STRATEGIC ALIGNMENT NETWORK, LLC

GAP / FSMA COMPLIANCE CHECKLIST

A practical farm food-safety self-assessment for produce growers, small farms, and agribusinesses

Purpose. Use this checklist to review everyday practices, identify gaps, organize records, and prepare for conversations with buyers, Extension educators, produce-safety specialists, or a third-party auditor. This is an educational planning tool—not a legal determination of FSMA coverage or a substitute for the current USDA audit checklist.

Farm / Business Name _____	**Owner / Food Safety Lead** _____	**Assessment Date** _____
Farm Address _____	**Phone / Email** _____	**Crops / Commodities** _____
Assessment Period _____	**Reviewer** _____	**Next Review Date** _____

How to use: Mark each item Yes, No, or N/A in the notes column. For every “No,” record the corrective action, responsible person, and completion date on the action log. Keep supporting records together and ensure employees know where procedures are located.

Important: GAP audits are generally voluntary, although a buyer, market, institution, or contract may require one. FSMA Produce Safety Rule requirements are mandatory only for farms and activities within the rule’s scope; exemptions and modified requirements may apply. Verify your operation’s status with the Alabama Department of Agriculture & Industries and FDA.

1. Determine Which Requirements Apply

Complete this screening before treating any checklist item as a legal requirement. Produce Safety Rule (PSR) coverage depends on the commodities grown, sales history, activities, and applicable exemptions. Other FSMA rules may apply to packing, processing, or food-manufacturing activities beyond ordinary farm operations.

Coverage and exemption screening

[ ]	List all produce commodities grown, harvested, packed, or held. Identify whether each is a raw agricultural commodity and whether it is typically consumed raw.	Notes / record: _____
[ ]	Calculate the farm's average annual monetary value of produce sales for the applicable previous three-year period using FDA's current inflation-adjusted cutoff.	Notes / record: _____
[ ]	Determine whether the farm is potentially covered, not covered, or eligible for a qualified exemption with modified requirements.	Notes / record: _____
[ ]	If claiming a qualified exemption, document total food sales and sales to qualified end-users versus all other buyers for the applicable three-year period.	Notes / record: _____
[ ]	Review the qualified-exemption calculation every year and retain records supporting eligibility.	Notes / record: _____
[ ]	If produce is intended for commercial processing with a validated kill step, confirm and document that all applicable regulatory conditions are met for that commodity.	Notes / record: _____
[ ]	Contact the Alabama Produce Safety Program or FDA when coverage is uncertain; retain written guidance or the outcome of an on-farm readiness review.	Notes / record: _____

Farm profile / decision notes

Produce sales (Year 1) _____

Produce sales (Year 2) _____

Produce sales (Year 3) _____

Total food sales average _____

Qualified end-user sales _____

Other buyer sales _____

Do not assume: Small acreage, farmers-market sales, or low production volume alone establishes an exemption. The PSR uses specific sales calculations and definitions. A qualified exemption is not a blanket exemption from safe-food practices or all documentation.

Key regulatory reminders (October 2026)

• Farms with average annual produce sales at or below the applicable inflation-adjusted $25,000 threshold are generally not covered by the PSR. Check FDA's current inflation-adjusted table for the relevant calendar year.
• A qualified exemption may be available when the farm meets both the inflation-adjusted total-food-sales threshold and qualified-end-user sales test; modified requirements still apply.
• For covered farms growing covered produce other than sprouts, pre-harvest agricultural-water compliance dates are April 7, 2025 (large), April 6, 2026 (small), and April 5, 2027 (very small). Harvest/post-harvest water requirements have earlier compliance dates and may already apply.
• Sprouts have separate, more stringent requirements.

2. Farm Food-Safety Management & Worker Practices

Written policies should reflect the actual farm, crops, workers, facilities, and activities. Keep procedures simple enough to be followed consistently.

Food-safety management

[ ]	A designated owner, manager, or food-safety lead is responsible for the farm's food-safety program.	Notes / record: _____
[ ]	A written food-safety plan or farm-specific procedures identify crops, activities, facilities, hazards, and preventive practices relevant to the operation.	Notes / record: _____
[ ]	Employees and family workers know who to notify about illness, injuries, contamination, damaged equipment, or unsafe conditions.	Notes / record: _____
[ ]	Visitors, contractors, and service providers receive applicable hygiene and access instructions.	Notes / record: _____
[ ]	Food-safety procedures are reviewed at least annually and when practices, crops, water systems, facilities, or equipment change.	Notes / record: _____
[ ]	A process is in place to document incidents, complaints, corrective actions, and follow-up verification.	Notes / record: _____

