



ROAD MAP TO FOOD SAFETY

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INTRODUCTION

The *Road Map to Food Safety* guides food hubs through the process of assessing, training, and evaluating their producer-members' food safety knowledge and protocols. The goal for each producer should be to develop a better understanding of food safety topics and primary concerns, meet Food Safety Modernization Act (FSMA) requirements as applicable, and achieve the food safety certifications that their buyers require, including GAP or Group GAP.

As part of a food hub's guidance strategy and suite of educational tools for their members, **Part 1: Guidance for Producers** can be shared as-is, with the producer as the intended audience. The section is also useful as a reference for food hub staff. **Guidance for Producers** provides basic FSMA and GAP compliance information applicable to most crops. See the chart in the "**Do I Need GAP Certification?**" subsection for a list of crops not eligible for GAP certification.

Food hubs can be instrumental in evaluating the food safety readiness of their producers, and the requirements of those wholesale buyers who will be served through the hub. A step-by-step action for food hubs is included in **Part 2: Guidance for Food Hubs**. Preparedness assessments performed by hub staff can help identify gaps in knowledge or protocols, informing the training and support needed to move producers towards meeting Federal food safety requirements and achieving certification through the Good Agricultural Practices (GAP) or Group GAP programs. Assessment survey samples are included in the **Guidance for Food Hubs**.

PART 1: GUIDANCE FOR PRODUCERS

The Road Map project was developed to help guide producers on their way to understanding and implementing best practices when it comes to food safety. An understanding of food safety is important to protect public health, business reputation, and manage liability and risk. Although a farm may not be required by law to create formal food safety plans and other procedures, these tools are highly recommended.

Definitions

- **NABC:** Northwest Agriculture Business Center
- **USDA:** United States Department of Agriculture
- **AMS:** (USDA) Agricultural Marketing Service
- **FDA:** (United States) Food and Drug Administration
- **WSDA:** Washington State Department of Agriculture
- **WSU:** Washington State University
- **FSMA (Food Safety Modernization Act):** Signed into law in 2011, the Act changed the way the Food and Drug Administration oversees food growing, harvesting, and processing activity in the U.S., and changed the approach to foodborne illness from responding to issues after they arise, to preventing them before they become a problem. There are some farms which are exempt from FSMA; see **Requirements & Best Practices - Does FSMA Apply to Me?** for details. For more details about FSMA, please see the FDA website: <https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-produce-safety>.
- **PSA (Produce Safety Alliance):**
The Produce Safety Alliance (PSA) is a collaboration between Cornell University, FDA, and USDA. This training program was created to prepare produce growers to meet the regulatory requirements outlined in the United States Food and Drug Administration's (FDA) FSMA Produce Safety Rule. PSA courses are available for those required by FSMA to obtain a certificate of training completion and others seeking a solid footing in food safety knowledge. See **Requirements & Best Practices** for details, and **EDUCATION/ SUPPORT** for training options.
- **FDA Produce Safety Rule:**
The Produce Safety Rule sets minimum standards for safe fruit and vegetable production and harvesting based on scientific understanding and based on Good Agricultural Practices (GAPs).

The full, unabridged rule can be found here: <https://www.regulations.gov/document/FDA-2011-N-0921-18558>. A user-friendly summary by Penn State Extension can be found in **RESOURCES – “Understanding FSMA: The Produce Safety Rule.”**

- **GAP (Good Agricultural Practices):** Good Agricultural Practices, or GAPs, are voluntary guidelines for produce farmers. The aim is to reduce the risk of on-farm microbial contamination that lead to food-borne illnesses. The guidelines are based on the Food and Drug Administration's (FDA) Guide to Minimizing Microbial Food Safety Hazards for Fresh Produce, which covers most fresh fruit and vegetable specialty crops. In short, whereas FSMA is a food safety law, GAP is a voluntary program.
- **Harmonized GAP:** Harmonization refers to an industry-led effort begun in 2009 to standardize the wide variety of standards and audits a sellers might face across markets and buyers into a single framework. This goal was to improve achievability, reduce costs, and as the [International Fresh Produce Association's Harmonization Initiative](#) (UF) website explains, “to reduce audit fatigue and allow operations to focus their food safety resources on achieving food safety, rather than passing audits.” Stakeholders across the produce industry were consulted by UF to create, “one audit by any credible third party, acceptable to all buyers,” acceptable nationally.
- **Mushroom GAP:** This a crop-specific audit just for mushroom growers. More information can be found on the USDA Agriculture Marketing Service website: <https://www.ams.usda.gov/services/auditing/gap-ghp/mushroom-gap>
- **Group GAP:** This program provides the means for farmers to achieve GAP certification through a group process. Groups of independent famers collectively choose which audit best fits their cooperating operations (GAP, HGAP, or HGAP Plus+) and select a group leader who develops a Quality Management System and food safety plan to which they will all adhere. Annual audits may be conducted internally or by a third-party auditor; this scheme allows producers flexibility and lowers the cost of participation. USDA audits are conducted annually but on only a portion of the group members. If those farms pass, the group jointly receives blanket GAP certification that validates certification for all members. Any growers, food hubs, or other supply chain participants can choose to create a cohort, regardless of other formal or informal connections.

