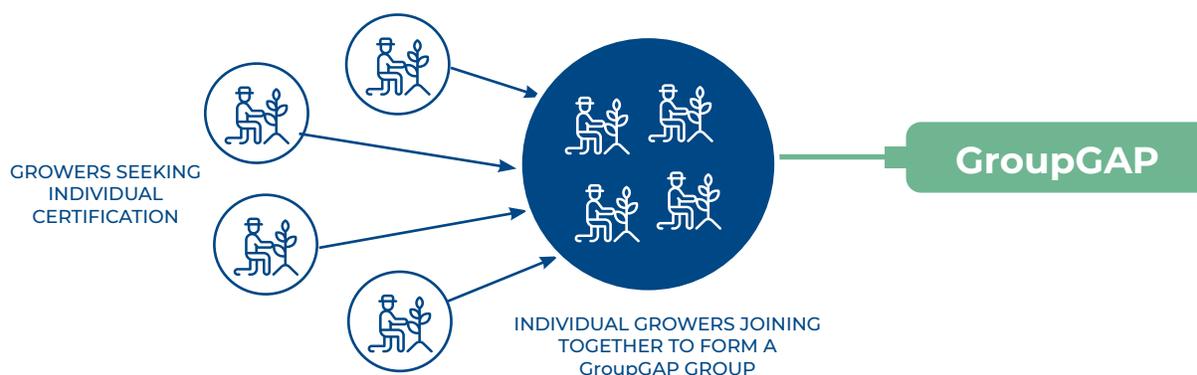


The Leafy Green Marketing Agreements and audits with California and Arizona specifically address reducing potential sources of contamination in leafy greens.

GROUPGAP

Historically, GAP certification to reach larger markets has been out of reach for many small and mid-sized farms, beginning farmers, and socially disadvantaged farmers because of the cost. **The USDA GroupGAP Certification Program provides another way for growers of all sizes and groups of growers to achieve GAP certification.** GroupGAP provides an umbrella of support, with the group and its participants addressing food safety cooperatively.

A **group** consists of producers and/or supply chain partners, that may include food hubs or cooperatives.



- In GroupGAP, **a collection of independent farms organize to create a food safety system.** Members identify the food safety audit standard (either GAP, HGAP, or HGAP Plus+) best suited to the requirements of their buyers. The group then works to develop and implement a shared **Quality Management System (QMS)** and food safety practices, collecting required documentation.
- A GroupGAP group **must have a Group Manager who takes responsibility for implementation of the group's QMS.** This manager could be a member of the group, an employee of the central entity (if one exists), a facilitator, or an external contractor.
- The group is **required to have an internal auditor(s) who then performs audits of all the group members' farms to ensure compliance** with the chosen GAP program standard. This auditor can be the group manager, group member(s), a group employee, or an external contractor.
- USDA will perform an annual system audit of the group's QMS, and annual GAP audits on a representative sample of farms. **If the group demonstrates compliance with its QMS and food safety audit standards, the group will be issued a GroupGAP Certification.** Group members can share the certification with buyers to gain more profitable market access.



Learn more about GroupGAP

<https://www.ams.usda.gov/services/auditing/groupgap>

IS GROUPGAP RIGHT FOR YOU?

- Can you gather a group of fellow specialty crop producers?
- **Would your group be willing to share responsibility for applying food safety practices to increase your market opportunities?**
- Can you identify individuals to fill the key roles?
- Can you agree to be audited as one body?

If so, the [GroupGAP User's Guide](#) and the [Path to GroupGAP Certification Fact Sheet](#) are great resources that provide specific steps for choosing and applying for GroupGAP.

