

# NASDA FOUNDATION



## Education and Outreach: Removing Barriers to USDA GAP Programs

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GAP PILOT STAKEHOLDER TRAINING

# Cooperative Agreement Objectives

Develop and pilot a strategy to address barriers to USDA GAP Programs

- GroupGAP
- Socially disadvantaged and historically underserved growers

Promote the utilization of USDA GAP Programs with the new strategy

- Toolkits as resources to provide education and outreach
- Partnership model for delivery



Photo credit: Michael Howard, Eden Place Farms



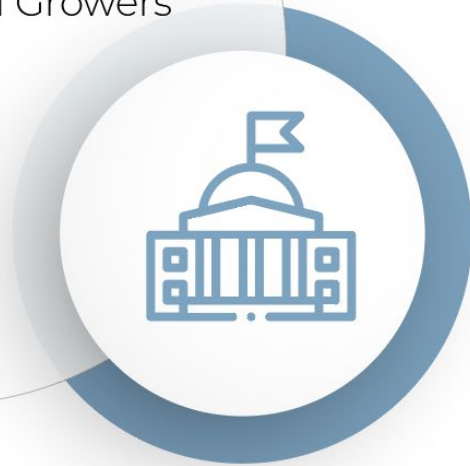
Cooperative  
Extension



Socially Disadvantaged  
& Underserved Growers



Non-Governmental  
Organizations



State Departments  
of Agriculture

# Partnership Model

Education and Outreach:  
Removing Barriers to USDA  
GAP Programs

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Removing  
**Barriers**  
to USDA GAP Programs



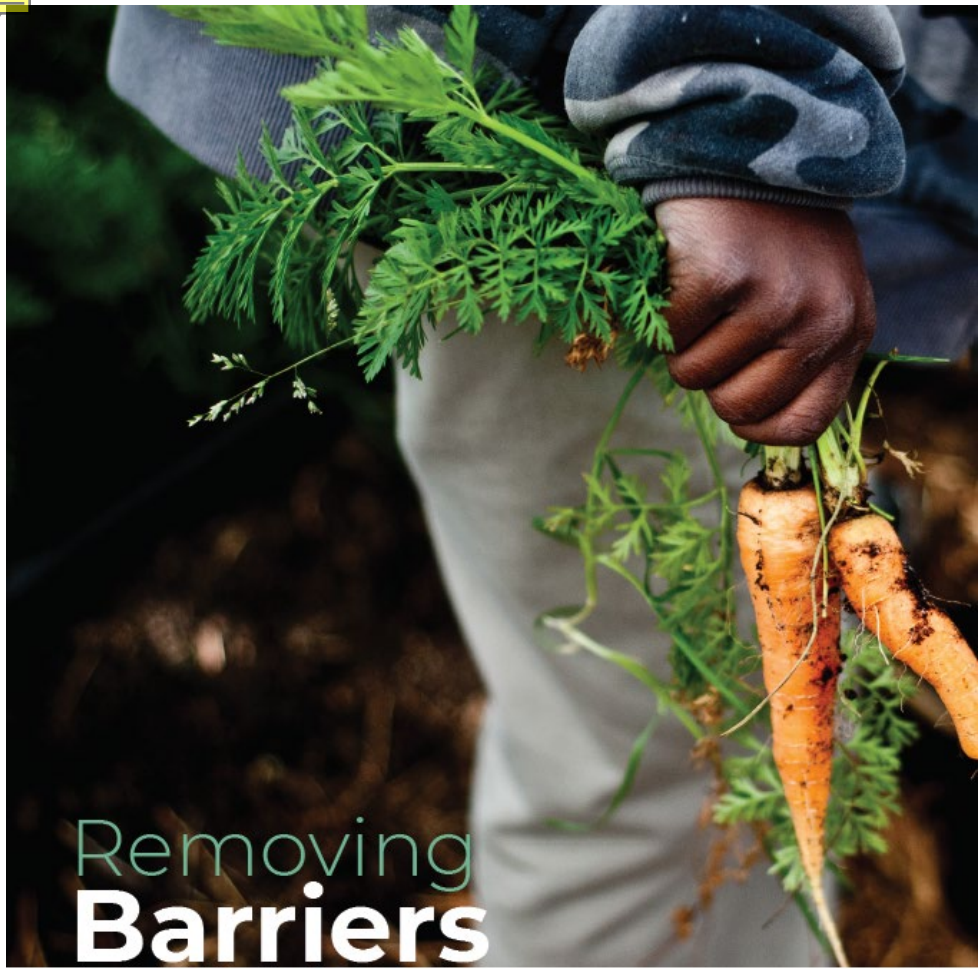
SHAREHOLDER EDITION  
**TOOLKIT**

# Stakeholder Toolkit

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Designed as a resource for our stakeholders outlining the NASDA Foundation's education and outreach program to address barriers to USDA GAP Programs