Requirements & Best Practices

The Food and Drug Administration drafted the Food Safety Modernization Act (FSMA) to ensure and preserve the safety of the nation's food supply. Which producers and products those rules apply to vary depending on a number of factors:

- 1) Whether the product is for sale or personal use
- 2) Whether the product is rarely consumed raw
- 3) The scale of the individual food business considered (by annual sales or numbers of employees)
- 4) Whether the product will be subjected to further pathogen-reducing commercial processing
- 5) Whether the intended market is a processor, grocer, restaurant, or consumer.

Does FSMA Apply To Me?

FSMA's Final Rule on Produce Safety was developed to enhance food safety for consumers. More information about the Final Rule can be found at <https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-produce-safety>. In general, if 1) a farm averages \$25,000 or less in annual sales over the previous three years, or 2) the produce is rarely consumed raw (see the **RESOURCE LIBRARY – "FDA Fact Sheet Produce Safety Rule 21 CFR-112-Rarely Consumed Raw"**) and will undergo processing with a "kill step," or 3) the farm does not sell the produce, then the farm is not covered by the rule.

Larger farms may be eligible for a qualified exemption if sales averaged less than \$500,000 per year in the last three years, and sales to "qualified end-users" (consumers, or retail establishments or restaurants that are in the same state no more than 275 miles away), were greater than to all other buyer types combined.

The Washington State Department of Agriculture developed the WSDA Produce Safety Rule Status Tool to help you determine your farm's regulatory requirements:

<https://www.surveymonkey.com/r/FSMAExTool>. Although some farms are exempt from mandatory adherence to FSMA rules, all producers are advised to voluntarily follow established food safety best practices to protect consumers from contaminated food, and businesses from risk and liability.

Do I Need the Produce Safety Alliance Course?

At least one key farm staff member of any farm that sold over \$25,000 in average annual sales in the past three calendar years must be certified as having passed the PSA training course. For more about the PSA program, see <https://cals.cornell.edu/produce-safety-alliance> or **EDUCATION/ SUPPORT**.

Do I Need GAP Certification?

GAP certification is a voluntary program that may be required by certain wholesale buyers in order to conduct business with them. These might include restaurants, schools, hospitals, grocers, distributors, or other institutional buyers. Ask your buyer if they require GAP, and if so, which GAP program they accept. Even if not required, GAP certification can serve as an assurance to current and future buyers that food safety protocols and best practices have been met and verified by an authorized auditor. GAP certification can enhance an operation's market position by demonstrating a commitment to minimizing contamination risk to consumers and liability for your buyers. Following is a list of some crops covered and not covered by GAP certification, from **RESOURCE LIBRARY – “GAP Audit Program Scope”**:

Crops and processes in addition to those included in under the specialty crop definition that may be covered by USDA GAP audit services include:

Culinary herbs	Fresh tea leaves	Pea tendrils
Dried beans	Harvested maple sap	Plants
Edamame	Hops	Tendrils
Edible flowers	Microgreens	Shoots
		Wheat grass

Crops that are not covered by USDA GAP audit services include:

Algae	Mint oil and other similarly produced oils	Sea asparagus
Forage and grain products	Medicinal herbs	Seaweed
		Sprouts*

*Note: The FDA has a document dedicated to sprouts. See **RESOURCE LIBRARY – “Guidance for Industry Standards: Growing, Harvesting, Packing, Holding Sprouts for Human Consumption.”**

Which GAP Program Would I Apply For?

There are several GAP audit options for producer, including crop-specific (mushrooms) and state-specific programs (California and Arizona). A producer can apply for certification on their own, or as part of a group. Some producers may find that Group GAP lowers costs by spreading fees among members. If seeking certification to meet your buyer’s requirements, be sure to inquire which GAP certification program they accept. For details about each GAP program, please see

<https://www.ams.usda.gov/services/auditing/gap-ghp> .

How Do I Comply With FSMA?

The first step is to determine whether your operation falls under the Produce Safety Rule using such tools as the **WSDA Produce Safety Rule Status Tool** at <https://www.surveymonkey.com/r/FSMAExTool> or the FDA’s “**Standards For Produce Safety: Coverage and Exemptions/Exclusions for 21 PART 112,**” included in the **RESOURCE LIBRARY**. Next, compile the list of procedures, records, policies, and strategies you will need to comply with the rule. Topics include:

1. Employee qualifications and training (this could include the PSA Training course, or an equivalent)
2. Worker health and hygiene
3. Water used during growing, harvesting, packing, and holding/ storage
4. Biological soil amendments of animal origin (such as manure and compost)
5. Wild and domestic animals
6. Equipment and buildings
7. Post-harvest activities, such as packing and holding/ storage

A summary prepared by the National Sustainable Agriculture Coalition is saved in **RESOURCE LIBRARY – “Understanding FDAs FSMA Rule for Produce Farms.”** The summary points out that the Final Rule only explains the standards, not how to comply with them, as each operation is unique.

