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USDA Group GAP & GHP Certification Program User's Guide

GroupGAP

March 2016

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USDA Group GAP & GHP Certification Program User's Guide
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INTRODUCTION

This User's Guide provides information about the U.S. Department of Agriculture's (USDA) Group Good Agricultural Practices (GAP) & Good Handling Practices (GHP) Audit Verification Program (GroupGAP). This guide does not establish any substantial rule that is not legally authorized by official Division policy.

Questions about this User's Guide may be directed to the USDA Agricultural Marketing Service (AMS), Specialty Crops Program (SCP), Specialty Crops Inspection (SCI) Division, Audit Services Branch in Washington, DC:

Audit Services Branch

Phone: 202-720-5021

Email: GroupGAP@ams.usda.gov

The SCI Division is responsible for grading, inspection, auditing, and standardization programs for fresh and processed fruits and vegetables and related products under the Agricultural Marketing Acts of 1936 and 1946, as amended. Applicants may obtain inspections and audits of any fresh and processed fruits and vegetables and related products for which they have a financial interest. These services are voluntary and offered on a fee-for-service basis.

Compliance with this AMS guideline does not excuse failure to comply with the Food, Drug, and Cosmetic Act, or any other applicable Federal or State laws or regulations.

GUIDE FOR ELECTRONIC USAGE

When accessed electronically, this manual has hyperlinks and hypertext (visible as underlined [blue text](#)) available to the PDF user. Clicking on a hyperlink takes the reader to a website with information relating to the subject. Hypertext links the reader to a different page within the current manual or to a different manual with information relating to the subject. For example, the hypertext in the Table of Contents allows a reader to go directly to the section of interest in the manual by clicking on the section title.

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GENERAL INFORMATION

Background

The USDA Good Agricultural Practices and Good Handling Practices (GAP & GHP) audit programs provide third-party verification that operations are following industry-recognized food safety practices, as well as regulations and recommendations from the Food and Drug Administration. USDA audits assess a producer's (company) efforts to minimize the possibility of contamination of fresh fruits, vegetables, and nuts by microbial pathogens. The program does not assure that the product is free from microbial contamination; the company is responsible for product safety, and the continued observance of practices that minimize the possibility of microbial contamination.

USDA audits generally occur on a scheduled basis at least once a year; unannounced verification audits also may take place, depending on the length of the production period.

The audit services offered as part of the USDA GAP & GHP audit verification program include:

- USDA GAP&GHP Audit
- Produce GAPs Harmonized Food Safety Standard
- Tomato Food Safety Audit Protocol
- Mushroom GAP
- Leafy Green Marketing Agreement (California and Arizona)

Information about these audit programs is available at: www.ams.usda.gov/gapghp.

In 2010, USDA began to explore establishing a protocol for group GAP and GHP certification. The USDA Group GAP & GHP Certification concept was first piloted in 2011, with one group participating. The pilot project was expanded to include 6 groups in 2013, and 11 groups in 2015. After reviewing the outcomes of the pilot program, USDA established the Group GAP & GHP Certification Program (GroupGAP) in 2016.

GroupGAP Overview

GroupGAP provides an alternative way for producer groups to achieve USDA GAP & GHP certification. The basic concept is that a producer group (Group) develops and implements a shared Quality Management System (QMS), incorporates the requirements of a GAP or GHP food safety audit service, and agrees to be audited as one body. The Group is required to perform internal audits of the group members' production locations to ensure compliance with the chosen GAP or GHP food safety audit service, and of their QMS to verify effective implementation of the QMS' policies and procedures. USDA then performs an annual system audit of the Group's QMS, and annual GAP and/or GHP audits of a representative sample of the Group members' production locations.

The GroupGAP program may offer the following benefits to participants:

- Buyers will recognize the advantage of the multi-tiered verification that is part of GroupGAP certification.
- Groups can fully leverage existing resources and share certification costs.
- A Group's QMS will help the Group achieve consistent results and continually improve its processes.

A Group is defined as any group of producers who agree to operate within an established business scope, and who have the operational resources to support the QMS and food safety audit service implementation. Examples of Groups include cooperatives, food hubs, and suppliers of a larger distributor. The advantages of GroupGAP apply to producers and organizations of all sizes, from smallest to largest.

Participation in GroupGAP includes agreeing to system audits and GAP or GHP audits of Group members. This, in turn, requires Group members to make their facilities, personnel, documentation, and records available to USDA for annual and follow-up system audits.

