

HARPS

Harmonised Australian Retailer Produce Scheme



HARPS Standard

Version 1.0



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Introduction

In 2012 Horticulture Australia Ltd (now Horticulture Innovation Australia Ltd) initiated a project to harmonise the food safety certification requirements of the major retailers in Australia. The result of this project is the **Harmonised Australian Retailer Produce Scheme (HARPS)**.

The scheme is voluntary and application for certification is open to all fresh produce businesses that undertake the following activities;

- Grow produce for retail sale
- Pack produce for retail sale
- Operate as an aggregator, distributor, broker or agent supplying produce for retail sale
- Are direct Suppliers or subcontracted Supplier, i.e. pack in retailer-branded packaging or bulk loose packs

The scope of the HARPS is for the growing and packing of whole produce (whole fruit, whole vegetables and in-shell nuts). The scope does not include the processing or value-adding of produce.

The retailers that participate in this program are;

- ALDI
- Coles Supermarkets
- Costco
- Metcash
- Woolworths

Under The HARPS Scheme Rules, certification will only be granted once the Supplier is certified to one of the following (base) schemes, plus HARPS;

Table 1: Base Schemes applicable to Supply Chain activity for HARPS certification

Base Scheme Applicable
Freshcare Food Safety and Quality Code of Practice
GLOBALG.A.P. Integrated Farm Assurance
Safe Quality Food (SQF)
British Retail Consortium Global Food Standard for Food Safety (BRC)

*Applicable schemes depend on scope and risk. Please refer to the HARPS Scheme Rules – Appendix 1 External Standard Matrix for further information or contact your retail Customer/s if unclear.

**Freshcare acceptable provisionally pending achievement of GFSI equivalence.

The HARPS standard is a set of criteria, above the base Food Safety Standards, which the retailers agree are fundamental for the delivery of safe produce to Australian consumers. These criteria have existed in various retailer requirements for some years. There are no new criteria in HARPS. HARPS will be managed and administered by PMA Australia-New Zealand Ltd (PMA A-NZ), on behalf of the participating retailers. A review of the HARPS Standard and any new requirement/s imposed by

retailers in relation to food safety will be conducted as and when required to ensure the content remains meaningful and current, with the overall aim of reducing the elements in this standard.

Section 1 - Food Safety Elements

1.0 Documentation

The Supplier shall maintain current certification to a Customer approved GFSI benchmark (or in progress) scheme. The scope of certification shall include all products supplied to all retail Customers participating in HARPS. Evidence of certification shall be maintained.

2.0 Approved Suppliers

- I. The **direct** Supplier, i.e. those that are responsible for the final pack, shall be responsible for ensuring all domestic and international Sub-contracted / Co-packer Suppliers (involved in the growing, packing or in-process storage of produce) destined for sale to the Customer meet the following requirements.

These external Suppliers shall:

- have access to a copy of the relevant finished product specification/s, including name, location, activities and products supplied
 - Ensure that sub-contracted /co-packers Suppliers are progressing towards compliance with HARPS requirements in line with the agreed HARPS implementation timeline
- II. The Direct Supplier shall document and manage all international **indirect** Suppliers involved in the growing, bulk packing or end storage of produce destined for sale to the Customer.

3.0 Specifications

- I. A current list of all products supplied to the Customer shall be documented and the corresponding current finished product specification/s (either Supplier developed and approved by the Customer, or Customer generated) shall be maintained.
- II. Where the Supplier develops a finished product specification, the specification shall include all relevant information required by the Customer and shall comply with Australian legislation including the Food Standards Code, National Trade Weight Measurement regulations and Australian Competition and Consumer Law.

- III. Finished product specification shall be reviewed whenever the product or process changes, or at least every 12 months. Changes to the finished product specifications shall be approved in writing by the Customer before implementation occurs.
- IV. Supplier copies of Customer Branded artwork shall be maintained.

