



**HARPS**  
HARMONISED AUSTRALIAN  
RETAILER PRODUCE SCHEME

# **HARPS Standard**

## **Version 2.0**

### **Top 10 CAR Review Report for Suppliers**

#### **FY24**

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## Table of Contents

<b>1. Introduction .....</b>	<b>4</b>
<b>2. Overview of Top 10 Corrective Actions .....</b>	<b>4</b>
a) Top 10 CARs for HARPS V2.0 FY24 .....	6
<b>3. Top 10 CAR Analysis.....</b>	<b>7</b>
a) CAR #1 – Element 14.10 - Scale Calibration .....	7
b) CAR #2 – Element 12.2 - Chemical Residue Testing of All Agricultural Products .....	9
c) CAR #3 – Element 3.4 - Retention Samples .....	11
d) CAR #4 – Element 12.1 - Microbiological, Chemical and Heavy Metal Testing Program...	13
e) CAR #5 – Element 6.4 - Water Quality and Consumables for Handwashing.....	15
f) CAR #6 – Element 14.11 - External Certification of Trade Measurement Scales .....	17
g) CAR #7 – Element 4.2 - Refresher HACCP Training.....	19
h) CAR #8 – Element 3.3 - Shelf-Life Validation at Last Touch Point .....	21
i) CAR #9 – Element 13.5 - Risk Assessment for Water Sources.....	23
j) CAR #10 – Element 7.3 - Mock Recall .....	25

