

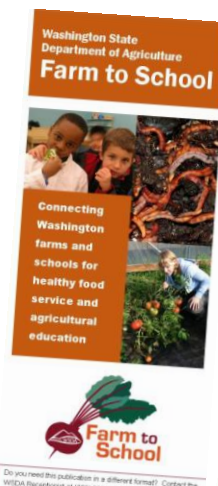
On-Farm Food Safety Certifications and Regulations



Washington State Department of Agriculture

WSDA Regional Markets Team

Small Farm Direct Marketing and Farm to School Team



Why food safety?

- Customer Safety
- Market Requirements
- Risk Management
- Laws and Regulations



Pilot Project: Unprocessed Fruits & Vegetables

As part of the 2014 Farm Bill, AMS and the Food and Nutrition Service (FNS) are conducting a pilot project in up to eight States to provide more purchasing flexibility and options for unprocessed fruits and vegetables, including minimally processed products such as sliced apples, baby carrots, and shredded lettuce. The Pilot project allows participating states to (1) use multiple suppliers and products established and qualified by the Secretary and (2) designate a geographic preference, if desired.



Outline

- What is on-farm food safety?
- What are Good Agricultural Practices (GAP)?
- What is the Food Safety Modernization Act (FSMA)?
- How does FSMA impact farmers?
- Next steps and resources

On-Farm Food Safety

How to **prevent and respond** to the risk of contamination caused by the following factors:

1. Biological
2. Physical
3. Chemical



On-Farm Food Safety

Core Principles

1. Keep pathogens off the food
2. Keep pathogens from spreading
3. Keep pathogens from growing



Tip: Think like a pathogen

Environments pathogens love

- Dirty, moist surfaces
- Standing water
- Warm temperatures
- Human or animal host
- Cracks, holes and other hard to reach places to harbor and multiply



<https://www.sciencedaily.com/releases/2010/12/101206111534.htm>

Pathogen Movement on the Farm

Source: Carrier that produce and/or spread pathogens from one point of the farm to another

1	Humans
2	Animals
3	Soil
4	Water
5	Equipment



Steps to Food Safety



GAP as Guidance

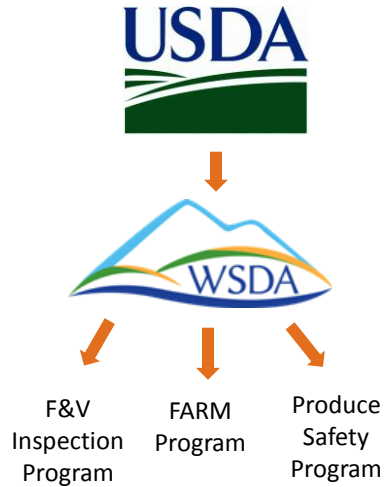
Good Agricultural Practices (GAP): Set of best practices to minimize food safety risk on the farm

- Fruit and vegetable only
- Industry-driven
- Voluntary standard
- Public and private certifications available

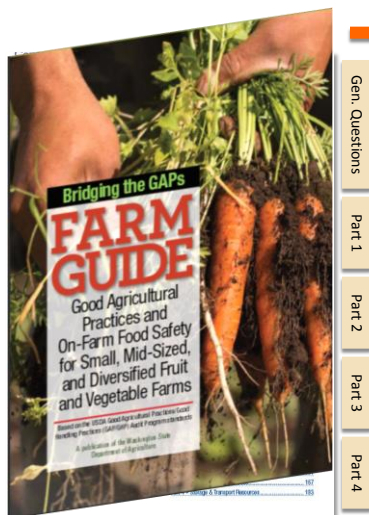


Why USDA GAP/GHP?

- Widely recognized
(Farms should always double-check with their buyer!)
- Cost-effective compared to private certifiers
- WSDA staff conducts audit
(Yakima, Wenatchee, Mt. Vernon)
- Many resources available



Designed for Diversified Farms



Step-by-Step Guide to USDA GAP/GHP Audit Checklist:

The image shows a stack of audit checklist forms. The top form is titled 'Part 1 - Farm Review Water Usage' and 'General Questions Implementation of a Food Safety Program'. It includes fields for Farm Name, Contact Person, Audit Site Address, City, State, Zip, Mailing Address, City, State, Zip, Telephone No., and Fax. It also has a section for 'USDA or Fair-State Office performing audit' with fields for Arrival Date, Departure Date, and Travel Time (hours). The form also contains a grid for recording audit results and a 'Person(s) Interviewed' section. The bottom of the form includes the USDA logo and the text 'For Official Government Use Only' and 'Revised: 10/2014 Version 1.2 Page 1'.