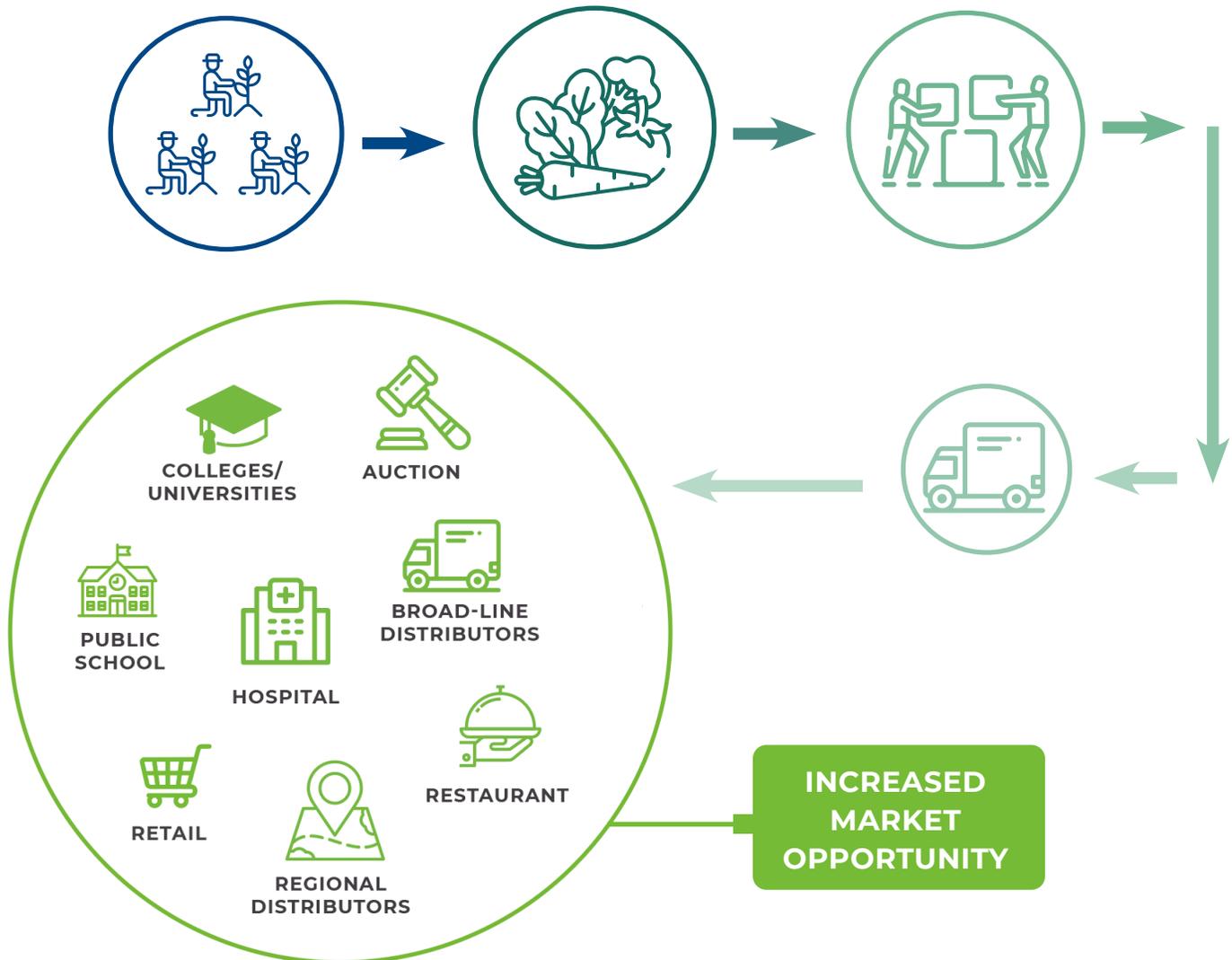
The "[GroupGAP Year](#)" process diagram details the main actions you will take to establish your group and seek GAP certification.



HOW IT WORKS

AN EXAMPLE OF HOW A GROUP CAN ACCESS NEW MARKETS

GroupGAP members may combine their harvest as part of an aggregator or food hub. The food hub distributes to a wider market base. These markets benefit from locally sourced and stable food supply chains.



Access the GroupGAP User's Guide

https://www.ams.usda.gov/sites/default/files/media/GroupGAP_Users_Guide.pdf

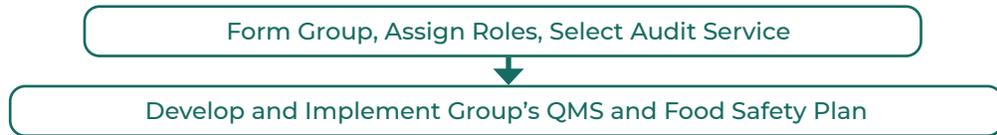
A GROUPGAP YEAR

ADAPTED FROM THE USDA GroupGAP USER'S GUIDE

LEGEND

■ Group Action ■ USDA Action

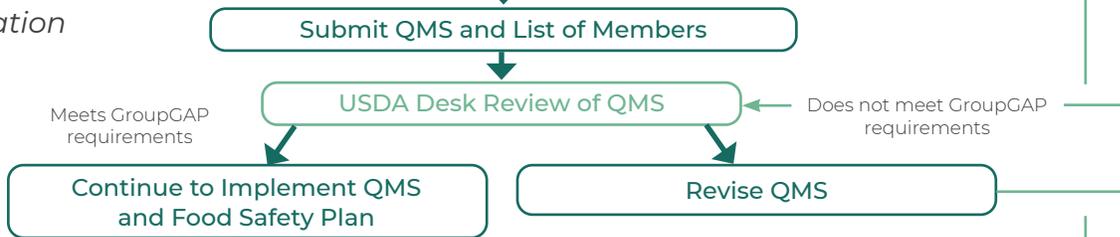
Pre-Application Process



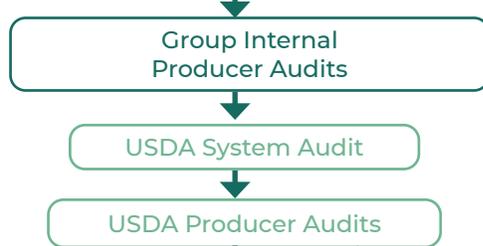
Initial Application Process



GroupGAP Participation



Audit Process



Corrective Action Process



Certification



Ongoing Participation



BENEFITS AND COSTS OF GAP PROGRAMS

A grower has several options in selecting which USDA GAP audit service is best suited to their farming operation. There are two key benefits to pursuing GAP certification.

Certification and passing the GAP audit does not guarantee that food is free of contamination; it does confirm that actions are being taken to **reduce the risk** of foodborne illness outbreaks originating from a farm. GAP certification also **opens markets** for producers to expand sales to major supermarket chains, school systems, restaurants, and other market outlets. Many retailers and foodservice buyers now require third-party GAP certification as a condition of contract.