GroupGAP is funded through user fees charged for the time required for USDA personnel to review Group's QMS plans, travel to and from an audit site, perform an audit, and carry out associated administrative and management activities. USDA charges on an hourly basis in accordance with the GroupGAP Fee Schedule ([Appendix III](#)).

Is GroupGAP Right for You?

Here are a few considerations to help you decide if GroupGAP is right for you:

- Do you have a group of producers who are willing to share responsibility for implementing food safety practices?
- Do you have the capacity to create a group?
- 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?
- Is your group of producers ready and willing to implement Good Agricultural Practices?
- 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 office](#) for additional information.

Grower groups interested in using GroupGAP to attain USDA GAP and/or GHP certification should visit <http://www.ams.usda.gov/groupgap> for current program information.

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For More Information

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STOP 0247, Room 0707-S
Washington, DC 20250-0247

HOW TO APPLY FOR PARTICIPATION

Once you've determined GroupGAP is right for you, here's how to apply to participate in the program.

Pre-Application Process

Before contacting USDA to apply for GroupGAP participation, your Group should first take these steps:

1. **Form a Group.** Establish a group of growers so the identity of the Group can be clearly defined.
2. **Designate a Group Leader.** Determine the individual responsible for leading the Group. The Group will designate this person responsibility for managing and coordinating the Group's GroupGAP responsibilities. You must identify this person in the Group's Quality Management System (QMS) documentation.
3. **Select an Audit Service.** Decide which GAP or GHP audit service you will apply at your members' production locations. You may select any of the audit services offered by the USDA GAP & GHP audit verification program, which are listed at www.ams.usda.gov/gapghp.
4. **Develop and Implement a Quality Management System.** A QMS tells your customers that you can consistently provide product that meets your customers', and applicable statutory and regulatory, requirements. A Group's QMS must cover all applicable GroupGAP activities and processes, and can be expanded by the Group to cover other business processes that are not part of GroupGAP. For example, a company that distributes a wide variety of produce from multiple warehouses could include its distribution activity in the QMS even though the scope of the GroupGAP certification is limited to on-farm activities.

The development and implementation of a QMS requires resources for associated documentation, staff training, and the performance of internal Group audits. GroupGAP requires that participating Groups develop a QMS based on ISO 9001. Requirements for a QMS are outlined in Quality Management System – Basic Requirements for Groups ([Appendix I](#)).

It is important to remember that the Group's QMS should be well-developed and deemed complete by the Group when it is submitted to USDA for review. The initial application fee is intended to cover USDA's review of this documentation for up to two review cycles.

5. **Develop and Implement a Food Safety Plan.** The Group's Food Safety Plan must meet the requirements of the chosen audit service. The Group may develop a Plan template for all members to apply, as appropriate, at their production locations, or shared procedures and forms for all members to use without variation.

6. **Designate/Hire Internal Auditors.** The Group should designate a Group employee(s) or member(s), or hire an external entity, to serve as an internal auditor(s). The internal auditor must meet the minimum requirements established in Internal Producer Auditor - Minimum Requirements ([Appendix II](#)).

USDA will provide training opportunities for internal producer auditors and/or a list of alternate training opportunities that will fulfill GroupGAP requirements. Information about training opportunities can be found on the GroupGAP website at www.ams.usda.gov/groupgap.

7. **Check the Checklist.** See the “Before You Apply” checklist ([Appendix IV](#)).

Application Process

Your initial GroupGAP application simply lets USDA know that your Group plans to take part in the program. At this point, you may, but are not required to, submit all of the documentation that you will need to fully participate in the program. To initially apply for GroupGAP participation, your Group must submit the following documents to USDA via [email, mail, or fax](#):

- Agreement for Participation in Audit Verification Programs ([FV-651](#))
- Request for Audit Services ([FV-237A](#))

By submitting these two forms, you denote your Group's agreement to pay the GroupGAP application fee and subsequent fees for services rendered in accordance with current audit rates, which are outlined in the GroupGAP Fee Schedule ([Appendix III](#)).

Upon receipt of your application, USDA will send the Group a letter acknowledging that we received your documents and payment, and that USDA considers you an applicant for service. At that time, USDA also will provide you access to the resources and technical guidance that is available to all GroupGAP participants.

