

Good Agricultural Practices A Reality Check -

Mike Orzolek, Prof Vegetable Crops
Dept. of Horticulture, Penn State University

I have been a vegetable specialist in the Mid-Atlantic region for 35 years. In that time, I have visited many vegetable farms and growers. All of these growers have been very conscious of the importance of food safety even before the USDA and FDA developed the Good Agricultural Practices (GAPS) criteria for vegetable and small fruit growers to help eliminate food borne diseases at the farm level. Also, there have been significant changes in field production techniques in the last 10 years.

The modern use of the plasticulture system (raised beds covered with plastic mulch with drip irrigation tape beneath the mulch) has helped eliminate the potential of E. coli and Salmonella bacterial contamination of vegetables and small fruit grown on the plasticulture system. Ninety five percent of the fruit grown on raised beds are never in contact with the soil, but are in contact with polyethylene plastic mulch. Plant architecture also will help determine whether specific vegetables or small fruits will come in contact with E. coli and Salmonella bacteria.

Vegetables that grow erect and tall such as sweet corn or okra have minimal chance for contact with bacteria. Compared to shorter and more prostrate crops such as tomatoes, cantaloupes and strawberries. **In fact, there has never been a documented case of sweet corn causing any food borne illness in the last 50 years.** In addition, leaves or husks cover the corn ear and the ear 20 to 30 inches above the soil is never in contact with the soil. Ironically, field corn grown for poultry, cattle or pig feed does not have to be tested for E. coli, Salmonella, Listeria, etc. even though there would be the potential for bacterial infection when consumed as fresh meat or poultry.

Should we require GAP audits for field corn destined for feed as well as certification? FDA does not distinguish between different plant architectural plant types and treats all vegetables the same. In reality, vegetables are not all the same. Any vegetable or small fruit grower, selling product to retail chain stores, must now be certified by passing a Good Agricultural Practices (GAPS) audit. The Food and Drug Administration is responsible for developing food safety guidelines, but they do not enforce those guidelines. FDA has opted to have private companies carry out the GAP audits on growers' farms requesting certification.

My question is whose is overseeing these private GAP auditing companies in regards to methods, training and costs? Are all audits processed in the same manner or do companies use their own interpretation of the criteria for the audits? If the grower is required to be certified under the GAPS program, what is the responsibility of the retail chain? Does FDA inspect individual retail chain stores to insure that the store and all produce employees are trained and following proper food handling procedures? Chain stores that have bulk displays of sweet corn encourage multiple handling of sweet corn ears by the consumer, are any of these consumers carriers of Food Borne diseases? With constant turnover in workforce, how many retail stores offer food safety training on a monthly basis? What's good for the goose is also good for the gander!

Both growers and retailers need to be accountable for food safety procedures and the audit requirement for growers should also apply to retail chain stores. Let us have both a reality check and common sense tackling our food safety solutions.