BENEFITS

REDUCTION OF
ECONOMIC RISK AND
FOODBORNE ILLNESS

IMPROVED MARKET
ACCESS OPPORTUNITIES



POTENTIAL ADVANTAGES OF PARTICIPATION IN

GROUPGAP

■ MARKET ACCESS *Opportunities*

GroupGAP makes food safety certification accessible for small producers and opens new doors to **larger, more stable and more profitable markets**. Certified growers have opportunities to distribute to local markets, such as colleges/universities, community organizations, corporate cafeterias, early childcare, eldercare facilities, hospitals, school districts/school food authorities, restaurants, retailers, prisons, and food distributors.

Buyers can aggregate groups of producers through a central entity, such as a GroupGAP co-op or food hub. Aggregation helps buyers to meet growing consumer demand for food with verifiable commitments to growing standards and food safety by pooling broad bases of local producers who meet those standards.

■ SHARED USE SAVINGS *Operations*

GroupGAP allows for cost and labor savings from standardization. Growers who utilize the same bins, boxes or other production equipment can facilitate bulk purchasing of these items. Creating standardized forms and tracking systems, such as shared water testing results, as part of the group QMS and **food safety plan** also provides the ability to track and target cost-saving improvements.

Technical Support

GroupGAP allows for cost savings with technical assistance providers. Members share costs for a facilitator and auditors which reduces the individual producer's financial burden.

■ FOOD SAFETY CULTURE *Compliance*

GroupGAP creates and reinforces a network-wide culture of food safety with a built-in community for learning and support. Food safety compliance becomes more deeply embedded in an organization's values and practices by increasing producer knowledge and personal investment in food safety issues. The ability for producers to work together enhances the degree of food safety compliance and improves audit pass rates.

Environment for Learning

Participation in a GroupGAP group provides a welcoming environment for new members and allows all members to learn from each other and improve their practices.

COSTS

AUDIT FEES FOR AN INDIVIDUAL PRODUCER

The USDA audit rate is currently \$132 per hour. Producers are charged for the actual hours USDA invests to complete the audit process, which includes:

- All travel time
- Preparation time to review food safety plans
- Time of on-site audit
- Administrative time to review, certify and post audit results

A typical GAP audit averages \$900 - \$1600, although it could possibly fall outside of this range. The cost of an audit is variable depending on the size of the operation, the diversity of crops and processes being audited, and the distance the auditor needs to travel. These costs could be reduced by coordinating the audits – having multiple growers in the same area ready for audits on the same day, which reduces the auditor travel time for each individual grower.

Any subsequent visits for unannounced or follow-up audits are charged on the same hourly basis. **A typical unannounced audit costs \$275 - \$575.**

The Harmonized GAP Plus+ service also requires payment of **an annual \$250 fee** to maintain the GFSI certification.

AUDIT FEES FOR GroupGAP MEMBERS

Seeking certification through the GroupGAP program has been promoted as cost saving when compared to seeking certification as an individual grower because **group members pool resources and share costs of the audit requirements.** Group size, use of consultants, travel time between member farms, and QMS complexity are just several factors that influence group expenses. Audit fees for GroupGAP certification are harder to quantify.

On-site **producer farm audits** are performed by the USDA on a representative sample of farms, specifically on the square root of the number of group members. For example, based on a group size of 36 growers, 6 members' farms will have on-site audits. The USDA also performs a system audit on the group, which looks at the implementation and adherence to the group's QMS, including a review of all the internal audit records. This audit is charged at the **current rate** for the time to prepare the audit checklist, the auditor travel time, the time on-site, and the time to write the audit report.

COSTS

GroupGAP AUDIT FEES

The following table lists the associated USDA audit activities and fees at the current rate of \$132/hour.

ACTIVITY	NUMBER OF HOURS	FEES
Initial Application Review and Fee	8	\$1,056 (one-time fee)
USDA External Producer Audits USDA System Audits USDA Follow-up Audits	Actual audit time, including associated desk and on-site audit activity, and auditor travel time	\$132/hour (variable)
Continued Participation Fee	2	\$264
Group Member List Change Fee (if needed)	1	\$132

GroupGAP requires several initial investments – **the USDA Application Fee (\$1,056), the internal auditor training (\$900), and group member QMS training (variable)**. Most fees are up-front, one-time expenses, reducing the expense of certification in subsequent years. The table below identifies the variability of calculating several specific operating costs.

ACTIVITY	COST	DESCRIPTION
Auditor Training	\$900, plus travel costs	One time fee per internal auditor. Currently held virtually.
QMS Writing	40-80 hours of staff time \$10,000-\$20,000 for consultant	Resources are available for QMS writing, but groups may choose to use a consultant.
QMS Management	40-400 hours of staff time	Will depend on the size of the group, complexity of the QMS, and other factors.
Internal audits (farm and QMS)	1-6 hours of staff time per farm	Groups who choose to train internal group staff to perform internal audits will only incur travel costs and staff time. Other groups may choose to use a consultant to perform this function.



Click to learn more about QMS resources and new (free) training from the [USDA](#) and the [Wallace Center](#).

There is no minimum number of farms required to pursue GroupGAP. However, there may be a break-even or minimum number of group members for GroupGAP participation to be cost effective. Cost savings will depend on the size of the group, size of the farms, distance between farms, as well as other variable factors. The more opportunities to share costs among a group lowers the cost for the individual grower. **While GroupGAP may not work for every grower, there are many grower communities who would benefit from participation**, including growers who have access to shared-use land, growers in close proximity or communities with shared cultural beliefs.



In many cases, states offer cost-share programs, providing financial assistance for small farmers. Follow up with your State Department of Agriculture to determine if cost-share or other financial assistance is an option in your state.

