

Session 10: Bridging the GAPs and Beyond in Food Safety

2:35-2:40 PM - Welcome, Introductions and Housekeeping – Marty Gerencer

2:40-3:00 PM - Phil Tocco: Preharvest Food Safety Educator, MSUE

3:00-3:20 PM - Tim Slawinski – Emerging Issues Specialist, Food & Dairy Division, MDARD

3:20-3:40 PM - Phil Britton – GroupGAP Coordinator, Cherry Capital Foods

Phil Tocco & Phil Britton came dressed in Thing 1 & Thing 2 t-shirts, which Marty got a photo of pre-session

Marty – introductions

Attendees included

- 4 farmers

- 4 processors/packers

- others

Phil Tocco

Why care about food safety?

Important distinction between things that *might* be bad for us (GMOs, rBST, antibiotics) and things we *know* are bad for us (salmonella, listeria, e. coli, gasoline)

47.8 million episodes of food poisoning annually, 127,839 hospitalizations, 3,037 deaths

our world today is pretty clean/sanitary – chlorinated water

products that cause illness don't match up with what people *think* cause illness

people list off chicken, meats, fish as top concerns but produce is #1 in

reality

Produce farm food safety means

- Safe & sanitary equipment

- People picking and eating food stay healthy

- Handouts available with more detail – Marty handed these out

On-farm food safety spectrum (graphic developed by Mariel)

FSMA Produce Rule required, other programs officially voluntary but effectively required, depending on who you sell to

MI State Food Risk Assessment, FamilyFarmed.org – tools for food safety

planning

Certifications – GroupGAP, USDA GAPs, other certifications like SQF

Tim Slawinski

Food Safety Modernization Act – what does the rule from the FDA say?

Signed into law in 2011, final rules settled on in 2015

41 sections, we're talking about just one today, dealing with produce

Focus on prevention – ensure the US food supply is safe

Produce rule is brand new, prior to this regulators would only be on-farm “for cause” – no routine inspections

Only addresses microbiological hazards (not gasoline, pesticides, etc)

Who's covered?

Produce typically eaten raw (FDA has exhaustive list of foods *not* typically eaten raw)

Who's not covered? (RAC = Raw Agricultural Commodity)

RACs not eaten raw

RACs destined for commercial processing (with a heat step)

Produce meant for on-farm consumption

Farms with <\$25k annual sales

What's covered?

Agricultural water

Water that contacts harvestable portion (note harvestable, not edible)

Irrigation, crop sprays, frost protection, washing, cooling

Requirement to inspect water source & look for potential risks

Requirement to test for E. coli (this being present is an indicator that something has happened to the water; E. coli itself is not the only concern) – different standards for pre-harvest & post-harvest

Biological soil amendments of animal origin (mainly manure)

Treated & untreated compost have different requirements

They are working on setting an interval from time untreated amendments applied until time you can harvest

This interval will not necessarily be same as organic standard of

120 days

In many cases, “alternatives” will be available *if* there is science to back those practices up (universities will likely be doing a lot of research into crop-specific situations)

Equipment, tools and buildings

Can be a big deal because there *will* be bacteria in the field, equipment can harbor it and allow growth to dangerous levels

Current rule is a little vague, interpretable, but it's easier for them to set vague rule and establish guidance that can be changed than to make changes later on to a too-strict rule

Equipment must be cleanable, buildings must be enclosed

Animals in the growing area

Must protect crop from animals, so there's a waiting period between grazing & harvest

Checking for evidence of animal intrusion

Health & hygiene of employees

Hepatitis, norovirus

Excluding ill employees and ensuring proper handwashing

Majority of rule is consistent with USDA GAPs, water is area where requirements are more involved than GAPs

Water testing – different rules for ground water, surface water, and treated or public water

Compliance Dates

3 categorizations for farm size

large (> \$500k in annual sales) = 2018 growing season

small = 2019

very small = 2020

Rules apply to anything being grown in the US (incl for international sale)

Trainings – MSU is offering a training (Food Safety Alliance) – every farm must have a designated person who's gone through the training, but this doesn't have to be a person who's on-site at the farm

Phil Tocco says trained person could even be a neighbor

Several trainings coming up – it would take effort to miss this entirely

Separate requirement for training of employees – this is a less formal training (other comes with official certificate)

What about packing houses?

