

Similarities & Differences Between the National Organic Program (NOP), Food Safety Modernization Act (FSMA), and 3rd Party Food Safety Audits

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The contents of this guide have been reviewed. Always check directly with your Organic and/or Food Safety agency for the specific information for your operation.

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What is it?



National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
The National Organic Program (NOP) is a federal regulation in the United States that describes the requirements raw agricultural products must meet to be approved as a certified organic product. The law covers crops grown on farms as well as animals and food products made at processing facilities.	The Food Safety Modernization Act (FSMA) is a federal food safety regulation that has seven main sections that cover various parts of the supply chain. One part, the Produce Safety Rule (PSR), applies at the farm level. Produce farms are classified into one of three categories under this section of the law: 1) fully exempt, 2) qualified exempt (partially exempt), or 3) fully covered or need to be in full compliance. This guide provides information on what a farm that needs to be in full compliance must do. Please refer to CAFF resources for what farms with a full or partial exemption need to do.	3rd Party Audits are voluntary processes that farms participate in to certify their food safety practices. Certain good agricultural practices (GAPs) are required depending on the audit type and scope. In person audits verify that those GAP practices are being performed and documented successfully. Farmers can request a 3rd party audit from state agencies for (USDA Harmonized GAP, USDA Harmonized GAP+, Global GAP) or from private companies (CCOF, SCS Global, Primus Auditing Ops) . There are many different types of 3rd party audits, ranging from simple to very complex. A farmer chooses which crops they want to be included in the audit. This resource focuses on the USDA Harmonized GAP Audit standard as it closely aligns with FSMA, and is generally accepted by many buyers. This is the standard most commonly used by small farmers. The USDA Harmonized GAP Audit has three main sections: 1) General Questions, 2) Field Operations and Harvesting, and 3) Post-Harvest Operations. This guide provides info on all three sections.

When did the program start?



National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
The NOP was signed into law in 1990 as the "Organic Foods Production Act." The law stated that organic products couldn't be sold into the marketplace until October 1st, 1993.	The FSMA was signed in 2011 by President Obama. The Food and Drug Administration released subparts of the law for public comment in 2015. As part of the law, state departments of agriculture inspect fully covered produce farms to ensure compliance. The first inspection dates started in 2018, but the first inspections did not start until 2019, with large farms. The last inspection dates for the smallest farms started in early 2021. Water requirements have been pushed out and start in 2022, 2023, or 2024 depending on your farm's size.	The USDA Harmonized GAP program started in 2011. In 2018, USDA voluntarily aligned the Harmonized GAP Audit program with FSMA. If a farm passes a USDA Harmonized GAP Audit that does not mean that they will not be inspected for FSMA or that the audit can replace a FSMA inspection. What it does mean is that a farm is likely to pass a FSMA inspection if selected for one.

Why should you care?



National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
Certified organic products often fetch a higher price than their conventional counterparts.	Producing safe food is essential to the success of your business. Compliance with the PSR will also help you meet all of the legal requirements your operation must meet in order to sell your produce.	You have a buyer requesting that you become GAP certified as a requirement to sell to them. Or, you do not have any buyers requiring it currently, but you want to expand possible marketing streams so you do it to open new market opportunities.

When would you get verified?



National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
At least once annually, an on-site inspection is done at the farm to verify compliance with the farm's Organic System Plan and the NOP requirements.	In California, the California Department of Food and Agriculture (CDFA) verifies that farms are in compliance with FSMA by conducting FSMA inspections on farms. Farmers do not ask for a FSMA Inspection; CDFA contacts farmers randomly and schedules inspections. With thousands of farms in California needing to be inspected, it is difficult to determine when your farm may be inspected.	Audits are completed upon request and annually thereafter. Unannounced visits are common and are determined based on the amount of time the operation is in production. Additionally, you need to consider all the activities covered under the audit scope you're planning. You should schedule the audit for when those activities (e.g. harvesting, washing) occur so you can time the audit to happen when the necessary on-farm activities are happening. You can't schedule an audit during the "off-season" as auditors need to observe many farm activities as they're happening. Also, the crops you want on your audit may play a role in scheduling.