Federal programs and grants that support GAP activities may also be available in some states. The new **Food Safety Certification for Specialty Crops (FSCSC) Program provides assistance to specialty crop growers who incur eligible on-farm food safety program expenses in 2022 and 2023**. The Farm Service Agency (FSA) will oversee the program and issue reimbursements. For more information, view the [FSCSC FactSheet](#) or contact your local FSA county office.

Another federal program is the USDA Risk Management Agency (RMA) Harmonized GAP Assistance Program that is available in select states.

Many buyers and retailers require liability insurance, which is unrelated to GAP but is another expense growers may have to consider. The RMA is a great source of assistance and has introduced a new insurance policy for small farmers who sell locally; see press release below for more information. Additionally, the RMA revised the plan of Whole-Farm Revenue Protection (WFRP) insurance to make it more flexible and accessible to producers beginning in crop year 2022.

- [USDA Introduces New Insurance Policy for Farmers who Sell Locally](#)
- [RMA Makes Improvements to Whole-Farm Revenue Protection](#)

Find an RMA agent: [Agent Locator | RMA \(usda.gov\)](#)

[RMA regional offices: Regional Offices | RMA \(usda.gov\)](#)



USDA GAP

MISCONCEPTIONS

MYTH

 The FSMA Produce Safety Rule and USDA GAP programs are the same and GAP certification exempts a grower from a regulatory inspection by the FDA.

FACT

 Having USDA GAP certification does not exempt a grower from a regulatory inspection. The FSMA Produce Safety Rule is a law, governed by the FDA, while GAP programs are voluntary food safety programs overseen by either third-party certification agencies or the USDA Agricultural Marketing Service (AMS). Having a GAP certification is a great way to demonstrate that a farm is adhering to effective food safety practices.

 Pursuing GAP certification is ONLY for growers who want to sell to large retailers.

 GAP certification is for any grower interested in accessing more market opportunities. Those opportunities may include large box retailers, but also may include local colleges/universities, community organizations, corporate cafeterias, early childcare, elder care facilities, hospitals, school districts/school food authorities, restaurants, prisons, and food distributors.

 Private third-party certifiers are more likely to have an unbiased auditor who are more willing to work with growers to resolve non-conformances in GAP audit findings.

 All GAP program auditors, whether federal, state or private, are held to the same standard of training and integrity, regardless of the certifying body for which they audit. The process for addressing non-conformances is the same regardless of the auditor or the agency.

 GroupGAP is another USDA audit standard like GAP, HGAP, or HGAP Plus+.

 GroupGAP is a certification option for any group of production locations and secondary activity locations that agree to operate under a shared Quality Management System and *seek certification* under one of the USDA GAP audit services (GAP, Harmonized GAP, or HGAP Plus+).

USDA GAP

MISCONCEPTIONS

MYTH

FACT



Not every farm is audited under GroupGAP, and if one member in the group fails an audit, the whole group fails.



Every farm is audited by the internal auditor assigned and agreed upon by the QMS the group established. USDA auditors will audit a representative number of the group's farms as well as the QMS plan and documentation to ensure the group is in compliance with its system. Failure of an on-site audit by a group member *does not necessarily* affect the outcome of the GAP audit.



GroupGAP is ONLY for groups of growers who are close friends and neighbors who practically grow together already.



Although GroupGAP may work for friends and neighbors, GroupGAP can work for any group of growers, regardless of existing connections or long-standing relationships. The only required relationship is the agreement to adhere to the same QMS. Additionally, organizing together through a food hub can empower growers who are otherwise isolated or struggling to find buyers for their produce.



GroupGAP growers are forced to blindly trust all other members of their group.



Growers who have agreed to seek GroupGAP certification must have trust amongst their members. This is of the utmost importance when forming a group. However, the QMS system has checks and balances in place to verify members are complying with food safety and group requirements (trust but verify). All group members agree to follow and implement the QMS, as well as acknowledge the corrective actions if food safety standards are not met. Corrective actions could range from simply removing a farm's unsafe product from distribution to group dismissal.

