

European Food Safety Certification—The GlobalG.A.P.[®] Standard and Its Accredited Certification Scheme¹

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Introduction

Food exporters to the 27 member countries of the European Union, Switzerland, and Norway may be asked by their customers to produce a certificate of compliance with the GlobalG.A.P.[®] standard. This private-sector standard is rapidly becoming the international trade norm for agricultural products, covering grains, processed products, fresh produce, meat, and fish. Certification is carried out by licensed third-party professional audit organizations. Over 100,000 growers in over 100 countries are certified as compliant with these rules.

GlobalG.A.P.[®] is the name of a private-sector association of major retail chains, importers, and suppliers (1). The term GAPs stands for Good Agricultural Practices. The GlobalG.A.P. consortium, formerly known as EurepGAP changed its name to reflect its increasing worldwide presence and eliminate possible confusion over possible connections with any official European Union (EU) body.

European Market Requirements

Many European importers and retailers will only buy produce, meat, and grain-based products that come from GlobalG.A.P.-certified farms, and they will demand written

proof, which is checkable on the scheme's website. Others may prefer a compliant source over a non-compliant one. There is no exact equivalent standard in the US. Several farm certification companies in this country are licensed to conduct farm audits using the GlobalG.A.P. checklist and are authorized to award certificates of compliance where merited (2).

Overview

GlobalG.A.P. aims to change the attitudes of farm management and farm workers from being purely production-oriented to being fully aware of the impacts their operation has on their customers and their own social and natural environments, and acting to mitigate any adverse effects of their production processes.

The GlobalG.A.P. standard is based on a very broad, generic hazard analysis study of the entire supply chain from the seed stage to dispatch to customers, covering every process that takes place in a single agricultural business. It does not, however, cover independent packinghouses, nor does it cover transport away from the farm.

Despite its environmental origins, the main concern is food safety, followed by worker welfare, and then ecological

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matters. There are slightly different versions for fresh fruit and vegetables, meat products, flowers and ornamentals, and combinable crops (grains and pulses). There is also an Integrated Farm Assurance version for farms with several types of operations taking place at once.

GlobalG.A.P requires strong internal controls, documented risk analysis by management, intensive employee training, meticulous record keeping, and annual on-farm inspections of work methods and paperwork by external auditors, using the current fourth version of the 233-question checklist. For fruit and vegetable growers, failure to meet one of 94 major requirements or 95% of the 117 minor requirements will result in certification being suspended rendering the farm unable to sell to customers who insist on compliance. There are also 21 recommendations. Compliance with this last class of questions is not essential, but a grower must be able to demonstrate that the recommendations have been considered during production planning.

Several of the Best Management Practices (3) set for crops by the State of Florida cover some aspects of GlobalG.A.P. Florida BMPs are primarily focused on the prevention or mitigation of water pollution. The US Food & Drug Administration's (FDA) 1998 Good Agricultural Practices (GAPs) voluntary guidance document covers many of the food safety questions. GlobalG.A.P is holistic, covering all aspects of farm management, and accentuates the need for integral crop and pest management.

Principles

Above all, growers must be compliant with all applicable local laws and regulations in the country of production. Failure to fulfill legal requirements automatically makes certification impossible.

In all cases, the standards only cover what takes place within the farm's legal boundaries, up to the 'Farm Gate,' broadly defined to cover situations where a farmer may operate several separate fields under one central management. On-farm packing operations that do not involve any physical transformations are certifiable, but off-farm packing facilities are not, even when owned and managed by the GlobalG.A.P grower or group of growers.

The primary focus of the GlobalG.A.P scheme is the prevention of food contamination. This is in line with legal requirements for all growers in the US. It is strong on chemical issues, in line with consumer perceptions in Europe generally. The current version is much less strict

about microbial contamination than the USDA and FDA guidelines for produce sold in the US (4).