4.0 Retention Samples and Shelf-life

- I. Shelf-life validation of finished product in final packaging shall occur on all new products (bulk and pre-pack) prior to first sale or when unit size, packaging materials or format of a finished product is altered, or when a significant change to the process has occurred.

Product challenge testing, based on risk assessment, shall also be undertaken as part of shelf-life validation, including elements such as elevated temperatures and transport. Supporting documentation shall be made available.

- II. Where no alterations have been made shelf-life verification shall be conducted annually for pre-packed products.
- III. Retention samples of each pre-packed product shall be maintained. This information shall include weight loss trials.

5.0 HACCP Training

- I. A representative of the organisation who is a member of the HACCP Team shall complete HACCP training by a recognised industry training body that is RTO / TPECS certified (or an international equivalent). A statement of competency confirming successful completion shall be maintained.
- II. A representative of the organisation shall undertake refresher HACCP training at least every three years. Internal or external training providers may conduct refresher training as long as they are conducted by an RTO/TPECS training body or certified trainer. Evidence of trainer/training body qualification shall be provided.

Refresher training may be conducted in a classroom environment or as an on-line course. Evidence of refresher training shall be maintained.

6.0 Labelling and Packaging

- I. Label claims, including nutritional, marketing and sustainability claims shall be validated during product development and verified throughout the contracted supply period.
- II. Prior to packaging being used, the Customer shall approve, in writing, the use of all label claims in both own brand and generic brand products.
- III. Allergen related claims shall be verified at a frequency based on a documented risk assessment and include as a minimum raw material testing (i.e. fruit waxes), cleaning verification and full allergen screen testing.
- IV. Supporting documentation in relation to label and allergen claims shall be maintained.
- V. A procedure shall be developed to ensure that packaging and labelling materials are assessed for compliance to specification and records kept demonstrating that materials are correct on receipt.
- VI. Documented checks of packaging, labelling and date coding, to ensure information is legible, correct and clear shall be undertaken on each production line on each production day and when packaging replenishment occurs during a production or packing run.
- VII. Records of packaging and labelling checks shall be maintained including a copy of the label being applied.
- VIII. All packaging and labelling, both Customer and vendor branded shall be reviewed for legal and Customer compliance on an annual basis unless otherwise specified by the Customer.
- IX. All packaging shall be stored within a secure and dedicated area.
- X. Procedures shall be developed to ensure packaging and labelling materials are appropriately identified, maintained in a clean and secure condition and used as intended.
- XI. The procedure shall ensure that only authorised personnel have access to packaging and labelling.
- XII. Only the packaging and labelling specific to product being packed should be made available for use at the time of packing and should be stored in a clearly identified location in close proximity to its point of use.
- XIII. Packaging shall be fully covered when returned to stock.
- XIV. Any left-over pre-coded packaging shall be destroyed and the volume of packaging disposed of documented.

- XV. For Suppliers that print their own labels or code packaging off-line, checks shall be conducted to ensure the correct coding has been applied at the point of printing.
- XVI. A “Packing ahead” procedure shall be documented clearly explaining the accurate application of date coding.

7.0 Personal Hygiene

- I. All employees, visitors, and contractors shall wear a hairnet and other suitable protective clothing when working around exposed product where a risk to product is identified. If workers, visitors or contractors have facial hair, all facial hair shall be covered when inspecting or packing product (final packed product). Beard nets shall be worn and shall cover both the beard and moustache.
- II. A return to work policy shall be documented and implemented for staff returning to work after suffering a communicable disease.
- III. A documented procedure shall be implemented detailing actions to be taken when illness or injury results in a contamination incident. Incidents shall be documented.
- IV. All sites shall have handwashing facilities available in a location that is easily accessible to all produce handlers.
- V. The number of handwashing facilities shall be adequate to facilitate all produce handlers.
- VI. Handwashing facilities shall be connected to or otherwise provided with a supply of warm, running potable water.