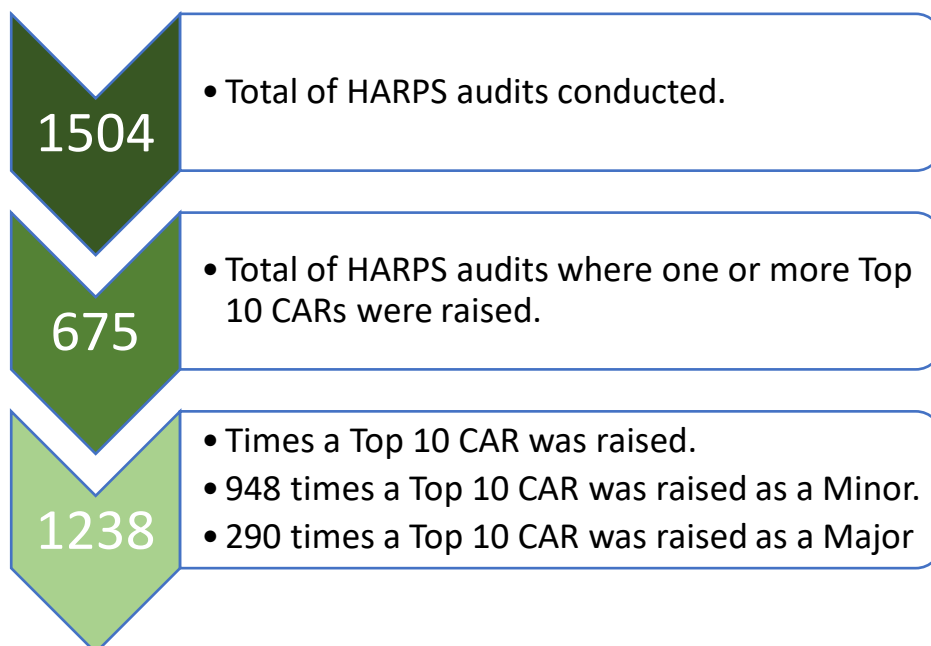
## 1. Introduction

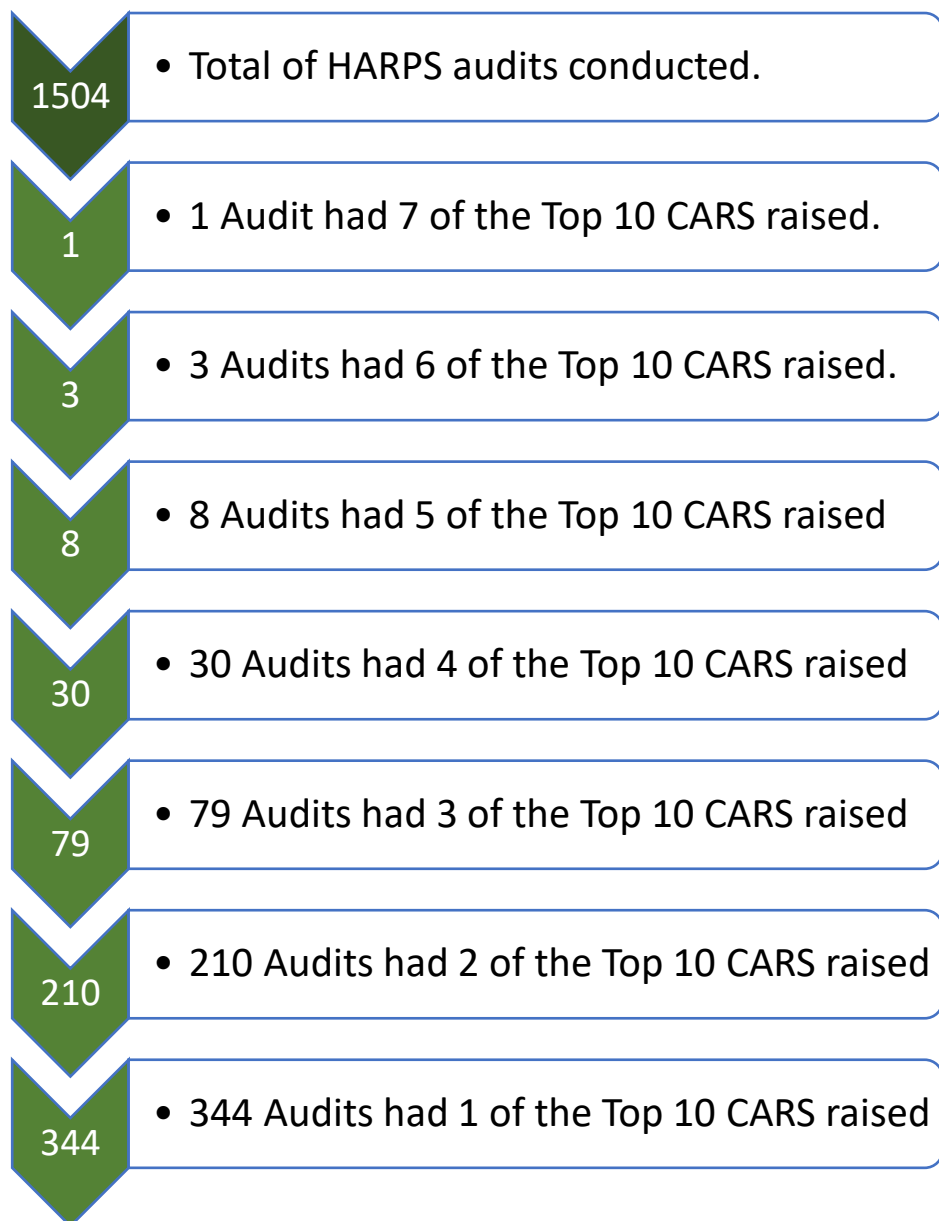
This report provides a comprehensive analysis of the ten most frequently raised Corrective Action Requests (CARs) under HARPS Version 2.0 during the period from 1 July 2023 to 30 June 2024. By examining these CARs, HARPS aimed to uncover trends, identify possible root causes of non-compliance, and propose actionable opportunities for improvement.

The findings presented in this report provides valuable insights and identifies opportunities across multiple stakeholders, including HARPS itself, suppliers, certification bodies, and auditors. These recommendations are intended to support the continual enhancement of compliance and performance across the supply chain, ensuring alignment with the HARPS standard and expectations.

