Issues in Successfully Completing Third Party Certification Programs: GAPs, HACCP and Fruit Quality

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Choice of Certification Scheme

- Identify the scheme required by the market you serve
- Identify the standards published for the scheme
- Determine all special training requirements
- Identify the format of the audit
  - Yes/no
  - Open narrative
- Confirm which certification bodies are accredited or registered to conduct the certification

Preparation of the “Evidence”

- Know what the questions are
- Know what answers are acceptable (guidelines)
- Understand how each question relates to what you do
- Identify persons who can best assemble evidence:
  - Clearly and legibly, and
  - Accurately, and completely
- Assemble all reference evidence (e.g., IFAS publications)
- Critique the evidence to be sure it addresses the audit requirements

Assignment of Audit Responsibilities

- Avoid the “Where’s Waldo?” problem
- Explain details of entire audit to ALL persons involved
  - Explain field audits to field workers
  - Explain harvesting audits to harvesting workers
  - Explain packinghouse audits to packinghouse workers
  - Explain HACCP audits to QA/QC workers
  - Explain ALL audits to management personnel

Constructive Audit Preparation (1)

- Opportunity to organize company operations
  - Build prerequisite programs
  - Replace outdated programs and materials
  - Upgrade precision
  - Accomplish in-house training
- Schedule training for individual responsibilities
  - HACCP (e.g., IFAS or IHA formal training)
  - Pesticide management (e.g., Restricted Pesticide License)
  - Technical services (e.g., Certified Crop Advisor)

Constructive Audit Preparation (2)

- Set goals to achieve 100%
  - Accept findings of non-compliance constructively
  - Perform corrective actions to demonstrate ability
- Construct a mock traceback scenario(s)
  - Discover problems
  - Resolve problems to achieve traceback within 2 hours
- Construct a mock recall(s)
  - Use a challenge from your market (e.g., consumer illness)
  - Add a challenge from a production site (e.g., MRL exceedance)
  - Add a challenge from the supply chain (e.g., co-mingled lots)
Logical Thinking

- Distinguish fact from:
  - Personal or company values
  - Personal or company attitudes
  - Personal or company beliefs
  - Personal or company opinions
- Rely ONLY on written documents
- Remember the HACCP Rule: “If it isn’t written, it didn’t happen.”
  - Document! Document! Document!

Organization of Evidence

- Plan for succession:
  - Evidence is so organized and clearly presented that your replacement can handle the audit
- Involve senior management:
  - Keep them fully informed during preparation
  - Include them in audit closing session
- Remain confident that you are competent:
  - Remember that no one can do a better job that you can
- Be professional:
  - Remember the need to handle stress

Additional Skills

- Speak the language:
  - GAPs speak field, agronomic, farmer language.
  - HACCP speaks pertinent pathogens, CCP, CL language.
  - Auditors speak their own language (e.g. FAA auditors).
- It’s okay to be nervous:
  - It demonstrates your ability to manage when things go wrong.
- Stick to the audit template:
  - The audit includes ONLY the template items.
- Have backup/a Plan B in case:
  - “The dog eats your homework”
  - You have a “senior moment”
  - You experience “white coat syndrome”

Looking Back to the Future

- Food Safety Enhancement Act of 2009 (H.R. 2749)
- Safe FEAST Act of 2009 (H.R. 1313)
- Food and Drug Administration Globalization Act of 2009 (H.R. 759)
- Food Safety Modernization Act of 2009 (H.R. 875)
- FDA Food Safety Modernization Act (S.510)

More Looking

- Global Food Safety Initiative (GFSI)
  - “Once certified, accepted everywhere.”
  - Global umbrella of recognized food safety certification schemes
- Sustainable Agriculture Practice Standard
  - Scientific Certification Systems (SCS)
  - Leonardo Academy—Standards Development Organization (SDO) for the American National Standards Institute (ANSI)—potential ISO
- ISO 9001 Quality Management System (QMS)
- ISO 22000 Food Safety Management Systems

Any Questions?

Thank you.

And special thanks to all those I have worked with and learned from through many years.