

# NASDA

FOUNDATION



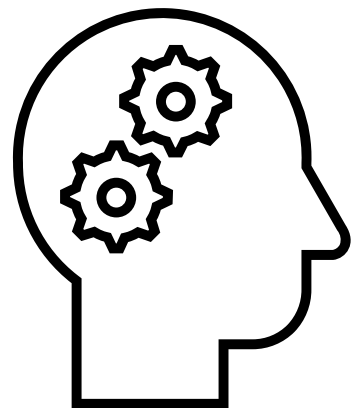
## Education and Outreach: Removing Barriers to USDA GAP Programs

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GROWER MEETING

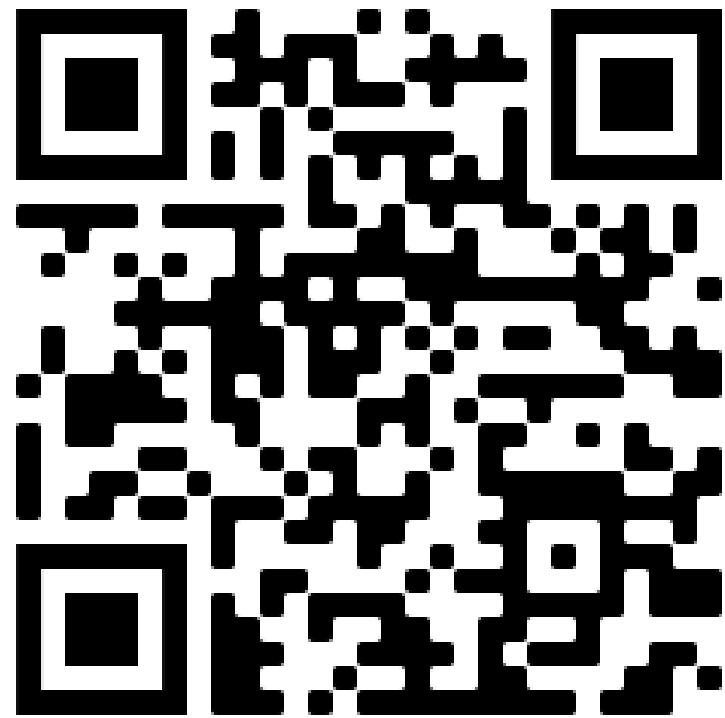


BEFORE



BEFORE

# Knowledge and Interest Check

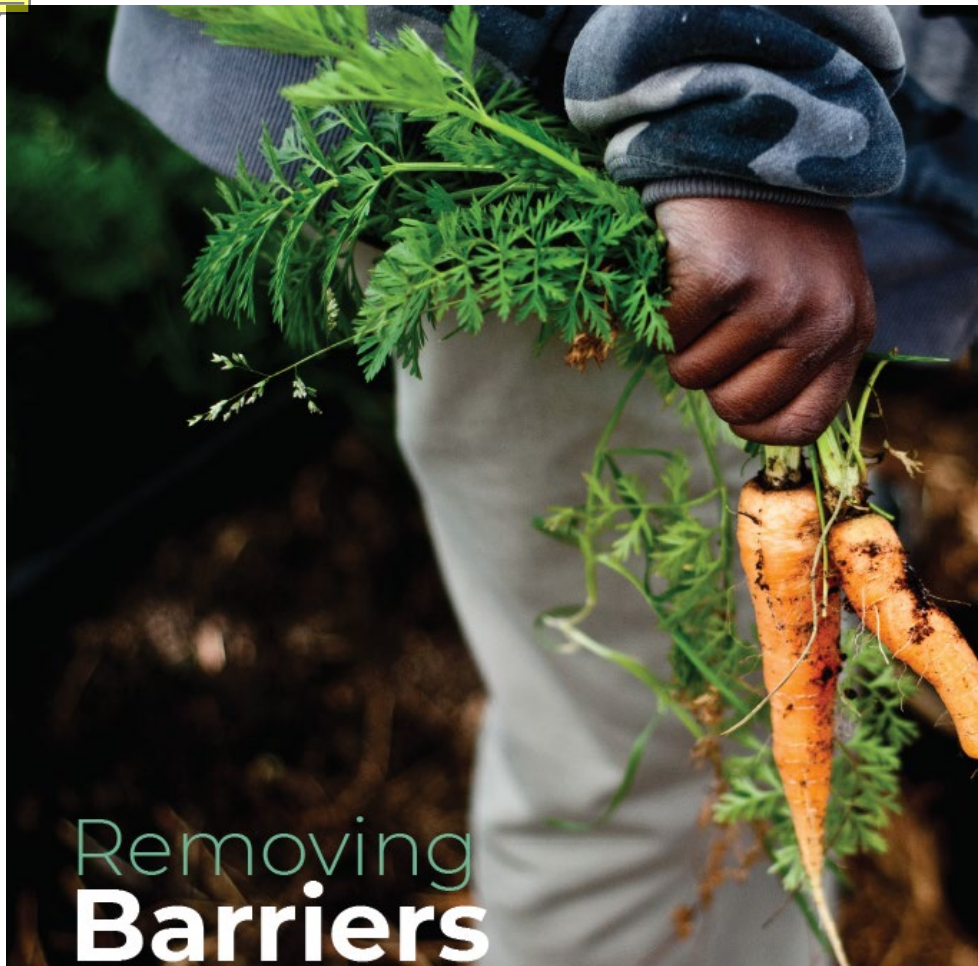




## Partnership Model

Education and Outreach:  
Removing Barriers to USDA  
Good Agricultural Practices  
(GAP) Programs

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## 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)

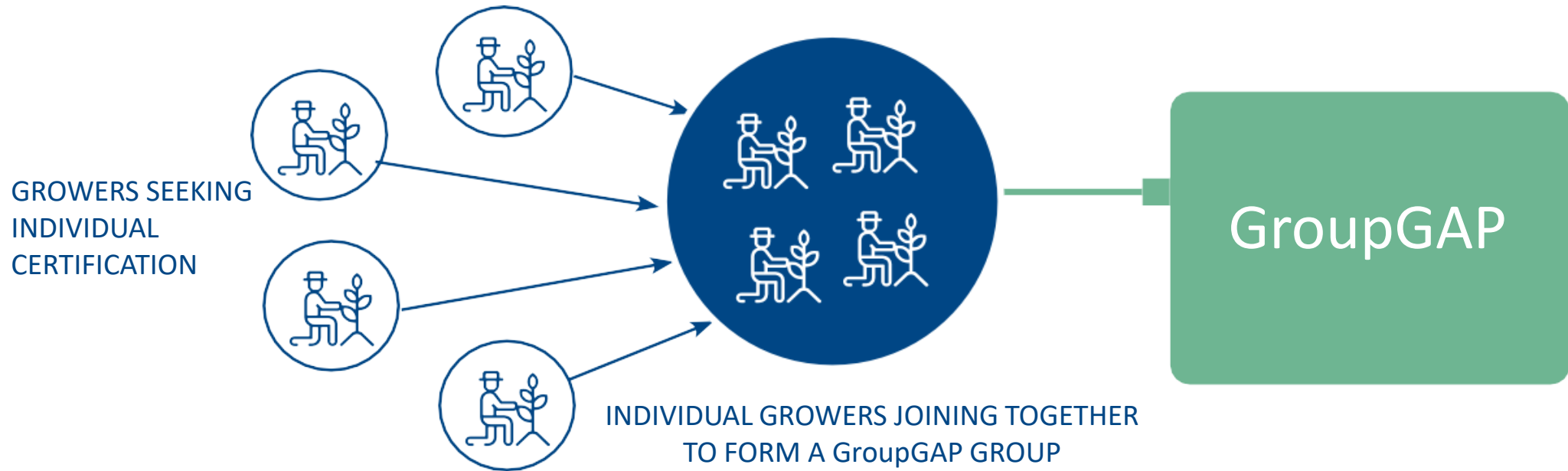
- **Harmonized GAP Plus+ (HGAP Plus+)**

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 farms. If the group passes, the group will be issued a GroupGAP Certification.

GroupGAP



# 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 current 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

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ACTIVITY	NUMBER OF HOURS	FEES
Initial Application Review and Fee	8	\$1,056 (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.

## 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

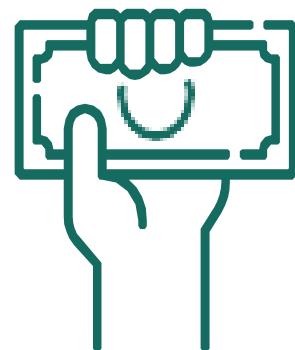
### What Expenses are Eligible?

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.

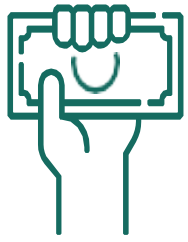


# New Funding Opportunity

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

6/17/2022

Submit to: [specialtycrop@fdacs.gov](mailto:specialtycrop@fdacs.gov)



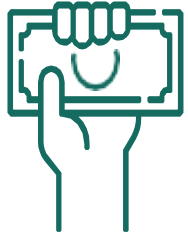
# GAP Funding Resources

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There are many grant opportunities available that will support GAP activities.

