GroupGAP
Audit Program
Program Overview
Specialty Crops Inspection Division

» Providing the entire specialty crops industry trusted, impartial, prompt, and accurate quality assurance and food safety verification services for all fresh, frozen, canned, and processed fruit and vegetable products

• Inspection and certification services
• Auditing and quality assurance services
• U.S. standards for fruits and vegetables
• Training

» User-fee funded, voluntary programs
SCI Division Audit Services

- Good Agricultural Practices (GAP) & Good Handling Practices (GHP)
- Qualified through Verification (QTV)
- Domestic Origin Verification (DOVS)
- Plant Systems Audit (PSA)
- Identity Preservation (IP)
Retailers began requiring suppliers to meet GAP & GHP requirements, and industry came to USDA to request the development of an audit program.

Developed in conjunction with Food and Drug Administration, Association of Fruit and Vegetable Inspection and Standardization Agencies (AFVISA) and our state partners, Industry, Academia

Working in cooperation with state departments of agriculture to provide our services nationwide and internationally
GAP & GHP Audits

- Looks at areas including:
  - Soil, manure, and soil amendments
  - Water
  - Animals (domestic and wild)
  - Training
  - Employee health and hygiene
  - Traceability and Recall
  - Equipment, tools, and buildings
  - Management responsibility and food safety plan
  - Documentation and record keeping
  - Corrective action
We’ll start with a little background on why and how USDA developed the GroupGAP program.

In 2010, a group of small grower representatives approached USDA and asked for the development of a program to help small and mid-sized growers obtain certification and access larger and more lucrative markets.

Increasing demand for locally sourced food offers unprecedented opportunities for farmers to expand their businesses – but only if they can show compliance with industry and Federal food safety standards as required by retail, institutional, and other buyers. Larger suppliers use the USDA GAP&GHP Program to show that compliance, however, the GAP certification process can be a time-consuming and costly process for many small-to-medium sized farms, creating a barrier for farmers who are trying to access larger wholesale markets such as schools, hospitals, and grocery stores.

Small growers needed a way to become USDA GAP certified.
Building on USDA’s long-standing commitment to helping America’s farmers succeed and expand markets across the nation, in 2013, we, in collaboration with the Wallace Center at Winrock International, launched a GroupGAP pilot program.

(The Wallace Center a nonprofit organization that supports efforts to move local food into larger scale marketing channels and has been a strong advocate of local and regional food systems across the US)

The 3-year GroupGAP pilot program included 22 projects that helped smaller growers and cooperatives meet retailers’ on-farm food safety requirements by working together to obtain group GAP certification. By working as a collective, the pilot participants leveraged economies of scale in the marketplace and saved money in becoming GroupGAP certified.

The success of the pilot program resulted in our offering the GroupGAP Certification Program as a new food safety verification service.
GroupGAP Audit Program

» GroupGAP

> A robust certification program that addresses the unique challenges smaller producers and food hubs face in complying with food safety audits
> Meets the demands of the retail, food service, and institutional buying community
> Will be aligned with requirements of Food Safety Modernization Act
GroupGAP Audit Program

» Growers, food hubs, and other marketing organizations can work collectively to undergo GAP certification as a group to:
  > Share the cost of certification
  > Operate under a single central quality management system
    • Share resources
    • Implement food safety training
    • Coordinate activities
  > Undergo an audit jointly to obtain GroupGAP certification
  > Internally oversee the food safety activities of members
GroupGAP Audit Program

» Benefits
  > **Producers:** Makes food safety certification accessible and opens new doors to larger, more stable, and more profitable markets
  > **Retailers and Larger Buyers:** Provides new sources of, and marketing opportunities for local specialty crop products
  > **Consumers:** Expands access to a greater diversity and quantity of safe, fresh, local produce
GroupGAP Audit Program

USDA will begin accepting applications April 4, 2016
GroupGAP Program
How it Works?

» Collection of producers form a group
» Group creates a Quality Management System and a Food Safety Plan for members
» Group trains internal auditors who perform audits on all members
» USDA performs annual system audit including small number of external producer audits
Internal Audit

» **Group must perform internal audits of members**
  > Carried out by the group’s internal auditor(s) who has been trained to USDA requirements
  > Internal audits include:
    • Producer (farm) audits of each member,
    • Unannounced audit(s) as determined by growing season
    • Any required follow-up audits for non-compliant members

» **Group must perform internal audit of QMS**
  > Reviews program implementation and documentation
USDA (External) Audits

» QMS System Audit
   - Evaluates implementation of and adherence to the group’s QMS
     • Review of group’s documents and records
     • Interviews with group management, QMS staff, and members (as applicable)
     • Review of completed internal audits
USDA (External) Audits

» USDA Producer (Farm) Audits
  » Number of audits = square root of the number of members, at a minimum
  » More audits if systemic problems are identified
  » Members to be audited randomly selected based on a USDA risk assessment of various factors

» USDA Auditors
  » Federal and/or Federal-State Partners
USDA GAP Certification

» Group Certification
  > Group certified as a whole
  > One certificate for the entire group

» Member Certification
  > Group members may chose to receive individual certificates that certify each member as part of the larger certified group

» USDA website lists both group and individual members as part of the larger group
Before we talk about the program in more detail, let’s first take a look at whether GroupGAP might be right for you.