## 2. Overview of Top 10 Corrective Actions

**For the period of analysis of 1 July 2023 to 30 June 2024 for HARPS v2.0:**





## a) Top 10 CARs for HARPS V2.0 FY24

Position in Top 10	HARPS Element	Requirement
1	14.10	Scale Calibration
2	12.2	Chemical Residue Testing of All Agricultural Products
3	3.4	Retention Samples
4	12.1	Microbiological, Chemical and Heavy Metal Testing Program
5	6.4	Water Quality and Consumables for Handwashing
6	14.11	External Certification of Trade Measurement Scales
7	4.2	Refresher HACCP Training
8	3.3	Shelf-Life Validation at Last Touch Point
9	13.5	Risk Assessment for Water Sources
10	7.3	Mock Recall

### 3. Top 10 CAR Analysis

#### a) CAR #1 – Element 14.10 - Scale Calibration

##### Element Details

Position	HARPS Element	Requirement
1	14.10	<b>Scale Calibration</b> <p>Certified test weights shall be used to verify scale and check weigher accuracy.</p> <p>The mass of the test weight shall be at or slightly above the maximum weight to be measured for a product.</p> <p>If in-line check weighers do not allow for the use of test weights, the certified test weight shall be used as part of a cross reference method.</p>

##### Reasons for Non-Compliance When a CAR was Raised Against Element 14.10

Reason	% Overall
Bulk/loose produce – where test mass was unacceptable.	53.5
Records of weight calibration not available.	25.4
Pre-packed produce – where test mass was unacceptable.	20.2
Insufficient explanation/ evidence around why CAR was raised.	0.9
<b>TOTAL</b>	<b>100</b>

## CAR #1 – Element 14.10 - Scale Calibration: Possible Root Causes and Opportunities

### Possible root causes

- Suppliers are unclear on what is required around test mass size / target size.
- Suppliers are not conducting calibration activities.
- Suppliers are not keeping records.
- Suppliers possibly confused around difference between daily calibration of scales and external certification of trade measurement scales/ and test mass.
- Cost of purchasing multiple certified test weights prohibitive.

### Opportunities

- HARPS blanket exemption now in place for bulk/loose produce where the test mass size is no longer required to be at or slightly above the maximum weight.
- HARPS clarity and education needed around correct process for scale calibration and what an appropriate test mass is e.g. "slightly above."
- HARPS education and reminder on the need for accurate records.
- Improvement opportunity with HARPS audit reporting.

## b) CAR #2 – Element 12.2 - Chemical Residue Testing of All Agricultural Products

### Element Details

Position	HARPS Element	Requirement
2	12.2	<p><b>Chemical Residue Testing of All Agricultural Products</b></p> <p>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.</p> <p>MRL testing must be conducted for all Agricultural Products applied to produce.</p>

### Reasons for Non-Compliance When a CAR was Raised Against Element 12.2

Reason	% Overall
Testing completed did not cover all requirements.	63.9
No test was conducted.	19.3
Samples submitted, awaiting results.	11.4
Insufficient explanation/ evidence around why CAR was raised.	4.8
Test results indicated a breach of tolerances.	0.6
<b>TOTAL</b>	<b>100</b>

## **CAR #2 – Element 12.2 - Chemical Residue Testing of All Agricultural Products: Possible Root Causes and Opportunities**

### **Possible root causes**

- Suppliers are not conducting testing early enough to allow for results to be returned and available in time for their audit.
- Delays to harvest has not allowed for results to be returned and available in time for their audit.
- Situations where a supplier is expecting the Tier 1 to arrange testing, however this arrangement is not formalised.
- Suppliers are not understanding that multiscreens do not capture all agricultural chemicals.
- Cost of additional tests may be prohibitive.

### **Opportunities**

- HARPS education and reminder that MRL testing needs to be arranged at the start of harvest.
- Education that testing arrangements, where someone else is arranging testing, must be documented.
- Education that some commonly used agricultural products such as Mancozeb/ Dithiocarbamates are not covered by multiscreen tests.
- Improvement opportunity with HARPS audit reporting.