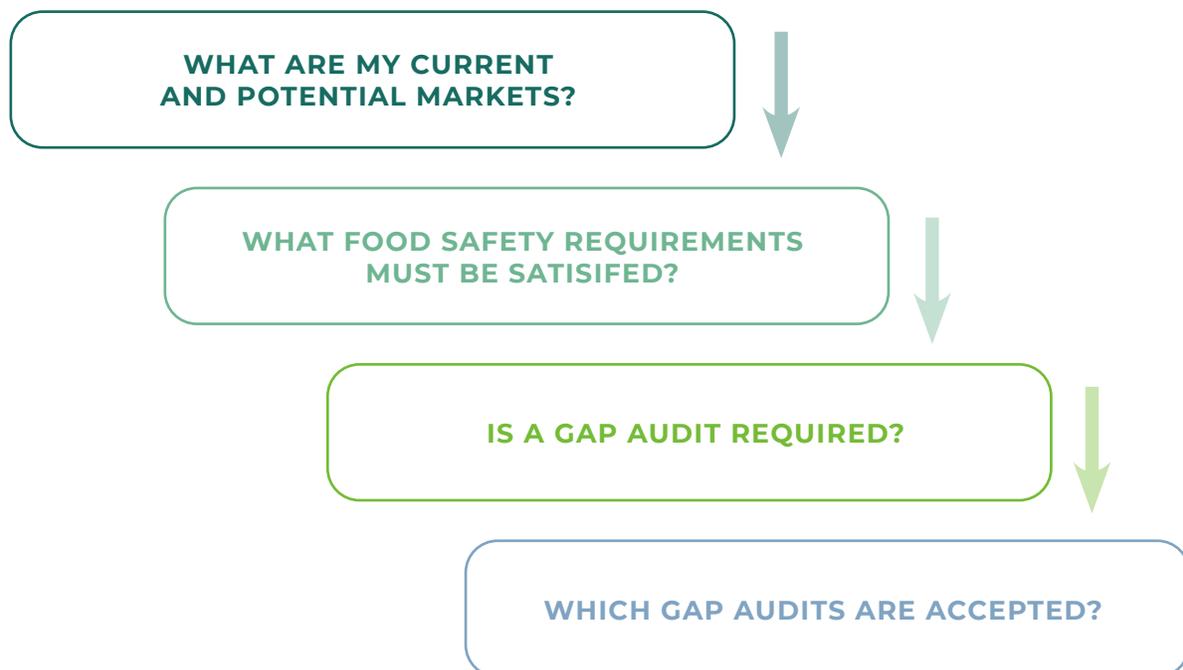
DETERMINING A GROWER'S GAP NEEDS

It is important to identify your market requirements ahead of planting to successfully sell your harvest. The following questions will help you make decisions about GAP and specific GAP products.

#1 DOES YOUR BUYER REQUIRE GAP CERTIFICATION?

ALL market sectors are looking for some level of food safety practices to be in place. How do you know if your farm operations need a GAP certification to show your commitment to industry best practices?

As with any market decision, it's important to have a discussion with your current and/or prospective buyers. Ask them what their specific food safety requirements are, and how they will verify your practices. **Do you need to have a food safety audit?**



#2 WHICH SPECIFIC AUDIT DOES YOUR BUYER REQUIRE?

To meet food safety requirements, buyers will communicate the GAP standard they will accept, commonly referred to as **buyer acceptance**.

If your buyer accepts GroupGAP, how do you know if GroupGAP is right for you?

IS GroupGAP RIGHT FOR YOU?

Here are a few considerations to help you decide:

- Do you have a group of producers who are willing to share responsibility for implementing food safety practices?
- Do you have the physical and logistical capacity to create a group?
- Does the group have a knowledgeable staff member, or is the group able to hire an individual who can write and implement a Quality Management System?
- Does the group have staff members, or does the group have the ability to hire an individual(s), who can meet the USDA auditor criteria?
- Do you know that all farms in a group do not have to grow the same specialty crops?
- Review the [Path to GroupGAP Certification Fact Sheet](#) for more information

In addition to meeting food safety standards, buyers are also looking for a wide array of product characteristics such as product variety, quality, consistency, availability, volume, price, and deliverability. With the systems approach, GroupGAP may ensure consistency in meeting customer needs, and may foster a transparency that builds customer confidence.

Since there is not a 'one size fits all' standard across all market sectors, it is vital that you communicate with your buyers, understand the requirements, and develop a well-aligned food safety program.



If you have determined that your buyer requires GAP certification, the next step is to contact the right people. They can help you receive training, develop farm assessments and food safety plans, and prepare for the audit.

CONTACT THE RIGHT PEOPLE

STATE DEPARTMENTS OF AGRICULTURE

Some states have programs that offer financial assistance to pursue GAP certification, and have marketing programs to connect growers and buyers.

COOPERATIVE EXTENSION

For GAP technical assistance, contact Cooperative Extension at land-grant universities and colleges in your state. Each state is different, but many academic institutions have a food safety, or produce, specialist who can answer your questions and walk you through the GAP process.



GAP contacts from **colleges and universities** across the nation have been compiled. They have the ability to provide assistance with the GAP certification process.

<https://nasda.foundation/gap>

NON-GOVERNMENT ORGANIZATIONS (NGOs)

Another beneficial resource are non-government organizations or non-profits specializing in farming and sustainability. NGOs are often able to provide technical and financial assistance regarding GAP programs and are willing to walk growers through the process step-by-step.



Several national **NGO contacts** for small, socially disadvantaged and underserved growers across the nation have been compiled. These NGOs specifically provide GAP resources.

<https://nasda.foundation/gap>

RESOURCES AND ACTIVITIES PROVIDED BY EXTENSION AND NGOs

- **Food Safety Modernization Act Compliance Training**
Produce Safety Rule and Preventative Controls
- **GAP Audit Certification Mentoring and Training**
- **GAP Preparedness Training**
Food Safety Plan Writing
- **Quality Management Systems Training**
- **Risk-Based On-Farm Food Safety Principles**
- **Production & Marketing Knowledge and Skills**
- **Direct Market Training**
- **Opportunity to Connect with Other Growers**



HOW TO RECEIVE TRAINING

Many university and college Cooperative Extension departments and NGOs offer mentoring and training programs. **They can provide you with specific training** (in direct marketing, produce regulations, GAP preparedness, etc.), **can show you how to conduct on-farm risk assessments, assist you in developing food safety plans specific to your farm operations, and guide you through preparing for a GAP audit.** They may even be present during your audit to ease any concerns. These resources are working for you, not against you!