Worker health, hygiene & training

[ ]	Workers receive training appropriate to their duties and are supervised to ensure safe practices.	Notes / record: _____
[ ]	Workers know when and how to wash hands, including before starting work, after breaks or restroom use, and whenever hands may be contaminated.	Notes / record: _____
[ ]	Handwashing stations are accessible, supplied, maintained, and properly drained; potable water, soap, and single-use drying materials are available.	Notes / record: _____
[ ]	Toilets and handwashing facilities are accessible, clean, and serviced; sewage and waste are managed to prevent contamination.	Notes / record: _____
[ ]	Workers are instructed to report diarrhea, vomiting, jaundice, fever with sore throat, infected wounds, or other symptoms that could contaminate produce or food-contact surfaces.	Notes / record: _____
[ ]	Open cuts or wounds are properly covered with an impermeable covering and, where appropriate, a glove; workers with potentially contaminating conditions are restricted from applicable tasks.	Notes / record: _____
[ ]	Gloves, if used, are maintained in sanitary condition and do not replace handwashing.	Notes / record: _____
[ ]	Workers use clean clothing and appropriate protective items; eating, smoking, spitting, and personal items are controlled in produce-handling areas.	Notes / record: _____
[ ]	Training dates, topics, trainer, and attendee names are documented; required standardized PSR training is completed by at least one supervisor or responsible party when applicable.	Notes / record: _____

Records to maintain

Training roster and materials • visitor / contractor instructions • illness and injury reporting procedure • restroom and handwashing service log • food-safety policy and annual review notes.

3. Agricultural Water, Soil Amendments & Growing Area

Water and biological soil amendments can introduce hazards if poorly managed. Assess the intended use of each water source and the practices that may affect produce or food-contact surfaces.

Agricultural water

[ ]	Identify each water source (public supply, well, surface water, rainwater, or other source) and map where it is used.	Notes / record: _____
[ ]	Identify water uses: irrigation, pesticide or crop-protection sprays, handwashing, washing produce, ice, cleaning, and other harvest/packing uses.	Notes / record: _____
[ ]	Inspect water systems under the farm's control for leaks, cross-connections, backflow, animal intrusion, damaged wellheads, and other contamination risks.	Notes / record: _____
[ ]	Protect wells, pumps, tanks, hoses, and distribution lines from contamination; maintain and repair systems as needed.	Notes / record: _____
[ ]	For covered farms, complete and document the required pre-harvest agricultural water assessment at the beginning of the growing season as appropriate and at least annually; reassess after significant relevant changes.	Notes / record: _____
[ ]	Document hazards, risk factors, mitigation measures, and the schedule for implementing and verifying those measures, as applicable.	Notes / record: _____
[ ]	Ensure harvest and post-harvest water meets the applicable microbial quality standard; do not use untreated surface water for uses where prohibited.	Notes / record: _____
[ ]	Use water treatment only when the treatment method, monitoring, and records meet applicable requirements; monitor sanitizer concentration or other treatment parameters as appropriate.	Notes / record: _____
[ ]	Maintain required water test results, public-water documentation, treatment records, and corrective-action records.	Notes / record: _____
[ ]	Stop affected water use when there is reason to believe it is unsafe or does not meet applicable requirements; document corrective action before resuming.	Notes / record: _____

Biological soil amendments / manure / compost

[ ]	Identify all soil amendments used, including raw manure, composted manure, compost, and other biological materials.	Notes / record: _____
[ ]	Obtain supplier information or maintain records showing source, treatment process, handling, and application dates.	Notes / record: _____
[ ]	Store amendments to prevent runoff, leaching, or contact with produce, water sources, equipment, and harvest areas.	Notes / record: _____
[ ]	Keep raw manure and untreated biological materials separate from produce handling and food-contact areas.	Notes / record: _____
[ ]	Use only treatment and application practices that meet applicable PSR requirements; do not assume an arbitrary waiting interval makes raw manure compliant.	Notes / record: _____
[ ]	Train workers who handle amendments in hygiene, equipment cleaning, and contamination prevention.	Notes / record: _____

Growing-area risk controls

[ ]	Inspect fields, high tunnels, greenhouses, and adjacent areas for evidence of animal intrusion, feces, flooding, trash, or other contamination.	Notes / record: _____
[ ]	Assess wildlife and domesticated-animal risks; take practical measures to prevent contamination without creating unnecessary hazards.	Notes / record: _____

[ ]	Manage livestock, pets, and working animals so they do not enter produce handling areas or contaminate covered produce.	Notes / record: _____
[ ]	Keep chemicals, fuels, lubricants, and other non-food materials labeled and stored away from produce and food-contact surfaces.	Notes / record: _____

4. Harvest, Packing, Storage & Transportation

Harvest and post-harvest controls should prevent contamination and maintain the identity and condition of the product from field to buyer.

