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## History of the Community Accreditation for Produce Safety Program

Item Type	report;article
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Download date	2026-06-18 07:42:43
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## **History of the Community Accreditation for Produce Safety Program**

Vern Grubinger and Hans Estrin. January 24, 2021

### Background and rationale.

The Food Safety Modernization Act (FSMA) was signed into law in 2011. It includes the Produce Safety Rule (PSR) which is the first federal standard for the production, harvest, and handling of fruits and vegetables. FSMA established that vegetable and fruit farms with annual produce sales less than \$25,000 are ‘not covered’ by the law, and that farms with annual sales of food less than \$500,000 may be ‘qualified exempt’ from compliance if at least half those sales are within a state, or within 275 miles of the farm, to ‘qualified end users,’ such as consumers and retailers that sell directly to consumers (1).

The passage of FSMA led to concerns about the marketplace implications for small farms (2), as well as the cost of compliance for small farms, which is not insignificant (3). In Vermont the concern was especially apt, because the vast majority of produce farms are small, and their sales are primarily direct to consumers and local retailers. The 2012 U.S. Census of Agriculture reported 814 farms selling vegetables, melons, potatoes and sweet potatoes in Vermont but only 50 farms had annual sales of those crops greater than \$250,000 (4).

A 2013 report by the New England Agricultural Statistics Service (5) found that 72% of Vermont’s fruit and vegetable farms rely on direct-to-consumer sales such as community supported agriculture, farmers’ markets, farm stands and pick-your-own, 22% of farms utilized direct-to-retail sales such as food co-operatives, general stores, and restaurants, and only 17% of Vermont fruit and vegetable farms utilize wholesale markets.

In 2016, the Vermont Agency of Agriculture, Food and Markets (VAAFMM) analyzed U.S. Census of Agriculture data for farms selling fruits and vegetables in the state and found that of an estimated total of 1,050 farms, about 500 produce farms would not be covered by FSMA and another 400 farms will meet the requirements for a qualified exemption. Only 150 farms, or about 14% of all produce farms in Vermont, would be fully covered by the requirements of FSMA.

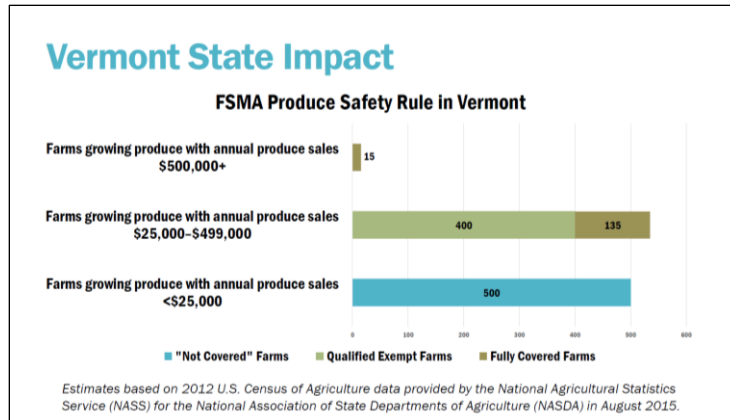


Figure courtesy of the Vermont Agency of Agriculture, Food and Markets.

Informal discussions with growers revealed that while there was general agreement that the PSR was not necessary or well crafted, there was a strong desire to be pro-active in response to a changing food safety landscape. Specifically, growers wanted to assure their customers that reasonable food safety practices were being followed on their farms in order to remain competitive in the marketplace. In addition, some growers recognized potential contamination concerns should not be ignored, because a food safety incident could seriously reduce the demand for local, fresh produce.

Groundwork for the program. In 2010, UVM Extension had developed the Practical Produce Safety (PPS) program in response to the increasing number of wholesale markets requiring their produce suppliers to pass a USDA Good Agricultural Practices (GAPS) audit. Extension in many states had started offering GAPS trainings, but the program seemed cumbersome for many small- and medium-scale growers, especially if only a small portion of their sales were to wholesale markets. However, Extension personnel and growers in Vermont did see the value of having a food safety curriculum that would meet the needs of smaller-scale fruit and vegetable producers, so the PPS was developed (6). It consisted of a manual, templates, and workshops, much like the more complicated GAPS trainings (7). An emphasis was placed on making it as “practical” as possible to improve food safety (avoiding cost and complexity), and on identifying best practices with multiple benefits (risk reduction, increased efficiency and profitability). PPS helped more than 100 Vermont growers write relatively simple produce safety plans aimed at implementing key practices that minimized risks, with much less time and expense than was required to pass a GAPS audit. However, PPS lacked any verification of the implementation of food safety practices, and it did not offer any recognition that could be used in the marketplace.

