



## USDA Good Agricultural Practices (GAP)

### The purpose of this notebook

The Washington State Potato Commission has prepared these documents and the video to help you as a grower understand and prepare for your GAP audit. You should carefully review the entire set of documents/video and be sure you understand how to apply them to your farm. Not all aspects of all the documents will fit your particular operation. We have provided a CD with all the documents in electronic format so that you can modify them as appropriate before use.

1. WSPC Guide for Audit Checklist – Notebook Section 1  
Our Guide walks through the entire Audit Verification Checklist and describes the kind of documentation or information that will help you pass each question. Where possible, we have tried to clarify specifically what the auditors will be looking at for each question. We list documentation accepted for each question that has a D or R in the far right column on the USDA GAP Audit Verification Checklist. We list the signs, forms and/or Standard Operating Procedures that we provide that might be helpful to you in meeting the requirements of such questions. Depending on your operation, you may not need to use some forms for some questions – you will have to make your own judgment call on each question.
2. Model Standard Operating Procedures (SOP) – Notebook Section 2  
The GAP Audit looks to Standard Operating Procedures as your farm's policies in compliance with many of the questions in multiple Parts of the audit. For that reason, it is important that you adjust this model to fit your operations and that you and your employees are willing to perform as your SOPs indicate.
3. USDA GAP Audit Verification Checklist – Notebook Section 3  
This document is the official checklist used by USDA during their audits. It allows you to see the entire set of questions, the point value assigned to each and the scoring for each section.
4. WSPC Sample Forms and Logs – Notebook Section 4  
These forms are suggested for your use in meeting the documentation requirements of the GAP audit. Not every operation will need to use every form, and you may feel that the forms need to be modified prior to use.
5. Document CD and Training Video – Notebook Section 5  
The CD contains all the documents described above in electronic format. This will give each operation the chance to modify the documents to fit its needs. The DVD contains a Worker Health and Hygiene video in Spanish and English that most operations can use to train their workers as required under GAP. It covers the worker health and hygiene training required in Part G of the audit; however, in addition you will have to instruct your employees on the specifics of your operation, such as the location of first aid kits, chemical spill clean up procedures, etc.



Sample signs

Also enclosed in the notebook are a set of laminated signs required by the audit. Additional copies are available from the WSPC.

**The materials in this notebook are provided as a service of the Commission to aid its growers in understanding and meeting the requirements of the USDA GAP audit. They are not a stand-alone guarantee of passing the audit. Auditors will expect operators to understand, apply and demonstrate the required standards as part of the documentation. Additional means of documentation may be required.**

**The materials in this notebook were correct at the time of publication. It is possible changes could occur as the program is enacted. Questions regarding the audit should be directed to:**

**Darla Lindemeier  
(509) 398-1353  
dlindemeier@agr.wa.gov**



## USDA Good Agricultural Practices (GAP) General Questions Section

**P-1. A documented food safety program that incorporates GAP has been implemented.** Standard Operating Procedures (SOPs) which include a food safety and security program incorporating GAP have been accepted and adopted by the farming operation.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedures.

*\*Model SOPs provided by WSPC.*

**P-2. The operation has designated someone to implement and oversee an established food safety program.**

**DOCUMENTATION ACCEPTED:** Name of person on Standard Operating Procedures.

*\*Model SOPs provided by WSPC.*

### Traceability

**G-1. A documented traceability program has been established.** All the information in Form U should be maintained for each field, and assembled in one place for inspection during your audit.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedures, sample records form.

*\*Model SOPs provided by WSPC.  
\* Model forms provided by WSPC: Field Production/Crop Disposition for Traceability (Form U).*

**G-2. The operation has performed a “mock recall” that was proven effective.** A mock recall must be conducted within 6 months of the audit date. Growers should be able to document what storage and field said product came from, when field was harvest and planted, and ideally what the seed source was.

**DOCUMENTATION ACCEPTED:** Sample recall form.

*\* Model forms provided by WSPC: Mock Recall Log (Form T).*



**Worker Health & Hygiene**

**G-3. Drinking water is available to all workers.**

**DOCUMENTATION ACCEPTED:** Well test documentation; bottled water receipts.

**G-4. All employees and all visitors to the location are required to follow proper sanitation and hygiene practices.** Signs are posted stating that employees and all visitors are required to follow proper sanitation and hygiene practices.

**DOCUMENTATION ACCEPTED:** Policy evident in SOPs; visitor sign-in and signs alerting them to follow specific policies; regular and periodic reviews of employee habits, training sessions or other means. Statements at orientation, employee handbook or policy statement "with no continual review or follow-up will not be considered as a 'required process.'"

*\*Model SOPs provided by WSPC.  
\*Worker health and hygiene video provided by WSPC.  
\*Model forms provided by WSPC: Worker Training Log (Form A); Health & Hygiene Policy sign-off sheet (Forms B & Bsp); Visitor Log (Form C).  
\* Model signage provided by WSPC: *Wash Your Hands...: All Visitors Are Expected To...**

**G-5. Training on proper sanitation and hygiene practices is provided to all staff.**

**DOCUMENTATION ACCEPTED:** Sign-in sheets for training sessions; signed affidavit from staff members.

*\*Worker health and hygiene video provided by WSPC.  
\*Model forms provided by WSPC: Worker Training Log (Form A); Health & Hygiene Policy sign-off sheet (Forms B & Bsp).*

**G-6. Employees and visitors are following good hygiene/sanitation practices.**  
[AUDITORS MUST BE TREATED AS VISITORS.]

