What’s New with Food Safety?

Good Agricultural Practices (GAP)
Good Handling Practices (GHP)
Food Safety Modernization Act
Outline

- Who is WSDA?
- Why food safety?
- What’s new with food safety?
- Food safety hot topics
- Resources to assist
- Questions
WSDA Provides Resources for Farmers

Small Farm Direct Marketing and Farm to School Team

Increasing the vitality of small farms by supporting them in business planning and direct markets.

WSDA’s Bridging the GAPs project identifies and shares best practices for on-farm food safety for small, mid-sized & diversified farms to:

- Improve food safety practices, planning and implementation
- Prepare for audits under USDA Good Agricultural Practices (GAPs) and Good Handling Practices (GHPs)
- Understand and prepare for FSMA’s final Produce Safety Rules

Information* available here:

www.agr.wa.gov/farmfoodbiz

www.agr.wa.gov/inspection
Why farms care about food safety?

- Customer Safety
- Market Requirements
- Risk Management
- Laws and Regulations
What We Teach Farmers

On-Farm Food Safety

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

- Biological
- Chemical
- Physical
Pathogen Cross-Contamination Points

- Soil
- Hands
- Water
- Surfaces
Good Agricultural Practices (GAP)

Good Handling Practices (GHP)

- Voluntary food safety audit
- To minimize the risks of microbial food safety hazards
- For fruit and vegetable farmers
(Private) Food Safety Audits

- primus GFS™
- IFS PACsecure
- CANADA GAP
- the alliance
- GLOBAL G.A.P.
- IFS Global Standards
- SQF Institute
- GRMS Global Red Meat Standard
- Food Safety System Certification 22000
Food Safety Audits

Good Agricultural Practices (GAP)
Good Handling Practices (GHP)
Why USDA GAP/GHP?

- Widely recognized
- Cost-effective compared to private certifiers
- WSDA staff certified to audit (*Yakima, Wenatchee, Mt. Vernon*)
- Similar principles as FSMA
- WSDA resources available to assist farmers
**USDA GAP/GHP Audit Checklist**

- **Principles**
  - Clean soil
  - Clean water
  - Clean hands
  - Clean surfaces

- **Processes**
  - Production
  - Packing
  - Handling
  - Storage
Bridging the GAPs Project
Farm Guide – Farm & Auditor Tips

AUDITOR TIP

During an audit, the auditor should be treated just like any other visitor, so if a visitor is required to use the handwashing station and sign in, then the auditor should be required to do the same.

AUDITOR TIP

Different scales of hydrocoolers, which can be used to remove field heat from produce, can also be used to clean and sanitize harvest totes.

HOW TO TAKE A WATER SAMPLE

Farm Guide is available online and in Spanish

ON-FARM EXAMPLES

A FARM IN WESTERN WASHINGTON

FARMER QUESTION
What’s New with Food Safety?

Draft rules release

1st comment revision ended

2nd comment period complete

Deadline for final rules

Final Rules Released

Phased in implementation
**FSMA (Food Safety Modernization Act)**

### 7 Rules

<table>
<thead>
<tr>
<th>Rule</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Produce Safety Rule</td>
<td>For Farms</td>
</tr>
<tr>
<td>Grow, harvest, pack or hold produce typically consumed raw</td>
<td></td>
</tr>
<tr>
<td>Preventive Controls for Human Food</td>
<td>For Food Facilities</td>
</tr>
<tr>
<td>Manufacture, process, pack or hold human food (requires registration)</td>
<td></td>
</tr>
<tr>
<td>Preventative Controls for Animal Food</td>
<td></td>
</tr>
<tr>
<td>Sanitary Transportation of Human and Animal Food</td>
<td></td>
</tr>
<tr>
<td>Intentional Adulteration of Food</td>
<td></td>
</tr>
<tr>
<td>Accredited Third Party Certification Rule</td>
<td></td>
</tr>
<tr>
<td>Foreign Supplier Verification Programs (FSVP)</td>
<td></td>
</tr>
</tbody>
</table>
**“Farm” Definition**