What is FSMA?

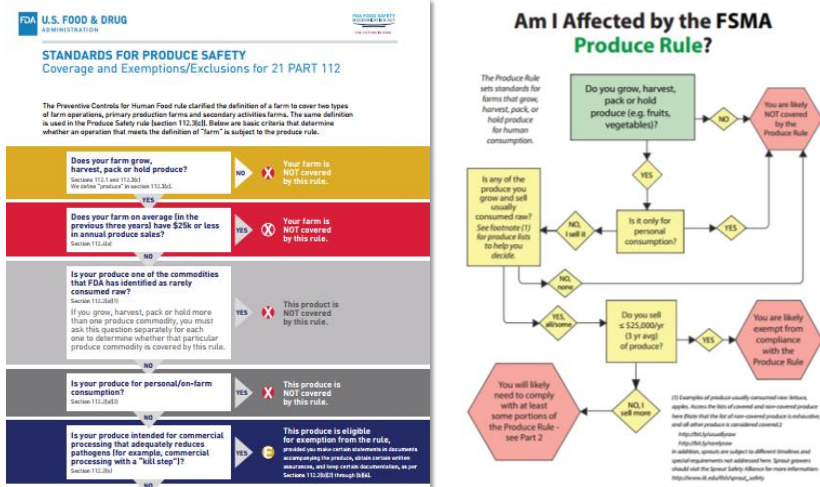


First Federal Rule for Produce Farms



Adulterated Food - Impure, unsafe, unwholesome or otherwise unfit for human consumption

Is your farm “covered” by FSMA?



Covered Farm Activity Examples



Covered Produce

- Fruits or vegetables, including mushrooms, sprouts, peanuts, tree nuts, and herbs
- Not including food grains (ex: barley, corn, sorghum, oats, rice, rye, wheat, amaranth, quinoa, buckwheat, oilseeds)

Excluded Produce

- **Personal or on-farm consumption**
- **Commercial processing**
[provided method and documentation as per §112.(b)(2) – (b)(6)]
- **Foods rarely consumed raw** (exhaustive list):
asparagus; black beans, great Northern beans, kidney beans, lima beans, navy beans, and pinto beans; garden beets (roots and tops) and sugar beets; cashews; sour cherries; chickpeas; cocoa beans; coffee beans; collards; sweet corn; cranberries; dates; dill (seeds and weed); eggplants; figs; horseradish; hazelnuts; lentils; okra; peanuts; pecans; peppermint; potatoes; pumpkins; winter squash; sweet potatoes; and water chestnuts

Small Business Exemptions

Exempt	Qualified Exemption
<p>≤ \$25,000 average annual produce sales (in previous 3 years)</p>	<p>< \$500,000 average annual food sales (in previous 3 years)</p> <p>and</p> <p>A majority (by value) sold directly to “qualified end-users” [112.3(c)]:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Consumer (not a business) <input type="checkbox"/> Restaurant or retail food establishment: <ul style="list-style-type: none"> • in the same state or reservation, or • within 275 miles of farm

Retail Food Establishment

An establishment that sells food products directly to consumers as its primary function (*annual monetary value to sales of food products directly to consumers exceeds the annual monetary value of sales of food products to all other buyers*).

Examples:

- Farmers Market
- Roadside stand
- Community Supported Ag (CSA)
- Grocery store
- Convenient stores



Best Practices Transfer to Market

- Encourage good personal hygiene and hand washing
- Maintain proper product temperatures as best possible
- Avoid cross-contamination
- Educate consumers to wash products at home
- Encourage product labeling, handling instruction and source-identification



Knowledge Test

A farm sells \$240,000 in grains to a grain mill for processing, and then also has a CSA that grosses \$250,000 selling to members in the same state.