Unlike the US Environmental Protection Administration, the EU does not specifically authorize the use of farm chemicals on specific crops. The EU does set maximum residue levels for crop protection products in specific produce items, but operates on the principle that if the substance cannot be detected, its use is acceptable so long as the application is made according to the laws of the country of origin. Generic plant protection products are acceptable under EU law if the active ingredient is registered. The EU does maintain a short list of banned chemicals that may never be used on crops to be sold within its borders; most of these are already banned by the EPA as well (5).

The secondary focus is on the protection of all persons on the farm, including visitors and subcontractors, from any harm caused by the growing and processing operations, and on fair treatment of workers and compliance with local labor laws. GlobalG.A.P does not currently include a detailed social inspection portion since this would duplicate other existing internationally accepted regimes like the Social Accountability 8000 Standard (6) and the Ethical Trading Initiative (7). Farm auditors may not have the necessary interview skills to investigate social issues.

The prevention of environmental contamination and conservation of wildlife and natural flora is another focus, but most of the 31 questions on this topic are classed as recommendations. The standard has been carefully designed to be achievable by growers of all sizes and levels of technical expertise. Large investments in infrastructure are not necessary. Smallholder cooperatives are actually encouraged, and there are separate guidelines for growers on topics such as risk analysis, soil management, microbiological hazards, water use, etc., to increase their understanding of what is required.

How It Works

Each grower may choose from a number of commercial audit firms that are licensed to issue GlobalG.A.P certificates to ensure price competition. Certificates are issued for a specific crop or crops on a specific farm. Any produce not named on the certificate is not covered. It is also possible for a legally constituted group of farms to obtain a group certificate covering all their members so long as they run an internal inspection system that fulfills the scheme's regulations. The group option significantly reduces the cost of the mandatory annual external recertification audits since

only a percentage of the group needs to be seen by outside auditors.

The 2011 version of the fruit and vegetable standard applicable to all farms newly certified from January 1, 2011 forward has checklists broken into three groups. The first fundamental group of questions, called ‘All Farms,’ is applicable to all kinds of agricultural operations, whether crops, animal husbandry, or aquaculture. The second group called ‘Crops Base,’ comprises basic questions relevant for different types of agronomy, both field and greenhouse. The third group includes questions specifically tailored for ‘sectors’ such as fresh fruit and vegetables, combinable crops (e.g., grains and pulses), flowers and ornamentals, beverage crops, etc.

Questions in each group are graded into three levels of importance: ‘Majors,’ which are mandatory; ‘Minors,’ which can sometimes be failed so long as 95% of the remainder are complied with; and ‘Recommendations,’ which are optional. Since each crop has its own unique growing conditions, which can also have regional variations, it is impossible for the standard to cover all possible situations. Some questions can be deemed ‘Not Applicable’ on a specific farm. Others, mostly ‘Majors,’ cannot be deemed ‘Not Applicable’ since they are essential for food safety.

Every farm has to fulfill requirements drawn from the following areas of concern:

1. Traceability
2. Record Keeping and Internal Self-Inspection
3. Varieties and Rootstocks
4. Site History and Site Management
5. Soil and Substrate Management
6. Fertilizer Use
7. Irrigation/Fertigation
8. Crop Protection
9. Harvesting
10. Produce Handling
11. Waste and Pollution Management, Recycling, and Re-Use

12. Worker Health, Safety, and Welfare

13. Environmental Issues

14. Complaint Forms

The produce handling requirements can be skipped by farms that sell their produce in bulk to a commercial packinghouse without any processing taking place inside the farm boundaries.

History and Organization GlobalG.A.P

The Eurep regime, as it was originally known, began as the European Retailers’ Protocol, first released in 1999, and updated four times since. A private-sector consortium consisting of major supermarket chains, large fresh produce traders, and producer associations put it together. The consortium came together to reduce the cost and complication of each retailer issuing separate farm standards and running or contracting out their own inspection systems, as happens in the US. The former system of differing proprietary standards had caused great confusion and increased costs for growers, leading to accusations of anti-competitive behavior against the supermarkets.

Voting members, retailers or suppliers, control the standard setting process and certification system. Non-governmental organizations, consultants, agricultural supply companies, and commercial and non-profit certification and inspection bodies may be associate members without voting rights. There is no governmental participation in the standard-setting process.

