

Produce Safety

A L L I A N C E

Produce Safety Educator's Monthly Call #17

March 21, 2016

2 PM EST

Meeting Summary

Total Attendance: 44

Meeting recording available at:

<https://cornell.webex.com/cornell/lsr.php?RCID=22ae9495dd9254f7b4e2b33ed9901623>

Agenda

Agenda, Monday March 21, 2016, 2PM EDT:

- 2:00 PM: Welcome
- 2:05 PM: GroupGAP Certification
 - Donna Burke-Fonda
Assistant Branch Chief, Audit Services Branch, Specialty Crops Inspection Division
- 2:35 PM: Questions & Answer Session
- 2:45 PM: Produce Safety Alliance Updates
 - Training timeline and updates
 - Regional Extension Associate Initiatives & Projects

Discussion

I. GroupGAP Certification

- **Donna Burke-Fonda, Assistant Branch Chief, Audit Services Branch, Specialty Crops Inspection Division**
 - See attached slides and audio for presentation.
 - GAP Certification- Traditional GAP audit program, voluntary service, certification market driven requirement for many produces
 - Obtaining certification is an obstacle for small farmers who want to access larger markets
 - Funding being provided to help small growers get “up to speed” with regulations or market requirements
 - GroupGAP Audit Program- certification accessible, affordable, and possible for growers of all sizes
 - GroupGAP Pilot Program-history
 - Goal-to help smaller growers and cooperatives meet retailers’ on-farm food safety requirements
 - 2013-2015, partnered with Wallace Center

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- Growers, food hubs, and cooperatives worked together to be certified as a group to save money and leverage economies of scale in the marketplace
- Success of pilot resulted in GroupGAP audit program as permanent service offering
- GroupGAP Audit Program
 - Any group of producers to meet demands of buyers and regulatory requirements
 - Group shares cost of certification
 - Benefits- food safety certification more accessible, opens doors to larger markets for producers; for retailers, provides new sources; for consumers, expands access to diverse, safe, fresh and local produce
- April 4, 2016 USDA accepting applications, but not from international groups
- Group Responsibilities – Before application, need to determine management structure and operate under a single QMS, and holding members accountable for meeting requirements
 - Documentation and records
 - Complete training
 - Identify staff for internal audits
 - Establish system for overseeing audits
 - Work with members to prepare for audits
 - Respond to auditor non-conformities
- Internal Auditor
 - Each group must have a trainer internal auditor, guide online
 - Education requirement can be met through USDA offering or other approved offerings
- USDA (External) Audit
 - QMS System Audit – onsite, 1-2 days, review of documents from group, interview groups members or management, reviewing internal audits
 - USDA Producer Audits – randomly selected number of group, square root of total members rounded up. If systemic problems are noted, they may add additional members to audit. Done by federal and state partners.
- GroupGAP Certification
 - If group has satisfied all program requirements, they are certified as a group. One certificate for entire group. Group members may choose to receive individual certificates.
- Fees
 - Hourly rate: \$92/hour
 - Includes time to review QMS, time to set up the group within system and scheduling audits, actual audit time, desk and onsite activity, auditor travel time

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ALLIANCE

- Group continuation of programs will be billed for 2 hours of continuation of participation
- More than one change of group member list will be billed 1 hour
- Is GroupGAP the best option?
 - Does not meet all producer's needs.
 - May be a way to open up new markets
- Roles for Extension
 - To get answers to questions about the program, e-mail GroupGAP@AMS.USDA.gov
 - Help growers determine if group certification is right for them
 - Connect growers in your state who may be interested in group certification
 - Provide training to groups, group determines how often that training occurs
 - Internal auditors will be taking PSA Course or other FDA recognized course prior to auditor training
 - Experienced individuals in agricultural QMS development
 - Can play roles as internal auditors, group managers/consultants, help navigate state funding resources
- Resources
 - USDA GroupGAP Webpage: www.ams.usda.gov/groupgap
 - Wallace Center: www.wallacecenter.org/foodsafety