**G-7. Employees who handle or package produce are washing their hands before beginning or returning to work.** Auditor is to observe employee hand-washing.



**G-8. Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work.**

*\*Model signage provided by WSPC: Wash Your Hands...*

**G-9. All toilet/restroom/field sanitation facilities are clean. They are properly supplied with single use towels, toilet paper, and hand soap or anti-bacterial soap and and water for hand washing meets the microbial standards for drinking water.** The facility is in good repair, sanitary, proper signage and water for hand washing meets the microbial standards for drinking water.

**G-10. All toilet/restroom/field sanitation facilities are serviced and cleaned on a scheduled basis.**

**DOCUMENTATION ACCEPTED:** Up-to-date cleaning schedule.

*\* Model forms provided by WSPC: Field Sanitation Unit Service Log (Form D).*

**G-11. Smoking and eating are confined to designated areas separate from where product is handled.** Written policy states that no eating or chewing food, no chewing gum, no using tobacco, and no drinking beverages can be done in the areas where produce is handled.

*\* Model SOPs provided by WSPC.  
\* Model signage provided by WSPC: Designated eating area.*

**G-12. Workers with diarrheal disease or symptoms of other infectious disease are prohibited from handling fresh produce.** Written policy excludes workers from coming in contact with produce if, by observation, they have diarrhea, an illness or open lesion (boil, sore, infected wound). The policy also states that personnel will report such health conditions to their supervisors.

**DOCUMENTATION ACCEPTED:** Answers to verbal questions to supervisors indicating they can a) recognize symptoms and b) know to direct afflicted persons away from product-handling areas.

*\* Model forms provided by WSPC: Illness/Injury Reporting Log (Form E).*



**G-13. There is a policy describing procedures which specify handling/disposition of produce or food contact surfaces that have come into contact with blood or other body fluids.**

**DOCUMENTATION ACCEPTED:** Written plan in SOPs.

***\* Model SOPs provided by WSPC.***

**G-14. Workers are instructed to seek prompt treatment with clean first aid supplies for cuts, abrasions and other injuries.** Written policy describes procedures which specify if workers are injured on the job, they must seek first aid help. The policy also states that personnel will report such health conditions to their supervisors.

**DOCUMENTATION ACCEPTED:** Written policy and procedures in SOPs and worker training; verbal queries of supervisors and workers.

***\* Model SOPs provided by WSPC.***  
***\* Worker health and hygiene video provided by WSPC.***  
***\* Model forms provided by WSPC: First Aid Kit Monitoring Log (Form F).***

**G-15. Company personnel or contracted personnel that apply regulated preharvest and/or post-harvest materials are licensed. Company personnel or contracted personnel applying non-regulated materials have been trained on its proper use.** Pesticides, growth regulators and fertilizers are applied by licensed operators and are compliant under WPS.

**DOCUMENTATION ACCEPTED:** Copies of licenses, if applicable, or if not, review of training documents which prove that the applicators have received training on the proper use of the materials.



## USDA Good Agricultural Practices (GAP) Part 1 – Farm Review

### Water Usage

**1-1. What is the source of irrigation water? (Pond, Stream, Well, Municipal, Other)**  
Auditor will list all sources.

**1-2. How are crops irrigated? (Flood, Drip, Sprinkler, Other)** Auditor will list all methods used on the farm.

**1-3. A water quality assessment has been performed to determine the quality of water for irrigation purposes on the crop(s) being applied.** All water used for irrigation must be regularly tested for bacteria -- well water at least once per year and surface water three times per season (once at planting, second at peak use and third at or near harvest).

**DOCUMENTATION ACCEPTED:** Testing log maintained by farm and results from testing company.

*\*Model SOPs provided by WSPC.  
\* Model forms provided by WSPC: Well Water Testing Log (Form G), Surface Water Testing Log (Form H).*

**1-4. A water quality assessment has been performed to determine the quality of water used for chemical application or fertigation method.** See 1-3 above.

**DOCUMENTATION ACCEPTED:** Testing log maintained by farm and results from testing company.

*\*Model SOPs provided by WSPC.  
\* Model forms provided by WSPC: Well Water Testing Log (Form G), Surface Water Testing Log (Form H).*

**1-5. If necessary, steps are taken to protect irrigation water from potential direct and non-point source contamination.** Operators should evaluate the surroundings of each field for the potential runoff of contaminated water. Where there is potential for contaminated runoff, measures should be taken to minimize the risk (e.g. berms, swails, diversions, etc).



### **Sewage Treatment**

**1-6. The farm sewage treatment system/septic system is functioning properly and there is no evidence of leaking or runoff.** Any such system should be kept in good working order.

**1-7. There is no municipal/commercial sewage treatment facility or waste material landfill adjacent to the farm.** “Adjacent” means ¼ mile or closer.