- Build and Assess Partnerships
- Implement the Grower Toolkit
- Highlight GAP Funding and Marketing
- Guide for Program Implementation



## Removing Barriers

to USDA GAP Programs

**NASDA**  
FOUNDATION

GROWER EDITION  
**TOOLKIT**

# Grower Toolkit

Designed for growers as a resource of information about USDA GAP Programs, and GroupGAP

- Grower GAP Needs
- Key Information
- Misconceptions
- Cost Breakdown
- Training and Technical Assistance
- Important Contacts



# The GAP Audit Program

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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.

- *Voluntary* and are conducted by a USDA-certified auditor
- *Verify that fruits and vegetables are* produced, packed, handled, and stored to minimize risks of microbial food safety hazards
- *Occur on a scheduled basis* at least once a year during harvest or post-harvest activities



## GAP CERTIFICATION DOES NOT GUARANTEE THAT FOOD IS FREE OF CONTAMINATION

- ✓ Actions are being taken to reduce the risk of loss and outbreaks originating from a farm.



- ✓ Opens markets for producers to major supermarket chains, school systems, restaurants, and other market outlets.



# Process Audits

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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 (GAP)**

- **Harmonized GAP (HGAP)**

Allows growers to demonstrate to buyers that they are implementing specific preventative measures/requirements from the Produce Safety Rule (PSR)

- **Harmonized GAP Plus+ (HGAP Plus+)**

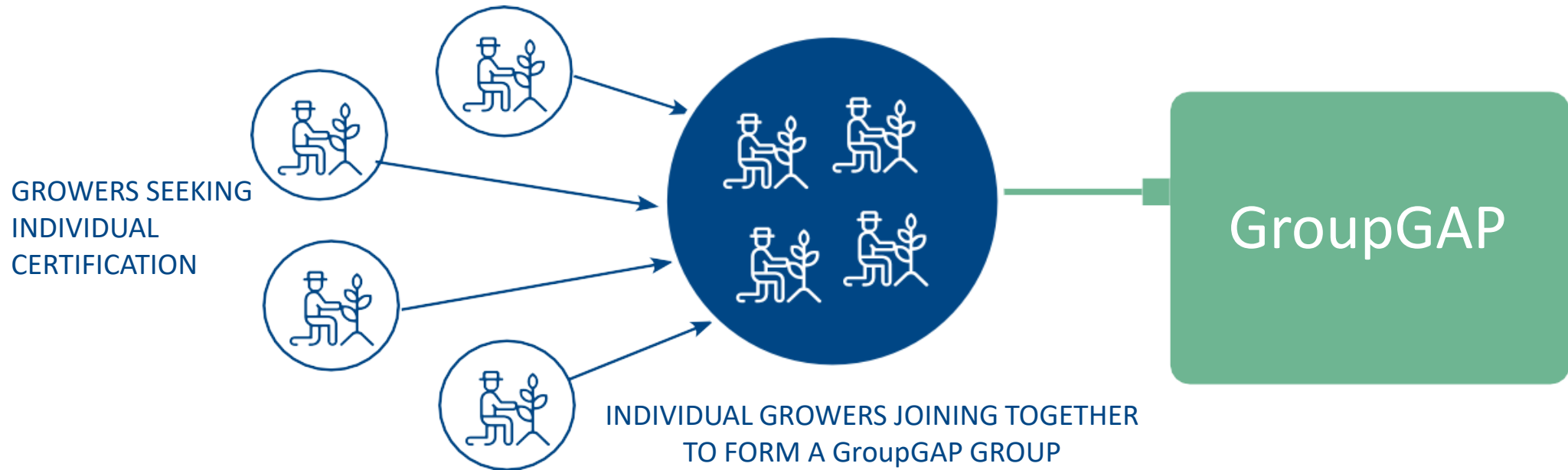
Acknowledged as equivalent to the GFSI Technical Equivalence Requirements



# USDA System Audit: GroupGAP

GroupGAP allows individual farmers to certify their practices together as part of a centrally-managed group to address food safety cooperatively.