<table>
<thead>
<tr>
<th>Primary Production Farm</th>
<th>Secondary Production Farm</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under one management</td>
<td>A majority interest owned, or jointed owned, by Primary Production Farm(s) that grow, harvest and/or raise the majority of raw produce</td>
</tr>
<tr>
<td>One general location</td>
<td>Harvest, pack and/or hold raw produce</td>
</tr>
<tr>
<td>Grow crops, harvest crops and/or raise animals</td>
<td>Different location than Primary Production Farm</td>
</tr>
<tr>
<td>Included activities</td>
<td></td>
</tr>
<tr>
<td>Pack</td>
<td></td>
</tr>
<tr>
<td>Hold</td>
<td></td>
</tr>
<tr>
<td>Label</td>
<td></td>
</tr>
<tr>
<td>Dry/dehydrate</td>
<td></td>
</tr>
<tr>
<td>Treat to reduce ripening</td>
<td></td>
</tr>
</tbody>
</table>
“Covered Produce”

- Fruits or vegetables, including mushrooms, sprouts (irrespective of seed source), 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

<table>
<thead>
<tr>
<th>Exempt</th>
<th>Qualified Exemption</th>
</tr>
</thead>
<tbody>
<tr>
<td>( \leq 25,000 \text{ average annual produce sales (in previous 3 years)} )</td>
<td>(&lt; 500,000 \text{ average annual food sales (in previous 3 years)} ) and A majority (by value) sold directly to “qualified end-users” [112.3(c)]:</td>
</tr>
</tbody>
</table>

- Consumer (not a business)
- Restaurant or retail food establishment:  
  - in the same state or reservation, or  
  - within 275 miles of farm
## Compliance Dates

<table>
<thead>
<tr>
<th>Business Size (based on produce sales)</th>
<th>Sprouts (subpart M)</th>
<th>Covered Activities (except subpart M)</th>
<th>Qualified Exemption</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Water</td>
<td>All other</td>
<td>Records</td>
</tr>
<tr>
<td>Very Small (&lt; $250,000)</td>
<td>3 years</td>
<td>6 years</td>
<td>4 years</td>
</tr>
<tr>
<td>Small (&lt; $500,000)</td>
<td>2 years</td>
<td>5 years</td>
<td>3 years</td>
</tr>
<tr>
<td>All other</td>
<td>1 year</td>
<td>4 years</td>
<td>2 years</td>
</tr>
</tbody>
</table>

|                                       | Labeling §112.6(b)(1) | All other §112.6, §112.7 |
|                                       | 1/26/2016             | 1/1/2020                          |
|                                       | 3 years               | N/A                               |

Time periods effective January 26, 2016
FDA Produce Safety Rule Topics

- Health/Hygiene (Subpart D)
- Water (Subpart E)
- Compost (Subpart F)
- Animals (Subpart I)
- Equipment (Subpart L)
- Sprouts (Subpart M)
Worker Health and Hygiene

- Prevent contamination by ill or infected persons
- Use hygienic practices when handling covered produce or contact surfaces
- Take measures to prevent contamination by visitors
- Workers and supervisors adequately trained
“Agricultural water” is used in covered activities on covered produce that is intended to or likely to contact covered produce or food contact surfaces.
Inspection and Maintenance

Must inspect all agricultural water sources at the beginning of the growing season or at least once annually.

1. The nature of each agricultural water source;
2. The extent of your control over it;
3. The degree of protection each source has;
4. Adjacent and nearby land use that may impact your water quality; and
5. The likelihood of introduction of known or reasonably foreseeable hazards by another upstream water user.
Water – Irrigation, Drinking & Washing
Produce Washing & Handling
### Quality Standards Based on Use

<table>
<thead>
<tr>
<th><strong>Growing</strong></th>
<th><strong>Harvest or Post-Harvest</strong></th>
</tr>
</thead>
</table>
| Direct application method where produce is **likely to or intended to** contact covered produce (harvested or harvestable part of product) | - Produce washing  
- Food contact surfaces  
- Cooling/Hydrating  
- Hand washing  
- Treated agricultural tea  
- Irrigating sprouts |

**Geometric Mean (GM):**  
≤ 126 CFU generic E. coli / 100 mL H₂O

**Standard Deviation (STV):**  
≤ 410 CFU generic E. coli / 100 mL H₂O

**Zero detectable E. coli in 100 mL of agricultural water**
## Water Testing

<table>
<thead>
<tr>
<th>Source</th>
<th>Baseline</th>
<th>Annual Review</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Untreated Surface Water</strong></td>
<td>20x over 2 - 4 years, collected as close to harvest time as practical</td>
<td>5x per year</td>
</tr>
<tr>
<td><strong>Untreated Ground Water</strong></td>
<td>4x per growing season or over 1 year</td>
<td>1x per year</td>
</tr>
<tr>
<td>(applied directly to growing produce – i.e. irrigation)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Untreated Ground Water</strong></td>
<td>4x per growing season or over 1 year</td>
<td>1x per year if no detectable E. coli</td>
</tr>
<tr>
<td>(for purposes in which no detectable generic E.Coli is found – i.e. produce/hand washing)</td>
<td></td>
<td>4x per year if detectable E. coli</td>
</tr>
<tr>
<td><strong>Public Water</strong></td>
<td>No requirements to test public water as long as Public Water System results are obtained indicating compliance</td>
<td></td>
</tr>
</tbody>
</table>
Corrective Actions