### **Animals/Wildlife/Livestock**

**1-8. Crop production areas are not located near or adjacent to dairy, livestock or fowl production facilities unless adequate barriers exist.** This question may be marked “No” if production fields are closer than 1 mile to an animal production area and there is no natural barrier such as topography, wooded areas and similar.

**1-9. Manure lagoons located near or adjacent to crop production areas are maintained to prevent leaking or overflowing, or measures have been taken to stop runoff from contaminating the crop production areas.** If contamination from manure lagoons is possible, i.e. the production fields are adjacent and at lower elevation, then special care must be taken to ensure that lagoons are secure and/or measures to protect the crop must be taken.

*\*Model SOPs provided by WSPC.*

**1-10. Manure stored near or adjacent to crop production areas is contained to prevent contamination of crops.**

*\*Model SOPs provided by WSPC.*

**1-11. Measures are taken to restrict access of livestock to the source or delivery system of crop irrigation water.** Animals should be restricted from areas around wells and irrigation ditches; even if only a few head of livestock, they should be kept 200 feet from the water source.





**1-12 Crop production areas are monitored for the presence or signs of wild or domestic animals entering the land.** Staff should periodically check fields for regular entry by wild or domestic animals and record in a log.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure and monitoring log.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Wild and Domestic Animal Monitoring Log (Form I).*

**1-13. Measures are taken to reduce the opportunity for wild and/or domestic animals from entering the crop production areas.** This does not mean that all animals must be completely restricted from fields at all times.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure.

*\*Model SOPs provided by WSPC.  
\*Notes on measures taken to limit animal access.*

### **Animal-based Soil Amendments and Municipal Biosolids**

The auditor must choose one of these options:

**Please choose one of the following options as it relates to the farm operation:**

**Option A. Untreated or incompletely treated animal-based soil amendments or a combination of untreated and treated animal-based soil amendments are used.**

**Option B. Only treated or composted animal-based soil amendments/ treated municipal biosolids are used as soil amendments.**

**Option C. No animal-based soil amendments or municipal biosolids of any kind are used as soil amendments.**

**Only answer the following manure questions (questions 1-14 to 1-22) that are assigned to Option chosen above. DO NOT answer the questions from the other two options. The points from the animal-based soil amendments and municipal biosolids are worth 35 of a total 190 points, and answering questions from the other two options will cause points to calculate incorrectly.**



**Option A: Untreated Animal-based Soil Amendments**

**1-14. When untreated animal-based soil amendments are applied, it is incorporated at least 2 weeks prior to planting and a minimum of 120 days prior to harvest.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure and application log.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Manure Application Log (Form J).*

**1-15. Untreated animal-based soil amendments are not used on commodities that are harvested within 120 days of planting.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure and application log.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Manure Application Log (Form J).*

**1-16. If both untreated and treated animal-based soil amendments are used, the treated animal-based soil amendment is properly treated, composted or exposed to reduce the expected levels of pathogens.** Composting methods and treatment records must be available, whether done on-farm or elsewhere.

**DOCUMENTATION ACCEPTED:** Treatment records, or records from supplier(s).

**1-17. Animal-based soil amendments are properly stored prior to use.** Leaching or runoff from stored animal-based soil amendments must be avoided.

**Option B: Composted Manure**

**1-18. Only treated or composted animal-based soil amendments and/or treated biosolids are used as a soil amendment.**

**DOCUMENTATION ACCEPTED:** Application log.

*\*Model forms provided by WSPC: Manure Application Log (Form J).*



**1-19. Treated or composted animal-based soil amendments and/or treated biosolids are properly treated, composted or exposed to environmental conditions that would lower the expected level of pathogens.** Composting methods and treatment records must be available, whether done on-farm or elsewhere.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure, application log.

*\*Model SOPs provided by WSPC.*

**1-20. Treated or composted animal-based soil amendments and/or treated biosolids are properly stored and are protected to minimize recontamination.** Leaching or runoff from stored animal-based soil amendments or biosolids must be avoided. Auditors will complete a site review.

**1-21. Analysis reports are available for composted animal-based soil amendments and/or treated biosolids.** Composting methods and treatment records must be available, whether done on-farm or elsewhere.

**DOCUMENTATION ACCEPTED:** Reports from analysis of soil amendments.

**Option C: No Animal-based Soil Amendments/Biosolids Used**

**1-22. No animal-based soil amendments or municipal biosolids are used.** Maximum points are awarded if this option is used.

**Soils**

**1-23. A previous land use risk assessment has been performed.** Operators should know previous land use. Previous use as a dairy, homestead, feedlot and similar are inappropriate uses.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure, risk assessment form.

*\*Model SOPs provided by WSPC.*

*\*Model forms provided by WSPC: Land Use Risk Assessment (Form S)*



**1-24. When previous land use history indicates a possibility of contamination, preventative measures have been taken to mitigate the known risks and soils have been tested for contaminants and the land use is commensurate with test results. Potatoes should not be grown on such sites.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Land Use Risk Assessment (Form S)*

**1-25. Crop production areas that have been subjected to flooding are tested for potential microbial hazards.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure, testing log.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Soil Testing Log (Form K).*

**1-26. Each production area is identified or coded to enable traceability in the event of a recall.** Records should allow traceability forward or back in the marketing chain.

