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  - Replace outdated programs and materials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. 1332)

•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.