

Produce GAPs Harmonization Initiative

David E. Gombas, Ph.D.
United Fresh Produce Association
dgombas@unitedfresh.org; (202) 303-3411

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Many leaders throughout the produce industry have increasingly recognized the cost and inefficiency of multiple standards and audits now being used to measure compliance with Good Agriculture Practices (GAPs). Neither produce suppliers nor retailers and foodservice companies are well served when duplicative standards and audits raise total supply chain costs without enhancement of overall food safety.

As a means to further explore the potential and accelerate the possibility for industry-wide commitment to harmonized standards, United Fresh Produce Association ("United Fresh") hosted a *Global Conference on Produce Food Safety Standards* in April 2009. Some 300 leaders from each stage of the produce supply chain, government, and third-party standard owners and auditors from around the world participated in the two-day conference.

During the conference, government and private-sector stakeholders involved with both on-farm produce GAP standards/audits and post-farmgate audit protocols presented overviews of their own systems, followed by group break-outs exploring questions about the potential value of harmonization and greater alignment of standards.

As suspected, a clear pattern of duplication and overlap among the many standards became apparent, leading participants toward a general consensus on the need to work together toward harmonization of standards.

Action Steps Toward Harmonization

In September 2009, United Fresh convened a "Steering Committee" of nearly 50 produce business leaders representing a critical mass of growers/shippers, fresh-cut processors, foodservice and retail customers in North America. In agreement with the need for a sincere and vigorous effort to attain harmonization of GAP food safety standards, the Steering Committee developed a Vision: to develop a harmonized food safety standard and checklist for GAP audits, and globally-acceptable auditing process, necessary to protect consumers from potential hazards that may contaminate produce at that stage of the supply chain, and that will build efficiencies into the supplier audit process.

In short, The Steering Committee identified a goal of **one audit by any credible third party, acceptable to all buyers.**

Further, the Steering Committee also identified a scope of work to be attained by this harmonized standard:

- Focused on food safety practices of pre-farm gate produce operations (as defined by the scope of the 1998 FDA GAPs);
- With clearly defined requirements that minimize opportunity for misunderstanding, misinterpretation and "standards creep" by operations and auditors;
- Globally recognized, but specifically applicable to North America operations;
- Requirements that are risk-based, science-based, attainable, auditable and verifiable;
- Considering all microbiological, chemical and physical hazards reasonably likely to occur, consistent with potential hazards addressed in FDA food safety guidances;
- Scalable to all size fresh produce operations;
- Considerate of regional- and commodity-specific food safety needs;
- Sufficiently non-prescriptive to be accepting of equivalent food safety practices;

- Acceptable to a critical mass of customers requiring general produce food safety audits;
- Freely accessible by everyone, including any 1st, 2nd or 3rd party auditor;
- Flexible to adapt as science reveals better practices and limits.

Technical Working Group:

The Steering Committee commissioned a “Technical Working Group” of food safety and operations professionals to develop the harmonized standard. This was a much larger group, representing customers, suppliers, government, audit organizations and produce association staffs; a broad scope of fresh produce commodities; a broad scope of operation sizes; and a broad scope of producing regions, including Mexico and Canada. There was an open invitation to all stakeholders, and over 150 ultimately participated. The Technical Working Group met in ten 2-day sessions at diverse locations around the country. The proceedings of each meeting were posted on a dedicated webpage, and some meetings were broadcast on the internet for the benefit of stakeholders unable to attend in person.

The Harmonization Process

Rather than create a new set of food safety standards, the Technical Working Group recognized that existing GAP standards already represent well considered plans, and that each standard was already accepted by some stakeholders. Therefore, they identified the GAP standards most commonly used in North America, and invited those standard owners to submit their standards for consideration in the harmonized standard. Thirteen standard owners responded, and the Technical Working Group reviewed each standard and selected the wording of each audit point that best represented the intent of harmonization. Special efforts were made to avoid creating new requirements, and to assure that all generally applicable audit points were included. The Technical Working Group refined these efforts by removing redundancies and providing clarification to the operation requirements and auditor instructions. Ultimately, two standards were developed: one for In-Field Operations, Harvesting and Field-packing, and one for Post-Harvest Operations.

Where We Are Today

The harmonized standards and all information pertaining to the Produce GAPs Harmonization Initiative are publicly available on the United Fresh website at www.unitedfresh.org/newsviews/gap_harmonization, and the intent remains for the standards to be freely usable by all interested parties. Teams of auditors, auditees and customers are field-testing the standards in pilot audits across a broad spectrum of commodities, regions and size operations; their findings will be used by the Technical Working Group to finalize the standards in early 2011. An “Operations Committee”, comprised of business managers representing the same broad diversity of growers/shippers, produce customers and audit organizations, has been commissioned to develop the operating policies and procedures for audit organizations to use the harmonized standards. Organizations are beginning to investigate replacing their current audit checklists for North America operations with the harmonized standards.