HOW TO PARTICIPATE IN GROUPEGAP

Initial Group Responsibilities

When you're ready to participate, your Group must submit to USDA (via [email, mail, or fax](#)) the following documentation. These documents can be submitted as early as they are available, but must be submitted at least 30 days before the expected earliest harvest of the crops that are included within the scope of certification.

1. **QMS.** The Group must submit its QMS manual and any associated documentation.

USDA uses Google Drive and university file servers as secure document repositories. If your Group wants to submit documentation using such sites, you must provide USDA with a link to the document site by sending an email to GroupGAP@ams.usda.gov. This should only be done after your initial application has been accepted.

2. **List of Group Members.** For each member, the list must include:
 - a. Member name
 - b. Street address (business or personal)
 - c. City
 - d. State
 - e. Zip code
 - f. Member contact information (contact name, phone number, and email address)
 - g. List of products covered by the Group certification
 - h. Physical location of the production area, including acreage of each fruit and/or vegetable and/or nuts or production site in square footage
 - i. Harvest season (the start and stop months for the year)
 - j. Labor (contract or direct hire)
 - k. Harvest type (mechanical or manual)
 - l. Specific audit service type and scope (e.g., Harmonized Field and Harvest Operations; USDA GAP&GHP Farm Review, Field Harvesting and Field Packing Activities, or House Packing Facility)
 - m. The most recent date of a USDA GAP and/or GHP individual audit certification for the member location, if applicable

- n. The Group's aggregation or distribution center, if one is included in the scope of the Group's certification

Initial USDA Responsibilities

1. **QMS Review.** USDA will review the Group's QMS documentation and provide the Group with a preliminary assessment of whether the QMS meets the requirements stated in Quality Management System – Basic Requirements for Groups ([Appendix I](#)).

Note: If the QMS does not meet the minimum requirements of GroupGAP, the Group must make appropriate changes and resubmit it to USDA for a second assessment. If the QMS documentation does not meet Program requirements during the second assessment, the Group must reapply for participation in the GroupGAP Program.

2. **QMS Approval.** If (when) USDA determines the Group's QMS meets the program's requirements, USDA will issue an acceptance letter to the Group.

Group Internal Producer Audits

Once you've been accepted into the GroupGAP program, your Group is responsible for conducting an annual producer audit at each of the member production locations following these requirements.

1. **Internal Producer Auditor.** The internal auditor(s) must meet the minimum requirements established in Internal Producer Auditor - Minimum Requirements ([Appendix II](#)).
2. **Annual Producer Audits.** An internal auditor must audit each member's location annually. Annual audits must be conducted and documented on official USDA audit checklists in accordance with the USDA GAP & GHP Audit Program policy, and by applying USDA acceptance criteria for the chosen food safety audit service. Official USDA audit checklists for the specific food safety audit services are posted at: www.ams.usda.gov/gapghp.
3. **Audit Scope.** The annual producer audits must include all scopes of the GAP or GHP food safety audit service that apply at the production location being audited.
4. **Follow-up and Unannounced Audits.** The internal auditor must conduct follow-up and unannounced audits that are carried out and documented in accordance with current USDA policy for the performance of unannounced audits. The unannounced audit is intended to verify continued compliance with audit service requirements and differs from the initial audit in that the auditee does not know specifically when the auditor will be onsite to perform the audit. The unannounced review will generally verify compliance through observation, but may also require a further review of documentation.

The documentation associated with the Group's internal producer audits must be available for review by USDA auditors during the annual USDA system audit.

USDA Audits

USDA will perform an annual system audit to verify a Group's implementation of its QMS, annual GAP and/or GHP audits of a certain number of the Group members' production locations, and unannounced audits. USDA will bill the Group for all costs for audits and associated travel time in accordance with the GroupGAP Fee Schedule ([Appendix III](#)).

1. USDA System Audit

- a. USDA will contact the Group to schedule the onsite system audit, and request copies of any updates to the submitted QMS documentation. The USDA system audit can occur any time after the Group has completed at least 25 percent of its annual internal producer audits. The onsite audit typically takes one to two days, and may include some desk audit activity before and after the onsite activity.
- b. After completing the onsite audit, USDA will issue a final system audit report to the Group.
- c. The Group will respond to any corrective actions associated with the system audit, following their Group's corrective action procedure and the requirements outlined in the [Corrective Action Process](#).

