Food Safety Verification Requirements
for Vendors Supplying Specialty Crops
through Trade Mitigation Purchase Programs

All vendors who supply specialty crops to the United States Department of Agriculture (USDA) through Trade Mitigation Purchase Programs must provide evidence that each of their suppliers – including producers, handlers, and packers – have undergone a food safety verification audit conducted by the USDA Agricultural Marketing Service’s Specialty Crops Inspection Division. Acceptable USDA food safety audits include:

- USDA Produce Good Agricultural Practices (GAP) Harmonized Audit
- USDA Harmonized GAP Plus+ Audit
- USDA Good Agricultural Practices & Good Handling Practices Audit

If a producer, handler, or packer has not completed one of the USDA audits listed above but has completed an audit under a Global Food Safety Initiative (GFSI)-benchmarked program, the vendor may elect to request a desk audit by the Specialty Crops Inspection Division to verify USDA’s food safety requirements have been met. The vendor is responsible for paying the Specialty Crops Inspection Division all costs associated with the desk audit. The current rate for fiscal year 2018 and 2019 for audit services is $108/per hour.

The following GFSI-benchmarked programs are acceptable alternatives to a USDA audit:

- Primary Production Standards
  - GlobalGAP Integrated Farm Assurance Scheme Version 5
  - GlobalGAP Produce Safety Standard Version 4
  - GlobalGAP Harmonized Produce Safety Standard
  - SQF Code 7th Edition Level 2
  - Primus GFS Standard v 2.1 or 3

- Packinghouse/Facility Standards
  - GlobalGAP Integrated Farm Assurance Scheme Version 5
  - GlobalGAP Produce Safety Standard Version 4
  - GlobalGAP Harmonized Produce Safety Standard
Vendors who elect to undergo a desk audit of any of these GFSI-benchmarked audits must submit to USDA the following documents for review:

- The complete GFSI food safety audit report (not just the certificate) for all producers, handlers, and packers from whom products were sourced.
- Completed Corrective Action Reports addressing non-conformances found by GFSI audit, if not included as part of the audit report.
- The Water System Risk Assessment and water test results
- Domestic Origin Verification
  - A vendor who handles products originating from outside the United States must submit a segregation plan that addresses how it ensures non-domestic products are not used for commodities purchased under the Trade Mitigation Program.
- Traceability Program standard operating procedures or other documents that outline the vendor’s traceability program as well as a record documenting the most recent mock recall.

Based on the findings of the desk audit, USDA reserves the right to require additional documentation and records.

When submitting documentation to USDA for a desk audit please submit to: scaudits@ams.usda.gov and for the subject line enter: Desk Audit for Trade Mitigation Purchases.

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