**DOCUMENTATION ACCEPTED:** Map or similar of production fields with identifying codes.



## USDA Good Agricultural Practices (GAP) Part 2 - Field Harvest and Field Packing Activities

### Field Sanitation and Hygiene

**2.1. A documented pre-harvest assessment is made on the crop production areas. Risks and possible sources of crop contamination are noted and assessed.** Items in the assessment should include field sanitation facilities, harvest and transportation equipment, possible contamination by animals, chemicals, fuels, etc.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure.

*\*Model SOPs provided by WSPC.*

**2-2. The number, condition, and placement of field sanitation units comply with applicable state and/or federal regulations.** One toilet facility and one hand washing facility is provided for each 20 employees or fraction thereof. Lavatories have hot (or tepid) and cold running potable water, hand soap, single use towels. Signs are posted instructing employees to wash their hands before beginning or returning to work in all bathrooms.

*\*Model signage provided by WSPC: Wash Your Hands*

**2-3. When question 2-2 is answered "N/A" (sanitation units are not required), a toilet facility is readily available for all workers.**

**2-4. Field sanitation units are located in a location that minimizes the potential risk for product contamination and are directly accessible for servicing.** Units are not in a place where 'gray water' can potentially contaminate a crop, either through routine cleaning or a spill.

**2-5. A response plan is in place for the event of a major spill or leak of field sanitation units or toilet facilities.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure to follow in case of contamination, including clean up, disposal of contaminated product, spill containment to prevent additional contamination.

*\*Model SOPs provided by WSPC.*



**Field Harvesting and Transportation**

**2-6. All harvesting containers and bulk hauling vehicles that come in direct contact with product are cleaned and/or sanitized on a scheduled basis and kept as clean as practicable.** Responsibility assigned to designated person.

**DOCUMENTATION ACCEPTED:** Service log; designated person assigned responsibility.

***\*Model forms provided by WSPC: Equipment/Sanitation Service Log (Form L).***

**2-7. All hand harvesting equipment and implements (knives, pruners, machetes, etc.) are kept as clean as practical and are disinfected on a scheduled basis.** Records of cleaning of implements and/or policy for cleaning implements and/or questioning of workers.

**DOCUMENTATION ACCEPTED:** Service Log.

***\*Model forms provided by WSPC: Equipment/Sanitation Service Log (Form L).***

**2-8. Damaged containers are properly repaired or disposed of.**

**2-9. Harvesting equipment and/or machinery which comes into contact with product is in good repair.**

**2-10. Light bulbs and glass on harvesting equipment are protected so as not to contaminate produce or fields in the case of breakage.**

**2-11. There is a standard operating procedure or instructions on what measures should be taken in the case of glass/plastic breakage and possible contamination during harvesting operations.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure documenting procedures.

***\*Model SOPs provided by WSPC.***



**2-12. There is a standard operating procedure or instructions on what measures should be taken in the case of product contamination by chemicals, petroleum, pesticides or other contaminating factors.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure.

*\*Model SOPs provided by WSPC.*

**2-13. For mechanically harvested crops, measures are taken during harvest to inspect for and remove foreign objects such as glass, metal, rocks, or other dangerous/toxic items. Auditors will observe or query harvesters.**

**2-14. Harvesting containers, totes, etc. are not used for carrying or storing non-produce items during the harvest season, and farm workers are instructed in this policy.**

**DOCUMENTATION ACCEPTED:** Description of policy in Standard Operating Procedures.

*\*Model SOPs provided by WSPC.*

**2-15. Water applied to harvested product meets the microbial standards for drinking water.** For the purposes of GAP, microbially safe water meets the microbial requirements of the EPA drinking water standards.

**DOCUMENTATION ACCEPTED:** Auditors must review water tests in order to determine that the water is microbially safe. Can only be answered N/A when water is not applied to field harvested product.

*\*Model forms provided by WSPC: Processing / Packing Line Water Log (Form M), Water Treatment Log (Form N), Well Water Testing Log (Form G), Surface Water Testing Log (Form H).*



**2-16. Efforts have been made to remove excessive dirt and mud from product and/or containers during harvest.**

**2-17. Transportation equipment used to move product from field to storage areas or storage areas to processing plant which comes into contact with product is clean and in good repair.** Auditors will observe the condition of the equipment.

**2-18. There is a policy in place and has been implemented that harvested product being moved from field to storage areas or processing plants are covered during transportation.** Auditors must question company personnel and should also observe loads.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure.

*\*Model SOPs provided by WSPC.*

**2-19. In ranch or field pack operations, only new or sanitized containers are used for packing the product.** This question is rarely if ever relevant to potatoes, but if it is relevant to a particular operation, a policy should be spelled out in the operation's Standard Operating Procedures.

**2-20. Packaging materials used in ranch or field pack operations are properly stored and protected from contamination.**

**2-21. Product moving out of the field is uniquely identified to enable traceability in the event of a recall.** There must be records kept on the origin of all product moved in bulk from the field to packing or storage facilities.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure.