How much does it cost?



National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
It varies since private companies and state departments of agriculture around the country provide this service. It also depends on how long an inspector will have to drive to get to your farm and how long they spend on your farm. There is often a one-time application fee (e.g. \$300) and then hourly fees thereafter. The NOP provides a cost-share program where farmers can apply for up to \$750 in reimbursement from Organic inspection costs.	In California, farmers cannot be charged for a FSMA Produce Safety Rule Inspection. Your farm may incur other direct costs (e.g. water tests, employee training costs) as you reach/maintain compliance with the law.	It varies based on the scope. Farmers need to submit the SC-430 Vendor Form to USDA and will be charged that way at \$115/hr. This includes pre-audit prep, travel, on-farm audit time, submission, and review. You are charged whether you pass or fail the audit, so it is important to be as prepared as possible to minimize costs and not have any reasons for an automatic failure. Figure out who to contact to schedule your audit here. Prices vary for private certification standards like PrimusGFS, GLOBALG.A.P., or SQF. Contact approved certification bodies for their specific pricing requirements.

Who provides certification?



National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
Businesses or state department's of agriculture have to apply to USDA to become an "Organic Certifying Body." Once they are approved they are allowed to conduct organic certification inspections. You can search the USDA database by state to find certifying bodies close to your geographic location. There are over 50 certifying bodies in the United States.	In California, CDFA's Produce Safety Program.	The USDA Harmonized GAP Audit is usually provided through your state Department of Agriculture. The Harmonized GAP audit is also offered by GLOBALG.A.P., it contains the same questions and is administered by approved certification bodies like CCOF.



Is it required by law?

National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
No. Becoming certified organic is a voluntary certification that a farm is not required to do by any laws.	If your farm meets the criteria and you are a covered farm, you need to follow the practices required. It is the law.	No, undergoing a 3rd party audit is voluntary and not a requirement of any law. This typically a buyer requirement.



How does the farm receive certification?

National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
First a farmer should review the requirements and make sure their farm can meet them. Then they need to make an Organic System Plan to document what is required. Next, the farmer contacts one of the Certifying Body Organizations and schedules an on-farm certification inspection. Check with the certifying body that you are going to work with and see if they have any templates that you can use to prepare your records for them correctly. After passing the inspection the farm will review a formal certificate dating their farm is certified organic and has a current organic certification.	If a farm is selected for an inspection, the farmer is provided an inspection report afterward. Unlike 3rd Party Audits, there is no publicly accessible FSMA Inspection portal where buyers can search whether a farm has passed or failed a FSMA Inspection.	At least 80% of the audit checklist items that apply to your farm (e.g. items not marked N/A) are marked compliant in each of the scopes covered in the audit.



How long does certification last?

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For one year.	All farms that are considered "fully covered" and need to be in compliance with FSMA PSR are expected to follow the law and be in compliance for perpetuity. If a farm has a FSMA Inspection, they are still eligible to be inspected in the future. Inspections are typically conducted based on size and will continue as long as you remain a covered farm.	An audit expires one year from the date of the previous audit.



What are the label requirements?

National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
There are very strict requirements about how farms can use the USDA Organic logo. As a baseline, no farm can use the USDA Organic logo unless they have an active organic certificate for the product the logo is being used with. From there, requirements differ depending on whether you are using any of these phrases with the organic logo: 100 percent organic, organic, made with organic, and products with less than 70 percent organically produced ingredients.	FSMA requires farms that have a qualified exemption to ensure the farm name and address is available at the point of sale. This is most commonly achieved by the farmer placing that information on every produce box leaving the farm. Additionally, if your farm is fully exempt from FSMA because you sell raw products for processing (e.g. tomatoes into sauce) then all boxes leaving the farm should say, "not for raw consumption." Farms that need to be in full compliance with the law must have traceability systems in place so that they know one-step forward and backward for where product goes.	To use the USDA GAP Logo, you need to follow their requirements including submitting a request to use the logo and having all your crops grown under your GAP Audit.

