# QUALITY ASSURANCE AUDITS FOR ON-FARM PROCESSORS

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Over the last couple years, more growers and food producers have been notified by their larger wholesale accounts that they may need to undergo an independent (third–party) quality assurance and food safety audit. While large and medium size food processors have long been exposed to the audit process, small and very small producers have not, in most circumstances, had to undertake them.

Three factors have combined to change this and now small producers are being subjected to many of the same requirements of larger companies. These are:

- The emergence of the Buy Local movement and desire of larger chain accounts to source local foods to meet consumer demands,
- Outbreaks of food borne illness attributed to fresh produce, and,
- Increased media attention to the issues surrounding food safety.

One can argue, with some merit, that subjecting small producers to the same requirements as large, industrial processors is akin to "attacking a canoe with a battleship." Nevertheless, increasing reliance on the audit process is a reality that is unlikely to change. In addition, there are significant changes in government regulation on the horizon that will require small producers to maintain some of the food safety systems that are now part of the audit process.

Perhaps the greatest audit related issues that small producers will face is allocation of resources. These are the time, effort and money needed for an audit and the lack of reciprocity among the several companies providing audit services. This lack of reciprocity is especially troubling as retail chains usually only accept the audit findings of their chosen audit firm. While all the audit firms utilize the same basic standards of safety and quality assurance they differ in how they evaluate compliance and how much detail they require in documentation. Some audit firms have tiered systems which allow a small producer to come into compliance at different levels of scrutiny over a period of time and others adapt a "one size fits all approach."

## TERMINOLOGY

Understanding the audit process required knowledge of the alphabet soup of food safety acronyms as well as definitions related to food packing and processing as defined below.

### *GAPs*

Good Agricultural Practices are the safety protocols related to growing fruits and vegetables through the harvesting, trimming and packing process. Water safety and quality for all uses from irrigation to washing are key components of a GAP plan. Food handler hygiene, hazards associated with prior land use and control of contaminants from adjacent land, land use history, proper addition of soil amendments, packing shed sanitation and proper use of cleaning and sanitizing chemicals are all

components of a GAP plan. Like any food safety system, a GAP self-assessment should be in writing, employees must be trained in GAP and the plan should be evaluated at least annually or any time there are changes in the farm that could affect safety.

***GMPs***

Good Manufacturing Practices are enumerated in the Code of Federal Regulations, Title 21 Section 110. GMPs are the regulations that the FDA and most states use as a basis for food processing regulation. GMPs cover personnel hygiene, plant construction and sanitation guidelines and proper equipment selection and sanitation. Also covered are "in process controls" which covers safeguards in food processing designed to reduce risk of contamination.

***SOPs***

Standard Operating Procedures is a general term given to written policies and procedures governing food safety. SOPs can be used to document GAPs and in food processing, particularly in areas of sanitation and safe food handling.

***SSOPs***

Sanitation Standard Operating Procedures are written, detailed procedures for cleaning and sanitizing facilities and equipment as well as personal hygiene policies. The cleaning and sanitation section should contain information on how to perform each specific task: who, how, when and what chemicals to use. SSOPs should also include inspection checklists and corrective action policies for SSOP deficiencies.

***HACCP***

Hazard Analysis and Critical Control Points is a system designed to eliminate or reduce food safety hazards to an acceptable level. HACCP is a highly detailed food safety system that relies upon careful analysis of biological, chemical and physical hazards that may occur during food processing and then developing a well documented and quantifiable plan to deal with those hazards. Only after a facility has met standards of the FDA's GMPs and has a working SSOP plan in place, can it implement HACCP. Implementing a HACCP plan without the proper pre-requisites will result in a plan that leaves food safety hazards in place and will result in a negative finding by a QA auditor.

Again, developing a HACCP plan is a significant undertaking that requires the highest level of commitment to training, sanitation, facility maintenance and selection of equipment that meets the food safety guidelines of the National Sanitation Foundation (NSL) or Underwriters' Laboratory (UL.)

***Packing***

Packing operations include washing, trimming, and packaging of fruits and vegetables in a manner that does not significantly alter the nature of the food. While packing should be done under GMPs it is certainly must be covered by a GAP plan.

***Processing***

Processing is defined by actions beyond packing that significantly alter the nature of the food. Peeling, dicing, coring, blanching and freezing are examples of processing activities. This processing often required a higher level of regulatory involvement that just packing and must meet the FDA's GMP standards.

## THE AUDIT PROCESS

While all audit firms use different evaluation and documentation systems, they all look for generally the same information. When a producer decides or is directed to have an audit, the first decision is what type to have. There can be GAP field audits, packing shed audits or processing facility GMP audits depending on the product being sold. In addition, several firms offer these different audits for producers with or without HACCP plans. Some large retailers are moving toward mandatory HACCP for suppliers while others are content with GAP or GMP audits.

Once the type and provider of the audit is determined, the producer should go to the web site of the audit firm and take advantage of audit preparation material that the firm has published. All firms use numbering systems that lend themselves to organization in a three ring binder. For example, Primus Labs (www. primuslabs.com) uses sections 1 through 6 with 1 being overall Good Manufacturing Practice's, 2 being Food safety File Requirements, 3 the HACCP evaluation and so forth.

Each section is then organized further. In the case of Primus, section 1.1.1 through 1.1.4 relate to general food safety practices, 1.2.1 and 1.2.2 to pest control practices, 1.3.1 through 1.3.8 to storage areas and packing material sanitation and handling. Section 2 starts at 2.1.1 for General File Requirements and runs through 2.9.4. for monitoring of Temperature Controlled Storage & Distribution. Every numbered item carries a point value for compliance.

The three ring binder system works well to organize all the information by section. In some sections, a simple yes/no checklist for each item works. Others, such as employee training should include copies of training policies, training certificates and training attendance records. In the case where temperature records are required, actual copies of temperature logs should be kept. In cases where requirements are clearly not applicable, that too should be noted to avoid point deduction.

The actual date for the audit should not be scheduled until all preparation has been completed and the producer has completed a self-audit to determine possible areas of non-compliance. Close attention should be paid to items such as pest control where non-compliance will result in automatic audit failure. An audit usually takes at least several hours with time divided between inspecting the facility and examination of the written food safety plan. Use of the binder system consolidates all information in one place, saves time and can avoid annoying the auditor by wasting time rooting around in file cabinets and stacks of paper for needed material. Most auditors will inform clients at the end of the day of the score and what follow up is needed, and, in the event of failure, what the options are for a follow-up audit.

It is easy to get overwhelmed by the audit process. The keys to success are to develop an understanding of the logic of the particular audit system and develop and maintain an organized training, compliance and record keeping system.