*\*Model SOPs provided by WSPC.*





## USDA Good Agricultural Practices (GAP) Part 3 – House Packing Facility

### Receiving

**3-1. Product delivered from the field which is held in a staging area prior to packing or processing is protected from possible contamination.**

**3.2. Prior to packing, product is properly stored and/or handled in order to reduce possible contamination.**

Activities during storage and transport are designed to prevent cross-contamination of produce from agricultural inputs, debris, cleaning agents, or produce.

### Washing/Packing Line

**3.3. Source water used in the packing operation meets the microbial standards for drinking water.** For the purposes of GAP, microbially safe water meets the microbial requirements of the EPA drinking water standards. DOCUMENTATION ACCEPTED: Auditors must review water tests in order to determine that the water is microbially safe. Can only be answered N/A when water is not applied to field harvested product.

**3.4. If applicable, the temperature of processing water used in dump tanks, flumes, etc., is monitored and is kept at temperatures appropriate for the crop.**

**3.5. Processing water is sufficiently treated to reduce microbial contamination.** Source water used in the packing of fresh fruits and vegetables must meet the requirements of the EPA Drinking Water Standard. Municipal water supplies are regulated by law and are required to meet these requirements. However, well water and surface water are subject to various uncontrollable influences and may or may not meet these requirements. The operation must provide documentation verifying the source water meets the EPA Drinking Water Standard requirements.

Model forms provided by WSPC: Water Treatment Log (Form N).

**3.6. Water-contact surfaces, such as dump tanks, flumes, wash tanks and hydro coolers, are cleaned and/or sanitized on a scheduled basis.**

Model forms provided by WSPC: Processing / Packing Line Water Log (Form M).

**3.7. Water treatment (strength levels and pH) and exposure time is monitored, and the facility has demonstrated it is appropriate for the product.** Develop an SOP that includes monitoring sanitation chemicals used to prevent cross contamination (i.e., chlorine and pH), periodic water sampling and microbial testing, scheduled water changes to maintain sanitary conditions.



**3.8. Food contact surfaces are in good condition; cleaned and/or sanitized prior to use and cleaning logs are maintained.** For all processes that use water: clean and sanitize water contact surfaces, such as dump tanks, flumes, wash tanks, and hydro coolers, as often as necessary to ensure appropriate water quality. Install backflow devices and legal air gaps, as needed, to prevent contamination of clean water with potentially contaminated water (such as between potable water fill lines and dump tank drain lines). Routinely inspect and maintain equipment designed to assist in maintaining water quality, such as chlorine injectors, filtration systems, and backflow devices, to ensure efficient operation.

**3.9. Product flow zones are protected from sources of contamination.**

**3.10. The water used for cooling and/or making ice meets the microbial standards for drinking water.** Only potable water is used at this facility.

**3.11 Any ice used for cooling produce is manufactured, transported and stored under sanitary conditions.** Ice is not used for cooling potatoes.

#### **Packing House Worker Health & Hygiene**

**3-12. Employee facilities (locker rooms, lunch and break areas, etc.) are clean and located away from packing area.**

**3-13. When there is a written policy regarding the use of hair nets/beard nets in the production area, it is being followed by all employees and visitors.**

**3-14. When there is a written policy regarding the wearing of jewelry in the production area, it is being followed by all employees and visitors.** Workers are not permitted to wear jewelry, watches, clothing with sequins or studs, bobby pins, false eyelashes and eyelash extensions, long nails, false nails, and nail polish. A worker may wear a single gold band if there are no stone insets. If nail polish has been applied, hands must be covered with gloves. Visitors observe from walkways and do not touch machinery or produce.

#### **Packing House General Housekeeping**

**3-15. Only food grade approved and labeled lubricants are used in the packing equipment/machinery.**

**3-16. Chemicals not approved for use on product are stored and segregated away from packing area.** This includes lubricants, cleaning supplies, paints, pesticides, etc.

**3-17. The plant grounds are reasonably free of litter and debris.**

**3.18 The plant grounds are reasonably free of standing water.**

**3.19 Outside garbage receptacles/dumpsters are closed or are located away from packing facility entrances and the area around such sites is reasonably clean.**



- 3-20. Packing facilities are enclosed.
- 3.21. The packing facility interior is clean and maintained in an orderly manner.
- 3.22. Floor drains appear to be free of obstructions.
- 3-23. Pipes, ducts, fans and ceilings which are over food handling operations, are clean.
- 3-24. Glass materials above product flow zones are contained in case of breakage.
- 3-25. Possible wastewater spillage is prevented from contaminating any food handling area by barriers, drains, or a sufficient distance.
- 3.26. There is a policy describing procedures which specify handling/disposition of finished product that is opened, spilled, or comes into contact with the floor. Create a written policy.
- 3-27. Only new or sanitized containers are used for packing the product.
- 3.28. Pallets and containers are clean and in good condition.
- 3.29. Packing containers are properly stored and protected from contamination (birds, rodents and other pests).

#### **Pest Control**

- 3-30. Measures are taken to exclude animals and pests from packing and storage facilities. Contracted pest control services place rodent traps around the facility to control pest activity.
- 3-31. There is an established pest control program for the facility.
- 3-32. Service reports for the pest control program are available for review. Have invoices and service records for pest control in and around facility available on file.
- 3-33. Interior walls, floors and ceilings are well maintained and are free of major cracks and crevices.