8.0 Recall

- I. All Customers, CB’s and base schemes (as per their own regulations) shall be notified of the intention to recall product from sale within sixty (60) minutes of the decision to recall product being made.
- II. Relevant Customers, CB’s and base schemes (as per their own regulations) shall be notified of the intention to withdraw product from sale within sixty (60) minutes of the decision to withdraw product being made.
- III. A mock recall, including mass balance check, shall be completed on product supplied to each Customer at least annually. One hundred percent of product shall be accounted for within two hours. An actual recall conducted within the last twelve (12) months may be used provided the process and product have not changed.

9.0 Allergens

- I. Where applicable, the most recent VITAL tool shall be used and VITAL assessments and associated documentation shall be maintained.
- II. Allergen statements on product labels shall comply with Customer allergen labelling policies (where applicable). Approval shall be sought from the Customer when the allergen status of a product changes or allergen statements on product labels are altered. The Customer shall approve changes in writing before implementation occurs. Records of approval shall be maintained.

10.0 Equipment and Maintenance

- I. A log of all equipment shall be developed and maintained, with multiple pieces of the same equipment individually identified. This applies to product contact equipment (i.e. washing baths and conveyors), measuring and detection equipment, processing tools and maintenance tools. Equipment shall be maintained and frequently assessed to ensure it is in good condition.
- II. Workshop, storage areas and tools shall be in good condition, stored in a clean and safe manner and shall not present a risk to product.
- III. Procedures should be in place to ensure wooden tools, field bins and pallets are regularly inspected to assess the condition and suitability for use. Damaged wooden items which present a risk to product shall be removed from use.
- IV. Any equipment used to store product shall be cleaned to prevent further contamination.
- V. Equipment in contact with produce shall be smooth, impervious and appropriate for use in production and packing.
- VI. Procedures shall be in place to minimise the risk of contamination to product from any scheduled or unscheduled maintenance.
- VII. All cleaning and maintenance equipment used in production / packing facilities shall be accounted for upon return.
- VIII. All equipment used in production / packing shall be:
 - Suitable for the use in which it is employed
 - Designed and accessible to facilitate effective cleaning
 - Part of a planned maintenance schedule

11.0 Cleaning

- I. A nominated member of the Management Team shall be responsible for managing the cleaning program.
- II. Wire brushes, steel wool, sponges and other porous items shall not be used in storage or packing areas of the facility. Where scouring pads are considered necessary for cleaning, they shall be of a contrasting colour and replaced after each use. Only clean mops shall be used in storage or packing areas, unless mop heads are replaced after each use. Squeegees shall be of single blade construction and maintained in a clean condition.
- III. Compressed air lines and high-pressure water hoses shall not be used in the cleaning process unless it can be demonstrated that compressed air and high-pressure water have benefits that outweigh the risk of equipment and environmental contamination. Documented records of use shall be maintained.
- IV. Records shall be kept demonstrating staff training and assessment of competence in cleaning effectively. Cleaning records shall be maintained and verified by a senior staff member / supervisor.
- V. Procedures shall be in place to ensure facilities, including product storage areas, are effectively cleaned at a suitable frequency. This procedure shall ensure appropriate segregation of product to prevent contamination.
- VI. A procedure shall be developed showing deep cleaning activities, the frequency of activity and verification at the commencement and end of each season.

12.0 Foreign Object Control

- I. A documented procedure for foreign object control shall be implemented covering activities from harvest through to packing, storage and dispatch (or as per process scope). The procedure shall include details of how control is maintained of soft (flexible) plastics, hard and brittle plastics, wood, cardboard and paper, glass and metal.
- II. A register of necessary items permitted for use in specified packing and storage areas shall be developed, and controls shall be implemented to manage compliance to the list, including compliance by visitors and contractors.
- III. Product shall be subjected to foreign object detection as defined by the Customer. All foreign object detection systems shall be appropriate and validated for the process employed and have an effective rejection device i.e. belt stops, air-jet etc.
- IV. Where metal detectors or other foreign object detection systems are used, checks of the equipment shall be conducted using a method defined and documented by the equipment

manufacturer. The frequency shall be based on risk. When required by the Customer, this determination of risk shall be demonstrable.

