

USDA Harmonized GAP

UPDATES, 2021

Background

Most certifying bodies for Good Agricultural Practices (GAP) are trending towards using the Harmonized GAP Standard as the basis for their certification rules. This Standard was first published January 5, 2018 by the [United Fresh Produce Association](#), which had led industry stakeholders in an effort to collaboratively create the document. The purpose of creating the aptly named Harmonized Standard was to simplify the rules farmers have to follow. Now, most certifying body's Standards are substantially the same. Even better, the audit rules align closely with the Produce Safety Rule, which means that if you pass a Harmonized GAP audit, then you are in technical compliance with the Food Safety Modernization Act's Produce Safety Rule.

The United States Agricultural Department (USDA) offers both a Fresh Produce GAPs Harmonized Food Safety Standard Audit and a Harmonized GAP+ Plus Standard. The latter of these have a few more requirements geared towards international produce markets and is Global Food Safety Initiative (GFSI) benchmarked. Bigger wholesale buyers that might trade internationally may ask for this more stringent audit. Most farmers hiring the USDA for audit services start with the Fresh Produce GAPs Harmonized Food Safety Standard Audit unless specifically told by their buyer to achieve a GFSI benchmarked certification.

In September of 2019, industry stakeholders met to discuss changes and updates for the Harmonized GAP audit. Carolina Farm Stewardship's Local Produce Safety Initiative team was present for these meetings, along with representatives from farmer associations across the country, big commercial entities, and food safety experts. A smaller group took the suggestions and debates from the September meeting and produced a draft update to the 2018 version of the Standard. In early 2020, the draft was open for comment from the fresh produce community, and was published as final April 10, 2020. Since then, certifying bodies have been updating their own versions of the Harmonized Standard. The USDA is expected to publish its new version in February of 2021.

Changes have also been made to the USDA's HGAP + Plus Standard. We will have an outline of those changes available soon.

2021 Major Changes to USDA Fresh Produce GAPs Harmonized Standard Food Safety Audit

There are fifty changes to the USDA Harmonized Audit for the 2021 audit season. Most of them, though, are either clarifications with language (no substantive changes), or very simple changes. We have highlighted eleven changes to the Standard that we consider major below.

- Any service providers must now be on your Approved Supplier List, as well as the previously required raw materials you use in your Operation. Requirement G-2.3.
- Farms must now have a written policy and keep records of any non-conforming product that has been recalled or has some other food safety related issue; these products must be adequately separated on-farm from produce that will enter the market. Requirement G-8.2 (new).
- If you have a bathroom in a building that opens directly into produce handling areas, you **MUST** install something to mitigate the risk of pathogens escaping the bathroom and getting into the produce handling area. The easiest would be a self-closing mechanism on the door; another suggestion is to create a maze-like entrance. Requirement G-10.3.
- If you use portable water tanks to hold hand washing water, you must clean, sanitize, and replace the water on a schedule you determine; no less than quarterly is recommended. Requirement G-10.6.
- Farms must now have a written procedure in place for major spills or leaks of portable toilets. This can be obtained through the company you contract. Requirement G-10.7 (new).
- Farms must now include a Site Security and Emergency Response Plan in their Food Safety Plan. The Site Security requirement includes the need for an additional annual Risk Assessment. Requirements G-12.1 and G-12.2 (new).
- If you only do the Field Operations Scope of the Audit, you will now need to provide evidence that any cleaning agents you use on food contact surfaces have been approved for that use. Requirement F-8.7 (new).
- If you want to wipe tomatoes or other vegetables with cloths (instead of single-use towels) you can now do so with appropriate risk mitigation in place. Requirement F-12.4.
- If you do the Post-Harvest Scope of the Audit, you will now be responsible for a hazard analysis, similar to a Risk Assessment, of your pack house each year prior to your audit. Requirement P-3.1 (new).
- Equipment and materials stored outside cannot be stored directly against the perimeter of buildings. Furthermore, outside storage areas must now have pest control. Requirement P-6.9.
- In your pack house all incoming packaging must now be inspected according to a procedure and records must be kept. Requirement P-8.2 (new).

Index of All Changes to the 2021 USDA Fresh Produce GAPs Harmonized Standard Food Safety Audit

The “Requirement” column refers to the Standard question so you can look it up once the new Standard is published, or compare it to your current Standard. The second column indicates whether the change is an additional (+) requirement, or whether a requirement was removed (-). If this column is blank, that means we considered the change to be neutral, or very minimal. This table includes the requirements listed above in the major changes section (those already discussed are bolded in the Requirement column).

