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U.P. Food Exchange Group GAP Pilot Study:

Group GAP as an Alternative to Individual Certification

This pilot project is sponsored by the U.P. Food Exchange (UPFE), a partnership between the Marquette Food Co-op and Michigan State University Extension, with support from the Western Upper Peninsula Health Department in conjunction with a larger pilot study being conducted nationwide by USDA-AMS and the Wallace Center. Supplemental financial support for the first year (2014) was provided by MIFFS (Michigan Food & Farming Systems) and the CRFS (MSU Center for Regional Food Systems). The Marquette Food Co-op and UPFE are providing ongoing funding for this project.

The U.P. Food Exchange (UPFE), a partnership between the Marquette Food Co-op and Michigan State University Extension with support from the Western Upper Peninsula Health Department, is a food hub that serves as a resource portal for farmers, businesses, and individuals looking to connect with and actively participate in their local food system.

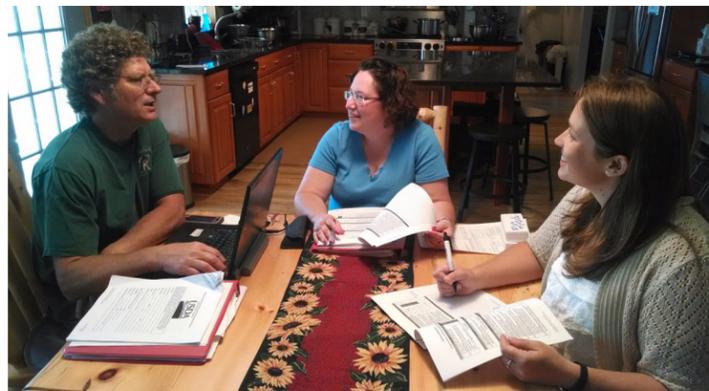
The U.P. Food Exchange (UPFE), located in Michigan's Upper Peninsula, was selected to partner with the USDA to be a part of a pilot study exploring new ways to address small farm food safety certification. Due to changing federal regulations related to the Food Safety Modernization Act as well as pressure from buyers and insurance companies, it appears that, in the near future, any farm (regardless of size) may at least need a farm food safety plan to sell to certain markets. This study will investigate group certification as a scale-neutral (no matter what size operation) way to make food safety certification attainable and more cost effective for even the smallest of farms. The pilot study "group" is comprised of pioneering small-scale (less than 5 acres) Upper Peninsula farms interested in assisting UPFE, the USDA, and the Wallace Center in developing a Group GAP (Good Agricultural Practice) model.

Why was The U.P. Food Exchange Selected to Participate?

UPFE was already helping to prepare farms in Michigan's Upper Peninsula for accessing the wholesale institutional market by actively offering food safety training, developing a Quality Management System (QMS) and recruiting farms for a food safety pilot project. This work was noticed by the Wallace Center and USDA. Michigan's Upper Peninsula (U.P.) has 1/3 of the land mass of Michigan and only 300,000 of Michigan's 9.8 million residents. This geographically remote region is known for its hay and potato production as well as dairy farming. Recently, there has been an increase in the number of diversified vegetable farms coming on the scene—young farmers starting out and retired people starting a second career. The direct to consumer market has, up until this point, been the primary market for these farms. This is changing as institutional demand for local food increases and these farmers see the value in selling beyond direct to consumer. To gain entry to the wholesale institutional market, these small-scale, diversified farms must address issues like food safety that can be a barrier to them accessing this growing market.

Setting the Stage for a Pilot

UPFE hosted food safety trainings in 2011 and 2012 for farmers across the U.P. that consisted of a combination of classroom education and a mock USDA audit at a local farm. In 2013, UPFE put out a call for farms to volunteer to participate in a group food safety certification pilot. At the same time, UPFE was developing a Quality Management System (QMS) to oversee the group's activities and requirements. Next



came training by USDA-AMS for those who would serve as internal inspectors for the group by performing both initial Gap Analysis visits and then inspections using the USDA GAP/GHP audit checklist sections 1-4. The self-selected farms then went through a day-long training that combined food safety and how to operationalize what they learned into a food safety manual for their respective farms.

What is Group GAP?

Group GAP is a group of partners working together to achieve a collective Good Agricultural Practices (GAP) certification. These partners can be farmers, buyers, distributors, food hubs, local non-profits, etc. The concept is that a group provides internal verification that it's members are meeting GAP standards by performing internal inspections. These activities are managed through a Quality Management System (QMS). The USDA then audits a statistical sample of the members, and also audits the group's QMS. If the sample is good and the system is good, that provides the USDA enough confidence to issue a group certification.