Harvest practices

[ ]	Harvest containers, knives, clippers, bins, and tools are clean, maintained, and suitable for food use.	Notes / record: _____
[ ]	Containers used for produce are not used for chemicals, fuel, livestock feed, waste, or other contaminating materials.	Notes / record: _____
[ ]	Harvested produce is protected from soil, standing water, animals, chemicals, and other sources of contamination.	Notes / record: _____
[ ]	Workers remove or segregate produce contaminated by feces, bodily fluids, or other hazards; affected product is not packed for sale unless a permitted and effective disposition is established.	Notes / record: _____
[ ]	Damaged, decayed, or visibly contaminated produce is handled according to written sorting and rejection procedures.	Notes / record: _____
[ ]	Harvest timing and field practices minimize unnecessary exposure to contamination.	Notes / record: _____

Packing and handling area

[ ]	Packing areas are clean, orderly, and maintained to prevent pest entry and contamination.	Notes / record: _____
[ ]	Food-contact surfaces are made of suitable materials, cleanable, and maintained in good repair.	Notes / record: _____
[ ]	Written cleaning and sanitizing procedures identify what is cleaned, the method, frequency, responsible person, and verification.	Notes / record: _____
[ ]	Cleaning chemicals and sanitizers are labeled, stored separately from produce, and used according to label directions.	Notes / record: _____
[ ]	Water and ice that contact produce or food-contact surfaces meet applicable requirements.	Notes / record: _____
[ ]	Reusable containers are cleaned and sanitized as appropriate before reuse.	Notes / record: _____
[ ]	Packaging materials are clean, protected from contamination, and suitable for their intended use.	Notes / record: _____
[ ]	Employees prevent cross-contamination between raw materials, finished produce, waste, chemicals, and dirty equipment.	Notes / record: _____
[ ]	Temperature-sensitive produce is cooled, stored, and handled under conditions appropriate to the commodity and buyer requirements.	Notes / record: _____

Storage and transportation

[ ]	Storage rooms, coolers, and vehicles are clean, maintained, and protected from pests, chemicals, and other contaminants.	Notes / record: _____
[ ]	Produce is stored off the floor where appropriate and separated from chemicals, fuel, animals, and non-food items.	Notes / record: _____
[ ]	Vehicles are inspected before loading and are clean, dry, and suitable for transporting produce.	Notes / record: _____
[ ]	Loads are protected from weather, pests, physical damage, and cross-contamination.	Notes / record: _____
[ ]	Temperature or cooling records are maintained when required by the commodity, buyer, or food-safety plan.	Notes / record: _____

[ ]	Product identity and lot information are maintained during storage, transport, and delivery.	Notes / record: _____

5. Pest Management, Traceability & Emergency Readiness

A farm should be able to identify what was harvested, when and where it was handled, and where it was distributed. A written response process helps the operation act quickly when a food-safety concern arises.

Pest and waste management

[ ]	Inspect buildings and storage areas for rodents, birds, insects, and other pests.	Notes / record: _____
[ ]	Use an integrated pest-management approach; document monitoring, corrective actions, and pesticide applications as appropriate.	Notes / record: _____
[ ]	Store pesticides and other agricultural chemicals in a secure, labeled area away from produce, packaging, and food-contact surfaces.	Notes / record: _____
[ ]	Follow pesticide label directions, application restrictions, and required worker-protection practices.	Notes / record: _____
[ ]	Remove culls, garbage, and other waste routinely; use designated containers and keep waste areas away from produce handling.	Notes / record: _____
[ ]	Maintain drainage and manage standing water, weeds, and debris around buildings and packing areas.	Notes / record: _____

Traceability and recall readiness

[ ]	Assign lot codes or another practical identification method to harvested and packed product.	Notes / record: _____
[ ]	Records connect product to harvest date, field or growing area, commodity, quantity, packing date (if applicable), and buyer or destination.	Notes / record: _____
[ ]	Maintain invoices, delivery records, and buyer contact information.	Notes / record: _____
[ ]	Written procedure identifies who makes decisions and who contacts buyers, regulators, and other parties if product may be unsafe.	Notes / record: _____
[ ]	Procedure explains how to identify, hold, segregate, and account for affected product, including product already shipped.	Notes / record: _____
[ ]	Conduct a mock trace or recall exercise periodically and document the time taken, results, and improvements.	Notes / record: _____
[ ]	Customer complaints and food-safety incidents are documented, investigated, and closed with corrective action.	Notes / record: _____

Suggested records file

Keep a clearly labeled binder or electronic folder with: farm profile and coverage determination; food-safety policies; training records; water source map, assessments, tests and treatment logs; soil amendment records; field inspections; harvest and sanitation logs; pest-control records; cooler / transport records; lot and sales records; complaint / recall records; and corrective-action forms.