Requires Manual or Plan



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Organic System Plan should be made and submitted to a certifying agent (e.g. CCOF). The Organic System Plan should include: -Description of practices on the farm and frequency they were performed -List of each substance used in production -Description of monitoring practices to verify the plan is being effectively implemented -If applicable, description of practices and physical barriers on preventing commingling of organic and nonorganic products -Other documentation required for federal, state, or local government can take the place of information required in the organic system plan (i.e. you don't need a duplicative record) Certifying Bodies (e.g. CCOF) have additional templates they require of producers. Check with your certifying body to see if they have specific templates they want you to fill out.	No. FSMA PSR does not require that you have a food safety plan; however there are various record keeping requirements. Some growers may find it easiest to have a food safety plan where they can store record keeping documents.	-A food safety plan with various records, standard operating procedures, and risk assessments is required. -Must designate a person as a Food Safety Manager that is responsible for ensuring compliance with the plan. -Food safety plan must have a disciplinary policy for food safety violations. -Food safety plan must be reviewed annually. -You may have to submit a copy of your food safety plan to the auditor in advance of your in-person audit. -Plan should be in place for at least a month before the audit occurs.



Recordkeeping Topics

National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
The following records must be kept: -Monitoring of Natural Resources (e.g. wildlife) -Preventative measures taken for pests and disease (e.g. pruning, trapping) -Sales -Harvest -Amendment purchasing and application -Postharvest Handling Your certifier will review and verify these records during your annual on-site inspection Certified organic farms must maintain all records documenting production practices for at least five years.	Full exemption from FSMA PSR financial and/or further processing documentation (if applicable) Qualified exempt documentation (if applicable) Employee/Personnel Training: topics, date, names of attendees; Documentation of at least 1 manager or supervisor attending FDA Approved training (Produce Safety Alliance Training) Water: Annual Water System Inspection findings, Water Test Results, Scientific Data demonstrating efficacy of water treatment method(s), Documentation of Water Treatment Monitoring (if applicable), Documentation on Microbial Die-off Practices (if applicable), Documentation of Corrective Actions if water doesn't meet requirements, Annual documentation from municipality of water test results (if applicable) Soil amendments of animal origin: purchased products need documentation that they were processed according to validated treatment methods and stored properly, any compost made on-farm that contains animal inputs needs to have time, temperature, and turning records. This document is referred to as the Certificate of Conformance. Equipment: record of the date and method of cleaning and sanitizing equipment used in harvesting, packing, and holding activities.	It's best to have at least a month of records prior to your first audit. There are four main audit scopes: 1) General Questions, 2) Field Operations, 3) Post-Harvest Operations and 4) Logo Use. You will need to determine which of the scopes you need or are required by your buyer to complete for your audit. All farms are required to complete the general questions scope. A typical farm will complete general questions and either Field Operations or Post-Harvest or both. If the farm is doing any post-harvest washing, storage, and packing then they will also do that scope. Logo use is rarely used by small farms. There are 81 mandatory items within the Harmonized GAP Audit. You must be found compliant or that the item does not apply to your operation for all 81 mandatory items. If your farm is found non-compliant on one or more of the 81 mandatory items you will not pass the audit. Required records: Designated food safety individual(s), Disciplinary policy for food safety violations, Approved Supplier program for all incoming materials, Water Quality, Post-Harvest area cleaning, Harvest tool cleaning, Traceability, mock recall, Recall Program, Corrective actions, self-audit (reference webinar), record of annual internal self-audit. Records need to be kept for a minimum of two years.

Risk Assessments



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National Organic Program requirements do not cover anything related to this topic.	FSMA takes a preventative approach to food safety and encourages farmers to conduct risk assessments often to determine areas of the farm where food safety risks can be mitigated/minimized.	Requires one to be completed for each potential hazard on the farm at these frequencies: 1) annually, 2) when major changes to procedures occur (e.g. new packing shed), 3) before harvesting a crop, and 4) when an injury happens on the farm.

