FSMA vs. GAP: A Side by Side Comparison for Produce Presented by: Leah Cook, January 2019

Records & Documentation Requirements

FSMA	FSMA: Produce Safety Rule					
Subpart & Section	Topic Areas	Record Requirements	Supervisor Review, Date, & Initial			
Subpart A Section 112(b)(2)	COMMERCIAL PROCESSING EXEMPTIONS	Must include written disclosure with shipped product saying that product is not adequately treated to reduce pathogens.	No supervisor review needed.			
Subpart A Section 112.2(b)(3)		Must get written assurances from your customer that they <u>or</u> their subsequent customer will perform commercial processing to adequately reduce pathogens.	No supervisor review needed.			
Subpart A Section 112.7(b)	QUALIFIED EXEMPTIONS	Must maintain sales records and records demonstrating eligibility for qaulified exemptions.	Supervisor review and signature needed; except on sales receipts.			
Subpart A Section 112.7(b)		Must perform and record annual review and verification of continued eligibility for qualified exemption.	Supervisor review and signature needed.			
Subpart B Section 112.12(c)	ALTERNATIVES TO ANY SUBPARTS	If you want to use alternate methods not listed in the PSR, you must establish and maintain documentation of scientific data or info that supports a conclusion that your methods provide an equal measure of protection.	No supervisor review needed.			
Subpart C Section 112.30(b)(2)	PERSONNEL TRAINING	All required personnel trainings must be recorded and records must include: dates, topics covered, and personnel trained.	Supervisor review and signature needed.			
Subpart E Section 112.50(b)(1)	WATER SYSTEM INSPECTION	Must record observations and inspection findings of water system inspections: at the beginning of the growing season, as appropriate, but at least annually.	No supervisor review needed.			
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Subpart E Section 112.50(b)(2)	AGRICULTURAL WATER ANALYSES	Must keep analysis reports of all agricultural water tests.	Supervisor review and signature needed.		
Subpart E Section 112.50(b)(3)	AGRICULTURAL WATER TREATMENTS	Must establish and keep records of all scientific data or info used to support the adequacy of your water treatment methods.	No supervisor review needed.		
Subpart E Section 112.50(b)(4)		Must keep records of results of water treatment monitoring.	Supervisor review and signature needed.		
Subpart E Section 112.50(b)(5)	AGRICULTURAL WATER APPLICATION / DIE-OFF INTERVALS	Must keep establish and keep records of all scientific data or info used to support microbial die-off or removal rates used to support time intervals used to achieve log reductions of <i>E. coli</i> .	No supervisor review needed.		
Subpart E Section 112.50(b)(6)		Must keep records of actions you take if ag water does not meet quality standards, including records of any time intervals or other reduction treatments applied.	Supervisor review and signature needed.		
Subpart E Section 112.50(b)(7)	PUBLIC WATER SUPPLY	Must maintain annual documentation of results or certificates of compliances from public water systems supplying your water.	No supervisor review needed.		
Subpart E Section 112.50(b)(8)	ALTERNATIVES TO WATER REQUIREMENTS	Must establish and maintain documentation of scientific data or info that supports a conclusion that your alternative methods provide an equal measure of protection.	No supervisor review needed.		
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Records & Documentation Requirements

FSMA: Produce Safety Rule					
Subpart & Section	Topic Areas	Record Requirements	Supervisor Review, Date, & Initial		
Subpart E Section 112.50(b)(8)	WATER ANALYSIS METHODS	Must keep records of any statistical analytical methods you use in lieu of the methods in the PSR to evaluate water results.	No supervisor review needed.		
Subpart F Section 112.60(b)(1)	TREATED BIOLOGICAL SOIL AMENDMENTS OF ANIMAL	Must have annual documentation that the process used to treated biological soil amendments of animal origins is scientifically valid and process is monitored.	No supervisor review needed.		
Subpart F Section 112.60(b)(1)	ORIGIN FROM 3RD PARTY SUPPLIERS	Must have annual documentation biological soil amendments of animal origins were handled appropriately to minimize risk of re-contamination.	No supervisor review needed.		
Subpart F Section 112.60(b)(2)	BIOLOGICAL SOIL AMENDMENTS OF ANIMAL ORIGIN TREATED ON-FARM	Must keep documentation that process controls (time, temperature, turnings) were achieved.	Supervisor review and signature needed.		
Subpart L Section 112.140(b)(2)	EQUIPMENT CLEANING AND SANITATION	Must establish and keep records of dates and methods of cleaning and sanitizing equipment used in covered harvesting, packing, or holding activities.	Supervisor review and signature needed.		
	**NOTE: Requirements COMMERCIAL PROCESSIN another 2 years t **NOTE: <u>ALL</u> WATER requirements				
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