IFA V6 PC SUMMARY: FRUIT AND VEGETABLES

General comments about the process

Comments received during each public consultation period were reviewed by the technical committees and members of management. The below serves as an overview of the outcomes of stakeholder feedback submissions.

With a diverse group of stakeholders, every effort was made to thoughtfully consider the needs of respondents. There is an understanding that some of the solutions presented in the standard will be continuously revised in future versions and may appear to the reader to be imperfect in nature. In the spirit of both simplification and food safety integrity, a balance was sought that honored both charges.

Our conversation with stakeholders is an ongoing dialogue, and IFA v6 begins our journey toward an inclusive standard-setting process. We offer our gratitude not only to all those who collaborated with us during the creation of IFA v6, but also to those who seek to continually improve the elements which warrant future adjustment.

Thank you for continuing to partner with GLOBALG.A.P. in creating standards that reflect the needs of the industry. We look forward to continuing to serve you through the implementation of IFA v6 and beyond.

TOPIC	FEEDBACK	RESPONSE
General comments		
Structure of the standard	Most respondents supported the proposed structure of distinct sections for management systems, food safety, worker well-being, and environmental sustainability.	The proposed structure was maintained. Areas where the structure may cause some confusions were flagged for emphasis in trainings and guidance materials.
Internal documentation and self-assessments	Requests were made to remove clauses related to document control and record-keeping, as these were viewed as challenging for small producers to comply with. Stakeholders noted that some of the requirements of this section were quite detailed.	The principles associated with these elements remain a Minor Must in the IFA v6 Smart edition. The criteria were reframed to request evidence of a system instead of a documented procedure. Additionally, with the understanding that the self-assessments can be cumbersome at the farm level, the exercise is viewed as a valuable element to internally managing an effective food safety program. As the efforts of self-assessment also serve to prepare the producer for content addressed in external audits, the principle was retained.
Resource management	Early iterations of this requirement were viewed as prescriptive and challenging to comply with for farms with limited resources.	A less prescriptive treatment of documentation requirements addressing the organizational structure was incorporated into the IFA v6 Smart edition, while the earlier iteration was retained in the GFS edition to comply with benchmarking requirements.
Training	Early iterations proposed wording that was less prescriptive in terms of training requirements and documentation, resulting in stakeholder feedback stating that expectations should be very clear. Concern was raised that the workforce is linguistically diverse and variable in levels of literacy. Requests were made to accommodate these realities.	Language was retained and in some sections clarified to provide greater detail as to the requirements for the training and the type of documentation that must be kept. Space was created for risk-based interpretation of how training is delivered to accommodate diverse work groups, with a focus on end competency.
Continuous improvement plan	Stakeholders noted a lack of clarity in how the principle will be audited and requested more guidance for producers and auditors.	As the industry has identified the importance of this topic, it remains in IFA v6. In response to the concerns raised by stakeholders regarding auditing and interpretation, guidance documents will be prepared. For IFA v6 GFS, both documentation of the plan and evidence of the plan's implementation are Major Musts. In IFA v6 Smart, only documentation of the plan is a Major Must, with implementation a Minor Must.