Growers complying with the Produce Safety Rule will need to do the following:

1. Designate at least one food safety officer.
2. Perform a hazard analysis and develop preventive controls. A food safety plan is not required but helpful to clarify and communicate procedures.
3. Develop forms for record keeping for sanitation, tracking the produce from field to delivery, pest management (including wild or domestic animals in growing areas), worker illness, employee training logs, recalls, and water testing.
4. Ensure that the food safety officer(s) and employees handling produce receive annual FDA-approved training in worker hygiene and sanitation practices.
5. Conduct testing of both surface and ground irrigation water, and postharvest (washing, cooling, icing) water. The current threshold requirements can be found here:
[https://www.fda.gov/food/food-safety-modernization-act-fsma/requirements-harvest-and-post-harvest-agricultural-water-subpart-e-covered-produce-other-sprouts#:~:text=These%20requirements%20include%2C%20but%20are,the%20intended%20purpose\(s\)%3B](https://www.fda.gov/food/food-safety-modernization-act-fsma/requirements-harvest-and-post-harvest-agricultural-water-subpart-e-covered-produce-other-sprouts#:~:text=These%20requirements%20include%2C%20but%20are,the%20intended%20purpose(s)%3B)
6. Conduct examinations of fields and produce to spot signs of animal-based contamination and record findings and corrective actions.
7. Maintain field inspection records.
8. Record cleaning and sanitizing of equipment and tools.
9. Use only FDA approved regimens for manure and compost:
 - a. Static composting that maintains aerobic (i.e. oxygenated) conditions at a minimum of 131 degrees Fahrenheit (55 degrees Celsius) for 3 days, and is followed by adequate curing, which includes proper insulation.
 - b. Turned composting that maintains aerobic conditions at a minimum of 131 degrees F for 15 days, with a minimum of five turnings, and is followed by adequate curing, which includes proper insulation.
 - c. Alternate: obtain documentation when using another method to show that the results contain the same level of microbiological quality.

The rule for raw manure is still under development. Meanwhile, the FDA states the following:

“The final Produce Safety rule requires that covered farms not apply raw manure in a manner that contacts produce covered by the rule during application. And these farms are required to minimize the potential for contact after application.

To minimize the chance of contamination, we also stated that we believe it would be prudent for farmers to comply with the USDA's National Organic Program standards related to raw manure use while the research and risk assessment is ongoing. These call for a 120-day interval between the application of raw manure for crops in contact with the soil and 90 days for crops not in contact with the soil."

<https://www.fda.gov/food/food-safety-modernization-act-fsma/raw-manure-under-fsma-final-rule-produce-safety>

Will My Farm Be Inspected?

Farms that are required to adhere to FSMA guidelines may be inspected, either by FDA, or a state agency. A farm may be selected for mandatory routine inspection, or for cause. If routine, the inspector will make an appointment to perform a site and records review. The inspection process leans towards education rather than punishment; recommendations and opportunities for self-correction are the most likely outcome should issues be identified. Repeat offenders and those reported as having food safety issues however, may undergo an unscheduled inspection, and may be fined. For more on what to expect, see the WSDA guide in the **RESOURCE LIBRARY – "What to Expect of a Produce Inspection."**

How Do I Apply For GAP Certification?

Producers applying as an individual business for GAP certification will first develop and implement a food safety program based on their own operations and produce, based on GAP standards. The program should include Standard Operating Procedures (SOP's), a person designated to oversee the program, and record-keeping including corrective actions, all of which should be written into the program description. The program should be followed to identify flaws and gaps, and then an internal mock audit performed, before scheduling a third-party auditor. This process will improve the likelihood of passing the audit. Detailed application guidance can be found in such documents as **RESOURCE LIBRARY – "USDA GAP & GHP Audit Program User's Guide."**

If pursuing Group GAP, a food hub, cooperative, or other cohort of producers applies for certification jointly. A leader is chosen to manage the application process and oversee the program. A Quality Management System (QMS) to which all members must abide is developed by the group leader for USDA approval, based on GAP standards. The group must also develop and submit a food safety plan, and record-keeping forms all members will use, that meet the requirements of whichever audit service is

selected from the list at <https://www.ams.usda.gov/services/auditing/gap-ghp>. The group leader submits the QMS, food safety plan, and a list of members and basic operational descriptions. Detailed application guidance can be found in **RESOURCE LIBRARY – “USDA Group GAP & GHP Certification Program User’s Guide,”** and **“FAQs GroupGAP.”**

How Do I Prepare For A GAP Audit?