## c) CAR #3 – Element 3.4 - Retention Samples

### Element Details

Position	HARPS Element	Requirement
4	3.4	<b>Retention Samples</b>  Representative retention samples of loose and pre-packed products shall be kept at a daily to weekly frequency based on a documented assessment of product safety and quality risks as well as volume of product supplied.  The rationale for the actual retention sampling shall be recorded and reviewed at least annually or if there are significant changes of risk.

### Reasons for Non-Compliance When a CAR was Raised Against Element 3.4

Reason	% Overall
Procedure did not meet all requirements.	38.6
No program in place.	17.0
No program in place for bulk/loose, only prepacks are retained.	15.0
No retention samples kept for season.	12.4
Frequency of retention sampling not aligned to risk assessment or HARPS standard.	11.8
No documented agreement from final touch point for retention sampling.	2.0
Record did not meet all requirements.	1.3
Insufficient explanation/ evidence around why CAR was raised.	1.3
Retention samples being completed late.	0.7
<b>TOTAL</b>	<b>100</b>

### CAR #3 – Element 3.4 - Retention Samples: Possible Root Causes and Opportunities

#### Possible root causes

- Suppliers may not understand what the documented retention sampling program should contain.
- Suppliers may be confused about the need to retain bulk loose produce.
- Suppliers may be confused about size of the retention sample.
- Suppliers are not wanting to waste excessive amounts of produce i.e. financial implications.
- Suppliers are not understanding that retention sampling agreements need to be documented.
- Situations where a supplier is expecting the Tier 1 to arrange retention sampling, however this arrangement is not formalised or documented.

#### Opportunities

- HARPS education on the documented retention sampling program.
- HARPS education and reminder around on the requirement to retain bulk loose produce as well as pre-packed produce.
- HARPS education on appropriate size of retention sample, with consideration around waste and cost reduction.
- HARPS education and reminder that retention sampling agreements, where someone else is arranging retention sampling, must be documented.

## d) CAR #4 – Element 12.1 - Microbiological, Chemical and Heavy Metal Testing Program

### Element Details

Position	HARPS Element	Requirement
3	12.1	<p><b>Microbiological, Chemical and Heavy Metal Testing Program</b></p> <p>A documented Microbiological, Chemical and Heavy Metal assessment and testing program shall be implemented that meets the requirements detailed in the Food Standards Code.</p> <p>Microbiological, Chemical, and Heavy Metal Testing shall be undertaken as per the requirements of the GFSI scheme (including any local regulations) and additional specified Retailer requirements and/or specifications.</p> <p>Where products are purchased from multiple growers, testing of each supplier's produce, by product type, shall be completed at a minimum frequency of once per year/season, or at the frequency defined by the Retail Customer.</p> <p>The Tier 1 Supplier is responsible for ensuring all of their Tier 2 Suppliers are made aware of Retail Customer testing requirements, if over and above the GFSI scheme's (including any local regulations) requirements.</p> <p>Testing shall be completed by an ISO 17025 (or equivalent) certified laboratory accredited by NATA (or equivalent) for the product category and test(s) being undertaken.</p> <p>Records of testing shall be maintained.</p>

### Reasons for Non-Compliance When a CAR was Raised Against Element 12.1

Reason	% Overall
Testing completed did not cover all requirements.	45.9
No test was conducted.	31.8
Samples submitted, awaiting results.	17.6
Test results indicated a breach of tolerances.	2.7
Insufficient explanation/ evidence around why CAR was raised.	1.4
No documented program in place.	0.7
<b>TOTAL</b>	<b>100</b>

#### **CAR #4 – Element 12.1 - Microbiological, Chemical and Heavy Metal Testing Program: Possible Root Causes and Opportunities**

##### **Possible root causes**

- Suppliers are not conducting testing early enough at the start of harvest to allow for results to be returned and available in time for their audit.
- Delays to harvest has not allowed for results to be returned and available in time for their audit.
- Suppliers are not testing all produce currently in scope.
- Supplier are missing all testing requirements such as heavy metal i.e lead and microbiological criteria.
- Suppliers are not understanding that multiscreens do not capture all agricultural chemicals.
- Cost of additional tests may be prohibitive.