Employee Training Requirements



National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
Employees with decision making authority for organic practices on the farm must have adequate training.	All workers must be trained upon hire and then at least once a year thereafter. At least one supervisor or responsible party from the farm needs to attend the FDA approved training (PSA Grower training) and have the certificate of attendance to provide during a FSMA PSR Inspection.	All personnel need to receive food safety training sufficient to their responsibilities. Training should occur upon hire and at least annually. Contracted personnel must be held to the same food safety standards as employees. Employee training must be provided in the language(s) workers can understand.

Worker Health & Hygiene



National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
National Organic Program requirements do not cover anything related to this topic.	All workers trained on: principles of food hygiene and food safety, recognizing symptoms of a health condition that is reasonably likely to result in contamination of produce, and any FSMA related standards that apply to their job. Harvest employees must also be trained on recognizing covered produce that must never be harvested (e.g. with feces on it), not harvesting dropped produce, inspecting harvest containers for any contamination, and correcting any problems with harvesting equipment or containers.	Employees and visitors shall be made aware of good personal hygiene practices (e.g. proper handwashing practices, signs of sickness), clothing and footwear needs to be clean and in good condition, and they should understand what to do in the event of sickness or injury. Auditors typically question employees about this during the audit. The farm must be in compliance with OSHA toilet requirements and have proper handwashing stations adjacent to the toilet facilities. Signs must be posted around the farm to remind employees and visitors about handwashing, break areas, bathroom locations, and the farm's policies and procedures.

Soil Amendments



National Organic Program	FSMA	3rd Party Food Safety Audits
The Organic System Plan should mention steps taken by the farmer to nurture soil fertility and improve soil organic matter content through proper tillage, crop rotation, cover cropping, and manure management. A farmer can apply the following products (as long as they are on the national list of allowed products) to a field to improve soil organic matter content: nutrients, soil amendments, mined substance of low solubility, mined substance of high solubility as long as it's used according to the National List of non-synthetic materials or ash as long as it was from an organic item that burned. Raw manure must be applied at least 90 days prior to harvest for crops that have edible portions that do not touch the ground (e.g. trellised tomatoes) and at least 120 days prior to harvest for crops that do touch the ground (e.g. melons). Farmers can not apply sewage sludge (biosolids) to their fields. Farmers can not burn crop residues unless it is to suppress disease or stimulate seed germination. Any products used on the farm or in the fields must be on the farm's approved material's list and all applications must be documented in an input log.	If you purchase soil amendments that contain animal inputs than you need to get documentation from the supplier that verifies that the amendment: 1) was treated according to a validated process (e.g. high heat) and 2) that the soil amendment was handled and stored in a manner to reduce the risk of contamination. If you're making any on-farm compost that contains animal inputs you need to have records of the time, temperature, and turning for each batch. The on-farm compost must be made according to the turned or static composting methods.	Ag chemicals need to be stored, applied and disposed of correctly. Soil amendments training shall address soil amendment risk, preparation, use and storage of the amendment. If a soil amendment contains raw manure or raw animal products, it is to be used according to NOP 90/120 Rule. On-farm made compost must have documentation of the static or turned composting methods used to be considered properly composted and not be treated as raw. Static composting is at at least 131 degrees for three consecutive days followed by adequate curing. Turned composting is at least 131 degrees for 15 days (do not have to be consecutive), with at least five turnings and followed by adequate curing. Curing is complete when the pile temperature is the same as the ambient air temperature. For any soil amendments with animal inputs that are bought from suppliers (e.g. compost, feather meal) they need to provide a Certificate of Conformance. This shows they have handled, stored, and created the product correctly and that the end product meets the microbiological analysis requirements. If using compost teas you should only use finished compost and water that has no detectable generic E. coli per 100ML. It's best to have an SOP on compost tea use. A record on amendments used, dates of treatment (if done on-farm) and application dates should be kept.