Initial concept. With the final FSMA PSR pending, in summer of 2014, UVM Extension’s vegetable and berry specialist, Vern Grubinger, proposed the concept of a “produce safety accreditation program” to establish a consistent, practical approach for fresh produce farms in Vermont to reduce food safety risks and maintain market credibility even if they were exempt from complying with the PSR.

UVM Extension administration agreed to provide start-up funds to hire Hans Estrin to coordinate the program, on a part-time, temporary basis. Mr. Estrin had previously collaborated on the development of the PPS as part of his work to launch a local food hub whose growers needed food safety credibility. Additional funds to support the coordinator's salary and operating expenses were raised through a Specialty Crop Block Grant and gifts from local foundations and a wholesale buyer.

The specific goals of the proposed program were to: establish practical produce safety standards for small and medium-scale farms; maintain market integrity for VVBGA farmers exempt from FSMA; provide a transparent way for growers to explain their food safety practices; reduce risk from food-borne pathogens on fresh produce; improve the quality and shelf-life of fresh produce; and, build a community of practice where growers and service providers share information.

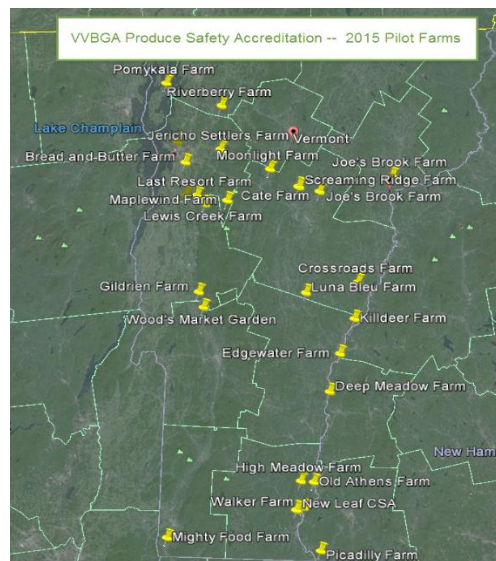
In fall of 2014 the board of directors of the Vermont Vegetable and Berry Growers Association (VVBGA) agreed to support a Produce Safety Accreditation program, allocating \$10,000 towards its development, and identifying a subset of growers/directors to work with the program coordinator. The program would be "owned" by the VVBGA and administered by Extension. Accreditation would be optional for VVBGA members, and it would only be awarded to farms that completed an approved produce safety plan and then documented its implementation.

Accreditation would have no legal or regulatory standing, but it would support compliance with the PSR. The VVBGA Board of Directors would approve the accreditation policies, including the produce safety standards, review procedures, and grower fees. The board's support was motivated by a desire to be "ahead of the curve," as customers were starting to ask about food safety practices. By making this a VVBGA program they would be setting their own standards for farms not be required to comply with, but still influenced by, the FSMA PSR.

In the fall of 2014, the program coordinator set about developing the content and delivery mechanisms for the program while a building community of practice comprised of leading growers and partner agencies. The coordinator researched web-based platforms that would support individual farm folders where growers would write plans and upload documentation, a review process for growers to get feedback on their plans and documents so they could make revisions, the ability to generate electronic badges or certificates, and the ability for growers to share information with one another and with customers if they so desired.

A PSA advisory board was established with representatives from the VVBGA, a wholesale distributor, the Vermont Agency of Agriculture, Food and Markets and the Vermont Department of Health. These stakeholders helped develop, test and refine the tools and procedures to be used. Directors and Officers insurance was acquired by the VVBGA to protect them from legal risks posed by the roll-out of the program.

Pilot program. In 2015, The program was launched, and renamed Community Accreditation for Produce Safety or CAPS (8). The advisory board crafted produce safety standards and a process for pilot-testing accreditation. The standards included 20 required produce safety practices, 8 optional practices, 4 specific records to be posted on-line, and posting of standard operating procedures for high-risk parts of farm operations. Ninety-five growers signed in to CAPS using Edvance 360, a commercially-available on-line learning management system, completing their farm's food safety self-assessment. Seventy of those growers also completed their food safety plans. From those farms, 24 were recruited to test the accreditation system, which involved providing documentation to be reviewed by a panel of farmers. At the end of 2015, 'mock' accreditation was awarded to 22 of the 24 farms.