What is a QMS?

A QMS is a system of interrelated processes designed to identify and gather customer inputs and deliver a product or service that meets them in a consistent, continuously improving way. For the USDA Group GAP program, it must be built on ISO 9001 or an equivalent standard. This is the tool that allows the USDA to issue a group certification without physically visiting each member. Manufacturers have been using QMS to deliver a consistent, verified output for decades. Group GAP adopts those same principles and applies them to food safety monitoring. Globally, more farms are GAP certified in groups than as individuals. Using a systems approach to food safety, Group GAP develops a culture of food safety that will promote wide adoption of food safety standards.

Why Group GAP?

Most things in life are better when done as a collaborative effort. Only a sample of members go through a USDA audit, and the cost burden is shared by the group, so this method certainly has the potential to be more cost-effective than an individual certification. The real benefit, however, comes from the interactions within the group, the sharing of knowledge and experience, and the technical assistance available to each member by their participation. Rather than striving to comply with a baseline standard, the members of the group can learn from each other and continuously improve their compliance.



What Is Meant By Good Agricultural Practices (GAP)?

Protecting Water & Soil

- Performing A Water Risk Assessment That Includes Testing Water (irrigation and processing and drinking)
- Performing A Soil Risk Assessment That Includes Testing Soil

Separating Animals From Crops

- Keeping Wild & Domestic Animals From Contaminating Crops
- Having An Effective Pest Control Program For Rodents And Other Identified Pests

Maintaining Clean Equipment

- Using Clean Harvesting Containers
- Properly Storing Harvesting and Packing Materials
- Using Clean Harvesting Equipment/Implements
- Using Clean Transport Vehicles
- Routinely cleaning wash/pack and storage areas

Having A Plan To Address Potential Contaminating Products & Situations

- Properly Storing And Applying Manure
- Storing "Chemicals" Properly & Away from Crop Production & Processing Areas
- Having A Plan to Address Potential Contamination Issues From Things Like Field Sanitation/Bathroom
- Having A Plan to Address Worker Injuries, Especially Those That Pose A Risk to Produce From Blood

Keeping A Healthy Workforce

- Not Picking When You Are Sick: Practicing Good Worker Health and Hygiene

Following Recommended Handling Practices

- Maintaining The Cold Chain (storing and transporting produce at appropriate temps)

Being Able To Prove Compliance With Food Safety Practices

- Having An Effective Traceability Program
- Providing Appropriate Staff Training
- Having a Food Safety Plan for Your Farm
- Documenting That You Have Done The Above by Keeping Current Records and Logs



UPFE Group GAP Pilot Study Project Phases

16 farms started as part of the group in April

- 1 | Development of Quality Management System (QMS) (2013-2014)
- 2 | Development of Farm Food Safety Manual by UPFE Management Team (March-April 2014)
- 3 | Internal Inspector Training by USDA (April 2014)
- 4 | Farmer Training by MSU Extension & UPFE Management Team (April 2014)
- 5 | Gap Analysis Visits to Participating Farms (June & July)

4 farms left the group at this point

- 6 | Pre-Official Internal Inspection Check-In Phone Call With Farms
- 7 | Internal Farm Inspections (end of July – early September)

2 farms left the group at this point

- 8 | USDA Audit of 4 farms in our group (early September)
- 9 | Internal QMS (quality management system) Audit (end of September)
- 10 | USDA QMS Audit (early October)
- 11 | Unannounced Surveillance visits to farms that include verification of corrective actions if applicable (mid September – beginning of October)
- 12 | **Debriefing with farms, internal inspectors, state auditor (November)**

10 farms received USDA GAP/GHP certification in 2014 for the 2014/2015 season



Upper Peninsula Farms Participating in the Group GAP Pilot Study

Eastern Region:

Ski Country Farm (Sault St. Marie)

Central Region:

Blueberry Pier (Menominee), Hannah's Garden (Marquette), Reh-Morr Farm (Eben Junction), Rock River Perennial Garden & Greenhouse (Chatham), Slagle's Family Farm (Felch), Sleepy Hollow Farm (Munising), Treasa's Treasures (Munising)

Western Region:

Anya Farms (Chassell), Wintergreen Farms (Ontonagon)

Agency/Business Partners

The following agency/business partners designated staff to serve as internal inspectors for the project.

- Chippewa/Luce/Mackinac Conservation District
- Keweenaw Co-op
- Marquette Food Co-op
- Michigan State University Extension
- Western U.P. Health Department