##### **Opportunities**

- HARPS education and reminder that testing needs to be arranged at the start of harvest.
- HARPS education and reminder that testing must include all produce on HARPS scope.
- HARPS education and reminder that testing must include heavy metal (lead) and micro.
- Education that some commonly used agricultural products such as Mancozeb/ Dithiocarbamates are not covered by multiscreen tests.
- Improvement opportunity with HARPS audit reporting.

## e) CAR #5 – Element 6.4 - Water Quality and Consumables for Handwashing

### Element Details

Position	HARPS Element	Requirement
6	6.4	<p><b>Water Quality and Consumables for Handwashing</b></p> <p>All hands shall be washed with soap and dried using paper towels or air dryers.</p> <p>Packhouse and in-field handwashing facilities shall be connected to or otherwise provided with a supply of water which is tested as E. coli &lt;1 cfu / 100 ml.</p> <p>Where this quality water is not available in-field, irrigation quality water is acceptable, provided that after drying hands this is followed with the use of an alcohol solution (minimum 60%) based hand sanitiser.</p>

### Reasons for Non-Compliance When a CAR was Raised Against Element 6.4

Reason	% Overall
No handwashing water test results available	66.7
Handwashing water test submitted, awaiting results.	9.4
Handwashing water test results show breach of E.coli levels.	8.0
No soap or paper towel available at handwashing station.	7.2
Handwashing water test results were not tested to HARPS requirement for E.coli.	5.1
No hand sanitiser available.	2.2
Handwashing station was not operational.	1.4
<b>TOTAL</b>	<b>100</b>

## **CAR #5 – Element 6.4 - Water Quality and Consumables for Handwashing: Possible Root Causes and Opportunities**

### **Possible root causes**

- Suppliers are not testing handwashing water to confirm that E.coli is <1cfu/100mL.
- Cost of testing may be prohibitive.
- Suppliers in remote locations may be finding access to laboratories challenging.
- Suppliers are not routinely checking that handwashing facilities are suitably equipped with soap, paper towelling and sanitiser.

### **Opportunities**

- HARPS education and reminder on the need for testing of handwashing water for E.coli.
- HARPS clarification on testing frequency.
- HARPS education and reminder on ensuring handwashing facilities are regularly being used by staff and suitably equipped with soap, paper towelling and sanitiser.

