

Update on Good Agricultural Practices (GAP) Audits in Tennessee

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WHAT IS A GAP AUDIT?

GAP audits are farm inspections conducted by a third party in order to verify that the farm is following good agricultural practices (GAPs). GAPs are best practices for growing, harvesting, packing, and transporting produce that minimize the risk of produce contamination and foodborne illnesses. During an audit, a third-party auditor will visit the farm, observe practices in the field and packinghouse, and review the farm food safety plan, written standard operating procedures (SOPs), and all documentation of adherence to the food safety plan and SOPs.

WHY BECOME GAP CERTIFIED?

While GAP audits are voluntary, many buyers, such as distribution centers, hospitals, supermarkets, schools, and restaurants, require all produce they purchase to be sourced from third-party GAP certified farms. The same retailers also are experiencing increased demand for locally grown produce from their customers. By becoming GAP certified, you could expand the marketability of your local produce to new marketing outlets and enhance the food safety of your farm.

WHO CONDUCTS GAP AUDITS?

GAP audits must be conducted by a third party (not the grower or the buyer). There are several organizations that conduct GAP audits, including the U.S. Department of Agriculture's Agricultural Marketing Service (USDA-AMS), Primus Labs, NSF, AIB International, Mérieux, SCS Global Services, ISO International Standards Organization, Ceres, WQS, GlobalGAP, and others. Each organization has different costs and paperwork requirements associated with their services, which should be considered when choosing an auditing scheme.

ARE ALL GAP AUDITS THE SAME?

No. Between organizations, GAP standards will vary from company to company. Within each organization, you may be able to choose from several audit schemes as well. For example, the USDA currently offers seven different GAP

audits: Harmonized GAP, USDA GAP, GroupGAP, Mushroom GAP, California Leafy Greens Marketing Agreement, Arizona Leafy Greens Marketing Agreement, and the California Cantaloupe Advisory Board.

HOW DO I CHOOSE AN AUDIT TYPE AND ORGANIZATION?

The audit you select will be decided primarily by which audit(s) your buyers will accept. Contact your buyers early and get the audit schemes that they will accept in writing. Once you have this list of audits to choose from, look over the audit standards on each organization's website to determine which one works best for your operation. All audits will cover field and packing house operations; however, some cover worker welfare or other standards as well. Additionally, cost should be a factor in audit choice.

HOW DO I PREPARE FOR A GAP AUDIT?

Once you have chosen a company and type of audit, there are a few preliminary steps you should take before scheduling the audit.

1. Review the standards for the type of audit you have selected. Does your operation meet these standards at first glance?
2. Gather all relevant paperwork and keep it easily accessible. Organize your paperwork to match the order in the audit scheme. The more organized you are, the faster your audit will go. Do you have a current farm food safety plan? Has it been reviewed in the past year? Do you have written standard operating procedures? Do they need to be updated? Do you have log sheets proving compliance for these practices?
3. Conduct a self-audit by using the organization's provided checklist to honestly assess your operation's compliance with the GAP standards. Did your farm pass or fail?
4. If your farm fails this self-audit, make necessary changes before requesting an official audit. In some cases, the standards for the audit may list suggested corrective actions.

Examples of a USDA Harmonized GAP audit standards and checklist are linked below.

Standards: ams.usda.gov/sites/default/files/media/Harmonized_GAP_Standard_Version2.pdf

Checklist: ams.usda.gov/sites/default/files/media/HarmonizedGAPsChecklist5.pdf

HOW DO I SCHEDULE A GAP AUDIT?

After conducting (and passing!) a self-audit, you are ready to schedule an audit. Visit the organization's website to find an email or phone number to begin the scheduling process. If the organization requires you to pay for the auditor's travel time, you may be able to share the travel cost with other farms in your area by coordinating audit schedules.

ARE THERE RESOURCES THAT CAN HELP WITH THE COST OF MY GAP AUDIT?

Yes! The Tennessee Department of Agriculture (TDA) has a cost-share program with grant funding to reimburse growers for 75 percent of the inspection cost, up to \$1,500. The funds are available on a first come, first served basis and the application is available at tn.gov/agriculture/farms/produce-nursery/gap.html. Growers with questions should contact Mike Brown at mike.f.brown@tn.gov or call (615) 837-5545.

The TDA also administers the Tennessee Agricultural Enhancement Program (TEAP), which is a cost-share program able to assist in improvements to farm infrastructure and equipment needed to meet GAP requirements (i.e., washable harvest bins, coolers, etc.). More information and the application can be found at tn.gov/agriculture/farms/taep.html. Growers with questions should contact producer.diversification@tn.gov or call (615) 837-5347.

WHAT ARE THE CONSEQUENCES OF A POOR GAP AUDIT?

If your operation fails to pass a third-party audit, you will have an opportunity to review and correct problems found by the auditor. You should speak to the auditor regarding deficiencies on your farm and ask which areas are the highest priority to fix. Next, you should make the necessary changes to bring the high priority areas into compliance first, then the rest of the deficient areas. After the necessary changes are made, you can schedule a follow-up audit.

USDA GAP IN TENNESSEE

Many buyers request one of the USDA audits.

In Tennessee, growers can choose between the Harmonized GAP, USDA GAP, GroupGAP, or Mushroom GAP audit types. Growers should visit ams.usda.gov/services/auditing/gap-ghp for more information on each audit type and to view the standards and checklist to conduct a self-audit.

Tennessee no longer has a dedicated in-state auditor for GAP audits. Instead, growers must contact the national USDA office and an auditor from a nearby state will be assigned to conduct your farm visit.

USDA GAPS contact information for Tennessee Growers:

Telephone: (202) 720-5021

Fax: (866) 230-9168

Email: SCAudits@usda.gov

Growers will also need to submit three forms (for first time audit) or two forms (for all subsequent audits) to the email above to request a USDA audit.

New Grower Form: ams.usda.gov/sites/default/files/media/SC430VendorForm.pdf

Request for Audit Form: ams.usda.gov/sites/default/files/media/SC237A.pdf

Agreement to Participate Form: ams.usda.gov/sites/default/files/media/SC651.pdf

ADDITIONAL RESOURCES

Below are some additional resources that will assist you in developing a farm food safety plan.

Cornell University - How to Write a Farm Food Safety Plan cornell.app.box.com/s/fyypsxmhn55dcyo8622i88vc41xphdu

Cornell University - SOPs and Log Sheet Templates cals.cornell.edu/national-good-agricultural-practices-program/resources/educational-materials/decision-trees/farm-and-packinghouse-record-keeping-sheets

University of Minnesota Food Safety Plan for You (FSP4U) safety.cfans.umn.edu

University of Tennessee Vegetable Production- Food Safety Resources vegetables.tennessee.edu/food-safety/



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