- (A) Full Exemption
- (B) Qualified Exemption
- (C) No Exemption

Knowledge Test

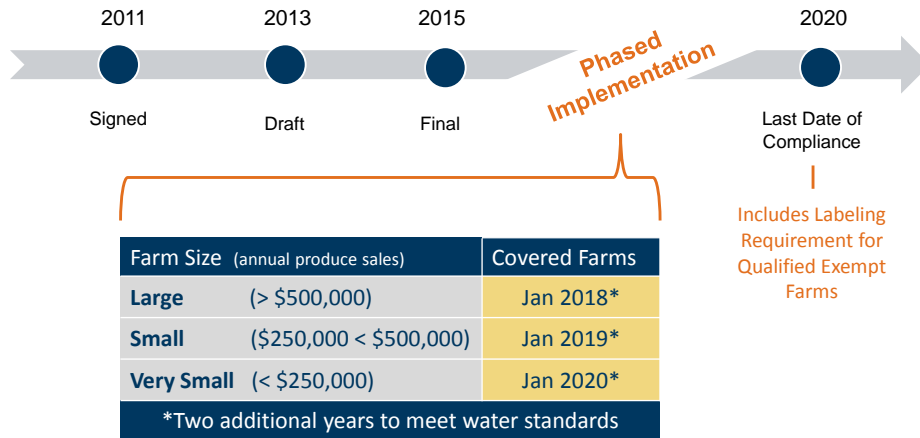
Farm selling \$475,000 in produce — \$200,000 wholesale, \$200,000 to a local restaurant, and \$75,000 to a local grocery store.

- (A) Full Exemption
- (B) Qualified Exemption
- (C) No Exemption

Qualified Exemption Requirements

- 1) Records claiming status (**EFFECTIVE NOW**)
 - Sales records including farm info, product, date and buyer
 - Annual review with signature and date from farm manager
- 2) Food packaging label (by 2020)
 - Farm name
 - Complete business address where food grown
 - Displayed “prominently and conspicuously” on label, poster, sign, placard, documents or electronic invoice
- 3) Compliance/Enforcement
- 4) Exemption Withdrawal/Reinstatement. FDA will:
 - Provide written notice of circumstances
 - Give owner opportunity to respond
 - Consider how farm address circumstance

Rules Finalized, Compliance Staggered



Compliance and Enforcement

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 Produce Safety Program Manager
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<http://agr.wa.gov/FoodAnimal/ProduceSafety/>

Washington State Department of Agriculture

Produce Safety Program
 Program Manager: Roger Beekman
 Phone (360) 742-8472 or producesafety@agr.wa.gov
 To view PDF files, download Acrobat Reader

Program Overview

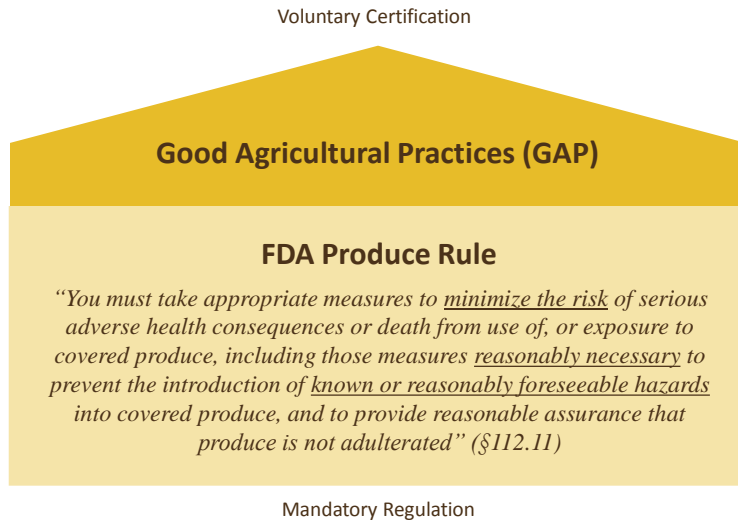
- In partnership with the Federal Food and Drug Administration (FDA), the Washington State Department of Agriculture (WSDA) is developing and implementing a Produce Safety Program. This Program will encourage the safe production of fruits and vegetables thereby reducing the public health risks for consumers of Washington produce across the nation and around the world. By using both education and enforcement, the Program will promote understanding of and compliance with the [FDA Produce Safety Rule](#) (external link), a component of the [Food Safety Modernization Act \(FSMA\)](#) (external link).
- The program will address two key goals:
 - Help Washington farmers comply with the FDA Produce Safety Rule.
 - Consistently and uniformly apply the FDA Produce Safety Rule in Washington State.