In 2016, a custom web platform was developed for the CAPS program by personnel specializing in web site development at University of Georgia. This platform was based on those used by Northeast and Southern SARE regions (SARE is a USDA grants program). It provided easier access for growers, reviewers and the program coordinator.

A total of 85 farms used the new platform to create individual farm folders and write produce safety plans. Sixty-eight of these farms took the next step and paid a \$100 fee to participate in the CAPS accreditation process. Farms were offered reduced rates upon request, and five growers asked to pay half price due to their financial situation. The 68 farms pursuing accreditation reported having 1,304 acres in crop production plus 715,442 square feet in greenhouse crop production, with aggregate annual produce sales of \$12.44 million.

To earn accreditation, farms had to document implementation of all 18 'best practices' established by the CAPS advisory board; these were a revision of the previous, more complicated requirements, based on feedback from the 2015 pilot farms.

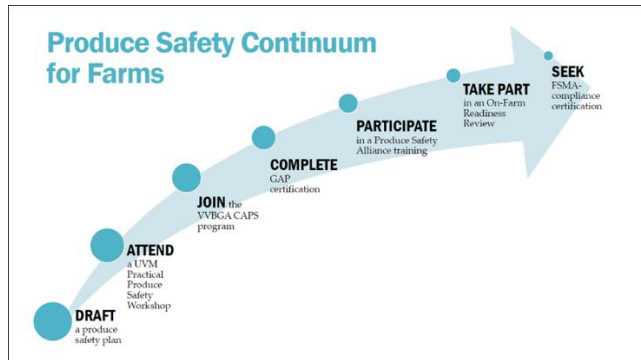
The first 12 practices must be included in a farm's produce safety plan, the last 6 practices must be documented with records and photos uploaded to a farm's on-line CAPS folder:

1. Land Use History and Farm Map.
2. Manure and Compost Management.
3. Irrigation Risk Reduction.
4. Container Management and Risk Reduction.
5. Wash and Pack Facility Description and Cleaning Procedures.
6. Rodent Management.
7. Cold Storage Cleaning and Management.
8. Wholesale Shipping and Traceability.
9. Transportation Cold Chain Maintenance.
10. Toilet Facilities.
11. Health and Hygiene Policy.
12. Accessible First Aid Kits.
13. Employee Training Verification Record.
14. Manure and Compost Records.
15. Farm Containers Cleaning and Management.
16. Potable Water Test Results.
17. Produce Washing System.
18. Cold Storage System and Thermometer Requirement.

Teams of three reviewers then scored on-line farm folders for completeness, using pass/fail for each required section, with comments required when a failing grade was given. There were 12 reviewers in total including the CAPS coordinator, farmers from the CAPS advisory board and personnel from Extension and the Vermont Agency of Agriculture.

In 2016 forty farms submitted complete documentation with no changes needed. Reviewers found corrections or additions needed by 23 other farms. Most were minor issues, such as a missing photo or lack of detail in a description of a standard operating procedure. By the end of 2016, sixty-three farms earned accreditation out of the 68 farms that enrolled initially.

The final PSR went into effect January, 2016, describing compliance dates for farms with different levels of annual sales (8). It became clear to Extension and VAAFMM personnel that there was a continuum of produce safety education and engagement depending on the sales, markets and products of vegetable farms. At a minimum, all farms were expected to have a produce safety plan, and on the other end of the scale was full compliance with the PSR.