Water



NOP	FSMA	3rd Party Food Safety Audits
Pasture land and surrounding resources, including bodies of water must be maintained or improved. Source Farming practices must improve or maintain the quality of the water on the farm. If a chlorine based sanitizer is used in irrigation water applied to crops it must not exceed the maximum allowed disinfectant limit under the Safe Drinking Act (less than 4 PPM).	As of 10/5/21 the Food and Drug Administration is currently reviewing the water requirements and is likely to release new information on them this winter. Until then the current requirements are in place: Farms must test groundwater 4 or more times during the first year of testing and then once a year thereafter. Farms must test surface water sources 20 times over an initial 2-4 year period and then 5 times a year thereafter. The water samples need to have 126 generic <i>E. coli</i> per or less per 100 mL water geometric mean and 410 or less generic <i>E. coli</i> per or less per 100 mL statistical threshold value. If water use for production does not meet those standards than treatment must be done. Drinking, handwashing, and water used for making ice and harvest/postharvest must have 0 generic <i>E. coli</i> per or less per 100 mL.	Water testing will be done at a frequency based on current industry standards. An initial water system risk assessment is required and documentation of risks identified must be made. There must be a written procedure that outlines the water testing procedure, actions taken based on the results, training requirements, and explanation on when situations require a review of the food safety plan. There should be a written description of the water system (e.g. map, narrative, photos). Water source(s) should be in compliance with prevailing regulations. Water systems shall not be cross-connected with any waste water systems. If water treatment is used it must be monitored. Potable water is required for certain activities on the farm (drinking, handwashing, food contact surfaces, ice) and requires a test that shows <1 generic <i>E. coli</i> and <1 total coliform. The audit doesn't require a certain type of water test. Generic <i>E. coli</i> showing a numerical value is often used by farmers. Water testing should follow industry standards and prevailing regulations.

Land



National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
You can certify an entire farm or just part of the farm as long as the area is clearly marked off. Certified production land cannot have prohibited substances applied to it for at least three years prior to the start of the organic certification. Distinct boundaries or buffer zones (e.g. runoff diversions) can be used to prevent unintended contamination of a prohibited substance from an adjacent land that is not under organic management. A Land Use letter from the previous landowner is helpful to document land uses and that cropland that can be used for certified organic crops.	FSMA encourages farmers to understand how the farmland was used prior to production and any potential food safety risks. Also consider adjacent land uses as nearby garbage dumps, confined animal feeding operations, and other land uses, can pose a risk for your farm.	The farm should be free of excess litter and uncontained trash , including culled produce. Trash can not come into contact with produce. The farm must have a waste management plan. Land risk assessment is needed to determine any risks. Sewage and septic systems must be adequately maintained. If a flood event occurs then you would need to do a new land risk assessment. If there is heavy rain and water pools on the surface of the soil before percolating into the soil that is not considered flooding.



Equipment, Tools & Buildings

NOP	FSMA	3rd Party Food Safety Audits
A farmer can not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock.	Farmers are required to keep a record of the date and method of cleaning and sanitizing equipment used in harvesting, packing, and holding (storing) activities. Employees must be trained in proper cleaning and sanitizing practices.	-List of all equipment on the farm that may contact produce. -Need to have a written procedure on how to control any spills from this equipment. -Written procedures on how water tanks are cleaned and at what frequency. -Handwashing and sanitation equipment must be available, kept clean, and not become a source of contamination. If gloves are used, make sure there is a policy in place and training provided on proper use and changing frequency. -All equipment that comes in contact with produce on the farm must be kept in good condition so it is not a source of contamination. -Any cleaning and sanitizing procedures should not pose a risk to contaminating produce and should be documented within a SOP. Maintain records of the date and method of cleaning and sanitizing equipment. -Maintain vehicle and equipment maintenance records. Have an SOP on addressing chemical spills and leaks (e.g. oil leaking from a tractor in the field). The farm should have a written policy, procedures, and a checklist to verify cleanliness of equipment used to transport produce (trucks, atvs). -Records should be kept on inspecting and cleaning equipment used to transport produce. -Coolers must be properly sealed and have drainage so that pooling water is minimized. Condensate dripping from pipes or condensers can not drip onto produce, so either stop the condensate from happening or install drip pans.