Assess On-Farm Risks

Assessing on-farm risks allows a grower to identify food safety contamination hazards present on their farm. There are several primary sources of contamination:



humans

animals



soil and soil amendments



equipment and tools



agricultural water



facilities

Each source can be a means for the spread of biological, physical, or chemical hazards. It is important to examine each stage of the flow of products and identify which risks might exist. Based on a thorough assessment, GAPs or best practices can then be incorporated at the different stages of pre-planting, production, harvesting, post-harvest handling, and marketplace handling in order to reduce and mitigate the risks. Using this assessment, you can create your food safety plan, which will become a working document for your farm.

Virginia Tech Cooperative Extension created an Assessing On-Farm Produce Safety Risks fact-sheet series; the link below will connect you to these factsheets. This series documents the multi-stage process of preparing for GAP certification and is an example of the type of resources available to growers. Additional produce safety resources and training modules can be found at the [Northeast Center to Advance Food Safety Clearinghouse](#) and the [Food Systems Leadership Network](#).

-  Performing a Hazard Analysis
-  General Practices
-  Pre-Plant Stage
-  Production Stage

-  Harvest Stage
-  Post-Harvest Handling Stage
-  Preparing for GAP Certification

Contact your local extension departments to determine if they also have resources specific to your state.



https://www.pubs.ext.vt.edu/tags.resource.html/pubs_ext_vt_edu:on-farm-food-safety

DEVELOP YOUR FOOD SAFETY PLAN

Consumers and retailers demand accountability when it comes to producing, buying and selling fresh produce. Developing, implementing and auditing a food safety plan are essential steps in obtaining GAP certification and can reduce both health and business risks for consumers and growers. **The food safety plan is comprised of information on land use, worker health and hygiene, restroom and sewage, water use, animals, manure, harvesting and packing equipment and containers, and traceability.**

Since each grower's conditions and operations are different, food safety plans need to be farm specific. Check with the contacts previously mentioned to see what resources they can provide, such as audit templates that can be downloaded and edited to include specific farm information.

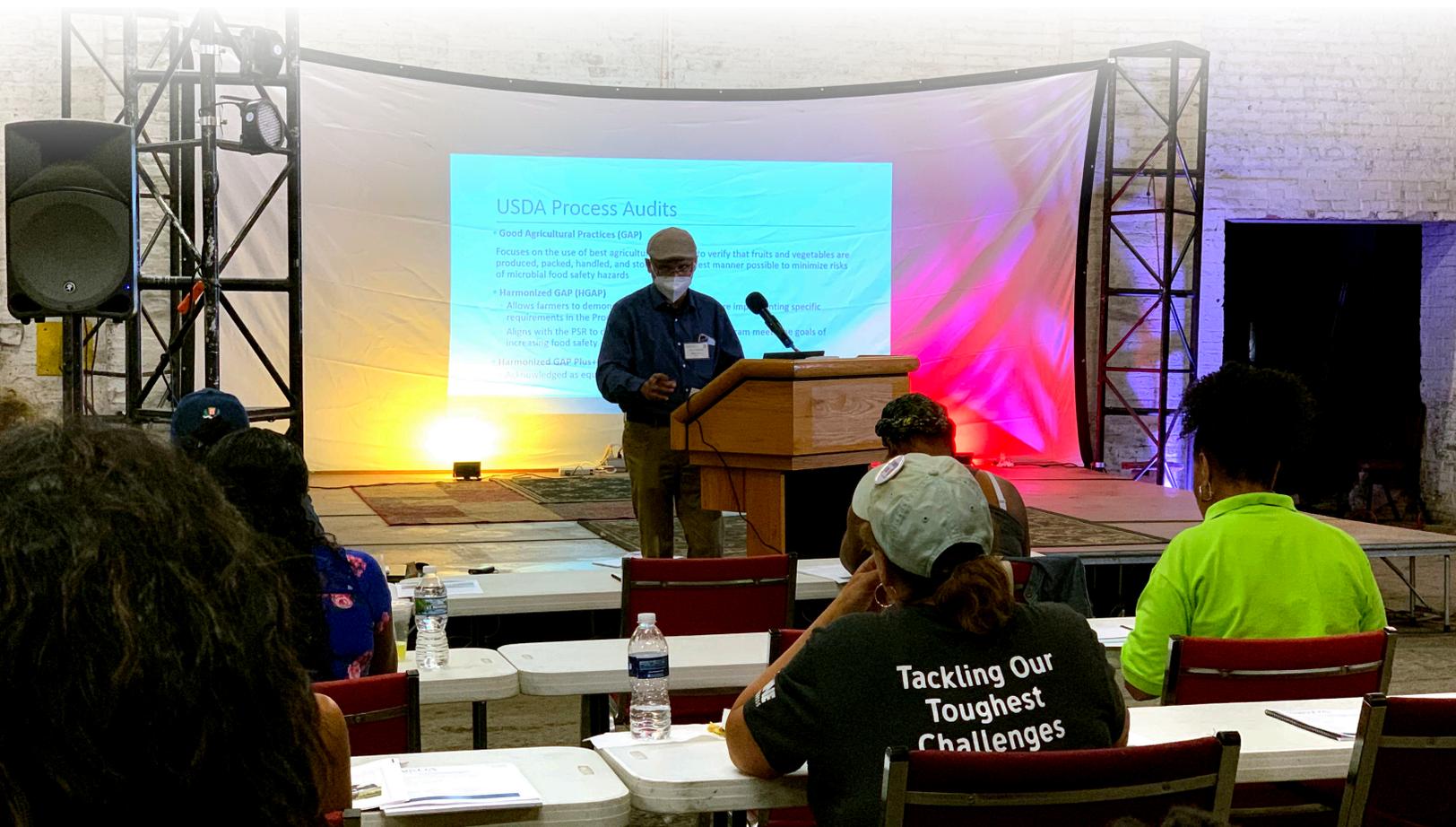
AUDIT PREPARATIONS

To prepare for an audit, growers will find that a checklist can be very beneficial. Each USDA audit standard has its own checklist which details the farm operations covered under that standard.