#### **Traceability**

- 3-34. Records are kept recording the source of incoming product and the destination of outgoing product which is uniquely identified to enable traceability.



## USDA Good Agricultural Practices (GAP) Part 4 – Storage and Transportation

### Product, Containers & Pallets

**4-1. The storage facility is cleaned and maintained in an orderly manner.** Auditors will examine storage buildings to confirm they are clean and orderly.

**4-2. Bulk storage facilities are inspected for foreign material prior to use and records are maintained.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure and inspection records.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Storage Building Inspection Log (Form O).*

**4-3. Storage rooms, buildings and/or facilities are maintained and sufficiently sealed or isolated and are protected from external contamination.** Good maintenance is critical.

**4-4. Storage grounds are reasonably free of litter and debris.** Auditors will inspect the grounds for garbage and other waste that might represent a microbial hazard to produce or attract rodents and other pests.

**4-5. Floors in storage areas are reasonably free of standing water.** Puddles and other standing water should be minimized, and should drain in a timely fashion to avoid microbial growth.

**4-6. Possible wastewater spillage is prevented from contaminating any food handling area by barriers, drains, or a sufficient distance.** Sewer pipes should be in good repair, and possible spill of wastewater from toilets or hand washing facilities must drain away from storage areas.



**4-7. There is a policy describing procedures which specify handling/disposition of finished product which is opened, spilled, or comes in contact with the floor.**

Operations that handle finished product should modify their Standard Operating Procedures accordingly; most potato operations will be exceptions to rule that this item cannot be marked N/A.

**4-8. Packing containers are properly stored and sufficiently sealed to be protected from contamination (birds, rodents, pests, and other contaminants).** Does not apply directly to potatoes, but care must be taken to keep storage buildings closed and sealed.

**4-9. Pallets, pallet boxes, totes, bags, bins, cellars, storage rooms, etc. are clean, and in good condition and do not contribute foreign material to the product.**

**4-10. Product stored outside in totes, trucks, bins, other containers or on the ground in bulk is covered and protected from contamination.** Potatoes should not be stored outdoors.

**4-11. Non-food grade substances such as paints, lubricants, pesticides, etc. are not stored in close proximity to the product.** These kinds of substances should not be kept in potato storage buildings.

**4-12. Mechanical equipment used during the storage process is clean and maintained to prevent contamination of the product.** Avoiding loose parts and leaking fluids on handling equipment is very important in potato storage and handling. Auditors will examine equipment to verify cleanliness, minimal leaks and loose parts.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure and cleaning records.

*\*Model SOPs provided by WSPC.*

*\*Model forms provided by WSPC: Equipment Sanitation Service Log (Form L).*



**Pest Control**

**4-13. Measures are taken to exclude animals or pests from storage facilities.** There must be evidence of a pest control program, and domestic animals must be excluded from storage facilities.

*\*Model SOPs provided by WSPC.*

**4-14. There is an established pest control program for the facility.** There must be evidence of a pest control program including dates of inspection, inspection reports and steps taken to eliminate problems. Poison bait stations must be located outside the buildings.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure and monitoring log.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Storage Pest Management Log (Form P).*

**4-15. Service reports for the pest control program are available for review.**

**DOCUMENTATION ACCEPTED:** Service logs and/or pest management company's records.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Storage Pest Management Log (Form P).*

**4-16. Interior walls, floors and ceilings are well maintained and are free of major cracks and crevices.** Storage buildings must be kept in good repair



### **Ice & Refrigeration**

**4-17. The water used for cooling, humidity, and/or making ice meets the microbial standards for drinking water.** Water used in cooling/humidification must be potable.

**DOCUMENTATION ACCEPTED:** Testing log maintained by farm and results from testing company.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Well Water Testing Log (Form G),  
Surface Water Testing Log (Form H), Water Treatment Log (Form N).*

**4-18. Manufacturing, storage and transportation facilities used in making and delivering ice used for cooling the product have been sanitized.** Ice is not used in potato storage – N/A.

**4-19. Climate controlled rooms are monitored for temperature and logs are maintained.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure, storage condition log.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Storage Condition Log (Form Q).*

**4-20. Thermometer(s) are checked for accuracy and records are available for review.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Storage Condition Log (Form Q).*

**4-21. Temperature control equipment condensation does not come in contact with produce.** The condensation mentioned here is what might form directly on refrigeration equipment, and hence it probably rarely applies to potatoes storage facilities.



**4-22. Refrigeration equipment (condensers, fans, etc.) and dehumidifiers are cleaned on a scheduled basis.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure.

*\*Model SOPs provided by WSPC.*

**4-23. Iced product does not drip on pallets of produce stored below. Potatoes are not stored with ice.**

### **Transportation**

**4-24. Prior to the loading process, conveyances are required to be clean, in good physical condition, free from disagreeable odors, from obvious dirt/debris.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure, truck checklist log.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Truck Checklist Log (Form R).*

**4-25. Produce items are not loaded with potentially contaminating products.** Potatoes are always transported to and from the grower storage in dedicated vehicles, so these points should be awarded.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure.

