

GAP program rollout is under way

Growers are part of implementation toward FDA's January 2018 deadline

by Nancy Walery

The Food Safety Modernization Act (FSMA) of 2010 standards for farming operations, known as the Produce Safety Rule, was finalized on Nov. 13, 2015, and phase-in of those rules is now under way with the earliest deadline in January 2018. However, CCH customers are increasingly demanding that all CCH growers be in even greater compliance (GFSI) ahead of the federal timelines.

Focus is on illness prevention. The focus of the comprehensive changes ushered in by the FSMA, typically referred to as the “GAP” (Good Agricultural Practices) program in the field, is on illness prevention in the food safety system using science-based minimum standards for the safe growing, harvesting, packing, and holding of fruits and vegetables grown for human consumption. In today’s global trade economy, the food safety rules will also extend beyond American shores to include pre-shipment verification requirements for importers and exporters.

FSMA vs. GFSI. FSMA’s mandates will coexist with the more stringent produce compliance requirements in the Global Food Safety Initiative (GFSI), a private international food safety standard that had been in place for all produce sold by the leading global retailers before the FSMA law was passed. Before GFSI standards existed, standards in different countries varied so widely that retailers had a hard time ensuring a safe supply chain (a result of globalization and international trade). GFSI standards allowed for retailers to hold all suppliers to the same benchmark. There are two leading GFSI level standards available in the U.S. for citrus: PrimusGFS and GlobalGAP. They cover very similar topics to FSMA, but the standards are slightly different. Current versions of these standards are *not* equivalent to FSMA, but both standards are working on an update that will bring the GFSI and FSMA requirements into alignment.

“Food safety can seem overwhelming at first, but it’s really not all that bad when you invest the time early on to prepare and take the process one step at a time,” said Jane Lynch, Technical Director for Food Safety Certifiers, a division of Organic Certifiers Inc. and a USDA accredited organic certification agency.

Preparing your farm. Lynch said there are three basic steps to bringing your farm into compliance with FSMA before obtaining certification: 1) Conducting an initial assessment by looking at the individual risks associated with your property, processes and equipment; 2) Preparing a Food Safety Plan, which is a set of procedures (and recordkeeping to document compliance) used on the farm to minimize risk of hazards and contamination; and 3) Conducting a self-audit to ensure that implementation of your food safety plan is sound.

Produce safety rules specific to farms—and more specifically to tree fruit producers—will center on taking steps to identify and prevent hazards when growing and harvesting your product based on known safety hazards. In brief, these rules include, but are not limited to, the documentation and certification of: multi-point water quality testing to ensure there is no presence of generic *E.coli* and other microbiological hazards; periodic worker training on proper health and hygiene practices; proper sanitation of equipment, tools and facilities that come into direct contact with crops; managing exposure of crops to domesticated and wild animals; and managing the use of biological soil amendments, such as raw manure and stabilized compost.

In upcoming newsletter articles in this series, *CCH Update* will focus on specific aspects of the FSMA rules and provide additional resources that will help growers better understand the regulations and get ready for certification.