

Justification for Change
Forms FV-24, FV-202, FV-237A, FV-651, & FV-652
7 CFR Part 51, Regulations Governing Inspection, Certification and Standards for Fresh
Fruit, Vegetables and Other Products
OMB No. 0581-0125

September 2014

The FV-24 Positive Lot Identification Stamp(s)/Die(s) Request Form, FV-202 Application for Interstate/Intrastate Commerce Inspector's License 1/, FV-237A Request for Audit Services, FV-651 Agreement for Participation in Audit Verification Programs, and the FV-652 Logo Use Request for Audit Program forms are used by members of the industry and the Specialty Crops Inspection Division. This Justification for Change requests minor revisions to these forms and are currently approved under OMB No. 0581-0125. These minor changes address a change in name, and modifications to audit checklists, and will have no effect on the burden hours approved for this collection. The revisions are explained below:

In October of 2012, the Fresh Products Branch changed its name to the Specialty Crops Inspection Division. In each revision of these forms Fresh Products Branch is changed to Specialty Crops Inspection Division. Additionally the edits have been made on each form to change Fruit and Vegetable Programs to Fruit and Vegetable Program to reflect proper nomenclature for the Program.

FV-24 Positive Lot Identification Stamp(s)/Die(s) Request Form

- 1) Updated to be in compliance with the USDA logo use policy
- 2) Removal of the cornucopia in the stamp/die design area and
- 3) Re-design of the top portion.

FV-202 Application for Interstate/Intrastate Commerce Inspector's License1/

- 1) Changed AMS shield to USDA logo
- 2) Added e-mail on box left to Birthdate
- 3) Added checkboxes next to Yes and No under question 9 and question 11
- 4) Under section CHECK ONE, checkboxes were added next to Unrestricted License, Other, Restricted License.
- 5) Deleted REGIONAL DIRECTOR'S SIGNATURE and DATE APPROVED line
- 6) Added checkboxes next to Concurrence and Disapproval at the end of form
- 7) Updated last modified date to 07/14 (from 12/13)

FV-237A Request for Audit Services

In the beginning block of the form title, Note statement: added new sentence for compliance with ISO 17065 Section 7.4.3: "Services will be declined if the request is beyond our scope of certification."

Type of Audit Services Requested

- 1) Removed the sub-headings and added: (Please choose at least one) as part of the header.
- 2) Removed "Once a request has been received...." statement from footer and added it to the header.

- 3) Listed GAPs checklist options. Adding these services as check boxes simplifies the process for the applicant by listing all of the main types of audit services provided so the applicant does not have to write in this type of audit service in the “Other” block.
 - o Produce GAPs Harmonized Audit-Field Operations & Harvesting
 - o Produce GAPs Harmonized Audit-Field Operations & Harvesting w/ Global Markets Primary Production Addendum
 - o Produce GAPs Harmonized Audit- Post Harvest
 - o Produce GAPs Harmonized Audit-Post Harvest w/ Global Markets Primary Production Addendum.
- 4) To further define the specific Tomato Audit Protocol Audits as unique check boxes so that the applicant no longer needs to write in this specification in the “Other” section. These audit types are listed as:
 - o Tomato Audit Protocol-Open Field Production, Harvest & Field Packing
 - o Tomato Audit Protocol-Packinghouse
 - o Tomato Audit Protocol-Greenhouse
 - o Tomato Audit Protocol-Repacking and Distribution
- 5) The abbreviation T-GAP was also removed for clarity. This abbreviation is used for the separated State-run regulatory program in Florida and confused applicant’s.
- 6) Removed Identify Preservation (IP) Audit
- 7) Added Plant Systems Audit (PSA) and Food Defense options
- 8) “Scope of GAP&GHP Audit (Please choose all that apply)” and “Good Agricultural Practices & Good Handling Practices (GAP&GHP) (Select Audit Scopes)” have been combined as one option “USDA Good Agricultural Practices and Good Handling Practices (GAP&GHP) Audit (choose scopes below) to simplify the selection.
- 9) Deleted “To download a copy.....” statement at the bottom of the form

FV-651 Agreement for Participation in Audit Verification Programs

Changes made under the following subheadings:

(1) The applicant agrees that with respect to:

- (e) Added sentence: “Failure to pay for services will result in decertification.”

(2) AMS agrees that with respect to:

Entire section changed to read:

- (e) To issue a certificate to the applicant and to post audit results to the USDA website, only when the applicant meets the USDA acceptance criteria for each scope being audited. NOTE (1): If an applicant does not want their company to be posted on the USDA website, they must put their request in writing. To provide the specific applicant checklist and results of individual questions to other parties or web-based systems only at the written request of the applicant (See the Optional section on page 2 of this form.) NOTE (2): Reports containing a compilation of audit information can be shared with the food and Drug Administration. In addition, AMS will notify FDA in the event of an imminent food safety risk.

(3) It is mutually agreed that with respect to:

- (a) Change “at least the minimum score is achieved” to “the USDA acceptance criteria is met”.

- (b) Change “If the minimum passing score is not achieved, the company’s information will be removed from the website until a follow-up audit is conducted by AMS verifying that effective corrective actions have been taken and the company attains the minimum score on all appropriate scopes of the audit.” To “If the USDA acceptance criteria is not met, the company’s information will be removed from the website until a follow-up audit is conducted by AMS verifying that effective corrective actions have been taken and the company meets the USDA acceptance criteria on all appropriate scopes of the audit.”

Approved by section:

Remove “Should AMS personnel be at a facility for other purposes and notice issues that would jeopardize the company’s standing on the specific audit program, AMS has the obligation to bring this to the attention of the company representative and, depending on the severity, withdraw certification.”

(OPTIONAL) The applicant request AMS to release audit results to:

This section has been added stating permission for AMS to upload the audit report into one of the identified web-based systems.

- (a) “Web-based Systems- The auditee designates the audit report is loaded into the following database (check all that apply):
 icix Azzule Systems FoodLogiQ
- (b) Other Parties- The auditee designates the specific applicant checklist and results of individual questions be sent to:
(Name of Company/Representative) (Email Address) (Phone)

FV-652 Logo Use Request for Audit Programs

Revised the following:

- 1) In header and section A, Logo Images on the form to update “Fruit and Vegetable Program” to reflect current titles.
- 2) Federal Authorization section should state “Fruit and Vegetable Program” instead of “Fresh Products Branch”.
- 3) In section B, added a space for the requesting companies email address.
- 4) Section E should state “Fruit and Vegetable Program” instead of “Fresh Products Branch”.

These changes to the forms will have no impact on the respondents, responses or burden currently approved under OMB 0581-0125 Regulations Governing Inspection, Certification and Standards for Fresh Fruit, Vegetables and Other Products 7 CFR Part 51.