PREPARING FOR A USDA GAPS AUDIT

**FALL AND WINTER TASKS**

- Designate someone to coordinate farm’s food safety plan.
- **Read through GAPs checklist, identify which practices you are already doing** and identify which practices you need to work on. Not all practices will apply to your farm. Access a copy of the checklist at: [http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5091326](http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5091326)
- Decide which crop(s) you’ll be certifying this year. The Auditor will need to observe the harvest of each crop that you choose to get certified. Depending on the length of that crop’s season, this may mean 1-2 additional unannounced visits from the auditor.
- Decide which sections of the Audit you’ll be doing. If a buyer is requiring that you be GAPs certified, they will tell you which sections of the Audit they want you to do. For example, if you are selling to Hannafords, you only need to do the **General** section and **Part I** and **Part II** on the GAPs checklist for **ONE** crop. We expect that buyers will require all sections eventually.
- **Write your farm safety plan, standard operating procedures and record sheets.** The UVM Extension GAPs Outreach Coordinator will be happy to look these over before your audit. The “doc” column of the **GAPS Audit Verification Checklist** will indicate whether you need a:
  - **P** = Policy or Standard Operating Procedure (SOP) written in your plan
  - **R** = Record sheet or log of activity
  - **D** = Document, which means that the practice needs to be written as a policy or SOP in your plan and you need a record to document the activity.
- Determine what equipment and supplies you’ll need to purchase to become GAPs compliant.
- Obtain or make maps of your farm and identify each crop production area with name or code of each production area (field, block, greenhouse bay) on the map. If you will be certifying your packing house, you’ll also need a map of the flow zone of your packing house.
- **Record application dates for raw manure.** If you use raw manure make sure that it is applied more than 120 days before harvesting (or about 4 months) and is **incorporated at least two weeks prior to planting** your crop. All manure application and incorporation dates must be documented. Unlike the organic standards, 120 days is the requirement for both crops that touch the ground and those that don’t touch the ground.
- Create a separate area for employees to eat lunch and store personal belongings away from where produce is handled.
- Create a rodent control plan and identify the locations of rodent and pest traps on your packing house map.
### SPRING TASKS

- **Test all water sources** used for drinking, washing, irrigation and/or mixing or applying pesticides or fertilizers. Testing early will give you time to correct any issues.
- **Arrange for a port-a-potty service and/or mobile hand washing stations** if necessary.
- **Obtain records from your compost supplier** on how the compost is treated, or if you make your own compost make sure that you have treatment records.
- **Conduct your employee food safety training.** Have employees sign a sheet saying they have received and understand the training. It is good to do this at the very beginning of the season because it is easier to get everyone following these practices at the beginning of the season, than trying to adopt them halfway through the season.
- **Take measures to keep birds, rodents, pests and domestic pets out** of fields, packing houses and other areas where certified produce may be grown, packed or stored. Document all measures that you take in your written plan.
- **Thoroughly clean and organize all areas where produce might be.** This includes washing and painting ceilings and walls if necessary, so that dirt, grease or paint chips cannot drop onto produce. Make sure that no chemicals or other potential contaminants are located anywhere near produce.
- **Thoroughly clean all harvest containers and equipment.** Replace any broken containers and equipment. Purchase new containers and equipment if necessary.
- **Post signs** where appropriate on: Handwashing procedure, Toilet/Port-a-potty emergency overflow plans, Visitor policy, Sanitation SOPs, etc. (Templates for signs are provided in the manual, CD and UVM Extension’s Center for Sustainable Agriculture’s website.)
- **Send Agreement forms to Steve Parise, Agriculture Resource Management Specialist, Vermont Agency of Agriculture, Food & Markets, 116 State Street, Montpelier, VT 05620-2901, Fax:802.828.5983.**
- **Schedule your audit as soon as you know what crop you’ll be certifying!** It is best to schedule the audit for a time when you will have been harvesting the crop for 2-3 weeks, as the auditor will need to see at least a couple weeks of logs and records for that crop. You should also have completed your mock recall on the crop(s) you are certifying by the time of the audit, so the auditor can see those records. Steve Parise: Phone: 802.828.2436 steve.parise@state.vt.us
- **Set up a pre-audit farm visit with the GAPs Outreach Coordinator** at UVM Extension Center for Sustainable Agriculture.

### HARVEST-TIME TASKS

- **Conduct Pre-Harvest Assessment** for all fields where audited crop is located
- **Start harvesting crop.**
- **Conduct mock recall** after harvesting your crop for a week or two, fill out the Mock Recall Template.
- **Conduct the first GAPs Audit.** You’ll be informed at this audit of any corrections you need to make. You’ll write a check to pay for the audit at that point, and then you can submit an invoice for reimbursement (the amount for reimbursement may vary from year to year) to the Agency of Agriculture along with IRS Form W-9 (see Auditor Information).

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