

Risk Insights

Provided by SCS Agency Inc

Implementing a Good Agricultural Practices (GAP) Program

According to the University of Florida, there has been an influx in produce-related foodborne illness outbreaks in the United States in recent years, causing many consumers to fall ill. As a result, the U.S. Food and Drug Administration (FDA) has taken steps to minimize risks to citizens by implementing a Good Agricultural Practices (GAP) program. Though these are simply guidelines, not regulations, they are designed to prevent microbial contamination of fresh produce instead of relying on corrective actions after contamination has occurred. In addition, GAP programs aim to make agricultural and packing entities accountable for their output to reduce the risk of foodborne illnesses.

Developing a GAP program at your facility will significantly increase the chances that your products will be safe for consumption. GAP programs outline the general procedures producers and packers of fresh fruits and vegetables should follow to ensure the safety of their products once they hit the grocery shelves. These programs generally outline pre-harvest practices, while an additional Good Handling Practices (GHP) program will cover both pre- and post-harvest protocol.

Though enforcing a GAP or GHP program at your facility is not mandatory by federal law, it is highly recommended to ensure product safety. In addition, some states do have requirements for companies operating under marketing orders. With these orders, handlers elect to operate under self-imposed rules to enhance the marketability of their commodity. Regulations include standardized packaging, minimum quality requirements and maximum quantity provisions. Beyond that, the FDA published the Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables to assist

producers, packers and shippers of fresh fruits and vegetables by providing information about foodborne hazards.

GAP Program Considerations

The following items are highlighted extensively in the FDA guide and should be given specific consideration when devising a GAP program at your facility:

Water quality

- Quality of water directly impacts the risk of foodborne illnesses for products. This includes flume water, processing water and water used for irrigation, mixing pesticides and other foliar-applied materials.
- Facilities must be aware of the source and quality of the water they are using.

Treatment of manure and municipal bio-solids

- Using manure and bio-solids for fertilizer can be effective with the proper precautions.



Recommendations include the following:

- Use treatments to reduce pathogens in manure, such as composting or aging.
- Remain aware that placing manure treatment and storage sites close to fresh produce can increase the risk of contamination.
- Consider the slope of the land, rainfall and the likelihood that runoff could affect fresh produce.
- Use barriers to secure storage and treatment areas in the facility.

Health and hygiene of employees

- Unhygienic practices by employees can increase the risk of foodborne illnesses if they are in contact with fresh produce. Recommendations include the following:
 - Train your employees to adopt good hygiene practices.
 - Develop a health and hygiene training program that includes hand washing practices, using the toilet safely and more.
 - Educate your employees on the signs of infectious diseases.
 - Provide employees with protection for cuts and lesions.

Sanitation areas

- Improperly managing waste in the field or packinghouse can increase the risk of produce contamination. Recommendations include the following:
 - Locate toilet facilities away from produce and easily accessible to employees.
 - Hand washing areas should be well-supplied and easily accessible.
 - Toilet facilities should be clean at all times.

Field sanitation

- Fresh produce can become contaminated from contact with soil, fertilizer, water, employees and equipment during pre-harvest and harvesting. Recommendations include the following:

- Clean harvesting containers prior to use.
- Avoid contaminating produce that is already washed, cooled or packaged.
- Keep harvesting and packing equipment clean.

Packing facilities

- Packing facilities should be kept in good condition to avoid microbial contamination. Recommendations include the following:
 - Remove dirt outside of the packing facility.
 - Use clean pallets, containers or bins, and discard ones that are damaged or extremely dirty.
 - Clean equipment, packing areas and storage facilities.
 - Develop a pest control program to reduce those hazards.

Transportation

- Establishing proper transport practices will reduce the risk of contamination. Recommendations include the following:
 - Establish good hygiene and sanitation practices for loading, unloading and inspecting produce.
 - Do not load produce into vehicles that are dirty or have an odor.
 - Do not leave harvested crops in the sun during the transportation process.

Traceback

- Facilities must be able to identify the source of their product under the Bioterrorism Act of 2002.
- Products must contain documentation, including the source of the product, the date of harvest, farm identification and a record of who handled the items.
- Products must be traceable throughout the packing, distributing and transporting process.

Know Your Resources

The FDA has created an online resource designed to allow you to examine various aspects of GAP and GHP practices,

available at <http://www.ams.usda.gov/services/auditing/gap-ghp>.

Establishing solid risk management practices is essential to minimizing the risk of a foodborne illness outbreak. To learn more about how we can assist you in developing corrective actions and promote workplace safety, contact SCS Agency Inc today.