- [GAP](#)
- [Harmonized GAP](#)
- [Harmonized GAP Plus+](#)

Click to access the checklist for each standard.





AUDIT PREPARATION CHECKLIST

1) Prepare Documentation (Audit Standards Checklists)

2) Request an Audit

- Complete the Request for Audit Service [Form SC-237A](#).
- Submit to USDA or State Auditor office ([Local Specialty Crops Inspection Division audit offices](#) which provides a list of states who are contracted to conduct USDA GAP audits).

3) Schedule the Audit

- Complete the [SC-430 Vendor Form](#) and submit to USDA or State Auditor office. The office will confirm receipt of the audit request and provide more information about the program, procedures and scheduling the audit.
- Complete an [Agreement for Participation in Audit Services form SC-651](#) and submit directly to the auditor or as designated by the audit office scheduling the audit.

4) The Audit

Your auditor will arrive on-site as scheduled to review your food safety plans, records, and ask you questions about your operation. Following the record review, the auditor will observe harvest or post-harvest activities before closing the audit. As mentioned, your extension specialist or the NGO you are working with may be by your side during your audit.

5) After the Audit

Make sure your food safety plan manual is kept up-to-date and current on any changes made to the USDA GAP audit checklists.

6) Share the Audit

Do you want to make sure your buyers see the positive results of your USDA GAP audit?

Auditees who successfully complete the USDA GAP certification are posted to the USDA website, receive a certificate, and receive a copy of the audit report. These can be personally shared with your buyers.

In addition, the USDA Specialty Crops Inspection Division (SCI) can upload your USDA audit report to the Azzule Systems database. When you complete your [Agreement for Participation in Audit Verification Programs \(SC-651\)](#), check the Azzule Systems box to indicate your permission for the audit upload. For the report to be uploaded, please send an email to SCAudits@usda.gov to request the service. SCI charges one hour at the current audit rate (\$132/hour) per PDF upload. You must pay the bill for the upload to maintain your certification listing on the USDA website. Your auditor will provide you with information on how the billing will work.

RESOURCES

USDA ALIGNS HARMONIZED GAP PROGRAM WITH FDA PRODUCE SAFETY RULE

The USDA and the FDA have aligned USDA's voluntary Harmonized GAP Audit Program with the FDA's Food Safety Modernization Act Produce Safety Rule. **This alignment is the first step the federal government will take to streamline the complex regulatory and market requirements for America's specialty crops sector.**



Access USDA/FDA Resources

<https://www.ams.usda.gov/sites/default/files/media/>

A FARMER'S HANDBOOK TO THE USDA HARMONIZED GAP STANDARD VERSION 1.0 (2018)

The Farmer's Handbook for the USDA Harmonized GAP Standard is **intended to assist small and mid-scale produce operations in preparing to meet the requirements of that audit, and so improve their opportunities to access markets for fruits and vegetables.** The Handbook was developed based on challenge areas small and medium-scale produce operations have consistently encountered in meeting the requirements of the FSMA-aligned USDA HGAP audit.

As a companion to this Handbook, the Carolina Farm Stewardship Association provides templates for conducting key risk assessments and for keeping certain critical records.



Access templates from the Carolina Farm Stewardship Association

https://www.carolinafarmstewards.org/wp-content/uploads/2019/06/HGAPmanual_v09-web-printable.pdf

FOOD SAFETY CERTIFICATION FOR SPECIALTY CROPS (FSCSC) FACTSHEET

The new Food Safety Certification for Specialty Crops (FSCSC) Program **provides assistance to specialty crop growers who incur eligible on-farm food safety program expenses in 2022 and 2023.** Eligible expenses include the development of or updating food safety plans, food safety certification costs, certification upload fees, microbiological testing for products, soil amendments and water, as well as training. The Farm Service Agency (FSA) will oversee the program and issue reimbursements. For more information, view the FSCSC FactSheet or contact your local FSA county office.



Access FSCSC FactSheet

<https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdafiles/FactSheets/2022/fsa-fscsc-fact-sheet-2022.pdf>

RESOURCES

WALLACE CENTER GROUPGAP/GAP/FOOD SAFETY RESOURCES

The Food Safety and Quality Community of Practice (formerly called the GroupGAP Community of Practice) is a place where individuals working to provide scale-appropriate and culturally-appropriate food safety technical assistance, training, and certification to local farms and food businesses come together to talk about best practices, lift up good ideas, work through common challenges, and build relationships. The Community of Practice is hosted on the Wallace Center's [Food Systems Leadership Network](#). An online discussion group and meet-up on Zoom occurs on the first Wednesday of the month from 1-2:30 PM EST.