2. USDA Producer Audits

- a. USDA will select a representative sample of a Group's member locations to audit on an annual basis. At a minimum, the number of locations will be the square-root of the total member count, rounded up to the next highest whole number. For example, if a Group has 40 members, USDA will select at least 7 of the member locations to audit. A Group's aggregation or distribution center also will be audited each year if it is part of the group certification. USDA may select additional locations, as needed, to verify compliance with program requirements.
- b. A local USDA audit office will contact the Group to schedule the onsite producer audits. That office will conduct the audit of the production site, complete the associated documentation, and submit the audit reports to the USDA GroupGAP program manager.
- c. The Group will respond to any corrective actions associated with the USDA audit, following their Group's corrective action procedure and the requirements outlined in the [Corrective Action Process](#).
- d. USDA GroupGAP certification will include a listing for the Group as well as each of the member locations that meet USDA acceptance criteria for the external producer audit.

Auditing a Diversified Production Operation

Under GroupGAP, a Group does not need to perform a separate audit for each individual crop produced at a member's site. USDA policy allows diversified production operations to cover all of the crops produced at a site under the same audit, subject to the following conditions:

- The member must declare all crops produced at the site and intended for certification in the product list on the member's entry that is sent to USDA as part of the [GroupGAP application process](#).
- The Group's Food Safety Plan must address the various risks associated with all the crops 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 activities.
- The internal auditor must have the opportunity to observe the crop(s) being grown and harvested during the initial audit or subsequent unannounced audits. For example, if the producer joins the Group on August 1, any crops that have been completely harvested prior to that date cannot be listed on the certification. The internal auditor does not have to actually witness every listed crop being harvested, but must have the opportunity to observe them.
- Each grower is subject to the appropriate number of unannounced audits as determined by the length of the growing season for all of the crops covered by the certification and as deemed appropriate by the internal auditor or Group manager.

While scopes of a diversified audit will vary, here is how a USDA GAP and GHP producer audit for a diversified operation might work for both the USDA GAP&GHP Audit (a) and the Harmonized Produce GAPs Audit (b).

1. ABC Farms produces a variety of fruits and vegetables, including asparagus, strawberries, sweet peas, tomatoes, peppers, peaches, nectarines, apples, pears, potatoes, broccoli, and cauliflower. The operation is in production from the start of the growing season on April 1 to approximately October 31 each year.
2. ABC Farms joins Group EFG in January and declares all 12 crops to be certified.
3. Group EFG's internal auditor performs the initial producer audit when the spring crops (asparagus, strawberries, and sweet peas) are being harvested.
 - a. The scopes included in the initial USDA GAP&GHP producer audit are the General Section and Part 1 Farm Review of the entire farming operation. The auditor also will perform Part 2 Field Harvesting and Field Packing Activities on the asparagus, strawberries, and sweet peas.

- b. The scopes included in the initial producer Harmonized Produce GAPs audit are the Field and Harvest and the Post-harvest Operations.
4. Because the operation is in production for more than 90 days, the internal auditor informs the operation that there will be two unannounced audits sometime during the rest of the growing season. At this point, the initial producer audit is finished and all appropriate documentation completed.
5. The internal auditor then makes plans to conduct the first unannounced audit to coincide with the harvest of the tomatoes, peppers, and stone fruit; and, the second unannounced audit to coincide with the harvest of the remaining crops.
 - a. The scope of the unannounced audit (USDA GAP&GHP) will include Part 2 Field Harvesting and Field Packing Activities for the crops being harvested during the audit, as well as an assessment of the General Section and Part 1 Farm Review to verify continued compliance.
 - b. The scope of the unannounced audit (Harmonized Produce GAPs) will include Field and Harvest and Post-harvest Operations for the crops being harvested during the audit, with additional assessment of other areas to verify continued compliance.

Corrective Action Process

Corrective actions may be initiated by either a Group's internal audit activities or USDA's system or producer audits. In either case, the Group must address the needed corrective action(s) using its Corrective Action Procedure, which is a required part of the QMS. The Group can record a corrective action using its own documentation or a USDA Corrective Action Report (CAR). USDA will issue a CAR for any non-conformity that causes a Group to not meet GroupGAP requirements. The Group must send its CAR to USDA via [email, mail, or fax](#).