The regime is run according to the ISO 62 and ISO 65 guidelines for certification schemes. Auditors, both internal and external, must have undergone training according to the rules for the ISO 9000 Quality Management or ISO 14000 Environmental Management standards. Certification organizations and their employees are required to undergo periodic refreshment training, and are supervised by the national accreditation body in each country. The American National Standards Institute monitors certification bodies based in the US.

The EU legal framework for food safety issues is different from that of the US. Collaboration of European commercial entities at an industry level is legal and does not violate EU anti-trust laws. Such a joint effort would be legally impossible in the US. There is an EU Food Safety Authority, but

this is primarily an inspection and consultative body, and does not administer any certification scheme.

Periodic updating of the standard has been done by technical committees of representatives from both the supply and retail sectors, with a different committee for each of fresh produce, combinable crops, livestock, and aquaculture. These committees also serve as adjudicators of disputes and the final authority on acceptance of other schemes as equivalents. Associate members and other interested parties prior to final publication of each revision hold regular public meetings at which comments can be made. The latest revision was published late in 2009 and is applicable from January 1, 2011 forward. Growers are allowed one year to adapt to the revised rules, ending December 2012.

Several pre-existing national and private farm management standards have been adapted to conform to GlobalG.A.P and are accepted as equivalents (8) so that farmers do not have to pay for several certifications in order to satisfy customers in different countries. The adaptive process is known as benchmarking. These adapted standards may contain additional requirements not covered by the core document or give some items greater importance, but they have to cover all GlobalG.A.P obligatory 'Major' and 'Minor' questions. There has been agreement between GlobalG.A.P and the Global Food Safety Initiative on mutual acceptance of certifications so that a grower who has the former certification does not have to undergo and pay for a second certification to comply with the second.

Growers in each major producing country are entitled to organize a National Technical Working Group, including also government, academic, and supporting industry representatives. These groups meet occasionally to discuss local issues related to GlobalG.A.P compliance and local laws and conditions. They are empowered to create national guidelines ratified by the international technical committees for each sector, which certification companies are bound to follow. This eliminates conflicts over interpretation between one country and another.

Based on experience gained during the early years of the scheme, the GlobalG.A.P secretariat has organized an internal control system to maintain worldwide credibility of the scheme. A team of experienced auditors employed by the scheme conducts regular visits to certification companies and their clients, the certified farms, to ensure all the rules are followed. Certification companies that are found wanting can be penalized, and if the breaches are significant, their licenses to issue GlobalG.A.P certificates can be suspended.

The external auditors are required to make unannounced visits to a percentage of their client growers during the year. This rule is intended to overcome the tendency for people to make sure everything looks good for the day when the annual audit is expected, after which everything is allowed to slide backwards until the next renewal. The certificates of farms found to have neglected the rules can be suspended or cancelled.

Contacts and Documentation

The GlobalG.A.P Standard itself, the checklists used by internal and external auditors, and the official compliance criteria for each checklist question are all publicly available on the regime's website in downloadable versions in several languages. The General Regulations governing the operation of GlobalG.A.P are also obtainable there. More information, in several languages, can be found on the website maintained by the standard's secretariat at <http://www.globalgap.org>.

Notes

1. Information on membership can be found on the GlobalG.A.P website at <http://www.globalgap.org>.
2. A list of currently licensed certification bodies is also available on the GlobalG.A.P website at <http://www.globalgap.org>.
3. Information on BMPs for Florida crops can be found on the UF/IFAS Extension Digital Information Service website (EDIS) at <http://edis.ifas.ufl.edu>.
4. The latest USDA farm checklist, effective April 1, 2007, is available online www.ams.usda.gov/fv/fpbgapghp.htm.
5. See EU Directive 79/117/EEC dated 21 December 1978.
6. For details, see <http://www.sai.org>.
7. For details, see <http://www.ethicaltrade.org/>.
8. See GlobalG.A.P General Regulations, which are available on the scheme's website at <http://www.globalgap.org>.

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