Requirement		Type of Change	Plain Language Description of Change
G-2.2	+	Record	The food safety plan must be reviewed anytime a change is made that could impact food safety. The review must be written and signed by senior management. CFSA’s templates already address this requirement.
G-2.3	+	Record	Service providers must now be a part of your Approved Supplier Plan (Post Harvest Scope only)
G-3.2	+	Procedure	Documents must be protected against any potential falsification. Keeping records in an office that is locked outside of normal business hours will fulfill this requirement.
G-4.1	-	Training	This is really just a clarification-- employees need food safety training if it pertains to their job responsibilities. Training must be conducted if there are changes in the operation that would impact food safety (i.e., you need to train employees on how to properly harvest a new type of crop). Remember all training must be documented!
G-4.2	-	Record	This clarifies the actual requirement by removing the need for a record. Traditionally, everyone gets a GAP workshop certificate to properly educate themselves about food safety on farms, but the changes here allow for the auditor to “interview” the farmer about his/her knowledge on food safety principles as an alternative way to satisfy this requirement.
G-5.3		Wording	This change is minimal, but was done so that it is clear that actual lab results are the preferred way

			of showing test results--not a farmer created spreadsheet. This is more efficient for everyone.
G-6.1	+	Procedures	If you reuse containers that go out to buyers (rare on a GAP certified farm) you must have a procedure to check that all labels are correct prior to packing. This is to add in a protection against an old label going out with a new product.
G-8.2	+	Written Procedure, Record	Farms must have procedure and records for segregation of any recalled, rejected, quarantined product.
G-10.1	+	Written Procedure	This is a minimal addition--most farms will already be compliant. If you don't have a written procedure for handwashing, create one!
G-10.3	+	Infrastructure	If you have a bathroom inside a building that opens into a produce handling area, the door to that bathroom must now have a self-closing mechanism, or a maze-like entrance. These were the examples provided, other mitigations might pass audit.
G-10.5	-	Procedure	If your waste system cannot handle toilet paper, you are no longer required to flush toilet paper. This will not be relevant on the vast majority of farms, but reflect the reality that some farms (mostly in South America) do not have septic systems that can accept toilet paper. If this exception is used, you have to have a very specific procedure for handling used toilet paper.
G-10.6	+	Infrastructure, Procedures	Hand washing stations must be located where produce handling is taking place, in addition to being adjacent to toilet facilities. If you use tanks to hold hand washing water, you must clean, sanitize and refill these tanks on a schedule you determine (and, of course, keep a record of these cleanings!)
G-10.7	+	Written Procedure	You must now have a response plan in place for major spills or leaks of field sanitation units. CFSA's food safety plan template usually includes this; you can get the plan from your portable toilet supplier as well.
G-10.8	+	Written Procedure	Management is now expected to reinforce the importance and compliance with hand washing. This is only a new requirement in name only, all

			food safety programs emphasize the importance of hand washing. You might want to increase your observation of your employees when they wash their hands and retrain them if necessary.
G-10.10	+	Procedure	A sentence was added to require that clothing be changed if it were so dirty as to pose a threat of contaminating product or a food contact surface. This is a minimal addition that was already implied in the rules.
G-10.12		Procedure	When employees use protective clothing (i.e., aprons) that protective clothing must clean as well as be worn and stored properly. This is true whether the employee is choosing to wear the protective clothing or they have been required to wear it by the owner/operator. Employers must provide a designated location for storage (i.e., hooks).
G-10.15			This was very slightly reworded for clarity's sake. No new requirements.
G-10.19			This slight change emphasizes that anyone who shows signs of foodborne illness MUST NOT have any contact with food or food contact surfaces. Best policy is to send these folks home.
G-11.1	-		This requirement is no longer mandatory.
G-12.1	+	Written Procedure, Risk Assessment	Farms now have to conduct an annual risk assessment about the potential for unauthorized individuals to gain access to growing or packing areas. Protective steps only need be taken if the risk assessment finds that it is likely unauthorized access will present food safety risks.
G-12.2	+	Written Procedure, Record	Farms must now have an emergency response plan. If there are incidents, records must be kept of those incidents.
F-1.1	+	Record	Flooding is added as a risk a farm must consider when doing their Land Use and History annual Risk Assessment. CFSA's risk assessments already consider this question.
F-2.1	+	Record	Specifies that chemicals that don't require registration can be used for food contact if all regulations are followed. Furthermore, this addition requires that Application Records for

