“The new program will take several years to roll out; even longer to become fully effective.”

**GAP Certification**
- **Continues to be voluntary** until a future statement is issued by FDA.
- **Continues to be industry driven** although the law is on the books.

**Advice to Growers**
- **Know what your buyers or packers require** in the way of GAP Certification.
- **Don’t wait until the last minute** if you know you need to be GAP Certified… the process takes reasonable time and effort.
**GAP Trained**

The Participant:

- 1. Has a working knowledge of Good Agricultural Practices
- 2. Has identified known hazards related to their farm operation
- 3. Has developed a “plan of action” to address and monitor food safety related hazards on their farm

**GAP Certified**

The Participant:

- 1. Has requested an audit from a Third Party auditing agency and passed the audit

**GAP Compliant**

The Participant:

- 1. Has implemented the plan of action that they have written and designed for their farm/business operation
- 2. Is keeping and continue to keep records and documents as required

**Wholesale Growers, Packers, Distributors**

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<tr>
<th></th>
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<td>Packers</td>
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Remains voluntary and industry driven
Direct Markets

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</tbody>
</table>

* Must pre-qualify under Tester-Hagan Amendment

Tester–Hagan Amendment, ctd.

- Requires documentation that demonstrates that the owner, operator, or agent in charge of the facility:
  1. Has identified potential hazards associated with the food being produced
  2. Is implementing preventive controls to address the hazards
  3. Is monitoring the preventive controls to ensure that such controls are effective

Tester–Hagan Amendment (S.510)

- **Direct Markets**—sales directly from farm to consumer without going through a third party buyer.
- Limited retail and direct markets
  - DM sources must account for 50%
  - Within the state
  - No greater than 275 mile radius.
- Produce less than $500,000 of product over the previous three years. (Must be documented and verified)
- Required to prominently and conspicuously display, at the point of purchase, the name and business address of facility where the food was manufactured (produced)

Tester–Hagan Amendment, ctd.

CSA’s, Farmers Markets, Roadside Stands, PYO are all considered retail food establishments under S.510 and regulated by state and local agencies i.e. licensed by locality and state health departments.

S.510

“NO PREEMPTION—Compliance with this subsection shall not relieve any person from liability at common law or under State statutory law.”
Beyond 2012…

**Note For Commercial Growers…**
- USDA will transition into using the Harmonized GAP audit document as the standard for USDA audits beginning in 2013.
  - One audit for Field Operations and Harvest
  - One audit for Post Harvest Operations
- The Harmonized audit will include an Addendum to satisfy the GFSI/Global protocol (has not been issued yet).
- VCE will be working on development of updated training materials to parallel the new audit.

**Direct Marketers…**

**Notes for Direct Markets…**
- Participate in training
- Develop your farm plan
- Work your plan and document
- Stay tuned…

Other points…

- **Deadlines for Certification** may be coming from Food and Drug Administration.
- **Unofficially:**
  - Farms over 25 acres will certify in one year from time of the directive.
  - Farms under 25 acres will have three years to complete certification.

Questions ??

Wythe Morris, ANR Agent
Commercial Horticulture
Virginia Cooperative Extension
Email: morrisw@vt.edu