## f) CAR #6 – Element 14.11 - External Certification of Trade Measurement Scales

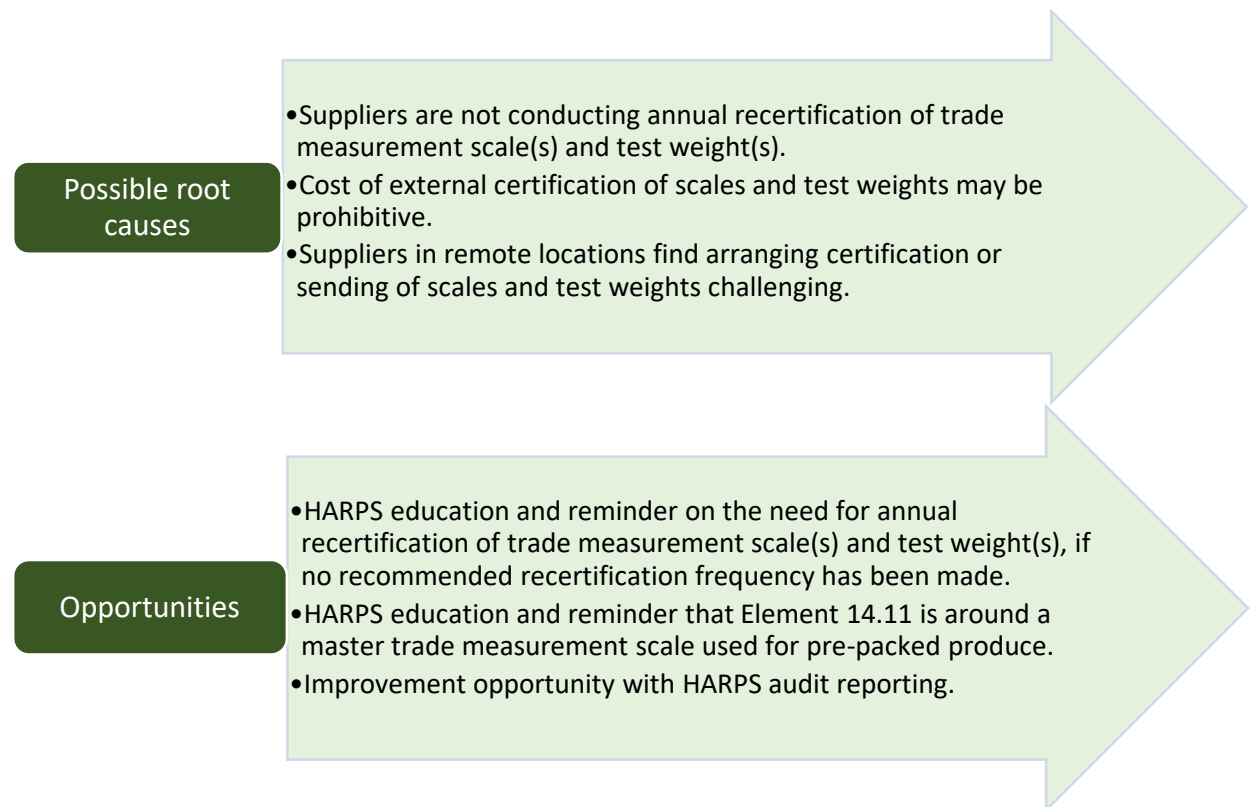
### Element Details

Position	HARPS Element	Requirement
5	14.11	<b>External Certification of Trade Measurement Scales</b>  A master trade measurement scale (used for pre-packing) and certified test weights shall be externally tested and certified at a frequency recommended by the certifier.  If no recommendations have been made, this shall take place annually.

### Reasons for Non-Compliance When a CAR was Raised Against Element 14.11

Reason	% Overall
External certification not conducted by due date.	39.5
Scales are not certified externally or by due date.	26.1
Certification records not available for test weight.	21.8
Trade measurement scales not available or in use.	5.0
Test weight not available.	3.4
Bulk/loose produce – where test mass was unacceptable.	3.4
Insufficient explanation/ evidence around why CAR was raised.	0.8
<b>TOTAL</b>	<b>100</b>

## **CAR #6 – Element 14.11 - External Certification of Trade Measurement Scales: Possible Root Causes and Opportunities**



## g) CAR #7 – Element 4.2 - Refresher HACCP Training

### Element Details

Position	HARPS Element	Requirement
7	4.2	<p><b>Refresher HACCP Training</b></p> <p>The HARPS Practitioner shall undertake Refresher HACCP Training (RHT) once every three years.</p> <p>The Refresher HACCP Training shall be conducted by a Registered Training Organisation (RTO) (or a local or international equivalent) or a Certified Trainer affiliated with an RTO.</p> <p>Refresher HACCP Training shall be trainer-led and can be delivered either online or face-to-face.</p>

### Reasons for Non-Compliance When a CAR was Raised Against Element 4.2

Reason	% Overall
Refresher training was not completed within 3 years.	81.1
HARPS practitioner enrolled for HACCP refresher but not completed at time of audit.	6.7
No evidence of initial HACCP training.	5.6
Refresher training completed was not “trainer led.”	3.3
HARPS practitioner has left the business.	1.1
Refresher training not completed by the same person as the initial HACCP training.	1.1
Insufficient explanation/ evidence around why CAR was raised.	1.1
<b>TOTAL</b>	<b>100</b>