2016 Addition to the Handbook for Small and Direct Marketing Farms
 Regulations and Strategies for Farm and Food Businesses

TAKING FRESH FOOD FROM FARM TO TABLE

Washington State Department of Agriculture

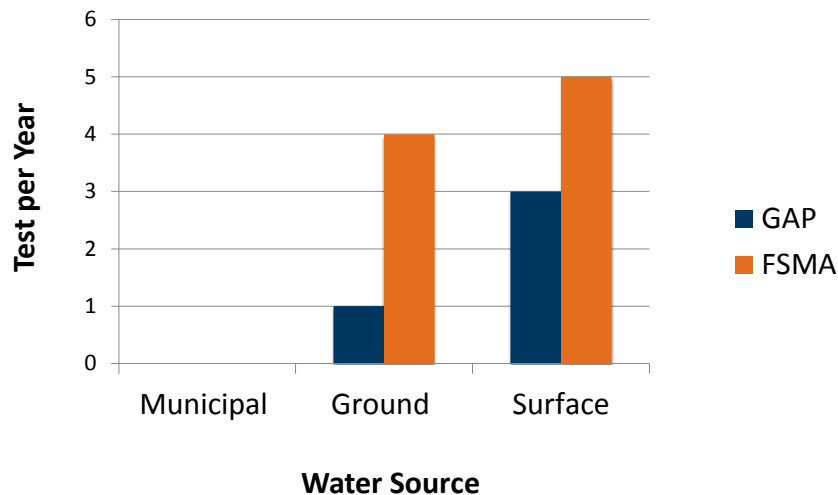
FSMA Sets the Floor, GAP Sets the Ceiling



More Similarities than Differences

		GAP	FDA PR
1	Sales Records (Qualified Exemption)		✓
2	Employee Training	✓	✓
3	Water Monitoring & Testing	✓	✓
4	Manure & Compost Management	✓	✓
5	Cleaning & Sanitation Schedules	✓	✓
6	Monitoring and Corrective Actions	✓	✓
7	Food Safety Plan	✓	

Water Testing Frequency



Quality Standards Based on Use

	Production or Irrigation	Harvest or Post-Harvest
	<p>Direct application method where produce is <u>likely to or intended to</u> contact covered produce (harvested or harvestable part of product)</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Produce washing <input type="checkbox"/> Food contact surfaces <input type="checkbox"/> Cooling/Hydrating <input type="checkbox"/> Hand washing ★ Treated agricultural tea ★ Irrigating sprouts
Standard	<p>Geometric Mean (GM): ≤ 126 CFU generic E. coli / 100 mL H₂O</p> <p>Standard Deviation (STV): ≤ 410 CFU generic E. coli / 100 mL H₂O</p>	<p>Zero detectable E. coli in 100 mL of agricultural water</p>

Compost App Best Practice

Type	Application Timing			Record
	USDA GAP	FDA Produce Rule	National Organic Standard	
Treated/ Stabilized	No time interval	No time interval	No time interval (depends on inputs)	Scientifically valid treatment process: (1) On-farm time, temperature, turnings, etc. records (2) Supplier analysis reports on production/handling
Untreated/ Raw Manure	2 week prior to planting or minimum 120 days prior to harvest	Recommend National Organic Standard until further research	120 days for crops in contact with soil 90 days for crops <u>not</u> in contact with soil	Application timing (when, where, how)

Actionable Next Steps

1. Keep sales records (qualified exemption status)
2. Post hand washing signage near bathrooms
3. Inspect agricultural water sources at least annually and consider water testing
4. Adopt practices to mitigate animals from crop fields
5. Consider compost type and application method
6. Call for assistance or interest in hosting workshops in your area

Contact Info

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