- V. Knives shall be controlled in packing and storage areas. Cardboard packaging shall be opened using safe knives. Knife and blade sharpening shall be conducted away from product and packaging. Used knives or blades shall be disposed of in a way that prevents further contamination. Knives shall be signed in and out of production for each shift and checked for integrity.
- VI. A sack and bag opening, transfer and resealing procedure shall be developed, documented and implemented to prevent the contamination of product with packaging materials during opening.
- VII. Detectable versions of equipment required in processing areas shall be in use (where available) i.e. pens, clipboards etc.
- VIII. The following items are not permitted to be used in production and storage areas, including offices located within these areas:
 - Metal office staples, paper clips or other metal office fastenings
 - Drawing or map pins, snap blades
 - Hole punches
- IX. Foreign object audits shall be implemented and conducted. The frequency of audits shall be defined, with this frequency based on risk. Findings of foreign object audits shall be investigated with the results of the investigation and corrective actions documented. This includes reported items, findings from detection systems and foreign object audits. Foreign object findings shall be documented and trended to establish any common sources. Investigations should involve liaison with raw material Suppliers where appropriate.

13.0 Verification and Validation

- I. A documented assessment and testing program shall be implemented. Assessments and/or tests of microbiological, chemical and physical parameters shall be undertaken as per the criteria and frequency outlined by the Customer. Testing is completed by an ISO 17025 (or equivalent) certified laboratory accredited by NATA (or equivalent) for the product category and test/s being undertaken. Records of testing are maintained.
- II. **Chemical** residue testing of produce destined for sale to the Customer shall be undertaken against (Maximum Residue Limits) MRLs as detailed in the Food Standards Code. Testing shall be completed by laboratory certified to ISO 17025 and NATA accredited for the product category and test(s) being undertaken. Records of testing shall be maintained.

Where product is purchased from multiple growers, testing of each Suppliers produce shall be completed at a minimum frequency of once per year/season, or at the frequency defined by the Customer.

- III. **Microbial, Chemical and Heavy Metal** testing shall be undertaken as per the requirements of the base standard (including any local regulations) and additional Customer requirements / specifications in regard to frequency and nature of testing.
- IV. If Microbiological, Chemical or Heavy Metal testing indicates a breach of Critical Limits as per Customer Specifications or regulations, Customers shall be notified within 1 hour of the site receiving the results.
- V. Product assessments shall be completed as per the frequency defined by the Customer. If no frequency is defined, then assessments shall occur at a minimum of twice per product, per production day, at the beginning and end of each run. Non Conformance to criteria shall be documented and corrective action undertaken, with the results made available to the Customer upon request. Customers shall be immediately advised of food safety issues. Further action shall be taken as agreed between the Supplier and the Customer.
- VI. Documented checks of packaging, labelling and date coding shall be undertaken on each production line on each production day and when packaging replenishment occurs during a production or packing run. These checks shall be completed as per the frequency defined by the Customer. If no frequency is defined, checks shall occur at the start and end of each product variant or pack size run. Records of the packaging checks shall be maintained.
- VII. Current supporting and validation data for the finished product specification information including Nutrition Information Panel (NIP) test results, shelf-life test results, raw material specification and packaging material specifications, shall be maintained.

14.0 Growing

- I. Treated and untreated fertilisers and soil additives made from human effluent or Biosolids are not permitted for use on growing sites or potential growing sites. Raw sewage flow into irrigation water sources is not permitted.
- II. All specialised growing media and substrate shall comply with Section 5 – Managing the Growing Site and Planting Material from **Guidelines for Fresh Produce Food Safety, Fresh Produce Safety Centre Australia and New Zealand - August 2015**.
- III. If raw manure is being used it shall be compliant **with TBC**
- IV. Where the harvestable part is growing in or in direct contact with the ground, has an edible skin and is generally eaten uncooked, **the period of time shall be TBC**.
- V. Each new or existing growing site, where risks have changed shall have a documented assessment to ascertain suitability for growing fresh produce. This assessment shall consider cropping, land use history, adjacent land use / industry and the need for soil testing (including microbial testing).