Here are a few considerations to help you decide if GroupGAP is right certification option for your group:

• Do you have a group of producers who are willing to share responsibility for the implementation of food safety practices?
• Do you have the capacity to create a group?
• Is your group of producers ready and willing to implement Good Agricultural Practices?
• Does the group have a knowledgeable staff member, or is the group willing to hire an individual, who can write and implement a Quality Management System?
• Does the group have staff members, or is the group willing to hire an individual(s), who can meet the USDA auditor criteria?
• Will your buyers accept GroupGAP? If your buyers have questions about the GroupGAP Program that you cannot answer, please direct them to the USDA GroupGAP website for additional information.
Pre-Application
The first step to obtaining group certification is to form or identify a group.

The USDA does not have a set definition for a group. A group can be any collection of growers, including co-operatives, food hubs, farmers market members, trade associations, or any other group of growers who can come together to share responsibility for food safety. Groups need to ensure that all members agree to operate under that quality management system. It is also important for Groups to assess their resources to determine that they are equipped to implement the requirements of GroupGAP and food safety certification.

There is no minimum number of members that are required to form a group. Groups will need to determine at what point the advantages of group certification outweigh the advantages of individual GAP certification. USDA is not going to set an upper limit on the number of growers. The maximum number of growers that a group can have will only be determined by the group’s ability to control their membership. Increasing membership numbers will typically require additional trained staff, and additional time for group coordination/management. In theory,
groups can range in membership from 2 members, to hundreds of members.

Some groups will have a centralized facility, like a shared packinghouse or warehouse, which will be used by multiple members of the group. This facility can be covered by the group certification, so long as it can be audited using the same food safety standard as other members. A centralized facility can be treated internally the same as any other group member, however, it will be selected for a USDA external producer audit as part of the system audit.
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Identify Key Roles

» Group Leader
» Group Management
» Internal Auditors (producer audits)
» Internal QMS Auditor
Before you apply you will need to designate a Group Leader. The Group will designate this person as responsible for managing and coordinating the Group’s GroupGAP responsibilities.

This group leader will need to:

• Oversee the group and program implementation
• Act as the point of contact for USDA auditors
• Ensure all program requirements are met
  • Including having sufficient trained internal auditors
  • And ensuring all required audits are completed
• Oversee the implementation of the QMS, including SOPs and record keeping requirements

Although some of these responsibilities may be shared by multiple staff members or group leadership, the Group must identify one responsible individual as its duly authorized representative on the FV-651, Agreement for Participation in Audit
Verification Programs.
Group Management

» Group ownership or leadership must show commitment to QMS and food safety
» Responsible for oversight and review of program

Internal QMS Auditor

» Performs annual audit of the QMS and program implementation
Some of these roles may be fulfilled by the same person.
Before you apply you will need to select an Audit Service. Decide which GAP or GHP audit service you will apply at your members’ production locations.

GroupGAP was designed to be a method of certifying a number of growers together, not as a specific audit standard. It is designed so that each group can choose which current USDA Good Agricultural Practices audit their members will be certified to.

The current USDA GAP & GHP audit service types include the USDA GAP&GHP, the Produce Harmonized Food Safety Standard, and Commodity Specific Audits, including mushroomGAP and the Tomato Audit Protocol.

Groups can also choose to add any applicable audit addendum to their certification scope. In order for the group as a whole to have the chosen addendum as part of their certification, every group member would need to meet the requirements of the addendum.

The current addendums that can be added to GAP & GHP audits include Food Defense, Logo Use, and Global Markets.

The Group is responsible for determining which audit service type and addendum would be most appropriate for its members. A number of
factors should be considered in making this decision:

- Are any of your members already following, or have they been certified to, a particular audit type? If your members are already used to a specific audit type, staying with this audit may ease the transition to group certification.

- Do your members exclusively grow one of the crops covered by a commodity-specific audit, such as mushrooms or tomatoes? Will this commodity-specific audit meet the Group’s requirements?

- Do your buyers require a specific audit? Some buyers will only accept specific audit certifications from their suppliers. Before applying for any audit program (group or individual), it is important to ensure that your buyers will recognize that certification.
Before you apply you will need to develop and implement a Food Safety Plan.

