

Fresh Products Branch Directive

FPB 702
06/08/09

UNANNOUNCED VERIFICATION REVIEW FOR GOOD AGRICULTURAL PRACTICES & GOOD HANDLING PRACTICES (GAP&GHP) AUDIT VERIFICATION PROGRAM

- I. Purpose** To outline & formalize the policy for conducting unannounced GAP&GHP Reviews.
- II. Background** Effective October 1, 2007, several changes to the GAP&GHP program were announced. The principal change is the inclusion of an unannounced review requirement. This requirement is specifically mentioned in Exhibit A of Fresh Products Branch (FPB) Directive 625, which the client/auditee signs prior to the start of any audits.
- III. Definitions**
- Initial Audit** – The annual announced audit that verifies farm/facilities compliance with the requirements of the USDA Voluntary GAP&GHP Audit Verification Program.
- Follow-up Audit** – The audit conducted if either the farm/facility’s initial or unannounced surveillance review does not meet the minimum passing score or receives an automatic unsatisfactory. The follow-up audit will measure the effectiveness of the corrective actions taken by the company. The follow-up audit is a separate review and cannot be used to satisfy the unannounced surveillance review requirement.
- Unannounced Surveillance Review** – The part of an audit that is conducted at some point after the auditee has successfully passed an initial or follow-up audit. It is used to verify that a farm/facility is still in conformance with the requirements of the USDA GAP&GHP Program and the auditee’s food safety plan. The unannounced surveillance review differs from the initial audit in that the auditee does not know specifically when the auditor will be on site to perform the audit. The unannounced surveillance review will generally verify conformance through observation but at times may also require review of documentation. Unannounced surveillance reviews shall cover all the scopes originally covered on the initial audit except as stated for “Farm Review.”

Distribution: FM, FPM, HQ, SPM
Originating Office: Office of the Chief
File Instructions: File in Directive Binder

In Operation - A farm is considered "in operation" when fruits or vegetables are being grown, handled or harvested and activities such as thinning fruit, picking, harvesting, or field packing occur. It does not include activities such as pruning which occur when the fruits or vegetables are dormant or ground preparation such as plowing, discing or planting. A facility is "in operation" when any fruit or vegetable handling activity occurs such as sorting, packing, repacking, storing or transporting. The number of days in operation shall include the day of the initial (or follow-up) audit and all days the farm/facility is (or intends to be) in operation during the following twelve-month period.

III. Policy

Scheduling

After the auditee has successfully completed the initial audit, or if necessary the follow-up audit, the lead auditor shall schedule the unannounced surveillance review(s). The lead auditor, with the area supervisor's approval, may alter the scheduled time when there are operational or activity changes in the facility or auditing service. The lead auditor shall take into consideration how much time remains in the growing season or how long the packing facility will be operating when scheduling the unannounced surveillance review(s). When the initial audit occurs late in the season, the unannounced surveillance review(s) may be scheduled for the following season, although it is highly recommended that the unannounced surveillance review(s) be performed in the same growing season as the initial audit. Auditors will need to verify the time the auditee is in operation by questioning the auditee and reviewing records. Unannounced surveillance review(s) can occur anytime as long as there is sufficient activity at the farm/facility to audit and may be made at the same time the auditor is visiting a farm/facility to perform initial or follow-up surveillance review covering other scopes.

The number of unannounced surveillance review(s) is determined by the length of time the farm/facility is in operation following the initial audit for a particular scope or part.

The lead auditor shall use the guidelines listed below to schedule the number of unannounced surveillance review(s). If unable to meet these guidelines, the Federal Program Manager/Federal Supervisor (FPM/FS) or Audit Program Coordinator (APC) shall be consulted for approval of a variation. The number of unannounced surveillance review(s) may be increased if the farm/facility is certified for various products that use similar production and handling procedures when not all the listed products are present at the time of the initial or follow-up audit. When water is used in the harvesting, packing or handling of any listed products the auditor should schedule at least one (initial audit or unannounced surveillance review) to verify the farm's/facility's good handling practices regarding water use are being met.

Guidelines For Part One - Farm Review of the audit program

Unless there are multiple commodities grown on the same piece of land during the same production season, unannounced surveillance review(s) are not required for production areas (gardens, fields or orchards) for Part One of the audit. However, an unannounced surveillance review(s) may be performed if there is a specific reason to suspect the farm's food safety program is not in compliance with their plan.

Guidelines For Parts Two through Six

- 1. For a farm/facility that is in operation for 30 days or less - A** farm/facility may be subjected to an unannounced surveillance review if there is a specific reason to suspect that their food safety program is not in conformance with their plan.
- 2. For a farm/facility that is in operation from 31 to 90 days - A** minimum of one (1) unannounced surveillance review shall be conducted. In most cases this should be sufficient to verify continued conformance with their plan. However, if a company is certifying multiple commodities or there is a specific reason to suspect that the food safety program is not in conformance, a second unannounced review shall be conducted.
- 3. For a farm/facility that is in operation for greater than 90 days – A** minimum of two (2) unannounced surveillance reviews shall be conducted. In most cases this will be sufficient to verify continued conformance to their plan. However, if a company is certifying multiple commodities or if there is a specific reason to suspect that the food safety program is not in conformance, the third review shall be conducted.

Documentation

The auditor should use a copy of the original checklist and scoresheet when performing an unannounced surveillance review(s). Only the parts (scopes) audited in the Initial Audit shall be reviewed during the verification review. The auditor may ask to review pertinent company documentation, policies and SOP's, especially those documents needed to substantiate observations. The auditor shall observe behavior referred to in the "General" section and other appropriate sections and shall make notes in the "comments" area of the checklist if points are not awarded.

When a facility passes an unannounced surveillance review, the date shall be recorded on the scoresheet and the scoresheet forwarded to the appropriate FPM/FS or FPB APC for review.

If it appears that the company may fail the audit, point values shall be determined for all questions. When a farm/facility receives a failing score due to total score or an automatic unsatisfactory condition, the auditor must follow procedures for documenting nonconformities and corrective actions in accordance with FPB policy and instructions for the GAP&GHP Audit Verification Program, including notification of the FPM/FS and APC. The scoresheet shall be sent through normal channels to the FPB APC.

The farm/facility shall be removed from the USDA GAP&GHP website until a follow-up audit is conducted and the farm/facility receives a passing score. When the farm/facility passes the follow-up audit, their information will again be posted on the USDA GAP&GHP website.



Leanne L. Skelton
Branch Chief