- VI. Equipment used to irrigate shall be inspected to ensure it is in working order and flushed as required before use.
- VII. All water sources shall be identified on a site map or similar. The map shall be updated when water sources change. This includes water for irrigation, spraying and in hydroponic/ indoor systems. Produce that comes into contact with floodwater shall not be sold.
- VIII. Each water source used shall be tested based on a risk assessment (but at least annually). The risk assessment shall include potential contamination situations where applicable, taking the characteristics of the crop into account.
- IX. Water sourced from recycled sources and schemes (i.e. class A recycled water) shall be identified and tested at a frequency defined by a risk assessment.
- X. An on-farm foreign object policy that includes all foreign object risks shall be developed and implemented.
- XI. Machinery and equipment used during the harvesting process shall be cleaned and maintained to avoid contamination of product (includes but is not limited to knives, harvest aids, bins and conveyors).

Section 2 - Quality and Regulatory Elements

15.0 Calibration and Weight Checks

- I. The Customer shall define the frequency and method of verifying finished product weight. If requirements are not defined by the Customer, all finished product shall meet the minimum net label weight / volume / count at the end of shelf-life (considering weight loss over shelf-life).
- II. All Customer-branded packed product shall be subjected to 100% inspection to verify label weight using check-weighing systems.
- III. For all other packed product, when product is subject to 100% weigh check records shall be kept to demonstrate compliance on an hourly basis.

For product that is not subject to 100% weight checking, records to demonstrate compliance shall be kept every 15 minutes at minimum.
- IV. Where in-line/ automated check weighers of finished product are in use, records of weight checks shall be maintained for the start, middle and end of every production run for every product pack size.
- V. Bulk products shall equal the weight or count as stated on the Customers finished product specification and the shipper carton / crate. Records of weight checks shall be maintained at the start, middle and end of each production run of each bulk carton size.
- VI. A procedure shall be implemented to ensure scales and check weighers (used for retail pre-packs and bulk loose product) are verified for accuracy at a defined frequency (no less than once per day before commencement of the production day). Records of verification shall be maintained.
- VII. Procedures shall be in place to calculate and verify packaging tares used at a suitable frequency to ensure the actual product net weight / volume is measured accurately.
- VIII. Certified test weights shall be used to verify scale and check weigher accuracy. If in-line or check weigher do not allow for the use of test weights, the certified test weight shall be used as part of a cross reference method.

16.0 Product sold or given to staff

- I. Customer branded product shall not be sold through staff, factory or other retail outlets unless branding is removed. Customer branding shall be removed completely when product is given freely to staff. If Customer branding cannot be removed from staff giveaways, Customer branding shall be defaced and / or marked as “factory second – not for sale”. All product sold or given freely to staff shall comply with relevant Federal and State Legislation.
- II. Where Suppliers wish to donate Customer branded product to a charity, written authorisation shall be obtained from the Customer/s prior to the donation. The Supplier shall maintain a logbook which records the date of donation, product details, batch numbers, use-by or best before dates, quantities and reason for donation. Donations that have been approved by the Customer and entered into the logbook do not require removal or de-facing of branding.

17.0 Food Fraud

- I. A risk assessment shall be conducted to identify any potential or known risks to the integrity of the product supplied on a global scale. Issues such as adulteration, counterfeiting, mislabelling and dilution of product either knowingly or not are considered critical non-conformances.

18.0 Insurance

- I. A Certificate of Currency evidencing Product and Public Liability Insurance of such an amount as considered acceptable by the Customer shall be maintained as a controlled document. Each relevant Customer shall confirm any variation to this requirement in writing.

_____ End of Document _____