Wild & Domestic Animals

National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
See the soil amendment section for raw manure application requirements.	FSMA requires that if significant evidence for potential contamination is found (e.g. animal feces present) you must evaluate whether produce can still be harvested and then take reasonable measures to not harvest produce that is reasonably likely to be contaminated. Domestic animals are not prohibited, but need to be excluded from production areas. Visitors should not bring pets to the farm. Pets can be considered working animals and should be monitored. Farms with pets should have a corrective action plan in place if pets contaminate production areas.	Written risk assessment on animal activity in and around the production area. Depending on risk assessment results, practices are put in place (noted in a standard operating procedure (SOP)) to minimize potential contamination from animals (e.g. fencing, reflective materials, hedge-rows). Monitoring for animal activity near and in the growing areas happens throughout the season.



Biodiversity & Conservation

National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
Organic practices require promoting cycling of resources, ecological balance, and biodiversity conservation. Requirement of a Monitoring Plan (logs and records) for wildlife and natural resources.	FSMA explicitly has this language, " 112.84 This Regulation does not require covered farms to take measures to exclude animals from outdoor growing areas, or to destroy animal habitat or otherwise clear farm borders around outdoor growing areas or drainages." Farmers are allowed and encouraged to practice co-management. Co-management is a variety of practices that allow farmers to balance food safety and biodiversity practices to maximize the success of both. For example, research has shown that having hedgerows is good for improving biodiversity on the farm and actually also helps reduce food safety risks as wild animals are more likely to stay in the hedgerows and not go into the field.	If livestock are on the farm and rotated through fields you must wait the proper amount of time (NOP 90/120 day rule) after they are last in a field before planting and harvesting from that field.



Pest Management

NOP	FSMA	3rd Party Food Safety Audits
Organic Processors/Handlers that run facilities must remove pest habitat, breeding grounds, and food sources around and inside of facilities. Source 205.271 Substances prohibited by NOP that are applied at a farm due to a Federal or State emergency are allowed as long as any crops (produce, livestock) that came into contact with the product are not sold, labeled, or represented as organic. Source 205.672 Farmers can not use any synthetic agricultural product(s) or products that contain nitrates, heavy metals, or toxic residues in excess of what is permitted by Organic Regulation.	FSMA requires continuous monitoring for pests such as mice in and around areas where covered produce is grown, packed or stored. FSMA does not regulate farm chemicals such as insecticides, pesticides, or fungicides. Those are regulated by other federal and state entities.	Agricultural chemicals (e.g. waxes, pesticides, postharvest sanitizers) can only be used according to directions on their label. Agricultural chemicals should be applied by a trained person (e.g. holds a pesticide applicators license) and done in a way that abides by any prevailing regulation (Environmental Protection Agency, EPA, at the state level and likely also the Department of Agriculture in your state). Water used to apply any agricultural chemicals should not be a source of contamination. Disposing of agricultural chemicals should not be a source of produce or environmental contamination. Have an active copy of the pesticide applicators license on hand. Have a water test result on file for the water mixed with any agricultural chemicals. Records must describe the means of disposing of chemicals and how equipment is cleaned that comes in contact with chemicals. Animals should be restricted from food handling areas. If rodent traps are used they should be located where they won't contaminate produce or food handling surfaces (and not have bait so they don't attract more rodents). The farm should have procedures (SOP) to manage pests to the extent appropriate to the farm and record info in a pest-control log. If using an outside company for pest control, they should provide reports on dates they inspected traps and steps taken to eliminate problems.

Seed & Transplants



National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
Farmers can not use seeds or seedlings that are not certified organic unless the farmer has demonstrated an inability to source organic options. This can be done by providing documentation that organic seeds are not available. Sprouts must be grown from certified organic seeds. Source A farmer can use seeds, seedlings, or planting stock treated with a prohibited substance if required by Federal or State phytosanitary regulations.	Not addressed in the regulation.	Not addressed in the regulation.