Available Federal Grants:

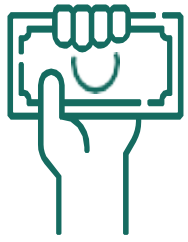
- **Farmers Market** and **Local Food Promotion Program**  
(implemented as FMPP and LFPP)
- **Urban Agriculture and Innovation Production Competitive Grants**  
| **Farmers.gov** (closed for current 2022-23 year)
- **NIFA Urban, Indoor and Emerging Agriculture Program** (closed for current 2022-23 year)



# GAP Funding Resources – State Specific

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*Insert any state funding opportunities available to growers for GAP activities*



## Funding Assistance

# USDA Risk Management Agency (RMA)

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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**

# 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

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WHAT IS AVAILABLE TO YOU AS A GROWER





# Contacting the Right People

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## **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.



*Insert SDA logo*



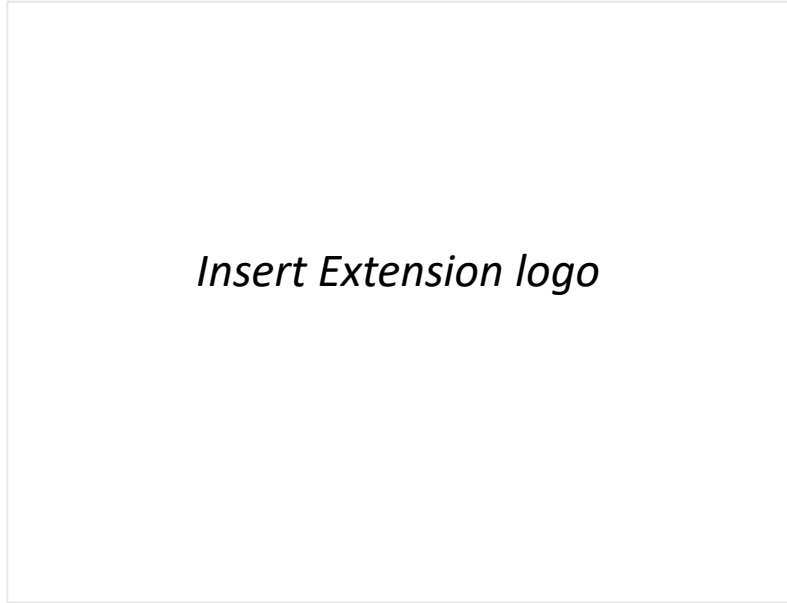
# Contacting the Right People

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## **COOPERATIVE EXTENSION**

Cooperative Extension at the land-grant universities and colleges in your state.

Each state is different, but many academic institutions have a food safety specialist who can answer your technical questions and walk you through the GAP process.





# Contacting the Right People

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## NON-GOVERNMENT ORGANIZATIONS (NGOs)

Non-government organizations or non-profits specializing in farming and sustainability.

NGOs are often able to provide technical or financial assistance regarding GAP programs and are willing to walk growers through the process step-by-step.





# Resources and Activities 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

## AUDIT PREPARATION CHECKLIST

### 1) Prepare Documentation

- Checklists for each standard – GAP, HGAP, HGAP+
- Food Safety Plan and Records
- QMS Manual (GroupGAP only)

### 2) Request an Audit

### 3) Schedule 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.

### 5) After the Audit

**6) Share the 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. All of these can be personally shared with your buyers.



# 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.



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. 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?

Is there anyone to help?

What do I do first?



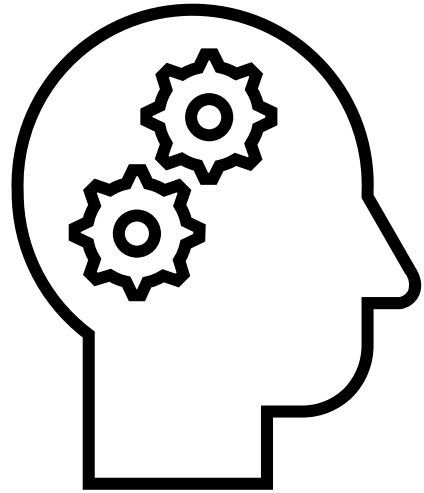
Removing  
**Barriers**  
to USDA GAP Programs

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TOOLKIT



Q&A



After



After

Knowledge and  
Interest Check



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**State Department  
of Agriculture**

Name(s), title

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Phone

Email

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**Cooperative  
Extension**

Name(s), title

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Phone

Email

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**NGO**

Name(s), title

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Phone

Email

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Contacts