



COOLING/COLD STORAGE WITH HACCP

The cooling/cold storage audit is performed a minimum of once per year. The audit is comprised of two main sections: Good Manufacturing Practices section and a Food Safety File Requirements section. The audit encompasses the areas of pest control, equipment, sanitation, employee hygiene practices, and all other operational practices and documentation as they relate to food safety. Food security is also addressed. A 'cooling/cold storage facility' is where product is temporarily stored prior to distribution in order to maintain the proper temperature. Pre-cooling processes (ice injectors, Hydrovac, pressure cooling, etc.) may also be used in the daily operations. If any packing, repacking, and grading etc. is occurring on site, a Packinghouse Audit should be used.

STORAGE AND DISTRIBUTION

The Storage & Distribution audit is performed at a minimum of once per year. The audit is performed at a minimum of once per year. The audit is comprised of two main sections: Good Manufacturing Practices section and a Food Safety File Requirements section. The audit encompasses the areas of pest control, equipment, sanitation, employee hygiene practices, and all other operational practices and documentation as they relate to food safety. Food security is also addressed. A 'storage and distribution facility' is where generally large retailers, food companies store product temporarily prior to further distribution to local market operations where multiple companies are located on one site to independently. If there is any packing, repacking, grading, etc., occur Audit should be used.

GFSI CERTIFICATION

Costco will accept the following GFSI certifications, with a minimum over PrimusGFS and SQF Edition 7. Costco will also accept BRC Certification GlobalG.A.P. Certification. Group certifications must be requested in writing and may be allowed.

All GFSI approved Certifications for Harvest Crews, Growing Areas, Pack Storage and Processing facilities must include the appropriate Costco Audit Addendum and meet the passing criteria for the audit.

STANDARD GAP AND GMP AUDITS

Costco will accept the following GAP and GMP food safety audits: NSF-1700 audits that include the appropriate Costco Addendum, with a minimum of also accept GAP and GMP food safety audits from SGS that include the Costco Addendum and meet the passing criteria for the audit.

Costco will accept GMP audits from all audit companies currently approved Audits/non-produce. Please refer to the Food Safety Audit Expectations.

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Food Safety Audit Requirements for Large Produce Suppliers of Low-Risk Commodities

Packinghouse and Growing Operation Audit Requirements

Any Global Food Safety Initiative (GFSI) Benchmarked Primary Production Standard OR

Pack House or Storage Operations 1,3,4,5
GFSI Global Markets Assessment – Intermediate Level* (must include BOTH the basic and intermediate level requirements)

GlobalGAP LocalGAP Standard – Intermediary Level* (Formerly called Primary Farm Assurance Std.)

PrimusLabs.com Packinghouse with HACCP Audit

PrimusLabs.com Cooling/Cold Storage with HACCP Audit

USDA Produce GAPs Harmonized Audit for Post-Harvest Operations with the Global Markets Addendum – Intermediate Level

Growing Operations 1,2,3,4,5

GFSI Global Markets Assessment – Intermediate Level* (must include BOTH the basic and intermediate level requirements)

GlobalGAP LocalGAP Standard – Intermediary Level* (Formerly called Primary Farm Assurance Std.)

PrimusLabs.com Ranch Audit

PrimusLabs.com Greenhouse Audit

PrimusLabs.com Harvest Crew Audit (required for field pack operations)

USDA Produce GAPs Harmonized Audit for Field Operations and Harvesting with the Global Markets Addendum – Intermediate Level

1. Audits must be completed for all individual growing operations, packinghouses, cold storage operations and distribution warehouses.
2. Suppliers that field pack and do not have a packinghouse or cold storage facility only need to complete a field level or greenhouse audit for each operation. Harvest crew audits are required for field pack operations.
3. Audits must be conducted while growing operations are in production or while packinghouses or storage operations are operating.
4. Audits must be conducted annually PRIOR to the expiration of the current audit.
5. ONLY verified PrimusLabs audits will be accepted. We do NOT accept affiliated audits using PrimusLabs software.

* Please note that these audits will cover both your Packinghouse/Cold Storage facility as well as growing operations in one audit.

27Aug13

Change on the Horizon for CAC's Food Safety Program

By Ken Melban
Director, Issues Management

In August 2011, the California Avocado Commission launched a Good Agricultural Practices (GAP) program to support GAP certification for growers. GAP is a set of practices, policies and procedures a grower (and employees) complies with to reduce the risk of microbiological contamination on fruit. Even though GAP certification is not yet required, in just three years 40 percent of California's avocado acreage has been certified. This is an impressive accomplishment, especially when you consider it was all done voluntarily!