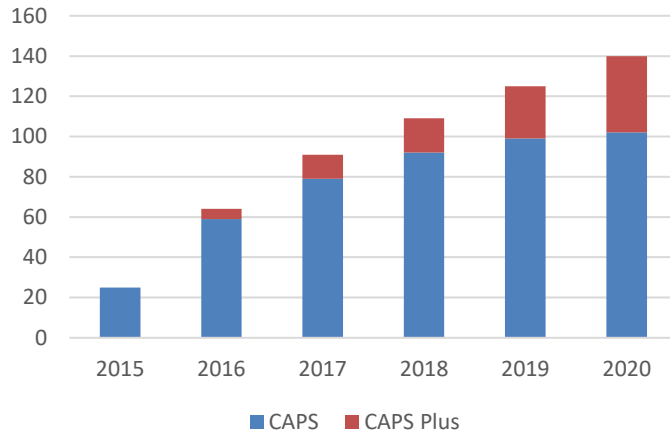


Addition of CAPS-Plus for wholesale markets. In 2016 the CAPS-Plus program was piloted with 5 farms, as a supplement to CAPS. While a CAPS farm folder makes it obvious to a reader what a grower is doing to assure produce safety, some large wholesale buyers require third-party, on-site audits to confirm this information. To address this, the CAPS program coordinator and produce safety personnel at the VAAFM worked with Hannaford supermarkets to design CAPS-Plus, which includes an annual audit from VAAFM staff to corroborate the documentation materials uploaded to the CAPS platform, and the requirement for a traceability plan by the grower, in the event of a product recall.

Earning a CAPS-Plus certificate is optional for farms that want to market their produce to larger buyers. Hannaford was the first wholesale buyer to accept CAPS-Plus in place of a USDA Good Agricultural Practices (GAPS) audit, which they had required. CAPS-Plus expanded the potential supply of local produce for the buyer and also opened up new markets for Vermont farms by making it less costly and time consuming to meet the buyer’s food safety documentation, compared to a GAPS audit. Participating growers pay a \$100 annual fee to enroll in CAPS and an additional \$200-\$400 for an audit, which has been reimbursed by supermarket buyers, in comparison to a USDA GAPS Audit, costing \$750 to \$1,000.

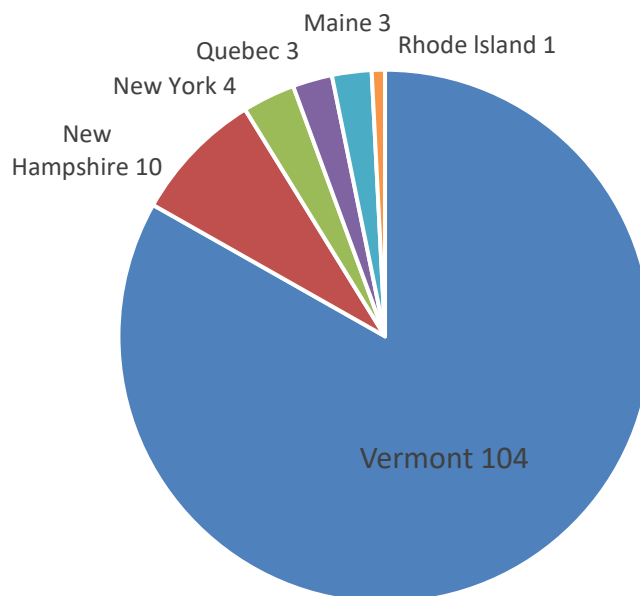


Number of CAPS and CAPS-Plus certificates issued from 2015-2020



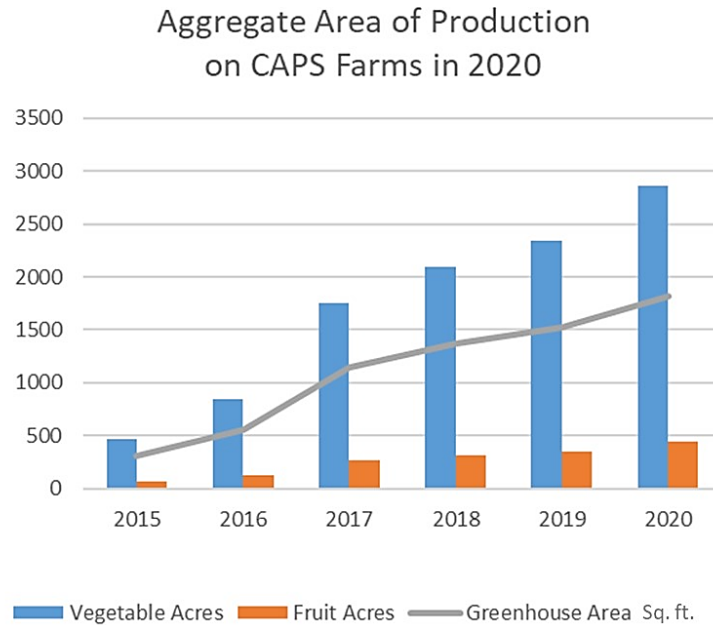
Although CAPS started as a Vermont-based program, growers in nearby states and the province of Quebec have also participated. Some of this is due to the fact that the VVBGA membership includes dozens of out-of-state farms. Another factor was the participation of the Deep Root Organic Truck Farmers cooperative in GAPS-Plus; the co-op has member farms in several states and Canada. As funding for personnel (in state agencies of agriculture) to conduct USDA-GAPS audits declined across the region, more buyers and growers came to realize that CAPS-Plus was a desirable alternative.