GroupGAP Certification

If the USDA system and producer audits show that a Group is in compliance with GroupGAP requirements, USDA will issue GroupGAP certification for the Group, and for each of the established members. Certification will include the listing of the Group and established members, including the associated grower/member production locations and crops that have met USDA acceptance criteria for the GroupGAP Program, at: <http://www.ams.usda.gov/services/auditing/gap-ghp#Listings>. The listing will be posted within 30 days of the issuance of the USDA system audit report.

Ongoing Documentation Requirements

The Group is responsible for ensuring that its required documentation is current, and for providing any updated documents to USDA throughout its participation in the GroupGAP program. This includes the:

1. **List of Members.** The Group must update its List of Members if any members or factors change, and submit an amended list to USDA via [email, mail, or fax](#).

The Group must notify USDA of the removal or addition of a member within 30 days; or, within 48 hours if a member is removed due to an ongoing food safety risk that was not adequately addressed according to control procedures established in the Group's QMS.

The Group may add a new member to its USDA certification after completing its internal initial audits of the new member's production location. The timing of this addition is at the Group's discretion.

The Initial Application Fee and Continued Participation Fee ([Appendix III](#)) cover up to one major change in the Group List of Members per year. A major change is defined as the addition or removal of two or more members, or the addition or removal of a single member entry more frequently than once per month. The Group will be billed the Group Member List Change Fee for additional major changes.

2. **QMS.** The Group must submit to USDA any updates to its QMS within 30 days of the change. The manual can be submitted via [email, mail, or fax](#), or a secure document site.
3. **Adding a Crop to the Group Certification.** The Group may add crops for inclusion in a Group member's certification during the current production period or growing season when:
 - a. The crop has been declared by a Group member to be included on his/her food safety plan, and
 - b. If the Group will have an opportunity to include production activities associated with the new crop in its internal producer audits during the current production period or growing season.

The Group must notify USDA of any change in crops included in the GroupGAP certification by submitting an amended List of Members in accordance with the procedure above.

Continued Program Participation

GroupGAP certification is effective for one year from the conclusion of the system audit and all external producer audits. To continue to participate in GroupGAP, the Group must:

1. Continue to maintain and implement a QMS and Food Safety Plan, and perform internal producer audits.
2. Notify USDA of its intent to continue participating in the program by submitting the following items via [email, mail, or fax](#) at least 30 days prior to the expected harvest of the crops included within the scope of certification:

- a. Request for Audit Services ([FV-237A](#)).
- b. Updates to the Group's QMS documentation that have not already been submitted to USDA.
- c. The current Group's List of Members if it has changed from previous submittals to USDA.

USDA will initiate the steps for continued participation in the new season or production period, and bill the Group the continued participation fee established in the GroupGAP Fee Schedule ([Appendix III](#)).

APPENDIX I – QUALITY MANAGEMENT SYSTEM – BASIC REQUIREMENTS FOR GROUPS¹

1. The Group must establish, document, implement, and maintain a quality management system (QMS), and continually improve its effectiveness in accordance with the requirements of the USDA GroupGAP Certification Program. The QMS establishes the system by which the Group will ensure that their group members are in compliance with the chosen GAP and/or GHP audit service - see item 5. c. (4.1)
2. If the Group chooses to outsource any process that affects the GroupGAP certification, the Group must ensure control over this process. Control of the process must be identified within the QMS. (4.1)
3. The documented QMS must be modeled after ISO 9001, a system that meets other recognized industry quality standards, or a process control system that is equivalent to or better than ISO 9001.

The Group must identify the quality standard used to model their QMS. Some Groups may have third party certification of their QMS; however, third party certification by any third parties is not required. Whether or not Groups want to use third party certification is completely optional on their part. Although certification information may be provided as documentation and evidence to support the system proposed by the Group, third party certification/registration documentation is not a substitute for government (USDA AMS) review and approval of the QMS.

4. The documented QMS must include, at a minimum:
 - a. Statements of a quality policy and quality objectives (4.2.1 a);
 - b. A description of the Group, including basic information on the Group's identity, location, product, method of distribution, customer base, and history of QMS implementation;
 - c. A quality manual (4.2.1 b);
 - d. Procedures (see item 6) and records (see item 7) required by the GroupGAP Certification Program (4.2.1 c); and
 - e. Documents needed by the Group to ensure the effective planning, operation, and control of its processes. (4.2.1 d)
5. The quality manual must establish:

¹ Where possible, the ISO 9001:2008 clause associated with any of the requirements stated in this document is identified in parentheses following the requirement.