		pesticide use include: crop, date, location of application, chemical used, application rate and method, and pre-harvest interval. Most application records already record all this information, but it is now a requirement that your records cover all this information.
F-2.4	Wording	The word “potential” was added. This removes any grey area from the rule about mixing water with agricultural chemicals. Use potable water (<1 MPN/CFU of generic <i>E. coli</i>) and you won’t have any issues.
F-5.4		A sentence was added for farms who are outside the U.S. and therefore don’t have to comply with the EPA, but some other regulatory agency.
F-6.2	-	This requirement is no longer mandatory.
F-7.1	Policies	Adds in a requirement that soil amendments be handled according to federal and local laws. The requirement already contemplated storage and application, so this addition is a minor addition.
F-7.2	Wording	The word “untreated” is added to make it clear that biosolids (i.e., treated human waste) are allowed under F-7.1. Some interpreted this rule to mean that biosolids were not allowed on GAP certified farms, which is not true. Biosolids must still be adequately treated. The EPA governs their use. This change also makes it clear that there is a prohibition against any human waste that hasn’t been properly and thoroughly treated.
F-8.2	-	This requirement is no longer mandatory.
F-8.7	+ Records	This is a new requirement for the Field Operations Scope of the audit, and is the same as P-6.3. The rule says that all cleaning agents have to be approved (usually by the EPA and/or FDA) for use on food contact surfaces. This just makes sure that sanitizers used in Field Operations are safe for food contact and used properly. However, if you have only ever done the Field Operations scope of the audit, you may have never had to provide documentation that the cleaning agents you use are approved for food contact surfaces. You now do need to do that.
F-10.3	Wording	This change clarifies when water must have

			antimicrobial treatments. We will have to wait until the USDA comes out with guidance on this one to see how they interpret it, but previously the rule said an antimicrobial must be used if the water was re-circulated. Now, the rule says antimicrobial treatment must be used in any water that is reused. If you already use an antimicrobial in your wash water, then you are already compliant. Quite likely, re-used water will be defined as everything from water in a dump tank that is used to wash separate loads of produce to water literally re-circulated through an operation's water lines.
F-11.3	-		This requirement is no longer mandatory.
F-12.4	-	Procedure	Reusable cloths are now allowed for wiping produce such as tomatoes, if precautions are taken. The USDA will have to provide guidance on what precautions are adequate. We will update this document when that guidance is available.
F-12.7		Wording	Changed "packing" materials to "packaging" materials.
P-2.1			This tracks the changes in F-2.1, but applicable here in Post-Harvest Operations. The change is a clarification that unrestricted chemicals might be permitted for use on food contact surfaces if allowed by federal and local regulation.
P-3.1	+	Risk Assessment	This is an additional required Risk Assessment, and considers all potential hazards in your pack house.
P-3.2	+	Infrastructure	Previously P-3.1. Adds language that require farmers to consider sanitary design and product flow in their pack house structure and use. CFSA already teaches this in our GAP workshops. Specific additions refer to proper grading of floors so standing water is not a problem, a clear flow of produce so that clean/dirty and dry/wet are separated, and any drop ceilings have to allow for cleaning or monitoring for pests.
P-4.2	-		Removes requirement that a farm document an animal control program as part of its Corrective Action procedures.
P-5.1	+		In the procedure column, a specific way of

			achieving the rule is added: all seams between food contact surfaces must be smooth and cleanable.
P-6.1	+		In the procedure column, another specific recommendation is added: if standing water is found, it is removed and then the floors are cleaned.
P-6.6	-		This requirement is no longer mandatory.
P-6.9	+	Infrastructure	This is an addition intended to illustrate how to comply with the rule: any equipment and materials stored outside cannot be stored right up against the building perimeter. Pest control must be added to outside storage areas.
P-6.11	+	Infrastructure	Floor drains must be functional and free of obstruction, properly maintained and cleaned. This would have already been a component of your food safety program if you have floor drains, but it is now made explicit.
P-7.6		Wording	Changes “recirculated” water to “reused” water; similar to the changes in F-10.3.
P-8.2	+	Written Procedure, Record	All incoming packaging materials must now go through an inspection procedure that is documented.
P-8.4	+	Written Procedure, Record	Any pallets, produce bins, totes or materials that come into contact with produce must be clean and in good repair. Cleaning and sanitizing of these items must be documented.
P-8.5	+	Written Procedures	All farms must develop a policy about whether harvest containers should come into direct contact with the ground inside a packhouse. Best practice is that they do not.
P-8.6		Wording	Added “packing” to clarify they also mean end-user packaging be inspected prior to use.
P-9.9	+	Record	There is now a record requirement for this question. Coolers must be added to your Master Cleaning and Sanitation Schedule.
P-10.4	+	Record	Farmers must now keep a record of testing the temperature of any refrigerated transport. Farmers determine the target temperature. This was already a requirement, but no record needed to be

			kept.
P-10.5	+	Policy	Allergens must now be considered when inspecting transportation vehicles.