*\*Model SOPs provided by WSPC.*

**4-26. Company has a written policy for transporters and conveyances to maintain a specified temperature(s) during transit.**

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure.

*\*Model SOPs provided by WSPC.*





**4-27. Conveyances are loaded to minimize damage to product.** For many reasons, including food safety, potatoes should be handled carefully to prevent damage.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure.

*\*Model SOPs provided by WSPC.*

### **Worker Health and Personal Hygiene**

**4-28. Employee facilities (locker rooms, lunch and break areas, etc.) are clean and located away from storage, shipping and receiving areas.**

**4-29. When there is a written policy regarding the use of hair/beard nets in the storage and transportation areas, it is being followed by all employees and visitors.** This item should be marked N/A for growers.

**4-30. When there is a written policy restricting the wearing of jewelry in the storage and transportation areas, it is being followed by all employees and visitors.** This item should be marked N/A for growers.

### **Traceability**

**4-31. Records are kept recording the source of incoming product and the destination of outgoing product which is uniquely identified to enable traceability.** There must be records kept on the origin and destination of product moving into and out of storage facilities.

**DOCUMENTATION ACCEPTED:** Standard Operating Procedure.

*\*Model SOPs provided by WSPC.  
\*Model forms provided by WSPC: Field Production/Crop Disposition for Traceability (Form U)*



## USDA Good Agricultural Practices (GAP) Part 5 - Preventive Food Defense Procedures

### Secure Employee/Visitor Procedures

**5-1. The company has a documented food defense plan and a person has been designated to oversee it.** The operation shall develop and implement a documented food defense plan. Similar to a food safety plan, a food defense plan includes a company Food Defense Manual, containing the company's published SOP's and/or documentation. It will also contain information or references pertaining to internal or self audits of the program. Other similar documentation may also be applicable and acceptable if it indicates that a formally established program is in place. The Food Defense plan shall indicate that there is a person in the operation that has implemented and will oversee the food defense program.

**5.2. Food defense training has been provided to all employees.**

Food defense training can be found here: [Food Defense 101 - Front-line Employee | FDA](#). And here: [Intentional Adulteration | Food Safety Preventive Controls Alliance \(FSPCA\) | Institute for Food Safety and Health \(IFSH\) | Illinois Institute of Technology \(iit.edu\)](#)

Records showing training instructions and training documents that each employee has signed should be available, file Completion Certificates.

**5.3. Employees are aware of whom in management they should contact about potential security problems/issues.** Provide the name of the management representative in charge of food security.

**5.4. Visitors are required to check in (showing proof of identity) and out, when entering/leaving the facility.** Check in and out documentation required. Visitors should be accompanied by an employee. A facility may designate exceptions to this for frequent visitors to the facility such as USDA inspectors, health department inspectors, the pest control contractor, etc., provided a documented list of exempted people is maintained. If an auditor is able to gain access to an enclosed packing house or wholesale warehouse facility without showing ID and signing in or checking in with an owner/supervisor, this is a sign that their visitor check-in policy is not working.

**5.5. The purpose of visitation to site is verified before admittance to the facility.**

Document purpose of visitation on Check in and out form.

**5.6. Visitors are prohibited from the packing/storage areas unless accompanied by an employee.** Documentation required, create a written policy.

**5.7. Incoming and outgoing employee and visitor vehicles to and from the site are subject to inspection.** Documentation required, create a written policy.

**5.8. Parked vehicles belonging to employees and visitors display a decal or placard issued by the facility.** All vehicles should be subject to inspection to look for any obvious sources of contamination.



**5.9. Staff is prohibited from bringing personal items into the handling or storage areas.** A written policy should be in place that prohibits workers from bringing personal items into the production, handling, or storage areas. This reduces the possibility of an insider from contaminating product. Many packing facilities will allow workers to bring water to the packing line. This is an acceptable practice as long as the water is supplied by the facility and is not brought from outside sources.

**5.10. Staff access in the facility is limited to the area of their job function and unrestricted areas.** A written policy should be in place. In the case of small operations that only have a limited number of employees who perform all job functions, this question may be answered N/A.

**5.11 Management is aware of which employee should be on the premises and the area they are assigned to.** Employees should not be allowed to loiter around the grounds and facility after their work hours, especially in sensitive areas of the operation. A work schedule outlining employee's hours and area the employee is assigned to work should be available to all management. Auditors should look for an employee work schedule that shows what employees are on duty at what time.

**5-12. A system of positive identification of employees has been established and is enforced.** A policy or procedure should be in place for verifying the employment eligibility of all new hires in accordance with the Immigration and Nationality Act. In addition, the operation should outline what level of background checks will be performed. This can be a procedure as simple as a reference check, or more detailed such as a credit check for financial personnel. Operations that employ farm workers through an outside contractor should stipulate in their contract that the contractor perform a minimum level of background checks as well.

### **Secure Facility Procedures**

**5-13. Uniforms, name tags, or identification badges are collected from employees prior to the termination of employment.** If an employee does not turn over these items, there is a procedure in place for management/security to be notified that the employee is not allowed access to the facility. A sign in/sign out log of equipment should be kept as documentation. If the facility is considered a small farm/operation and does not have a requirement for name tags/badges, uniforms, etc. this question may be answered as N/A.