- a. The scope of the QMS, including details of and justification for any exclusions from the USDA GroupGAP Certification Program requirements (4.2.2 a);
 - b. How the Group will address management responsibility (5); resource management (6); product realization (7); and measurement, analysis, and improvement (8);
 - c. How the Group will communicate and instill the quality policy and quality objectives throughout the organization and to their customers;
 - d. How the Group ensures that responsibilities and authorities are defined and communicated within the organization, including an organizational chart or similar document listing all personnel, and their responsibilities and authorities;
 - e. The necessary competence for personnel performing work affecting product quality, including the criteria for training; and
 - f. Specified product requirements, including the GAP and/or GHP audit selected for the food safety audit service - see item 8.
6. The documented QMS must include, at a minimum, the following procedures:
- a. Control of documents (4.2.3);
 - b. Control of records (4.2.4);
 - c. Internal audit (8.2.2);
 - d. Control of nonconforming product (8.3);
 - e. Corrective action (8.5.2);
 - f. Preventive action (8.5.3); and
 - g. Internal producer audits (how the Group will accomplish their annual and unannounced audits of the member locations).
7. The documented QMS must include, at a minimum, the following records:
- a. A list of participating producers/members, to include member name, (mailing) street address, city, state, zip code, member contact information, list of fruits and/or vegetables produced, physical location of the production area including acreage of each fruit and/or vegetable and/or nuts or production site square footage, harvest season – the start and stop

months for the year, labor – whether it is contract or direct hire, harvest type – mechanical or manual, and the specific audit service type and scope (i.e. Harmonized Field and Harvest Operations; USDA GAP&GHP Farm Review, Field Harvesting and Field Packing Activities, and House Packing Facility; etc.) to be covered by certification, and the last date of USDA GAP and/or GHP individual audit certification for the member location;

- b. A written agreement or contract with each member which grants permission for USDA AMS authorized personnel to enter any and all farms and/or facilities covered by the specific audit program for the purposes of conducting the audit;
- c. Management reviews (5.6.1);
- d. Personnel education, training, skills, and experience (6.2.2 e);
- e. Records associated with product realization, including, but not limited to (7.1 d, 7.2.2, 7.3.2, 7.3.4, 7.3.5, 7.3.6, 7.3.7, 7.4.1, 7.5.2, 7.5.3, 7.5.4, and 7.6):
 - i. Review of the requirements of the specified USDA GAP and/or GHP audit service, including changes;
 - ii. Inputs relating to production and food safety requirements, including changes;
 - iii. Necessary risk assessments, including appropriate periodic reviews;
 - iv. Verification and validation of food safety control measures;
 - v. Internal producer audit results, including documentation of both annual, announced audits and unannounced audits (these could also be used to fulfill requirement stated in iv., above);
 - vi. Results of supplier evaluations;
 - vii. Traceability, or unique identification of product;
 - viii. Customer property lost, damaged, or unsuitable for use; and
 - ix. Calibration and verification of measuring/monitoring equipment;
- f. Internal audits (8.2.2);
- g. Release of product to be delivered to customer (8.2.4);

- h. Nature of nonconformities, and subsequent action taken (8.3);
 - i. Results of corrective actions taken (8.5.2); and
 - j. Results of preventive actions taken (8.5.3).
- 8. The documented QMS must include, at a minimum, the procedures and records required by the chosen GAP or GHP audit standard. The audit services available for the USDA GroupGAP Certification Program are located here:
www.ams.usda.gov/gapghp

APPENDIX II – INTERNAL PRODUCER AUDITOR REQUIREMENTS

LEVEL	CRITERIA
Auditor - Prerequisites	✓ Possess Personal Attributes important in the performance of auditing activities <u>Personal Attributes</u> Ethical, open-minded, diplomatic, observant, perceptive, versatile, tenacious, decisive, self-reliant, acts with fortitude, open to improvement, culturally sensitive, and collaborative. ✓ Demonstrate effective verbal and written communication skills ✓ Hold a High School Diploma or Equivalent ✓ Possess 3-Years Post-High School Education and/or Experience, as follows: <u>Education</u> Education may be substituted for experience. A 4-year course of study leading to a bachelor's degree in an agriculture related field (sciences, statistics, or business) will meet the experience requirement. <u>Work Experience</u> Have a minimum of 3 years post-high school experience in an agricultural related field, such as applicable farm experience, agricultural commodity grading, agricultural marketing, food processing, laboratory testing, quality assurance, process control application, process or systems auditing, ISO standards application. <u>Combination Education & Work Experience</u> Combinations of successfully completed post-high school education and experience may be used to meet total qualification requirements for experience.