The Commission's GAP effort was initiated in response to consumers' changing perception concerning the safety of fresh produce. Over the last few years quite a few food safety outbreaks directly linked to fresh produce have occurred, and although there were no major public health issues associated with whole avocado, society began to question, in general, the safety of fresh produce. Their confidence shaken, consumers began to demand the government and retailers take steps to ensure the safety of fresh produce. In response, retailers started developing food safety standards

for their suppliers. Candidly, this was also likely an attempt to try and mitigate future liabilities. The world was changing.

In addition, Congress enacted the Food Safety Modernization Act (FSMA) in January 2011 mandating the creation of federal requirements intended to ensure that all fresh produce sold in the United States is free of pathogen contamination. The responsibility for FSMA was placed on the Food and Drug Administration (FDA), requiring growers to demonstrate compliance with specific procedures and policies in their growing and harvesting of produce. Although FSMA has been passed, the FDA is still working to finalize the specific rules. Retailers, though, are not holding back on their requirements for GAP-certified fruit.

The current CAC-GAP program primarily supports a grower audit under the U.S. Department of Agriculture's GAP standards. The USDA GAP audit addresses many of the critical food safety areas, but unfortunately is considered an "entry level" audit by many buyers, and therefore not accepted. When the Commission's GAP Committee developed the CAC-GAP manual, it was viewed as a first step to favorably position growers with pending food safety requirements from both retailers and the FDA. Over the last three years, the Commission has attempted to negotiate acceptance of the current CAC-GAP program from major buyers, but there has been little progress. In fact, this year both Costco and Wal-Mart communicated their respective acceptable audit standards to suppliers, and the USDA GAP audit is not included.

During the last few months, the Commission has been considering possible next steps in our food safety program

to ensure growers who choose to become GAP certified are meeting buyer requirements. An analysis of acceptable audits was conducted, and it was determined that a Primus Ranch audit would require the fewest changes to the existing CAC-GAP manual and place the least amount of new requirements on growers.


In August

2014, based on a review and recommendation from the CAC-GAP Committee, the Commission Board approved revising the manual to support a Primus Ranch audit. This decision wasn't easy nor was it made in haste. Serious consideration was given to "holding the line" with our current program and forcing a possible showdown with buyers. When push comes to shove would buyers soften their requirements and accept California fruit that was certified under the USDA GAP audit? Or would they look to fill their orders from other sources?

While we would all like to believe California's premium avocado positioning would work to our advantage in such a scenario, ultimately it's a risky proposition. Two factors led to the decision: import supplies during our season continue to increase; and other international producers of avocados are currently Global GAP certified (or pursuing certification), which is a much more rigorous audit. It was the board's position that it will become increasingly challenging to build on our California premium brand if we aren't at (or near) the current food safety certification level of our competitors. With shelf space at a premium and the competition beating down our door, there is just too much at stake.

In addition, as reported by Tom Bellamore in his "Message from the President" article, the FDA is currently conducting a sampling assignment specifically on avocados to test for *Salmonella* and *Listeria*. We can argue whether this is warranted or unwarranted, right or wrong, fair or unjust. But that won't change our current reality — whole avocados are under scrutiny and as an industry we need to do everything possible to maintain and build on the safe production of our fruit. Becoming GAP certified at an acceptable standard makes sense.

The Commission will be conducting a series of GAP workshops on December 2 (Fallbrook), December 3 (Ventura) and December 4 (San Luis Obispo), 2014. We will discuss the new changes to the manual, which primarily include increased record keeping for pesticide and fertilizer use, a modification to the water quality levels, and in some instances, frequency of testing. I would encourage you to attend and learn about the program and the Commission's GAP rebate — up to \$300 for actual audit costs (pending Board approval).

Finally, you may want to talk with your handlers about becoming GAP certified. Many have a food safety representative who will help prepare you for a GAP audit. The CAC-GAP program is voluntary, and ultimately you are free to choose whether you pursue GAP certification or not, and, if so, under which audit. As the world of food safety continues to change, the Commission will continue to provide you with the necessary food safety tools to help you ensure the safety of your fruit while maintaining a competitive position in the market. 

GAP December Workshops

December 2, 2014

9:00 to 11:00 a.m.

Grand Tradition Estates & Gardens
220 Grand Tradition Way
Fallbrook, CA 92028

December 3, 2014

9:00 to 11:00 a.m.

Museum of Ventura County
100 E. Main Street
Ventura, CA 93001

December 4, 2014

9:00 to 11:00 a.m.

Veterans Hall
801 Grand Avenue
San Luis Obispo, CA 93401