**5-14. The mailroom is located away from the packing/storage facilities.** For small farms/operations this question may be answered N/A.

**5-15. Computer access is restricted to specific personnel.** There should be a written Policy or Procedure to limit access to the company's computer network so that sensitive information is only accessed by authorized personnel.

**5-16. A system of traceability of computer transactions has been established.** All electronic transactions (bills of lading, purchase orders, etc.) are traceable to the person who initiated them. For larger operations, there may be several people that are assigned the



responsibility to generating transactions. In small operations only one person may be responsible for generating transactions, in this case this question may be answered N/A.

**5-17. A minimum level of background checks has been established for all employees.** A written policy or procedure should be in place for verifying the employment eligibility of all new hires in accordance with the Immigration and Nationality Act. In addition, the operation should outline what level of background checks will be performed. This can be a procedure as simple as a reference check, or more detailed such as a credit check for financial personnel. Operations that employ farm workers through an outside contractor should stipulate in their contract that the contractor perform a minimum level of background checks as well.

**5.18 Routine security checks of the premises are performed for signs of tampering, criminal or terrorist activity.** A written procedure should be in place for scheduled checks of the operation. On a farm, critical areas such as the storage barns, pesticide storage areas, and any product storage areas should be checked routinely. For packing sheds and wholesale warehouses that have a more permanent structure, the entire facility should be routinely checked. Including development of a checklist to verify the points of entry into buildings, either on the farm or packing house/wholesale warehouse.

**5.19 Perimeter of facility is secured by fencing or other deterrent.** Obviously it is very difficult, if not impossible to fence an entire farm operation. This question specifically deals with packing facilities and other buildings on the operation. The buildings should have some sort of deterrent such as fencing, locked doors, or similar items that will deter potential intruders from entering the facility. In the case of a farm this question may be answered N/A.

**5-20. Checklists are used to verify the security of doors, windows, and other points of entry.** A written checklist should be in place.

**5.21. All keys to the establishment are accounted for.** There shall be an accountability log showing who is in possession of any keys to enter the facility. Lost keys are documented on the accountability log, and steps are taken if keys to sensitive areas such as chemical storage areas are reported lost or stolen. These steps may include changing the lock or adding additional security measures.

**5.22. The facility has an emergency lighting system.**

**5-23. The facility is enclosed.**

**5-24. Storage or vehicles/containers/trailers/railcars that are not being used are kept locked.**

**5-25. Delivery schedules have been established.** The operation shall develop a policy which outlines delivery schedules and the policy for rejecting loads. The policy should include a list of criteria for why the product doesn't meet specified requirements as well as food safety requirements such as evidence of container tampering, evidence of suspicious foreign objects,



etc. The receiving department/facility shall never accept incoming product that is from an unknown source. All deliveries should be listed on the delivery schedule, and only deliveries

from that schedule should be accepted. The policy should address returned product and outline the returned product should be inspected for obvious signs of tampering or intentional contamination.

**5.26. The off-loading of incoming materials is supervised.** Unless the incoming material is being delivered by an employee of the operation, or a designated person outlined in the food safety plan, all incoming product should be unloaded under the supervision of an auditee employee. Truck drivers and other delivery personnel should not have unrestricted access to the facility.

**5-27. The organization has an established policy for rejecting deliveries.** The company should outline the policy for rejecting loads. A written policy should include a list of criteria for why the product doesn't meet specified requirements as well as food safety requirements such as evidence of container tampering, evidence of suspicious foreign objects, etc.

**5.28. Unauthorized deliveries are not accepted.** Provide a written policy statement.

**5.29. The company does not accept returned (empty) containers for packing of product unless they are sanitized containers intended for reuse.** Provide a written policy statement.

**5-30. The facility has a program in place to inspect product returned to the facility for tampering.** Provide a written policy statement.

**5-31. The company has identified the individual(s), with at least one backup, who are responsible for recalling the product.** Provide a written policy statement that assigns the task to a person.

**5-32. The company has performed a successful mock recall of product to the facility.** Operations must have some documented evidence of completing at least one practice recall within the 6 months previous to the audit and have assigned a person(s) to be responsible to implement any recalls. Documents must indicate the customers contacted, the amount of product remaining from the original shipment and the disposition of product which could not effectively be recalled. Such disposition may include sales to customers, reshipment to a subsequent customer that could be contacted if a recall were necessary or destroyed product.

**5-33 Product imported from outside the United States is segregated from domestic product.** Provide a written policy statement.

**5-34. Allergens handled by the facility are segregated from products to avoid cross contamination.** Provide a written policy statement: There are no allergens handled by this facility.



**5-35. Floor plans, product flow plans, and/or segregation charts are in a secure location.**

A map of the facility showing the floor plans, flow plans, and segregation areas should not be left in an unsecured location. If an aggressor was able to get a copy of this information, it would serve as a “blueprint” to analyze weaknesses of the facility.

**5-36. The organization has registered with the FDA and has been issued a registration number (do not record the number on checklist).** Only Food Handlers need to register with the FDA, grower/packers are exempt from this provision