Auditor Training	✓ Auditor Training, by any of the following: - o USDA AMS Fundamentals of Auditing – a two-day or distance learning (In Development) course based on ISO 19011, parts 4 and 6, or - o ISO 9001 3-day Internal Auditor or 5-day Lead Auditor course provided by an Exemplar Global (http://exemplarglobal.org/) certified provider. A list of certified organizations can be found here: http://exemplarglobal.org/certification/what-we-offer/search-for-certified-individuals-or-organizations/, or - o American Society for Quality (ASQ) (http://asq.org/index.aspx) Quality Auditor certification (CQA). Additional information can be found here: http://asq.org/cert. ✓ Produce Food Safety Training – a course that addresses the basics of Good Agricultural Practices (GAP) or the Food Safety Modernization Act (FSMA), Produce Safety Rule requirements. This can be fulfilled by one of the following: - o Produce Safety Alliance (PSA) (http://producesafetyalliance.cornell.edu/) Grower Training. Information about this training can be found here: http://producesafetyalliance.cornell.edu/training/grower-training-courses. For 2016, an alternate to this training is the GAPs Online Produce Safety Training Course provided by Cornell University. You can find more information here: http://portal.ecornell.com/corporate/landingPage.do?method=load&corporateGroupId=15606. - o PSA Grower Training Train-the-Trainer Course. Information about this course can be found here: http://producesafetyalliance.cornell.edu/training/train-trainer-course. - o Equivalent FDA-recognized course (yet to be determined). ✓ Audit Service Specific Training - o USDA AMS audit service training course, addressing the specific USDA acceptance criteria for the chosen audit service selected by a Group for their GroupGAP certification. These currently include: ▪ USDA Produce GAPs Harmonized Food Safety Standard Auditor Training Course. ▪ USDA Good Agricultural Practices & Good Handling Practices (GAP&GHP) audit verification program Auditor Training Course. - o Other equivalent audit service training identified by USDA AMS. These will be added to this list, as they become available.
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LEVEL	CRITERIA
Auditor – Maintenance of Role	✓ Maintain qualifications by participating in GroupGAP internal producer audits on an annual basis. ✓ Complete continuing professional development (CPD) courses that relate to their role as a GAP and/or GHP auditor (minimum of 20 hours/year). See Summary of CPD Activities and Credit Hour Allowances in table, below. ✓ Complete required auditor refresher courses.²

² Identified by USDA with Group notification provided on an annual basis.

SUMMARY OF CPD ACTIVITIES AND CREDIT HOUR ALLOWANCES –PART 1 OF 2

Activity	Credit Hours Earned		Maximum Credit Hours	Documentation Requirements
Instructor Credit for teaching or leading courses <i>All courses must be taught in addition to your usual job responsibilities.</i>	College	1 Credit Hours = 15 Hours	Maximum of 20 hours	A letter from the college, company, or organization verifying the course title, dates, and hours instructed or the course outline or description that documents the instructor's name, course title, and dates.
	Non-College	1 Credit Hours = 15 Hours		
	Agency, technical society or organization sponsored	1.5 X contact/classroom hours (hours spent teaching)		
Student Credit for Attending Courses	College	1 Credit Hour = 10 Hours	Maximum of 20 hours	Copy of official transcript or report card showing semester credit earned, course title, and completion date.
	Non-College	Hour for Hour		Certificate of completion or letter from sponsor showing dates, hours, title, and assigned CEU or credit value.
	Agency, technical society or organization sponsored	Hour for Hour		
	Home-Study	Hour for Hour		
Meetings Meetings, conferences, seminars, workshops, and forums sponsored by Gov't agency, ASQ, or other technical societies and organizations. <i>These do not include day-to-day normal business meetings.</i>	Conferences/ Workshops/Clinics	8 Hours per Day	Maximum of 20 hours	A roster, statement from the organizations officer, monthly meeting notice signed by organization officer, monthly meeting tickets, or receipts.
	Meetings	Hour for Hour		
Committees or Board of Directors Gov't agency, ASQ, or other technical societies and organizations. <i>These do not include day to day normal business meetings.</i>	Elected Officer (Chair, Chair-Elect, Secretary, Treasurer)	20 Hours per Year of Service	Maximum of 20 Hours	A letter from the appropriate chair stating the committee's mission, frequency of meetings, your duties, and term of service on the organization's letterhead.
	Member leader in appointed position	15 Hours per Year of Service		
	Member who performs ad hoc responsibilities	2 Hours per event/activity		
Professional Auditor Certifications	Individuals receiving and maintaining professional certifications that pertain to auditing meet the AMS Auditor CPD requirements.		N/A	Provide a copy of a certificate or membership card that designates the recipient's name, the certification, and its issued and expiration dates.

