



**Steven W. Troxler**  
Commissioner

## North Carolina Department of Agriculture and Consumer Services

April 21, 2020

Dr. Robbie Parker, Chairman  
Board of Directors GAP Connections  
2450 E.J. Chapman Drive  
Knoxville, TN 37996

Dear Dr. Parker:

I am writing to express concern regarding GAP Connections conducting on-farm audits for the 2020 growing season due to COVID-19. Based on what is currently known about the transmission of the virus, it concerns me that auditors will be traveling across rural communities and visiting multiple farms this year. These are unprecedented times, and public health must be taken into consideration for guest workers, farmers, our rural communities and the staff of these auditing firms.

The N.C. Department of Agriculture and Consumer Services has been working with the agricultural community and stakeholders to find workable solutions to issues related to COVID-19. These efforts include communicating with retail groceries in our state to allow for one person to purchase bulk groceries for agricultural workers. I have also prepared Notice of Essential Food and Agricultural Worker forms in English and Spanish and worked with law enforcement across the state to make them aware of this notice. Staff is also evaluating options for direct delivery of bulk groceries directly to farms and mobile laundry facilities to help facilitate workers staying at home to minimize spread of the COVID-19 virus. Stay-at-home orders are currently in place across North Carolina, with some counties implementing orders that are more stringent. It may be some time before things return to normal.

It is my understanding that growers on year-three of the three-year tobacco GAP certification process will be able to conduct desktop audits. I ask that you conduct all tobacco GAP audits this way or allow for required documents to be mailed for review in place of conducting any on-farm audits this growing season. Since certification is based on a three-year cycle, I further recommend that GAP Connections resume auditing farmers for the 2021 growing season based on the audit format that was scheduled for 2020 (i.e. those currently on year-two of the cycle would resume an audit based on year-two in 2021.) Similarly, USDA-AMS has extended the expiration date of USDA GAP audit certifications scheduled to expire on or by May 31 by 60 days. This is not a time for business as usual.

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Dr. Robbie Parker, Chairman

April 23, 2020

I believe eliminating the on-farm component of GAP Connection's audit process for the 2020 growing season will go a long way in promoting individuals to stay at home, helping slow the spread of the virus, and thus keeping our farms operational. The health of our agricultural workers is of utmost importance, and the risk of spread and/or infection should be minimized whenever possible.

While it will have minimal impact on tobacco farmers in our state, I applaud GAP Connections for making the 2020 GAP Training Program available online and for compiling COVID-19 resources in Spanish and English for your grower members. You recognize the seriousness of this situation and how we all must modify operations to ensure health and safety at this time.

Please let me or my staff know if you have any questions.

Sincerely,



Steven W. Troxler  
Commissioner

SWT/bf