<table>
<thead>
<tr>
<th>(1) Stop and correct</th>
<th>(2) Treat</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stop using water source, assess, rectify and verify water align with original standards (§112.45)</td>
<td>According to section §112.43 (i.e. physical treatment pesticide device approved by the EPA)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>(3) Time interval</th>
<th>(4) Change method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Apply time interval or microbial die-off rate between last irrigation and harvest and end of storage (acceptable for water used to irrigate, not for water requiring 0 detectable E. coli) [§112.45(b)]</td>
<td>Change water source or application method so that ‘contaminated’ water does not contact or is not likely to contact the harvested or harvestable part of the crop (can be temporary fix while applying corrective actions)</td>
</tr>
</tbody>
</table>
# Biological Soil Amendments

<table>
<thead>
<tr>
<th>Treated</th>
<th>Definition</th>
<th>Application</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stabilized according to scientifically valid controlled physical, chemical and/or biological processes with limits on detectable types of bacteria (i.e. Listeria, Salmonella, E. coli) [§112.54, §112.55]</td>
<td>No time interval between application and harvest if applied in a way that minimizes contact with covered produce before and after application</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Untreated</th>
<th>Definition</th>
<th>Application</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soil amendments containing animal byproducts (manure/fish) that do not meet criteria for “treated” biological soil amendments</td>
<td>[Reserved for further research] Recommend USDA Organic standard: <strong>120 days for crops in contact with soil</strong>  <strong>90 days for crops not in contact with soil</strong></td>
<td></td>
</tr>
</tbody>
</table>
Animals – Farm, Wild and Domestic
Animals

- Same standards for domesticated and wild animals
- Take all reasonably necessary measures to identify and not harvest produce likely to be contaminated
  - Visually examine growing area and all covered produce to be harvested
  - Certain circumstances: additional assessment during growing and taking measures to mark areas to avoid during harvest
No Animal Exclusion

“Farms are not required to exclude animals from outdoor growing areas, destroy animal habitat, or clear borders around growing or drainage areas. Nothing in the rule should be interpreted as requiring or encouraging such actions.” (§112.84)
Animals - Grazing

Does not require establishing waiting periods between grazing and harvest, but FDA encourages farmers to voluntarily apply intervals as appropriate. (FDA may put out guidance in the future.)
Field Harvest Contact Surfaces
Storage & Packaging
Rule sets standards to prevent these sources, and inadequate sanitation, from contaminating produce.

Required measures to prevent contamination include, for example, appropriate storage, maintenance and cleaning of equipment and tools.
Traceability

Date Conducted: 9/10/11
Lot #: 310
Conducted by: Sam

Product traced: Cucumbers
Buyer Name: ________________  Buyer phone: ________________

<table>
<thead>
<tr>
<th>Step backward</th>
<th>Step forward</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harvest date</td>
<td>Harvest Location</td>
</tr>
<tr>
<td>9/10/11</td>
<td>Field 13</td>
</tr>
<tr>
<td>Harvester</td>
<td>Packer</td>
</tr>
<tr>
<td>Mary, Jon</td>
<td>Sam</td>
</tr>
<tr>
<td>Packing date</td>
<td>Packer</td>
</tr>
<tr>
<td>9/11/11</td>
<td>9/11/11</td>
</tr>
<tr>
<td>Shipping date</td>
<td>Customer(s) contacted</td>
</tr>
<tr>
<td>9/11/11</td>
<td>LMNOP Distributors</td>
</tr>
<tr>
<td>Amount of product remaining</td>
<td></td>
</tr>
<tr>
<td>from original shipment at</td>
<td></td>
</tr>
<tr>
<td>customer</td>
<td></td>
</tr>
<tr>
<td>2 Cases</td>
<td></td>
</tr>
<tr>
<td>Amount of Product Sold</td>
<td></td>
</tr>
<tr>
<td>by Buyer</td>
<td></td>
</tr>
<tr>
<td>25 cases</td>
<td></td>
</tr>
</tbody>
</table>