Guidance for producers whether participating in Group GAP or on their own is available from the Produce Safety Alliance and WSDA. One way to prepare is to take the PSA Training Course. The food safety plan development discussed in the course is required to pass the inspection, and helps the operator think through their product’s journey from field to distribution. A detailed list of audit scoring criteria and things to consider is shown in **RESOURCE LIBRARY – “USDA_GAP Audit Verification Checklist Version3.”** Mock or practice audits can also help identify processes or on-site facilities that require correction or improvement.

In Group GAP, the cohort’s designated internal auditor (for whom USDA will provide training), or an external auditor, will conduct scheduled audits of all members each year and may conduct unannounced audits. Each member must agree to make their records and facilitates available for inspection as needed. USDA reviews the group’s QMS annually and performs scheduled audits of a certain portion of the group’s members each year to ensure standards are being maintained. See more suggestions in the preparation guide from Virginia Cooperative Extension in **RESOURCE LIBRARY – “A Guide to the GAP Certification Process,”** or Utah State University Extension’s **“Good Agricultural Practices (GAP): Certification Basics.”**

There are similarities and differences between FSMA and GAP criteria. Farmers already adhering to FSMA guidelines may be well positioned to pass GAP requirements. For a summary comparison between the two programs, see **RESOURCE LIBRARY – “Farm Food Safety Laws: FSMA vs. GAP.”**

Growers applying for certification and preparing for a GAP audit will want to do the following:

1. Designate at least one food safety officer.
2. Develop a food safety plan that includes food risk assessment, operating procedures and record keeping, and names the food safety officer.

3. Develop forms for keeping records on sanitation, tracking the produce from field to delivery, pest management activities (including wild or domestic animals in growing areas), worker illness, visitor logs and policies, employee training logs, recalls, cold storage temperatures, and water testing.
4. Develop a traceability protocol including record-keeping, and may include lot codes such as the date and the field designation for harvested produce on bin label. Performing and documenting a mock recall based on the recall process outlined in your food safety plan is recommended.
5. Ensure that the food safety officer(s) and employees handling produce receive annual training in worker hygiene and sanitation practices.
6. Test water three times a year for generic E.coli. For more on water requirements, see **RESOURCE LIBRARY – “GAP Water FAQ’s.”**
7. Prepare a review of the farm’s septic system and nearby sewage plants.
8. Conduct examinations of fields and produce to spot signs of animal-based contamination and record findings and corrective actions.
9. Treat or compost manure using a documented process. Have an accredited lab analyze the nutrients in the manure and record the results. Apply raw manure two weeks before planting or 120 days or more before harvest. For manure testing insights, see <https://swnydlfc.cce.cornell.edu/submission.php?id=1183&crumb=livestock%7C10>
10. Document the land’s previous uses, and the flood-prone areas.
11. Assess and record hygiene in the fields and of the field sanitation units (portable restrooms).
12. Create and document an inspection regimen for physical (EX: metal shavings, broken glass), chemical (EX: cleaners, equipment fluids), and biological (EX: manure, mold) contaminants.
13. Inspect and record cleanliness of packing materials, ice, and the wash/pack facility in general.

What Documents Are Required For GAP?

Most of the recommended templates for required record-keeping are included in the **RESOURCE LIBRARY Forms and Templates** section, downloaded from the Produce Safety Alliance article, “[Records Required by the FSMA Produce Safety Rule](#)” (the article is also available as a pdf in the resource collection: “**Records Required by the FSMA**”). Remaining templates are found within the article itself, towards the end. The article explains which records are mandatory; the format is up to the individual. If

the provided templates are not used, forms should contain at a minimum the following information, as appropriate:

- The name and location of the farm
- Actual values and observations obtained during monitoring
- An adequate description of the produce commodity in question, if applicable to the record (e.g. the commodity name such as “lettuce,” or the specific variety or brand name of a commodity such as “Monte Carlo,” and any lot number or other identifier)
- The location of a growing area or other area, if applicable to the record (such as a specific field or packing shed)
- The date and time of the activity documented

The forms in the Road Map collection meet the records requirement and pertain to the following subjects (Note: “Subparts” refer to portions of the FSMA rule):

- Records to Support a Farm’s Coverage or Exemption Status
- Personnel Qualifications and Training (Subpart C)
- Agricultural Water (Subpart E)
- Biological Soil Amendments of Animal Origin (Subpart F)
- Equipment, Tools, Buildings, and Sanitation (Subpart L)

Note that records must be readily available and accessible during the inspection and available for copying by FDA upon oral or written request. Growers have 24 hours to obtain records kept offsite, even if the farm is closed for a prolonged period. For more information, please see the PSA’s **“Records Required”** article referenced at the beginning of this section.

Where Can I Find A GAP Auditor?

There are many auditor services searchable online. The contacts provided below are not intended as an endorsement of individual businesses but as examples.