Location of CAPS Farms in 2019



Participation in CAPS and CAPS-Plus has increased steadily. In 2019, the 125 farms enrolled in CAPS reported growing a total of 1,903 acres of vegetables, plus 287 acres of fruit and berry crops, and 1.25 million ft<sup>2</sup> of greenhouse crops. Using 2017 U.S. Census of Agriculture data for Vermont we estimate their aggregate annual sales of produce to be \$21.8 million. The average CAPS farm grows 15.2 acres of vegetables, 2.3 acres of fruit, and has gross annual produce sales of \$174,400. The USDA currently defines small family farms as those with gross cash farm income less than \$350,000.

In 2020, one hundred and sixty farms used CAPS resources on vvbga.org to write or modify produce safety plans and 140 of those farms earned CAPS accreditation. Of these 140 farms, 38 also completed CAPS-Plus by completing a traceability plan, a mock recall, and passing an on-farm audit with VAAF. CAPS-Plus was accepted in lieu of a GAP audit by Hannaford Supermarkets, the Deep Root Organic Truck Farmers Cooperative, Food Connects, Wegman's, Price Chopper, Shaw's, Reinhart Foods, and Whole Foods. The 140 accredited farms had aggregate production of 2,865 vegetable acres, 447 fruit acres and 1,822,000 sq. ft. of greenhouse/high tunnels representing a total of \$32.4 million in estimated aggregate annual sales.



A custom web site was launched in 2020, designed by Extension personnel working with Tamarack Media Cooperative in Burlington, Vermont. This work was funded in part by a grant by the VAAF. The new website improved the user and reviewer experience, and simplified behind-the-scenes administrator functions such as aggregation of data across participating farms. The new website also added a soil health platform so that growers could manage that information as well as produce safety information. Both of these areas on the website support grower compliance with regulations, without being regulatory in nature.

## Grower Testimonials

“CAPS-Plus was a great experience for us. After years of contemplating the overly onerous requirements of other Food Safety Audits, we decided to give CAP-Plus a try. CAPS-Plus allowed us to access new markets and was a compatible option during our busy season. The inspection was clear, straightforward, and amicable. It felt like a collaborative process.”

- Angus Baldwin, West Farm, Jeffersonville, VT

“I've spent a lot of time muddling through this whole Food Safety thing over the last 5 years and this is the first time I've said "Oh, this is so clear, so easy!" Exactly what you need is spelled out very clearly in a very straightforward step by step process. It's all done online, and when it's finished it's available for buyers to view, with photos of your wash set up, cleaning protocols, the works! (Instead of expensive on-farm audits).”

-Hank Bissell, Lewis Creek Farm, Starksboro, VT

“CAPS has helped us get on our food safety game with a minimum of fuss, but significant improvements to our operations. The online system makes it easy to satisfy buyers we have a credible food safe production approach. This for only \$100 - amazing!”

- Andy Jones, Intervale Community Farm, Burlington, VT

“I am very proud of this certificate, and what it represents in practice. We all do a better job here with the work that we are doing.”

- Mary-Ellen Lovinski, East View Farm, E. Hardwick, VT

“The individual attention provided to our farm--particularly a farm that is so small—has really motivated us to complete our CAPS pilot. Without encouragement and support, we would not be anywhere close to completing a food safety plan of any kind. In particular, the coordinator’s understanding of our small-scale has really made it possible. The suggestions offered us have been realistic, within our budget, and have helped us become proud of our farm's food safety.”

- Becky Madden, Singing Cedars Farm, Orwell VT

“The CAPS plus program encouraged us to be better organized and therefore be more effective and efficient.”

- Tony Scott, Ways Mills Farm, Quebec

“I really appreciate the value of a CAPS coordinator to keep us reminded of our tasks and make sure we complete the program. Keeping the farmers on board is like herding cats. Individualized advice on how the requirements apply is also very helpful.”

- Elizabeth Wood, New Leaf CSA, Dummerston VT

“The UVM Extension Coordinator has provided us with invaluable support, encouragement, and expertise--turning CAPS participation from what could be ongoing headache into a real learning tool and valuable assessment program.”

- Bruce Wooster, Picadilly Farm, Winchester NH

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