

# GAP and Its Impact on Us as Growers

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# What is GAP?

## (Good Agricultural Practices)

- An assurance to our customers that thought and action have been exercised to minimize the potential for fresh produce contamination by pathogens

# Reasons we are here

- Spinach from CA...the jury is still out
- Jalapeno peppers from MX...it really wasn't tomatoes
- Cantaloupes from Colorado
- Salad mix from Mexico
- Many other issues related and not related to fresh produce

# GAP Status in New England

- Dozens of growers have become GAP certified in response to new requirements from Hannaford, Price Chopper, Stop & Shop, and Wegmans
- Harmonized GAP is/will slowly replace GAP?
  - Growers are just beginning to be certified

# Where are we headed

- Other Supermarkets?
- Others: Co-ops, Farmer's Markets, Institutional Food Buyers, Farm Stands, Farm to School, others?
- How will the Food Safety Modernization Act signed into law 1/4/2011 affect GAP?
- How will state programs fit in (CQP, RI GAP)

# FSMA (Food Safety Modernization Act)

- Federal food safety law -- applies to farms growing fruits and vegetables normally eaten raw (covered produce) and to food facilities
- Law was passed January 4, 2011
- Regulations are in proposed form and establish mandatory practices to prevent microbial contamination of fresh produce and processed foods
- FDA is the Regulatory Authority!!!

# FSMA...

- FSMA has 5 parts but 2 that most apply to domestic human food production
  - Produce Safety (applies to farms)
  - Rule for Hazard Analysis and Risk-Based Preventive Controls for Human Food (applies to those who manufacture, process, pack or hold human food... “facilities”)
  - there are exemptions...qualifying for an exemption under one part does not automatically mean you will qualify for an exemption under the other

# Produce Safety Rule

- Tester-Hagan amendment exempts farms with less than \$500,000 gross sales of “food” but there are qualifications:
  - At least 50% direct to retail or a retailer
  - In-state sales or not more than 275 miles from the farm
  - Includes all “food” including animal feed and produce not covered by the rule
- Not all farms will qualify because of the way they market:
  - Food hubs
  - Institutional food distributors
  - Selling through any “middle man”



# Produce Safety Costs

- Less than \$250,000 \$ 4,697
  - \$250-500K \$12,972
  - Over 500K \$30,566
- 
- FDA Admits that the Rule will put some farmers out of business
  - It is FDA's goal to cover the largest 20% of the farms that produce 80% of the food

# Produce Safety Proposed Rules...

- Non-Exempt Farms Must comply with regulations related to
  - Worker Health and Hygiene
  - Agricultural Water
  - Equipment, Tool, and Building Sanitation
  - Biological Soil Amendments (compost & manure)
  - Domestic and Wild Animals
  - Traceability
  - Records must be kept to prove that you are in compliance with all regulations

# Agricultural Water...

- Testing Requirements

- Farms using municipal water can replace testing with documentation from the water facility proving that the water meets the standards
- Well water must be tested at the beginning of the season and every 3 months thereafter
- Well water that has been stored in an above ground holding tank or pond must be tested every month
- Surface water must be tested every 7 days unless it is from a source that you control, then every month

# Agricultural Water...

- Testing Standards...
  - If it contacts covered produce during growing it must contain no more than 235 CFU generic E. coli per 100 mL sample, and no more than an average of 126 CFU per 5 samples (recreational water)
  - If it contacts covered produce during or after harvest must have no E. coli (less than detectable levels) per 100 mL sample (potable)
  - Again, if it does not meet the standards it cannot be used until corrective actions have been taken and subsequent testing shows the actions were effective

# Agricultural Water...

- Ag water can be treated with antimicrobials in place of testing, but
  - If wash water is treated with more than 200 ppm chlorine the farm is processing and must comply with the requirements of Preventive Controls.
- Wash water must be changed frequently enough that it has no detectable levels of E. coli or treated with sanitizer...perhaps
- Records must be kept of inspections, testing, and corrective actions

# Sanitation: Equipment, Tools, and Buildings

- Greenhouses and high tunnels are classified as buildings which cannot have for example
  - condensation dripping from the ceiling
  - water pooling on the floor
  - and they must be laid out so workers can move freely without clothing touching covered produce

# Biological Soil Amendments...

- If the untreated amendments are applied in a way that they are likely to touch covered produce
  - They must be applied 9 months before harvest.
  - Agricultural teas made from untreated biological soil amendments must also meet this standard.
  - States options if this is not changed?

# Voluntary v. Mandatory Food Safety

- “Voluntary” USDA/Private
  - GAP, Harmonized GAP, SQF, GFSI, Global GAP
- Voluntary State
  - Commonwealth Quality (MA)
  - Rhode Island GAP (RI)
- FSMA:
  - Waiting for second draft or final rule
  - Not sure if there will be a connection with any of the voluntary standards
  - Not sure about oversight and compliance



# Voluntary v. Mandatory Food Safety

- All food safety standards have the same parts
  - Worker hygiene
  - Water quality
  - Sanitation
  - Livestock and wildlife
  - Compost and Manure
  - Traceability

# State Government Comments

- Do not want an interim or final rule
- Want a second draft, expect it early summer
- Who will provide regulatory oversight?
- State programs for compliance?

# Our Biggest Fears as Farmers

- We do not have “big-guy” issues:  
Risk = Toxicity X Exposure
- Can we afford this? ...time and money
- What about animals? ...domestic, wildlife, my dog
- Water issues: Can we comply?
- Traceability and to what level of detail?
- The un-foreseen...

# Chopped Lettuce Issues

<b>Date</b>	<b>Timing</b>	<b>California Psychrotrophic plate count cfu/g</b>	<b>Massachusetts Psychrotrophic plate count cfu/g</b>
9/09/04	Day 0/ Pre-wash	1,500,000	2,500,000
9/09/04	Day 0/ Post-wash	15,000	400,000
9/14/04	Day 5/ Post-wash	21,000	800,000
9/19/04	Day 10/ Post-wash	4,300,000	41,000,000

If you really think about all the possibilities, how the heck are we all still alive?



# Bottom Line

- Individual growers will need to decide if they will become certified based on their customer's needs, the desire of the grower to keep that customer, and potential peer pressure

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- An increased understanding of food safety and how you, your employees, and the environment impact it

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- An increased understanding of food safety and how you, your employees, and the environment impact it
- The materials necessary to create a farm plan and to prepare for an audit
- The sobering realization that farming just gets less and less fun every year