- The California Department of Agriculture summarized what to expect during an audit on their website:
<https://www.cdfa.ca.gov/producesafety/inspection/#:~:text=What%20records%20are%20required%20during,must%20be%20initialed%20and%20dated.>
- Eagle Certification Group (Dayton, OH)

info@eaglecertificationgroup.com .800.795.3641

Rachel Miller Rachel.miller@eaglecertificationgroup.com

- Agricultural Marketing Service (AMS): See “How to Request an Audit” for instructions.
<https://www.ams.usda.gov/services/auditing/gap-ghp>
- WSDA F&V Audit Services USDAGAPGHPAuditReview@agr.wa.gov (509) 249-6900

Who Can I Contact for GAP and Food Safety Support?

- WSDA: <https://agr.wa.gov/services/inspections-and-investigations/inspections/fruit-and-vegetable/contact>

Northern Region General Office

270 9th Street N.E., Suite 101-A, East Wenatchee, WA 98802

(509) 662-6161;

toll free: (866) 687-1557

Produce Safety Program: <https://agr.wa.gov/departments/food-safety/produce-safety>

Connie Fisk

Produce Safety Program Manager

producesafety@agr.wa.gov

(360) 545-2519

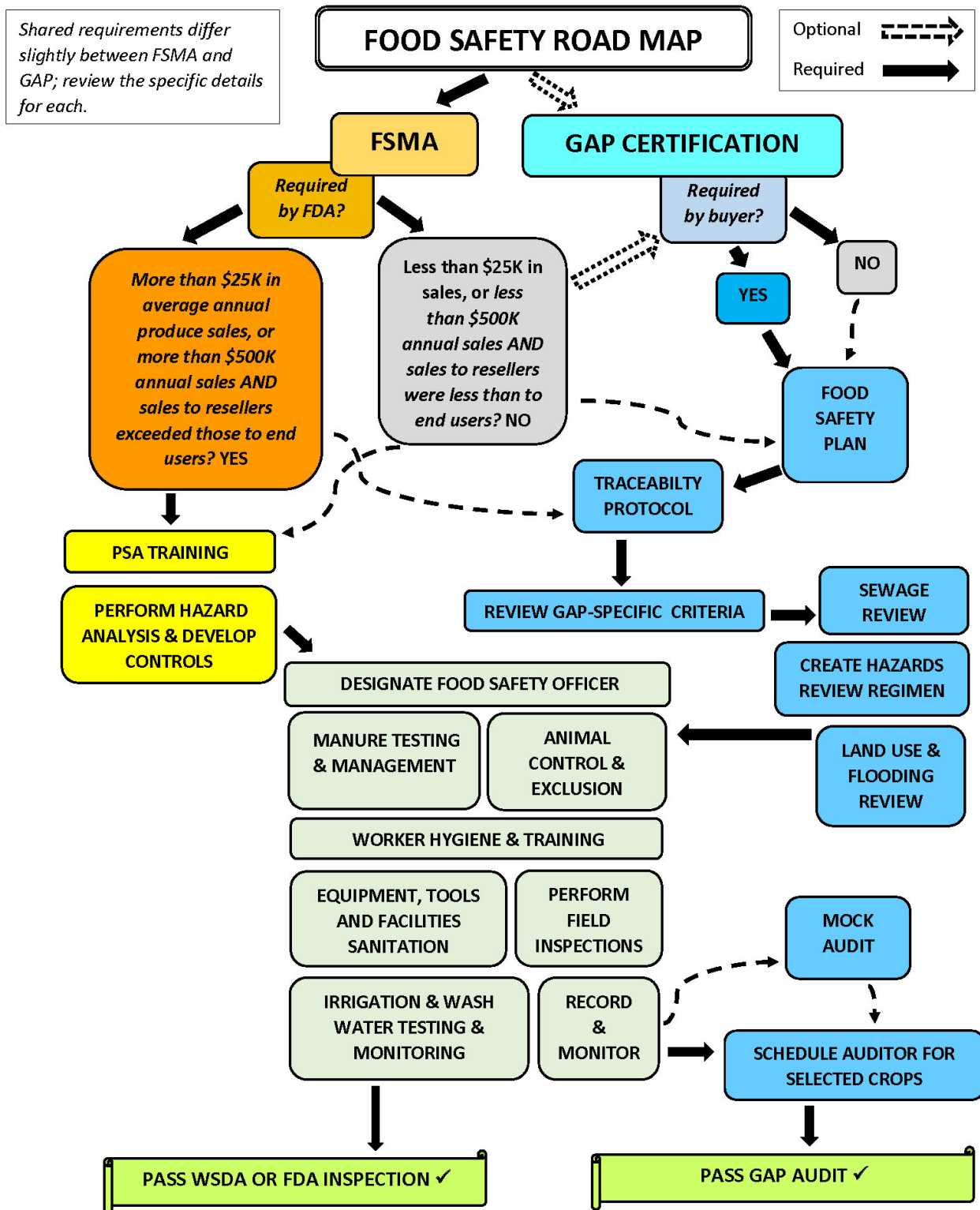
Darla Lindemeier, Fruit & Vegetable Inspection Program/ Commodity Inspection Division