Certify to either GAP, Harmonized GAP, or Harmonized GAP Plus+ audit standards





A collection of independent farms organize to create a Group.

Develop and implement a shared Quality Management System (QMS) and food safety practices.

A Group Manager takes responsibility for implementation of the Group's QMS.

Internal auditor(s) performs audits of all the group members' farms.

USDA audits the Group's QMS, internal records and a ratio of farms. If the group passes, they will be issued a GroupGAP Certification.

# GroupGAP Requirements



# Forming a Group

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## 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?

## Develop rules in the QMS

- Policies and corrective actions

# Potential Benefits of Participation in GroupGAP

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## MARKET ACCESS

### *Opportunities*

- Makes food safety certification accessible for small producers
- Opens new doors to **larger, more stable and more profitable markets**



# Potential Benefits of Participation in GroupGAP

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## SHARED USE SAVINGS

### *Operations*

- Allows for cost and labor savings from standardization – bins, production equipment and forms

### *Technical Support*

- Allows for cost savings with technical assistance providers – facilitators and auditors



# Potential Benefits of Participation in GroupGAP

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## FOOD SAFETY CULTURE

### *Compliance*

- Creates and reinforces a network-wide culture of food safety with a built-in community for learning and support.

### *Environment for Learning*

- Provides a welcoming environment for new members and allows all members to learn from each other and improve their practices.





# COSTS

## Audit Fees – Individual Producer

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**The audit rate is \$132 per hour.** Producers are charged for the actual hours that USDA invests to complete the audit process

- 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.**

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

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



# COSTS

## Audit Fees – GroupGAP Members

ACTIVITY	NUMBER OF HOURS	FEES
Initial Application Review and Fee	8	\$1056 (one-time fee)
USDA On-Site 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



# COSTS

## Audit Fees – GroupGAP Members

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.

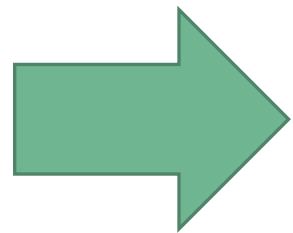


# GAP Certification ... NOT for every farmer?

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Small growers, especially socially disadvantaged and underserved growers, may find it difficult to obtain contracts:

- Can not verify to buyers that they are using best industry practices and do not have the resources to seek GAP certification
- Do not have the volume - buyers can buy in greater quantities for less money
- Will not accept a USDA GAP audit (the buyer)



**Growers who do not need GAP certification because they do not have a buyer and are not required to be certified by food safety regulations, will often not see the value of the cost, time and record-keeping commitments.**

## FOOD SAFETY CERTIFICATION FOR SPECIALTY CROPS



### Overview

The Food Safety Certification for Specialty Crops (FSCSC) Program provides assistance to specialty crop operations that incurred eligible on-farm food safety program expenses in 2022 and 2023.

These operations incur significant costs to comply with regulatory requirements and market-driven food safety certification requirements each year with little opportunity to recover increased costs.

### Who is Eligible?

To be eligible for FSCSC applicants must meet the following:

- Be a specialty crop operation;
- Have obtained or renewed a:
  - 2022 food safety certification that was issued between June 21, 2022 and December 31, 2022; or
  - 2023 food safety certification issued during calendar year 2023; and
- Have paid eligible expenses;
- Meet the definition of a small business or very small business; and
- Be located in the United States, District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, or the Commonwealth of the Northern Mariana Islands.

PROGRAM YEAR	ELIGIBLE CERTIFICATION DATE	APPLICATION DEADLINE
2022	June 21, 2022 - December 31, 2022	January 31, 2023
2023	January 1, 2023 - December 31, 2023	TBD

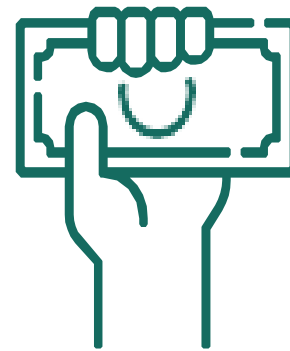
### What Expenses are Eligible?