Harvest



NOP	FSMA	3rd Party Food Safety Audits
The National Organic Program does not have any specific requirements related to harvest.	Essential to make sure that crops with feces on it are not harvested. If a crop with feces or other contamination is found, a no-harvest buffer zone (between 0-25 feet) needs to be established depending on the severity of the contamination. Tools and equipment used during harvest must be cleaned and sanitized according to your farm's procedures.	A pre-harvest risk assessment is required before every harvest. Required written procedures: Harvest containers and packaging material and that they're acceptable for their job. Whether containers are permitted to be on the ground or if there needs to be a buffer. For inspecting food contact containers before they are used. That employees are trained on how to deal with any contaminated, damaged, or dropped produce. Water and/or ice used during harvest must have zero detectable generic E. coli. Test results that document water quality must be available. Farm needs procedures (SOPs) for water used in contact with produce or food contact surfaces. Water use SOPs address: The microbial quality of water or ice that comes in contact with produce. Treatment of re-circulated water, if applicable. If applicable, address control of wash water temperature. Any crop that does not grow on the ground that is dropped on the ground during harvest must be culled. Farms should have a policy that contaminated, damaged, or decayed produce must be culled.



Postharvest

NOP	FSMA	3rd Party Food Safety Audits
Can not use any packaging materials, storage containers, or bins that contain synthetic fungicides, preservatives, or fumigants. Chlorine products are allowed to be used in postharvest wash water as long as they stay under the maximum levels permitted by FDA or EPA for such purpose. Crops that are exposed to chlorinated water must be rinsed off by water without chlorine in it. Peracetic acid can be used in wash or rinse water and/or on food contact surfaces according to the FDA limits.	Water used for handwashing, washing crops, and making ice must be free of detectable generic E. coli/100 mL sample. Make sure any trucks transporting packaged produce are not a source of contamination. If refrigerated units are being used, make sure they are maintained and monitored to reduce produce safety risks and that dripping condensate will not become a source of contamination on produce. Make sure all thermometers are working properly.	Harvested produce is handled in a manner so that it is not likely to be contaminated. Cloths that pose a risk for cross-contamination shall not be used to wipe produce. Packaging materials should be appropriate for their use and stored in a manner that prevents contamination. Farm has a written policy regarding whether packaging materials can be in direct contact with the soil (e.g. during field pack). Need a documented traceability program to trace one step back and forward. For every crop you should know one step backwards: what field it came from, personnel that were involved with the crop, etc. You should also know one step forward: where the product was sold. Annual mock recall must be conducted. All chemicals are stored in a secured location (locked and away from produce) and all chemicals properly labeled. Written procedure is needed on how refrigerated equipment is maintained and working correctly. If you are buying produce from another farm(s) they must be an approved supplier. Farms can become an approved supplier by having a successful GAP Audit or by having a food safety plan. The buyer needs to verify the farms compliance to GAP standards. If supplier farms are audited, maintain copies of their most recent audit certificates. Postharvest building(s) is constructed and maintained in a way to prevent contamination (buildings do not need to be completely enclosed). All tools used to monitor sanitizers or cooler temperatures should be maintained and accurate. Food contact surfaces should be made of non-porous materials whenever possible (wooden tables/pallets are allowed if they are well maintained). Master cleaning schedule and related SOPs are present. Cleaning products are only used in ways they are approved to be used. The packinghouse area is relatively free of litter, waste, and culls.

Testing



National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
Certifying bodies (e.g. CCOF, Oregon Tilth) are occasionally required by USDA to test product residue for pesticides, insecticides, and fungicides. Your certifying agency may request a product sample from you to complete residue testing.	FSMA requires water testing for all farms. If you are using an unvalidated treatment method for a soil amendment you will have to get that tested and provide documentation that the process works for reducing pathogens.	Required risk assessments contain testing requirements. If a hazard requires you to do testing (e.g. water testing) then you must follow certain practices and recordkeeping.

Traceability



National Organic Program	Food Safety Modernization Act	3rd Party Food Safety Audits
National Organic Program requirements do not cover anything related to this topic.	Not covered in the FSMA Produce Safety Rule. Covered in FSMA's Traceability Rule that is still under development.	Required to conduct a traceability exercise annually and have a traceability program that tracks one step forward and backward for each crop.