DLindemeier@agr.wa.gov

(509) 398-1353

- WSU: <https://foodsafety.wsu.edu/>
Dr. Claire Murphy, Produce Safety Extension Specialist claire.murphy@wsu.edu
- Agricultural Marketing Service (AMS):
<https://www.ams.usda.gov/services/auditing/gap-ghp/audit>
SCAudits@usda.gov
(202) 720-5021

- Cornell University: <https://cals.cornell.edu/institute-for-food-safety>
Nancy Long foodsafety@cornell.edu
(315) 787-2288
- Northwest Agriculture Business Center
info@agbizcenter.org
(360) 336-3727



PART 2: GUIDANCE FOR FOOD HUBS

Producers may need to lean on food hub staff to help them reach the level of understanding and preparedness required to pass food safety inspections and achieve certification. Leading a cohort of producers through the process is an efficient and mutually supportive strategy to guide members to achieving food safety goals. At least one food hub staff member should be assigned as food safety officer and GAP readiness coordinator to guide the process and monitor producers' GAP readiness, whether as individuals or in a group. Tasks may include:

- Delivering surveys and interviews and summarizing results
- Facilitating training (individually and in groups), resource access, and providing staff support to ensure that all producers in the cohort have what they need to move forward
- Keeping track of the training delivered and noting producer progress
- Facilitating readiness evaluations prior to the certification application and formal audit scheduling

Staff time will vary between food hubs, and will depend in part on the number of members involved and the members' current food safety knowledge and experience. For each group of members, the time estimate is as follows:

- | | |
|--|------------------|
| • Survey design and delivery including follow up: | 3-6 hours |
| • Results summary, analysis, and report development: | 6-8 hours |
| • Training selection and action plan: | 4-6 hours |
| • Training delivery facilitation: | 8-15 hours |
| • Effectiveness evaluation and additional support | 8-12 hours |
| • Food safety plan reviews and mock audit support | 20-25 hours |
| • <u>GAP certification application</u> | <u>1-3 hours</u> |

TOTAL ESTIMATE	50-75 hours
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STEP 1: Member Assessment. Evaluate producer members' knowledge gaps and readiness to develop food safety plans for their individual operations via interviews and surveys.

STEP 2: Buyer Assessment. Evaluate the needs of food hub buyers to determine which food safety certifications they require.

STEP 3: Training Assessment. Based on survey and interview responses from the individual surveys, identify which of the available training materials are best suited to help producers better understand food safety and develop their own food safety plans, aligned to GAP criteria or other as indicated by the buyer survey. Producers could be grouped into those who are beginning, somewhat familiar with, or experienced with food safety to deliver more targeted training.

STEP 4: Training access plan. With the information gained from producer surveys and certification goals from buyer surveys, develop a plan to facilitate access to the appropriate training courses and support materials, and determine educational methods best suited to prepare producers to meet requirements. Training delivery methods may vary depending on producer language and learning styles, and technology access and capacity.

The Produce Safety Alliance (PSA) training course is required for at least one staff member from farms covered under the FSMA rule and lays the groundwork for GAP and food safety plan preparation. See **EDUCATION/ TRAINING** to learn more about this and other training options. Additional materials are available in the **RESOURCE LIBRARY**.

STEP 5: Issue post-training evaluations to determine the success of education delivered, and whether additional training or support is needed to achieve the level of food safety understanding needed to develop a food safety plan and pass a GAP audit inspection if indicated. Tailor the support provided to the learner.

STEP 5: Set a deadline for completed food safety plans and communicate this to producer cohort members. Consider hosting workshops or facilitating the development of independent working groups with intermediate milestone goals at set intervals.

STEP 6: Food safety plan review. Identify WSDA staff and other qualified resources to critique written food safety plans and schedule initial and follow-up reviews. Some producers may require individualized support to adjust plans to meet a minimum threshold; others may self-edit. Plans should be re-submitted for a follow-up final review by a set deadline.

STEP 7: Producers should be provided with the GAP Checklist as appropriate (see **RESOURCE LIBRARY – “USDA: GAP Audit Verification Checklist Version 3”**) and perform a mock self-audit of their operations. Their food safety plans should incorporate and address the Checklist’s inspection questions. Mock audits could also be arranged through WSDA and other qualified resources.

STEP 8: Final Pre-GAP assessment and application. When the food hub GAP team is satisfied that all producers are ready based on self and third-party audits and food safety plan reviews, the final preparatory step is to submit the GAP certification application based on the group. The team might want to host a general meeting of members to get consensus that the members themselves feel ready and confident moving forward. Once certification has been achieved, Group GAP requires annual farm audits by the food safety lead or leads which will ensure that members remain in compliance. New buyers should be queried for their food safety requirements, which may include GAP or other certifications. An annual re-survey of existing buyers will ensure that customer requirements align with current standards.