## **CAR #7 – Element 4.2 - Refresher HACCP Training: Possible Root Causes and Opportunities**

### **Possible root causes**

- Suppliers are not undergoing refresher training every 3 years.
- Suppliers are not understanding that training needs to be completed and a confirmation of enrolment is not sufficient evidence to prevent a CAR.
- Suppliers are not completing training in a "trainer led" setting for either online or face to face refresher training.
- Cost of refresher training may be prohibitive.

### **Opportunities**

- HARPS education and reminder on the need for refresher training every 3 years, in a "trainer led" setting.
- HARPS education and reminder that training needs to be completed and that a confirmation of enrolment is not sufficient evidence to prevent a CAR or to close an already raised CAR.
- Improvement opportunity with HARPS audit reporting.

## h) CAR #8 – Element 3.3 - Shelf-Life Validation at Last Touch Point

### Element Details

Position	HARPS Element	Requirement
8	3.3	<p><b>Shelf-Life Validation at Last Touch Point</b></p> <p>Shelf-life Validation, including labelled weight compliance, shall be conducted at least annually for pre-packed and bulk products and records of validation maintained.</p> <p>The responsibility sits with the last touch point for the product before delivery to the Retail Customer DC.</p> <p>Corrective actions are required if shelf-life is inadequate or net weight is not maintained over shelf-life.</p>

### Reasons for Non-Compliance When a CAR was Raised Against Element 3.3

Reason	% Overall
No evidence of shelf-life validation.	61.1
Validation records not properly maintained.	15.6
No shelf-life validation by last touch point or agreement present.	12.2
Shelf-life validation procedures are not followed.	7.8
Insufficient explanation/ evidence around why CAR was raised.	2.2
Supply chain testing not completed.	1.1
<b>TOTAL</b>	<b>100</b>

## **CAR #8 – Element 3.3 - Shelf-Life Validation at Last Touch Point: Possible Root Causes and Opportunities**

### **Possible root causes**

- Suppliers are not conducting shelf-life validation.
- Suppliers are not recording and maintaining evidence of the completion of shelf-life validation, including weight compliance.
- Suppliers are confused between the difference of shelf-life validation and retention sampling.
- Suppliers are not understanding that shelf-life validation agreements need to be documented, if the responsibility sits with another Tier.

### **Opportunities**

- HARPS education around the difference between shelf-life validation and retention sampling.
- HARPS education and reminder around the need for shelf-life validation and retaining evidence of completion.
- HARPS education that shelf-life validation agreements, where another Tier is arranging shelf life, must be documented.
- Improvement opportunity with HARPS audit reporting.

## i) CAR #9 – Element 13.5 - Risk Assessment for Water Sources

### Element Details

Position	HARPS Element	Requirement
9	13.5	<b>Risk Assessment for Water Sources</b>  A risk assessment shall be conducted for each in-use water source, taking potential contamination situations and the characteristics of the crop, irrigation technique and other factors into account.  Microbial water quality shall be verified at a frequency dependent upon the level of risk identified.

### Reasons for Non-Compliance When a CAR was Raised Against Element 13.5

Reason	% Overall
Water testing was not completed.	50.9
Records of water testing were not available.	35.8
No risk assessment for water available.	7.5
Water testing completed does not meet the risk assessment requirements.	5.7
<b>TOTAL</b>	<b>100</b>

**CAR #9 – Element 13.5 - Risk Assessment for Water Sources:  
Possible Root Causes and Opportunities**

**Possible root causes**

- Suppliers are not documenting a risk assessment for each in-use water source.
- Suppliers are not testing in-use water, to a frequency that relates back to the supplier's risk assessment, to validate in-use water source quality.