SUMMARY OF CPD ACTIVITIES AND CREDIT HOUR ALLOWANCES – PART 2 OF 2

Activity	Credit Hours Earned				Maximum Credit Hours	Documentation Requirements
Electronic Media, Webinars, Articles, & Books <i>An individual may receive credit for watching or listening to electronic media such as audio, videotapes, DVDs, CD-ROMs, podcasts.</i> <i>Credit will be given for reading books, articles, and webinars.</i>	Audio, Video, CD-ROM, DVD, etc.		15 min per item		Maximum of 6 Hours	The individual shall self-certify that s/he has completed an activity by submitting an email to his/her supervisor attesting to the date(s) the individual viewed/listened to the media source, its title, and length of time, OR by submitting a copy of the media source with the above-listed information.
	Articles					
	Books		4 Hours per Book		Maximum of 20 Hours	
	Webinars		Hour for Hour			
Publishing		Author	Co-Author	Editor	Maximum of 20 Hours	Provide a copy of the published review along with the publication table of contents.
	Media Review	2.5 Hours per published review	N/A	N/A		
	Article	1 Hour per Article	0.5 Hours per article	N/A		Provide a copy of article and the table of contents so reviewer can identify the issue of the magazine, the title of the article, and the author/co-author of the article
	Book	20 Hours per Book	15 Hours per Book	7 Hours per Book		Provide a copy of the title page showing the title and author/co-author and a copy of the table of contents. Book editors should submit a letter from the author, co-author, or publisher indicating the work edited and a copy of the table of contents.

APPENDIX III – GROUPGAP FEE SCHEDULE

The following activities or events will be billed at the USDA AMS audit verification services rate, (currently \$92/hour). The fee is published here:

www.ams.usda.gov/services/grading/fees#processed.

Activity	Number of Hours
Initial Application Fee	8
USDA External Producer Audits; USDA System Audits; USDA Follow-up Audits	Actual audit time, including associated desk and on-site audit activity, and auditor travel time
Continued Participation Fee	2
Group Member List Change Fee	1

APPENDIX IV – BEFORE YOU APPLY CHECKLIST

Check	Task
	Decide if GroupGAP is right for you - 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? - Does the group have a knowledgeable staff member who can write and implement a Quality Management System? - Does the group have staff members who can meet the USDA auditor criteria? - Are your producers ready and willing to implement Good Agricultural Practices? - Will your buyers accept GroupGAP?
	Create a Group - Do you have a pre-existing network of producers? - Is your group ready and “on-board” with GroupGAP? - Does your group have a central facility (packinghouse, warehouse, etc.) that will be considered a member of the group?
	Choose a food safety audit service and - Determine which USDA audit service your group plans to use - o Which audit service are your internal auditors trained to audit to? - o Do your buyers require a specific audit service? Scopes? Addendums? - Develop food safety plan manual or template (if using) - Develop standardized producer documents and records (if using) - Develop standardized food safety signs (if using)
	Create Quality Management System, including - Write Quality Manual - Develop group policies - Identify and create group records or forms
	Identify a Group administrator who will act as the person responsible for program implementation and the contact person for the USDA
	Identify trained personnel to perform internal producer and QMS audits, or identify appropriate personnel to attend the required training (see Appendix II for requirements for internal producer auditors)
	Implement the Quality Management System. This includes: - Train group employees, members, or any other necessary personnel on the Quality Management System and their responsibilities - Share the Group's quality policy and objectives with staff, members, and customers

	- Develop a plan for and conduct the internal QMS audit(s)
	Develop a membership agreement between the Group and producers which allows the Group staff and the USDA access to producers' property in order to conduct audits
	Train growers on the requirements of the chosen food safety audit service
	Establish plan for and perform the internal producer audits, including any applicable unannounced audits

APPENDIX V – A GROUPGAP YEAR