United States Department of Agriculture
Agricultural Marketing Service
Fruit and Vegetable Programs

Fresh Products Branch Bulletin

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INSTRUCTIONS FOR THE CORRECTIVE ACTION PROCESS IN THE GOOD AGRICULTURAL PRACTICES & GOOD HANDLING PRACTICES (GAP&GHP) AUDIT VERIFICATION PROGRAM

I. Purpose

To outline the policy for requesting and reviewing corrective actions in the GAP&GHP Program.

II. Policy

Effective October 1, 2007, a corrective action report is required for any GAP&GHP audit that fails because of a specific "automatic unsatisfactory" or because a particular scope fails to meet the minimum passing score of eighty percent (80%). This report must be submitted to the lead auditor or state audit program supervisor prior to a federal or federal-state auditor conducting a re-audit of the farm/facility.

Observing and Recording Non - conformities

When an "automatic unsatisfactory" is observed on an audit, the auditor shall write a detailed observation of the practice or procedure that caused the failure including time, location, individual who witnessed it and the specific question or item that was noted as a non-conformity. The observation causing the failure should be reported verbally and in writing to the person who oversees the Food Safety Program for the auditee. A corrective action report form is attached for the auditor's use.

The same procedure shall be followed when a particular scope fails to meet the minimum passing score, i.e., a corrective action report must be completed for the non – conformities noted.

Evaluating Corrective Action Reports

When the lead auditor or state audit program supervisor receives the corrective action report from the auditee, it should be evaluated for the following items (not all may apply to every deficiency):

Distribution: HQ, FM, FS, FPM, OIC
Originating Office: Field Operations Section
File Maintenance Instructions: File in Bulletin Binder until incorporated in handbook.

- Short Term Corrective Actions – Does it include the details of the failure(s) and an immediate solution to the issue? Does it show who at the farm/facility is responsible for verifying the corrective action(s) has been implemented? Does it appear to be a reasonable solution to the problem? Does the corrective action conform to policies or Standard Operating Procedures (SOPs) listed in their food safety plan?

- Root Cause Analysis - When necessary, does it include long term actions needed to correct the issue? Usually a root cause analysis requires a change in SOPs or a policy in the food safety plan – has this been included?

See attachment for an example of a corrective action plan.

Once the corrective action report has been reviewed and the actions taken appear to be reasonable and appropriate, the lead auditor or state audit program supervisor will notify the auditee that the corrective actions were reviewed and will be verified during the re-audit. If however, the actions seem lacking or do not address the issue, notify the auditee and request that they review the corrective actions again, revise and resubmit for approval. It is important to remember that corrective actions are not approved as effective until they are verified during the re-audit. If there are questions regarding evaluating corrective action reports, please contact your Federal Program Manager or the Field Operations Section.

Verifying Corrective Actions
When the audit team performs the re-audit of the farm/facility, auditors must review the results of the corrective action plan to determine that the actions were implemented and that they achieved the desired results. The audit team should verify the corrective actions through the use of observations, records, and document reviews.

The corrective action report shall be kept with the audit checklist and scoresheet in the office of record for the audit.

Attachments: Exhibit #1 – Blank Corrective Action Report
Exhibit #2 – Example of Completed Corrective Action Report

Leanne L. Skelton 11/28/07
Leanne L. Skelton
Branch Chief

USDA Fruit and Vegetable Programs **Good Agricultural Practice & Good Handling Practices** **CORRECTIVE ACTION REPORT**	Report #: _____ of _____
Company Name/Farm:	Date:
Lead Auditor:	Crop:

Description of Non-Conformity:

Notified company staff at time of finding non-conformity: YES or NO

Checklist question number and/or section of auditee food safety plan non-conformity is associated with:

Company Representative Signature:

SIGNATURE AFFIRMS FACTS CONCERNING NON-CONFORMITY ARE CORRECT

Corrective Action Proposed and Time Frame for Implementation: (Attach separate sheet if necessary)

Auditor Signature for Acceptance of Proposed Corrective Action and Timetable for Implementation:

Top portion for AUDITOR USE ONLY; bottom portion for Company and Auditor use.

USDA Fruit and Vegetable Programs Good Agricultural Practice & Good Handling Practices CORRECTIVE ACTION REPORT	Report #: 1 of 1
Company Name/Farm: QRS Produce Co Timbuktu, Some state USA	Date: November 21, 2007
Lead Auditor: Joe Q Auditor	Crop: Sweet Peppers

Description of Non-Conformity:

Observation - During review of the sorting and packing of sweet peppers on the packing line at approximately 10:45am, auditor observed several packers chewing tobacco and spitting tobacco juice onto the packing line in close proximity to unused packing cartons. The packers had just returned from a break and had not utilized this particular packing line today.

Auditor reported issue to QC Manager who was acting as a guide to the audit team. QC Manager observed issue as well. Audit was terminated, as this observation is an automatic unsatisfactory under "Observation of employee practices that jeopardize or may jeopardize the safety of the produce."

Notified company staff at time of finding non-conformity: (YES) or NO

Checklist question and/or section of auditee food safety plan non-conformity is associated with: One of the 5 automatic unsatisfactory areas on audit

Company Representative Signature:

IMA C Representative

SIGNATURE AFFIRMS FACTS CONCERNING NON-CONFORMITY ARE CORRECT

Corrective Action Proposed and Time Frame for Implementation: (Attach separate sheet if necessary)

CORRECTIVE ACTIONS TAKEN: Graders were taken off the line and asked to remove chew. The packing line was shut down and the area cleaned and sanitized according to company's Food Safety Plan. Unused cartons that may have been contaminated were removed from area, and not used. Graders then returned to packing activities. All packers reminded that chewing or eating is not allowed on packing line.
Upon review of personal hygiene training records by QC Manager, it was found that the graders that had the chew did not receive the required personal sanitation and hygiene training. QC Manager was instructed by senior management to verify that all current employees have received the proper training, and that all new employees must receive the proper training prior to working on the packing lines. Also each line supervisor must verify that any new employees are trained before allowing packer to work on the line.

Auditor Signature for Acceptance of Proposed Corrective Action and Timetable for Implementation:

Joseph Q Auditor 11/26/07

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