Subcontractors	Stakeholders offered thoughtful insights into the continuing confusion surrounding the definition of subcontractors as opposed to outsourced activities and services. The terminology continues to be interpreted in a variable manner during audits.	Guidelines are being prepared to address this ongoing challenge.
Stock management, traceability, and mass balance	Concern was raised that some of these activities are more suitable for a processing environment and are challenging to document in a consistent manner.	Criteria on management of inventory have been clarified in response to stakeholder comments, while the integrity of product traceability and product labeling requirements (GLOBALG.A.P. Number) remain unchanged. Clarification exempts bulk products (e.g., potatoes sold directly from the field) from detailed mass balance calculations, but this information remains critical if packing is done in the field.
Laboratory testing	The availability of laboratories accredited to ISO 17025 varies widely and in some regions such laboratories are not existent or are inaccessible due to infrastructure challenges.	Understanding that the availability of ISO 17025 accredited laboratories is a challenge globally, space was created in the standard to utilize laboratories verified through other trusted systems and programs, while still giving strong preference to those compliant with ISO requirements.
Food safety policy declaration	Throughout the process, there was a great deal of concerned feedback regarding the food safety policy declaration. Several iterations were proposed as a means to eliminate the signed declaration, but all served to further complicate the user experience.	In the end, it was determined that the declaration will be retained for IFA v6, with the understanding that it is an imperfect solution. Future revisions will continue to search for other means to capture and document the contents of the food safety policy declaration in a more suitable manner.
Wildlife and animal activity	Phrasing should be clear to avoid creating an expectation of full elimination of wildlife in the production area; vague phrasing such as "excessive animal activity" caused confusion.	Language was added allowing a risk-based treatment of the presence of animals and more clearly linking the requirement to the likelihood of potential contamination events. Language was retained in relation to pests in handling areas, in keeping with the critical risk posed in these situations.
Provisions for clean toilets	Stakeholders remained divided on this topic, with some strongly preferring a defined allowable distance for the location of toilets and others requesting the distance be less firmly prescribed.	In keeping with the spirit of a less prescriptive experience, the final version reflects a risk-based treatment of toilet location, with the expectation that toilets are within "reasonable proximity" of the working location. The principle will be reviewed and revised in subsequent versions as needed.
Water management	Water testing attracted the highest volume of stakeholder comments, with a wealth of perspectives and experiences offered from around the world. Preferences for having separate pre- and postharvest principles for water analysis were voiced. Product tables and decisions trees presented in early iterations were considered confusing and too prescriptive. Concern was raised that leaving the requirement fully open-ended would allow for using risk assessments to support a lack of any water testing. Defined thresholds raised concern that prevailing regulations are variable and of setting expectations not in keeping with risk-based assessments.	In the spirit of simplification, the unified approach to pre- and post-harvest principles for water analysis was retained. Prescriptive elements, including the decision tree and product lists, were removed. To ensure the integrity of the water supply, a minimum analysis frequency was set for all products under certification. Defined thresholds for irrigation water quality were eliminated from the final version under the provision that these be governed by carefully assessed risks.
Plant protection products	Stakeholders identified specific cases of variability in auditing experience related to maximum residue levels (MRLs). Confusion was noted in the wording of the standard, and requests were made to resolve these issues in the revision.	Wording related to pesticide residue testing and MRLs was reworked to improve the audit experience and reduce confusion. Pathways for compliance were clarified for scenarios in which products are destined for a number of potential countries.

Postharvest handling	Concerns were raised that the environmental monitoring programs (EMPs) are often viewed as requiring microbial analysis by a laboratory, which can add costs for the producer and may not be necessary when viewed through the lens of assessed risk. While space should be made to acknowledge the implementation of these important programs, risk-based EMPs that avoid prescriptive requirements are critical for global implementation of the standard.	In postharvest handling situations, environmental monitoring programs (EMPs) are increasingly widely used. EMPs are not as common in primary production settings, nor is the intent of the standard to enforce their implementation in these applications. In post-harvest activities, EMPs are based on risk, the nature of the product, and retailer requirements. Understanding that implementation of such activities adds cost and requires some technical knowledge, guidance will be created to offer pathways for compliance.

Environmental Sustainability

Compliance level of new topics	On plastics, food waste, greenhouse gases, no deforestation (no conversion of natural ecosystems into agricultural use), there were opposing views on whether the topics should be covered at Recommendation, Minor Must, or Major Must level, given their relevance.	The issue was and continues to be carefully discussed at decision-making multi-stakeholder steps of the process, such as focus groups and technical committees.
Need for guidelines and definitions.	Topics such as biodiversity, including no land conversion (e.g., definitions of natural ecosystems, grassland, etc.), metrics, and continuous improvement are so new and/or complex that guidelines and definitions for them may be needed.	The given topics are the highest-priority proposed additions for new content in the guidelines of IFA v6. Also, updates of existing IFA v5 guideline content is proposed for integrated pest management, water management, and plant protection products.
Forms of evidence in the criteria	Is documentation required, or is visual evidence enough?	The mention of documentation has been revisited and kept only where considered essential.
Controlled environment agriculture (CEA)	For the most modern forms of CEA and to some degree more classical greenhouses, can some of the principles and criteria still apply, and which evidence would be possible, e.g., on biodiversity?	The flexible and nonprescriptive spirit of the criteria, and the outcome orientation of the principles, was emphasized in the revision. In proofreading IFA, references like farms or production sites were, where applicable, made inclusive of greenhouses and CEA.
Production sites/farms not owned by the producer	Producers might not have the legal framework to implement some of the requirements in the case of short-term rented or leased land (e.g., a three-year lease might not be enough to implement a long-term continuous improvement plan).	This topic will continue to be explored in future discussions and revisions of the standard.
Land conversion/nondeforestation	• Cut-off dates for land conversion/nondeforestation must be carefully considered so as to be comparable to other standards and represent the pressing nature of the issue without by default excluding previously certified farms. • Binding requirements for restoration are technically challenging to implement.	As part of biodiversity, this is the priority proposed for new content in the guidelines of IFA v6.
Metrics	• Who owns the data? • Will data be shared with supply chain members? • Will producers be assessed based on the numbers (thresholds, certain targets to meet) or quality of the data? • How is data collected?	There is ongoing work to develop GLOBALG.A.P.'s data policy. A guideline on metrics is also in development.

Note: If you would like further details on the feedback received during the public consultation process, please contact GLOBALG.A.P. at publiccomments@globalgap.org.