Join the discussion group: <https://foodsystemsleadershipnetwork.org/groups/food-safety-and-quality/forum/>

Register for the monthly call series: https://us02web.zoom.us/meeting/register/tZYqfuGtqTgqHdExCSGQRxVLIYzTRIUIJ_rEM



Access GroupGAP/GAP/Food Safety resources from the Wallace Center

<https://foodsystemsleadershipnetwork.org/resource-library/topic-areas/food-safety-and-quality/>

NEW (AND FREE) TRAINING FROM THE WALLACE CENTER: QUALITY MANAGEMENT SYSTEMS FOR FOOD AND FARM BUSINESSES

FOOD SYSTEMS
LEADERSHIP NETWORK

Quality Management Systems (QMS) are an incredibly powerful tool for businesses large and small – including food and farm businesses. But what are they, really? How do you actually implement one? What are they good for? The Wallace Center has partnered with Food Business QMS mastermind, Phil Britton of Fresh Systems, LLC to design **a free, self-paced primer course to walk you through the ins and outs of building and using a QMS to benefit your food business.**

We'll look at how a QMS can help increase efficiency, build resiliency, optimize resources, continually improve, and ultimately empower your organization to better serve your customers. This course is designed for food hubs, USDA GroupGAP groups, and other food businesses interested in the benefits a QMS can provide. This course builds on the content in the [QMS Guide for Farms and Food Businesses](#), and is designed to take you deeper into the practicalities of designing, implementing, and using a QMS. You can work through this course on your own, at your own pace, or go through it together with a cohort of your peers.



Access Wallace Center Training

<https://foodsystemsleadershipnetwork.org/courses/quality-management-systems-training/>



KEY TERMS

■ **AUDIT (Food Safety/Producer Farm)**

The objective of a food safety or producer farm audit is to review a food safety system and documentation to ensure that appropriate risk mitigation practices are in place and followed.

■ **BUYER ACCEPTANCE**

Buyer acceptance refers to whether a buyer will accept USDA GAP and/or other third-party audit certification schemes from their suppliers.

■ **FOOD SAFETY MODERNIZATION ACT**

The Food Safety Modernization Act (FSMA) shifts the focus from responding to foodborne illness to preventing it. Enacted in 2011, seven major rules were finalized to implement FSMA, including the Produce Safety Rule. Rules were designed to take clear specific actions that must be made at different points in the global supply chain for both human and animal food to prevent contamination.

■ **FOOD SAFETY PLAN**

A food safety plan is a written document that addresses audit checklist questions to show a grower's understanding of on-farm food safety risks and practices, and to document what the operation is doing to mitigate the identified contamination risks.

■ **GLOBAL FOOD SAFETY INITIATIVE BENCHMARKING**

The Global Food Safety Initiative (GFSI) is an international industry network created to find solutions to reduce food safety risks, audit duplication and costs while building trust within the entire supply chain. Within GFSI, benchmarking is a procedure by which a food safety-related scheme is compared to the GFSI Guidance Document. The process is intended to be executed in an independent, unbiased, technically proficient and transparent manner by a third-party audit.

■ **GAP AUDIT PROGRAM**

Good Agricultural Practices (GAP) audits are voluntary, third-party (USDA) audits that focus on the use of best agricultural practices to verify that fruits and vegetables are produced, packed, handled, and stored in the safest manner possible to minimize risks of microbial food safety hazards.

■ **GOOD AGRICULTURAL PRACTICES**

Good Agricultural Practices (GAPs) are best practices that target specific risks identified by an on-farm risk assessment and are designed to minimize the risk of foodborne illness caused by contaminated fresh produce.

■ **GROUP**

Under GroupGAP, a group consists of producers and/or supply chain partners, that may include food hubs or other marketing organizations.

■ **GroupGAP CERTIFICATION PROGRAM**

The USDA GroupGAP Certification Program is a certification option that allows individual farmers to certify their practices together as part of a centrally-managed group, meeting the latest FSMA requirements and certifying to either GAP, Harmonized GAP, or Harmonized GAP Plus+ GFSI Equivalent audit standards.

■ **HARMONIZED GAP AUDIT PROGRAM**

Harmonized Good Agricultural Practices (HGAP) audits are one of USDA's audit services. This audit service includes requirements which address the minimum requirements of the Producer Safety Rule, as well as industry best practices and Good Agricultural Practices.

■ **HARMONIZED GAP PLUS+ AUDIT PROGRAM**

Harmonized Good Agricultural Practices Plus+ (HGAP Plus+) audits are one of USDA's GAP audit services. This audit builds on the requirements of the HGAP audit and has been recognized for technical equivalence by Global Food Safety Initiative (GFSI).

■ **MARKET ACCESS TOOL**

A market access tool is a process or procedure designed to help farmers, ranchers, and food businesses of all sizes gain entry into new commercial markets for their products.

■ **ON-FARM RISK ASSESSMENT**

An on-farm risk assessment identifies food safety contamination hazards present on a grower's farm.

■ **PRODUCE SAFETY RULE**

The Produce Safety Rule (PSR) is one of the seven food safety regulations that are part of the Food Safety Modernization Act. The PSR sets a series of standards for the safe growing, harvesting, packing, and holding of produce grown for human consumption. The Food and Drug Administration (FDA) is responsible for the oversight and enforcement of the PSR.

■ **QUALITY MANAGEMENT SYSTEM**

A Quality Management System (QMS) is a collection of business processes focused on achieving a quality policy and quality objectives to meet your customer requirements. A QMS addresses a group's organization structure, policies, procedures, and the resources needed to meet a business's goals; for example, group food safety certification.

THANK YOU TO OUR CONTRIBUTORS



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