How was it:
1. Handled
2. Washed
3. Stored
4. When?
5. By whom?
FDA Educational Outreach Plan

Current FDA Partners for Educational Outreach

http://www.fda.gov/Food/GuidanceRegulation/FSMA/default.htm
Food Safety
Modernization Act (FSMA)

Program Manager: Lucy Severs
Phone: (360) 902-1876

Policy and External Affairs: Claudia Coles
Phone: (360) 902-1905

With the recent release of final preventive controls rules for human and animal food under the federal (FSMA) Food Safety Modernization Act, it’s become evident that this sweeping reform of our federal food safety laws requires immediate and focused effort within our Food Safety and Consumer Services Division to ensure Washington citizens enjoy a safe food supply.

Resources for Food Manufacturers

Animal Feed Resources [PDF 238 KB]
FSMA Rule Analysis

National Sustainable Agriculture Coalition

Facilities Rule (Part 1 of 3)  http://sustainableagriculture.net/blog/pc-rule-analysis-part-1/

Produce Rule (Part 1 of 2)  http://sustainableagriculture.net/blog/produce-rule-analysis-part-1/
USDA GroupGAP

- Start date April 4th, 2016
- Requirements
  - Grower group
  - Quality Management System (QMS)
  - Group Leader
  - Trained Internal Auditor
- USDA will spot audit Grower Group to verify certification

ams.usda.gov/services/auditing/groupgap
Wholesale Success & Workshops

Olympic and Kitsap Farm Workshop Series

Grow your sales opportunities with this special WSDA workshop series for fruit and vegetable growers

Wholesale Success with Atina Diffley
Sequim  8:30am-4:30pm
NOT JUST FOR WHOLESALERS! This definitive training builds capacity of farmers at all scales to sell into your markets of choice and tap the burgeoning demand for locally grown fruits and vegetables. Meet your buyers’ expectations with best practices for post-harvest handling, packing, food safety, and business management. Learn strategies to become more efficient and profitable.

GAPs Farm Walk
Dharma Ridge Farm - Quilcene  9:00am-noon
Food Safety Plan Work Session  1:00pm-4pm
Food safety is a hot topic. Buyers increasingly require on-farm food safety assurances. Expand your market access by learning best practices and new produce safety rules for fruit and vegetable growers. Prepare for a voluntary Good Agricultural Practices (GAP) audit with this on-farm workshop led by WSDA educators and GAP auditors. Bring your computer for an afternoon work session to create your food safety plan.

Local Buying Tour Event
North Kitsap  9:00am-4:00pm
Connect with other specialty crop farmers and buyers on this “mobile workshop” tour that will demystify the ins and outs of local direct sales. Expand your market access by learning best practices and new produce safety rules for fruit and vegetable growers. Prepare for a voluntary Good Agricultural Practices (GAP) audit with this on-farm workshop led by WSDA educators and GAP auditors. Bring your computer for an afternoon work session to create your food safety plan.

March 23
March 24
April 4
WSDA Farm to School Toolkit

This toolkit is designed to provide farms, schools, families, and communities with resources to help them meet their farm-to-school goals.

Through stories, photos, templates, documents and more, this toolkit highlights farm to school and school garden successes throughout the state and draws together best practices and farm to school tips from our in-state and national network partners.

Please contact us with questions, comments, and farm to school successes of your own. With this toolkit we can continue to learn and share with each other. We'd love to hear from you!

A Bremerton School District student is excited to sample a variety of sweet peppers.

CURRENT PROGRAMS

Taste Washington Day 2012 was a huge success around the state! Schools celebrated WA agriculture on Wed, Sep 26th.

IN THE NEWS

- Taste Washington Day 2012
- Growing to School: Students taste success with local food program
- USDA Unveils Historic Improvements to Meals Served in America’s Schools

SUBSCRIBE

Share news and information on farm-to-school and school gardens, including seasonal newsletters, funding opportunities, job postings, and policy updates.

www.wafarmtoschool.org
Washington Harvest Posters

Available for free download: http://www.wafarmtoschool.org/Page/98/promotion
The “Green Book”

Handbook for Small and Direct Marketing Farms

Regulations and Strategies for Farm and Food Businesses

2014

40 Fact Sheets total
Questions?
Contact Info

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