Could fall under 2 different rules – produce safety rule or preventive controls (geared toward mfg facilities)

Distinction is based on ownership – farmer-owned will fall under produce safety rule

If you're doing any cutting of product, that's manufacturing. Getting over 50% of product from other farms, is also manufacturing. Washing can be considered treating, depending on chlorination level of the water (<200ppm is treating the water, >200ppm is treating the product) – all of these fall under preventive controls

FDA has site with lots of information, but it can be tough to navigate. Tim is happy to answer questions, now or later on.

QUESTION – are exempt farmers encouraged to keep records as though they are still subject to the rule?

Yes, buyers may still want these requirements to be met

Harder to go back and start from scratch, if you go above \$25k and become non-exempt it will be easier if you have already been doing it

QUESTION – rules also apply to food brought in from outside the country – how is that inspected/regulated?

Importers verify farms are meeting FSMA requirements, then USDA verifies importers are meeting requirements

Farms & importers can voluntarily go to FDA & show they're meeting requirements to get expedited

Phil Tocco

So how does meat verification work?

Education/training

Self-assessment

Verification step

Same three steps will be used to implement FSMA

On-farm readiness review – voluntary pre-inspection review for covered farms

Promote coordination, educate before regulating

There is value in learning industry/regulatory practices in a spirit of partnership

This is *not just about huge farms* – doesn't take much to meet the income requirements

Instituted by Nat'l Association of State Depts of Ag (NASDA)

FDA has limited ability to implement & enforce, do inspections

In 42 states, State Dept of Ag will be the ones implementing FSMA on the farms

State ag depts. understand specifics of growing in their own states

FDA, USDA & Extension all worked together to develop review process

Next step is to improve efficiency of tool, should be usable by Extension as an education tool, as well as by growers and packers as a self-assessment

Toolkit document lists the regulations, and then recommendations of how to comply

Most critical first steps are marked in red, and all regulations are cited with where they came from in the full rule

Phil Britton

GroupGAP

GAP is voluntary, market-driven USDA program (buyers want verification that you meet a certain standard)

You take practices, put them in a food safety plan & document what you're doing, then USDA comes and audits according to their checklist

Difficulty is that this is a big jump, especially for small farms

GAP is USDA auditing a farm, 1:1

GroupGAP is a group of farms, all following food safety plan, and then group administrator audits individual farms, USDA audits the administrator and a sample of farms

Allows more opportunity for technical assistance, collaborative spirit; make the jump to certification a little easier

Did pilot, then expanded statewide last year

Group contains ~15 farms

Just one group in the state; process of becoming group is complicated

2 ways to get involved

from farm side, link to GroupGAP network

become internal auditor (have to undergo some USDA training)

trying to build capacity on both sides

QUESTIONS:

How many farms can be in a group?

Phil B - No limit, just auditor capacity

What are financial advantages of being in GroupGAP?

Advantages don't really kick in until you have a larger group of farms.

Orig model, farmer pays full cost of audit. Group model, cost can be spread among all farms (this year it was \$500/farm)

If you're solo and don't pass, have to pay for auditor to come back out

Tim – as FSMA comes into effect, thinks there will be more demand for GAP certification, because it's a way for buyers to verify that their purchases are coming from places that meet minimum requirements. The team effort piece of GroupGAP (like having support from Phil B to meet all requirements) has been a bigger benefit than the financial piece

Phil T – even if you are exempt, *you will need to have documentation of the fact that you're exempt*; envelopes available in the meeting room have a form for demonstrating this and are a good way to keep all documentation in one place