Member Assessment Survey

The following is an example of an initial survey to distribute to those food hub producer members who will be applying for GAP or take part in a Group GAP cohort. The purpose is to ascertain producers' current food safety knowledge and GAP preparedness:

1. Which of the following do you do to address food safety on your farm?
 - a. Field inspections for wildlife contamination
 - b. Manure testing
 - c. Irrigation or wash water testing
 - d. Bathroom cleaning routine
 - e. Provide worker training on hygiene and sanitation
 - f. Routine cleaning and sanitation procedures (tools, equipment, bins, cooler, other)
 - g. Follow a food traceability process (field numbers, lot codes, other)
 - h. Follow a facility inspection routine (equipment, storage, tools, buildings, other)
2. Do you have at least one person named as a food safety officer?
3. About how often do you perform most food safety activity?
 - a. Describe: _____
4. Do you keep records on the actions listed above with dates, times and person responsible?
5. How do you record your food safety activity?
 - a. Blackboard or sticky notes
 - b. Notebook kept by shift manager
 - c. Standardized forms used by staff performing the activity, filed in a secure location
 - d. Other: _____

6. Do you have written procedures covering food safety activity?
7. Are posters displayed, reminding workers of food safety actions?
8. Do you have a visitor log or visitor policies?
9. Do you have a food recall plan?
10. Have you attended the Produce Safety Alliance course and received a certificate of completion?
11. Do you have a written food safety plan?

Buyer Assessment Survey

Buyer food safety certification and assurance requirements vary. To ensure that your food hub members are or will meet the needs of the buyers you serve, ask your buyers which of the following they require in order to do business with them through surveys or interviews:

Please tell us which of the following certifications and actions you require of your produce sellers:

- GMP (Good Manufacturing Practices)
- HACCP (The Hazard Analysis Critical Control Points)
- GAP/GHP (Good Agricultural Practices/ Good Handling Practices)
- Harmonized GAP
- Mushroom GAP
- SSA (Sprout Safety Alliance)
- Other: _____

Training Evaluation

To understand the effectiveness of training curricula and delivery, use post-training evaluations to gather feedback from students. Following is one example of a survey that assesses whether further training or support is required; adjust the questions according to the topics covered. Actual training effectiveness will be evident in the quality and completeness of the food safety plans produced and in mock audit results. Food safety staff are advised to apply flexibility to training and support plans and employ multiple culturally appropriate approaches in ascertaining each producer's GAP readiness.

1. How strong do you think your understanding of the following topics was before the training?

Scale on 1 (low) to 5 (high)

- a. Water management
- b. Manure / soil amendments management
- c. Employee training
- d. Cleaning, sanitation and hygiene
- e. Field inspections
- f. Record keeping
- g. Monitoring and making corrections
- h. Food Safety Modernization Act (FSMA)
- i. GAP and GroupGAP

2. How well do you understand the topics after the training? Scale on 1 (low) to 5 (high)

- a. Water management
- b. Manure / soil amendments management
- c. Employee training
- d. Cleaning, sanitation and hygiene
- e. Field inspections
- f. Record keeping
- g. Monitoring and making corrections
- h. Food Safety Modernization Act (FSMA) and requirements
- i. GAP and GroupGAP and requirements

3. Did you understand the instructor and materials clearly?

4. How was the pace of the class?

- a. Too slow
- b. Just right
- c. Too fast

5. How well could you explain the topics covered to someone else? Scale on 1 (low) to 5 (high)

6. Do you need support in understanding any of the topics covered? If yes, what do you need help with? _____

7. What can we do to help students better understand the topics or materials presented next time? _____

PART 3: EDUCATION/ TRAINING

- **Produce Safety Alliance Grower Training - WSDA Produce Safety Program**

This course prepares growers to meet FSMA regulations. Food safety plans, field and facility sanitation, pest management, worker training, manure application, and water topics. Hosted with partners such as [Washington State University \(WSU\)](#), [Washington State Tree Fruit Association \(WSTFA\)](#), [Northwest Agriculture Business Center \(NABC\)](#); most trainings occur over the winter season. See the website for updates:

<https://agr.wa.gov/departments/food-safety/produce-safety/produce-safety-trainings>

Courses are also posted on partner websites:

- NABC: contact info@agbizcenter.org (360) 336-3727 for upcoming NW Washington opportunities.
- WSU Extension: <https://foodsafety.wsu.edu/training-programs/psagtandttt/> For more information contact Cathy Blood
- More information on arranging local PSA training events is available through Cornell University: <https://cals.cornell.edu/produce-safety-alliance/training/grower-training-course>

- **FSPCA Preventive Controls for Human Food (PCHF) Participant Course** (Food Safety Preventive Controls Alliance (FSPCA))

<https://www.fspca.net/pc-human-food-preventive-controls-qualified-individual>

Standardized hazard analysis and preventive controls training course and distance education module that covers developing a food safety plan, hazards and hazard analysis, preventive controls, monitoring/ controlling, record keeping, regulatory requirements.