6. GAP Audit Preparation & Corrective-Action Log

A USDA GAP audit is a voluntary verification program. Buyers may specify a particular audit scope or standard. Before scheduling an audit, confirm the current standard, checklist version, scope, commodities, locations, and buyer expectations with USDA AMS or the auditor.

Pre-audit readiness

[ ]	Confirm which audit is requested: USDA GAP, USDA Harmonized GAP, Harmonized GAP Plus+, GroupGAP, or another buyer-approved program.	Notes / record: _____
[ ]	Obtain the current official standard and checklist; do not rely on an outdated or unofficial copy.	Notes / record: _____
[ ]	Confirm audit scope, commodities, growing / packing locations, and whether all relevant activities are included.	Notes / record: _____
[ ]	Review records for completeness, dates, signatures or initials where required, and consistency with actual practices.	Notes / record: _____
[ ]	Walk through the farm as an auditor or buyer might: fields, water sources, restrooms, handwashing, packing areas, coolers, chemical storage, and vehicles.	Notes / record: _____
[ ]	Interview workers to confirm that they understand and follow the written procedures.	Notes / record: _____
[ ]	Close identified gaps, retain evidence of corrective actions, and verify that the correction is effective.	Notes / record: _____
[ ]	Confirm any buyer-specific requirements for testing, certifications, insurance, traceability, or documentation.	Notes / record: _____

Corrective-action log

Use one line for each gap. Attach additional sheets as needed.

Date / Finding	Corrective Action	Responsible Person	Due / Completed	Verified By

Farm readiness sign-off

Owner / Manager Signature _____ **Date** _____ **Next Review Date** _____

I have reviewed the items above and identified the actions needed to improve or maintain food-safety practices at this operation. This sign-off does not constitute regulatory certification or a third-party audit.

7. Key Contacts & Official Resources

Use current official resources to confirm requirements. Regulations, inflation-adjusted thresholds, audit standards, and buyer specifications can change. The links below were reviewed for this checklist in October 2026.

Alabama support

Alabama Department of Agriculture & Industries – Produce Safety Program
Website: https://agi.alabama.gov/foodsafety/FSMA/
Email: producesafety@agi.alabama.gov
Program contact information and on-farm education / readiness support are listed on the state website.

Federal regulatory guidance

FDA – FSMA Final Rule on Produce Safety
https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-produce-safety

FDA – FSMA Final Rule on Pre-Harvest Agricultural Water
https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-pre-harvest-agricultural-water

FDA – Agricultural Water Requirements (Harvest and Post-Harvest)
https://www.fda.gov/food/food-safety-modernization-act-fsma/requirements-harvest-and-post-harvest-agricultural-water-subpart-e-covered-produce-other-sprouts

FDA – FSMA Inflation-Adjusted Cutoffs
https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-inflation-adjusted-cut-offs

FDA – Small Entity Compliance Guide
https://www.fda.gov/food/food-safety-modernization-act-fsma/fda-issues-updated-small-entity-compliance-guide-produce-safety-regulation

GAP audit guidance

USDA Agricultural Marketing Service – GAP Audits
https://www.ams.usda.gov/services/auditing/gap-ghp

USDA Harmonized GAP Program and current checklists
https://www.ams.usda.gov/services/auditing/gap-ghp/harmonized

Produce Safety Alliance – Training and Resources
https://producesafetyalliance.cornell.edu/

Important limitations

This checklist is an educational self-assessment tool prepared by Strategic Alignment Network, LLC. It is not legal advice, a complete reproduction of 21 CFR Part 112, an FDA inspection checklist, a USDA audit checklist, or a guarantee of compliance. Not every item applies to every farm. Requirements depend on the farm's status, commodities, activities, water uses, exemptions, and applicable federal, state, local, and buyer rules. Consult current regulations and appropriate authorities before making compliance decisions.

Strategic Alignment Network, LLC
Educating and empowering agriculture communities to manage successful farms, agribusinesses, cooperatives, and teaching farms.
Resource Center