The Group’s Food Safety Plan must meet the requirements of the chosen audit service.

The food safety plan must address the various risks associated with all the crops and processes being certified.

For example, if a berry grower hand picks strawberries but mechanically harvests blueberries, the food safety plan must address the potential risks and corrective actions associated with each of these crops as well as with both mechanical and hand harvesting.

The Group may choose to develop a Plan template or example plan, for all members to adapt and apply as appropriate at their production locations, or they may choose to create a set of common procedures and forms for all members to use without variation.
Write Your QMS

What is a QMS?
» Is it the same as a food safety plan?
  > No
» Quality Management System is a business tool
» Set of policies, process, and procedures that dictate how business operates

Why does it help?
» Helps ensure you deliver consistent product
Write Your QMS

What goes into my QMS?
» Dictates how the group will function
» Management responsibility
» Documentation and record keeping
» Membership and scope of certification
» Control of non-conforming members/product
» Training of food safety/QMS responsible staff
» How perform internal audits
» Corrective and preventive actions

QMS is how the group functions, food safety plan is how the members function
Training

For Growers/Members

» Food Safety Training
  > Sufficient to understand food safety and implement GAPs
  > Dictated by the requirements of the audit type you choose

» GroupGAP specific?
  > No additional member training requirements
  > Does your QMS go above and beyond the audit type?
  > Do you have group-specific requirements?
  > Do the members need to understand your QMS?
ISO 9001 3-day internal auditor or 5-day lead auditor course offered by an exemplar global certified provider.
There are a number of fees associated with the GroupGAP program.

The first is the application fee. After a Group’s application is received, they will be billed an application fee equivalent to 8 hours at the Specialty Crops Program hourly audit service rate.

After the first year, if Group intends to remain in the GroupGAP program, they will be asked to submit a continued participation fee (instead of the application fee). This fee will be equivalent to 2 hours at the SCP hourly audit service rate.

Groups will also be charged for the auditor time associated with the USDA audits required in the GroupGAP program. This includes the USDA external producer audits, the annual system audit, and any required follow-up audits.
Application Process

» Before applying, the group must have developed and implemented its QMS and food safety programs

» To apply, group’s single contact person submits:
  □ Request for Audit Services (FV-237A)
  □ Participation Agreement (FV651)
  □ Application fee
The #1 Question

» If one member fails does the whole group fail?
  > Not necessarily!
  > The group’s QMS must include a system for dealing with non-conforming farms
  > If a member fails, it is the group’s responsibility to control that member and their product in adherence with its QMS
  > If a group’s system is working properly and controls any non-conforming farms, the group would not fail based on one member
  > If a member has systemic issues that the group is failing to control, this reflects a larger issue with the group’s QMS and the group would fail
Resources

» [www.ams.usda.gov/groupgap](http://www.ams.usda.gov/groupgap)
  > Users Guide
  > Frequently Asked Questions
  > Internal Auditor Training Opportunities
  > Webinar Recordings
  > Fact Sheets

» GroupGAP@ams.usda.gov

» GroupGAP@ngfn.org

» [www.ngfn.org/food safety](http://www.ngfn.org/food safety)
Introductory Resources

- USDA’s GroupGAP website
- An Introduction to GroupGAP
- Wikipedia article on Quality Management Systems
- USDA GroupGAP Fact Sheet
- Small Farmers Can Make Food Safety Work: The Group GAP Pilot Project in Michigan’s Upper Peninsula
- GroupGAP pilots’ experiences webinar

More Advanced Resources

- USDA’s GroupGAP Webinar
  - Recording
  - Slides
  - Q&A
- Good Naturesd Family Farms Pilot Group GAP Report
- A Phase Gate Overview for GroupGAP Implementation (from Cherry Capital Foods)

Resources for Implementers

- Example Quality Management Systems
  - Upper Peninsula Food Exchange (UPFE)
  - Agricultural and Land-Based Training Association (ALBA)
- Example Master Farm Status (to track the progression of member farmers) from UPFE
- Example Gap Analysis Template (for educational / NON-audit visits to member farms) from UPFE
- Example Food Safety Plan Checklist (for the member farmers to track additional farm-specific documents that need to be completed in their on farm food safety plan) from UPFE
- Example GroupGAP Farmer Application from Allen Neighborhood Market Place Exchange
- Example Gantt chart plan for implementing GroupGAP from TopCo/TopGAP
Patricia Tripp
New Appalachia
– NC

artisanfoodsolution
SAFE • FRESH • LOCAL
Kaley Grimland
ALBA – Salinas, CA
Additional Resources

» Website: www.ams.usda.gov/groupgap
» Email questions to: groupgap@ams.usda.gov
» Wallace Center: www.ngfn.org/foodsafety