**Opportunities**

- HARPS education and reminder around the need for risk assessments of in-use water sources.
- HARPS education and reminder around the need for water testing to validate in-use water source quality, as it relates back to the supplier's risk assessment.

## j) CAR #10 – Element 7.3 - Mock Recall

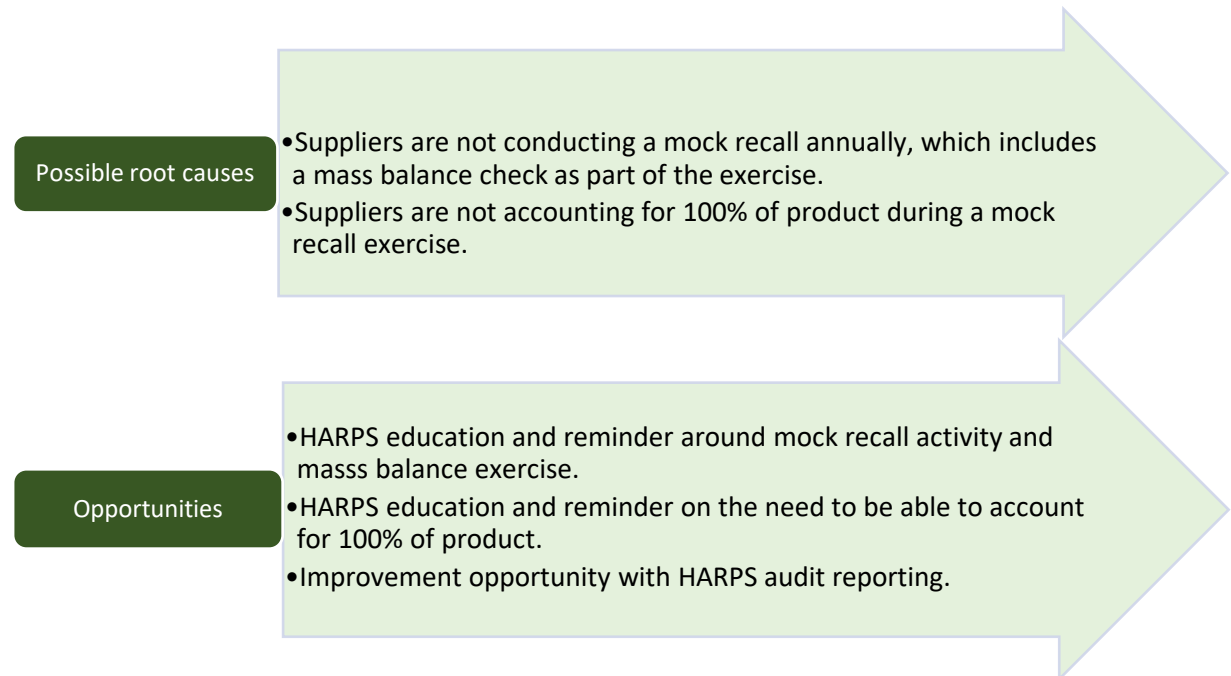
### Element Details

Position	HARPS Element	Requirement
10	7.3	<p><b>Mock Recall</b></p> <p>A mock recall, including mass balance check, shall be completed on one product supplied to any Customer at least annually.</p> <p>Where possible, different products shall be tested in each mock recall.</p> <p>One hundred percent (100%) of product shall be accounted for within two hours.</p> <p>An actual recall conducted within the last twelve (12) months may be used provided the process and product have not changed.</p>

### Reasons for Non-Compliance When a CAR was Raised Against Element 7.3

Reason	% Overall
No mock recall conducted within the last 12 months.	67.9
Only a partial mock recall was completed.	20.8
100% of product not accounted for.	7.5
Insufficient explanation/ evidence around why CAR was raised.	3.8
<b>TOTAL</b>	100

### CAR #10 - Element 7.3 - Mock Recall: Possible Root Causes and Opportunities





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