Specialty crop operations may receive reimbursement for developing an initial food safety plan, maintaining or updating an existing food safety plan, food safety certification, certification upload fees, microbiological testing, and training.

Specialty crop operations who obtain their food safety certification through a group model under a food safety management system are eligible for their share of eligible expenses paid by the group, in addition to any eligible expense incurred individually.

### What Expenses are not Eligible?

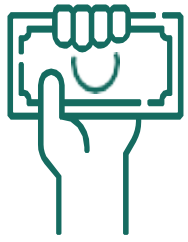
Ineligible expenses include infrastructure improvements, equipment, supplies, salaries and benefits of employees, and fees or penalties for late payment.



# New Funding Opportunity

## USDA ANNOUNCES ASSISTANCE FOR ON-FARM FOOD SAFETY EXPENSES FOR SPECIALTY CROP GROWERS

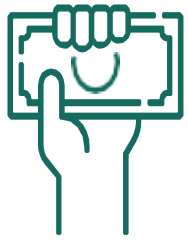
6/17/2022



# GAP Funding Resources

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- **Harmonized GAP Assistance Program**  
CT, DE, HI, ME, MD, MA, NV, NH, NJ, NY, PA, RI, UT, VT, WV, WY
- **Farmers Market and Local Food Promotion Program**  
(implemented as FMPP and LFPP)
- **Regional Food System Partnerships**
- **Specialty Crop Block Grant Program** (implemented as SCBGP and SCMP)
- **Urban Agriculture and Innovation Production Competitive Grants**  
(closed for current 2022-23 year)
- **NIFA Urban, Indoor and Emerging Agriculture Program**  
(closed for current 2022-23 year)



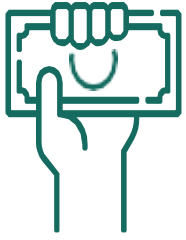
# USDA Risk Management Agency (RMA) Funding Assistance

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**Liability Insurance:** Many buyers and retailers require liability insurance, which is unrelated to GAP but is another expense growers may have to consider.

## Press Releases

- **USDA INTRODUCES NEW INSURANCE POLICY FOR FARMERS WHO SELL LOCALLY**
- **RMA MAKES IMPROVEMENTS TO WHOLE-FARM REVENUE PROTECTION**



# GAP Funding Resources – New York **(example)**

- 1. USDA Specialty Crop Block Grant (SCBG)** This funding is available for GAP audits only, plus any HGAP audits not covered by the USDA AMS-RMA funding described in bullet 2. SCBG grant is available for up to \$2,000 for 1st and 2nd time audits, and up to \$1,000 for subsequent audits.
- 2. USDA Agricultural Marketing Services- Risk Management Agency (AMS-RMA)** funding is available through USDA's Audit Services Branch in form of subsidy. This funding is for HGAP audits only. This funding covers: cost of audit, travel expense and USDA audit review.
- 3. Funding for New York's GAP Toolkit attendees (\$300+)**
- 4. Additional Information?**  
*"Good Agricultural Practices New York Agriculture and Markets"*  
<https://agriculture.ny.gov/food-safety/good-agricultural-practices>



# Marketing Resources

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## **USDA Agricultural Marketing Service**

- Connect growers to consumer outlets
- Information on food hubs, cooperatives and the **USDA Farm to School Program**
- Local food directories

## **North American Agriculture Marketing Officials (NAAMO)**

## **Domestic Market Programs**

- Retail/Wholesale Partnerships

# Determining a Grower's GAP Needs

## Does the BUYER require GAP certification?

- Open and clear communication with buyers
- Identify market requirements BEFORE planting





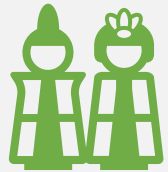


# Determining a Grower's GAP Needs

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**Which specific audit does the buyer require?**



No 'one size fits all' standard - communicate with buyers, understand requirements, and develop a well-aligned food safety program.



Will your buyer accept a GroupGAP certification?