II. Q & A

- Has it been an easy transition for groups to start a QMS?
 - The Wallace Center has played a large role in helping to design a QMS, but this is one of the challenges
- Looking for economic data, downsides, cut-off point. When is this a better deal for an individual to be part of a group rather than pay for their own audits?
 - There are other ways groups of growers achieving certification. Calling it a "Coordinated GAP". Example: Blueberry growers in TX share travel of auditor who audits 10 locations. We are working with Transportation and Marketing, should have been identified as a pilot partner. Going to take a few years to get data together.
- Are all members of the group going to be required to write a food safety plan?
 - Yes. Each member has to meet the food safety requirement of the audit service or audit standard the group has selected, but the group can develop that plan together. Or if they don't have the same plan, they can help address the various issues together (e.g., wildlife intrusion, risk assessment). They will have to have a food safety plan that is implemented at each growing location.
- Shared story of a group of small growers (16 participants-Food Hub) in MI separated by several hours who shared audit costs. Each paid less than \$500 on improvements in

order to comply with requirements. Each spent \$500 on audit costs individual audits would have been comparable or more.

- (Donna) This group was instrumental in helping understand, lessons learned. A different model. No central entity.
- Response: QMS is opaque. Find someone from the auto industry with ISO 9000 experience to help walk you through it.
- (Donna) American Society for Quality, local chapters. Document how to apply ISO 9001 at a farm, ISO 22006. Gives good input.
- How receptive is industry to accepting GroupGAP? Is it really going to help drive down the audit costs?
 - USDA is not the only player providing audits at growing locations. We haven't gotten a lot of feedback yet. A few entities, a few of the larger buys won't accept group certification at all. Trying to address that thru the use of Harmonized audits. Have an addendum for the Global Markets addendum that has been accepted by many buyers as a way to get small and medium sized growers into the system. Trying to achieve greater acceptance.
- Can you give an example of how a group of growers initiates a group?
 - There has to be something around which the group revolves, a shared need (i.e., identifying a market in the area or buyer willing to buy from groups). There has to be a shared mission or understanding and folks who are comfortable with this team effort.
- We are doing more of a "Coordinated GAPs" approach with our growers. Will there be a problem if there is a mix of farms in the group, where some are exempt from FSMA (i.e., exempt from water quality profiles or produce is not covered).
 - USDA has a dialogue with FDA. The audits are voluntary. Not a regulatory requirement. If a small producer is exempt, they may have an audit because the market is requiring it. The buyer is expecting them to apply at least a minimum level of compliance to these regulations. Smaller producers can rely on resources that might be provided through their association with the larger members.
- Is the USDA GAPs going to require everything that is in FSMA (i.e., water irrigation testing requirements)?
 - We have been working with FDA on the Harmonized Audits to make sure our expectations of the audit at a minimum meet the expectation of the requirements within FSMA. We will be editing our audit requirements so they incorporate FSMA and general industry and specific product industry guidelines.

III. PSA Updates

- PSA will not be hosting any Train-the-Trainer or Grower Training Courses until September 2016
- Working with FDA to align course materials with final regulations
- Courses will be announced via the general listserv

- Trainer interview process and update webinar for attendees of the 2014/2015 TTT Courses will be available when curriculum materials complete

IV. Other Items

- **Summary of Regional Extension Associate Initiatives & Projects:** Giving talks, developing networks, fact sheets, continuing education materials and presentations to share with collaborators, interfacing with FDA in editing curriculum materials and TAN submissions, and pursuing cross-training
- **Do not hesitate to reach out to the PSA Regional Extension Associates -**
<http://producesafetyalliance.cornell.edu/alliance/contact-us>

V. Call Wrap Up:

- **Future Produce Safety Educator Meeting Agendas:** Let us know what you would like to talk about! Send us your ideas, concerns, comments and we will add it to the next monthly meeting.
- **Next meeting: Monday April 25, 2016 - 2PM EST**
- Call-in information and agenda will be sent closer to the meeting date
- Thanks to everyone for taking time to participate in this call