- **Bridging the GAP** (WSDA) – FSMA explanatory videos in English and Spanish (WSDA)

<https://agr.wa.gov/departments/business-and-marketing-support/gapghp>

- GAP, FSMA, and On-Farm Food Safety: <https://www.youtube.com/watch?v=UscCS6Ya6ts>
- GAP, FSMA, y Planificación de la Seguridad Alimenticia en la Granja: <https://www.youtube.com/watch?v=eLXxZe6gEgI>

- **SSA Sprout Grower Training Course** ([Sprout Safety Alliance](https://www.iit.edu/ssa/training) (SSA))
<https://www.iit.edu/ssa/training>

Sprout producer training in best practices to enhance safe production methods and support implementation of sprout-related requirements in the Produce Safety rule.

PART 4: RESOURCE LIBRARY

Referenced in the Producer Guide

NOTE: Fees quoted in older documents may have changed. Some documents predate later FSMA rule adjustments, though the core information is still valid. To stay abreast of the latest information, subscribe to FSMA updates: <https://www.fda.gov/food/food-safety-modernization-act-fsma/whats-new-fsma>

- [A Guide to the GAP Certification Process](#)
- [Farm Food Safety Laws: FSMA vs. GAP](#)
- [FAQs GroupGAP](#)
- [FDA Fact Sheet Produce Safety Rule 21 CFR-112-Rarely Consumed Raw](#)
- [Gap Audit Program Scope](#)
- [GAP Water FAQ's](#)
- [Good Agricultural Practices \(GAP\): Certification Basics](#)
- [Guidance for Industry Standards-Growing, Harvesting, Packing, Holding Sprouts for Human Consumption](#)
- [Records Required by the FSMA](#)
- [Standards For Produce Safety: Coverage and Exemptions/Exclusions for 21 PART 112](#)
- [Understanding FDA's FSMA Rule for Produce Farms](#)
- [Understanding FSMA: The Produce Safety Rule](#)
- [What To Expect of a Produce Inspection](#)
- [USDA GAP & GHP Audit Program User's Guide](#)
- [USDA: GAP Audit Verification Checklist Version 3](#)
- [USDA Group GAP & GHP Certification Program User's Guide](#)

Forms and Samples

Templates available for use as-is were acquired from the Produce Safety Alliance:

- [Food Safety Plan TEMPLATE](#)
- [Recall Plan TEMPLATE](#)
- [Standard Operating Procedure Worksheet](#)

- [Deviations and Corrections Worksheet](#)
- [Sample Mock Audit Log](#)
- [Recall Product Information](#)
- [Sample Recall Contact List](#)
- [Recall Notification Form](#)
- [Recall Product Retrieval](#)
- [Recall Follow Up Plan](#)
- [Injury/ Illness Report Form](#)
- [Restroom Cleaning Log](#)
- [Water Testing Result Log](#)
- [Risk Assessment: Previous Land Use and Site Selection](#)
- [Break Area Cleaning Log](#)
- [Sample SOP: Basic Employee Hygiene](#)
- [Sample SOP: Pest Control](#)
- [Sample SOP: Restroom Cleaning](#)

Optional templates and examples

- [Southern Exposure Family Farm Recall Policy](#)
- [GAP Food Safety Plan-Caruso](#)
- [Farm Map Template-NJ Experimental Station](#)
- [NABC Basic Food Safety Plan template: produce](#)

Other documents and infographics

Quick Reference Charts

- [Standards For Produce Safety: Coverage and Exemptions/Exclusions for 21 PART 112](#)
- [Big-8-Allergen-Educational-Poster](#)
- [Am I Affected by New Food Safety Rules](#)
- [Farm Food Safety Laws: FSMA vs. GAP](#)

Additional Resources

- [A Farmer's Handbook to the USDA Harmonized GAP Standard Version 1](#)
- [FDA-Fact-Sheet-Produce-Safety-Rule-21-CFR-112-Rarely-Consumed-Raw](#)
- [Bridging the GAPs Farm Guide: English](#)
- [How To Wash Produce with Peracetic Acid doc 676](#)
- [GAP Practices Sanitation During Harvest](#)
- [Post harvest food safety-U of Mass](#)
- [USDA Gap And GHP Checklist](#)

Resources in Spanish

- [Bridging the GAPs Farm Guide - Spanish](#)
- [Understanding FSMA: The Produce Safety Rule in Spanish: Entendiendo FSMA Norma de Inocuidad de los Productos Agrícolas Frescos PennStateExt](#)
- [SPANISH GHPGAP Audit checklist \(Buenas Prácticas Agrícolas y Buena Prácticas de Manejo del USDA lista de control\)](#)
- [Video in Spanish](#) - GAP, FSMA, y Planificación de la Seguridad Alimenticia en la Granja:
<https://agr.wa.gov/departments/business-and-marketing-support/gapghp>)

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