# Resources

AVAILABLE TO GROWERS



# STATE DEPARTMENTS OF AGRICULTURE

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- Financial assistance programs to pursue GAP certification
- Marketing programs to connect growers and buyers
- Pilot state participants:



**Agriculture  
and Markets**



# COOPERATIVE EXTENSION

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- Land-grant universities and colleges
- Food and produce safety experts provide technical assistance
- Walk growers through the GAP process



Cornell University  
Cooperative Extension  
Orange County

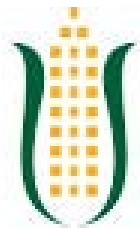


UNIVERSITY OF  
**ILLINOIS**  
URBANA - CHAMPAIGN



# NON-GOVERNMENT ORGANIZATIONS (NGOs)

- Specialize in farming and sustainability
- Technical or financial assistance
- Walk growers through the GAP process



Urban Harvest





# Technical Assistance Provided by Extension and NGOs

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Food Safety Modernization Act Compliance Training

- Produce Rule and Preventative Controls

GAP Preparedness Training

- Food Safety Plan Writing
- Quality Management Systems

GAP Audit Certification Mentoring & Training

Risk-Based On-Farm Food Safety Principles & Assessments

Production & Marketing Knowledge & Skills

Direct Market Training

Opportunity to Connect with Other Growers

# New York Grower Meeting Testimonial

May 17, 2022

17 Growers attended  
from 11 farms

Cooperative  
Extension educators  
presented the Grower  
Toolkit





# Post-New York Grower Meeting

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## Post-meeting

- 4 farms are preparing for their GAP audit
- Several farms followed up for technical assistance

Overall survey results increased growers' knowledge of USDA GAP Programs and how it will help them improve access to market and reduce foodborne illness and economic risk.





# Misconceptions

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# USDA GAP Misconception #1

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



Having a USDA GAP certification does not exempt a grower from a regulatory inspection.



# USDA GAP Misconception #2

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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.



# USDA GAP Misconception #3

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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 which certifying body for which they audit. The process for addressing non-conformances is the same regardless of the auditor or the agency.

# USDA GAP Misconception #4

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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 (either GAP, Harmonized GAP or HGAP Plus+).



# USDA GAP Misconception #5

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



Failure of an on-site audit by a group member **does not necessarily** affect the outcome of the GAP audit.

# USDA GAP Misconception #6

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GroupGAP is **ONLY** for groups of growers who are close friends and neighbors that 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.



# USDA GAP Misconception #7

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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).

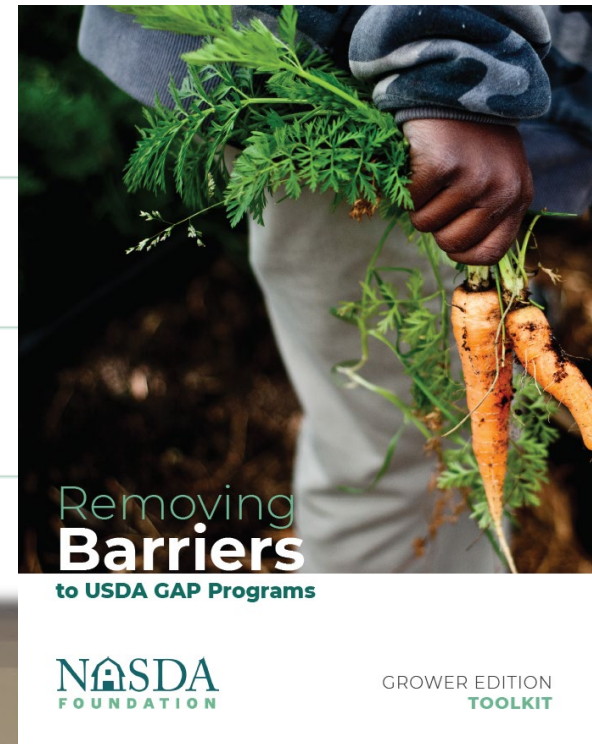


# The Grower Toolkit

How will it benefit my farm?

What do I do first?

Is there anyone to help?





Program Overview

## Overview

### Removing Barriers to USDA GAP Programs

The USDA Good Agricultural Practices (GAP) Program offers a unique way for producers to access markets and verify their use of sound agricultural and food safety practices.

These completely voluntary audits provide a way for individual producers or groups to meet annual food safety/good agricultural practices audits required by buyers. Conducted by a USDA-certified auditor, the audits generally occur on a scheduled basis at least once a year during harvest or post-harvest activities.

A woman with curly hair, wearing a light blue shirt, a green apron, and gardening gloves, is shown in profile, looking down at a plant in a field. The background is a blurred cityscape under a clear sky. The text 'Q&A' is overlaid on the left side of the image.

Q&A

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# Thank You



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