

Albany, New York, 02/04/19 through 02/06/19

Day 1, Monday, Feb 4th, 2019

Evening welcome reception.

Day 2, Tuesday, Feb. 5th, 2019

8:30am: Welcome and Plenary Session

The annual meeting began at 8:30 am, with an introduction and plenary session. The goal of this meeting is to provide a platform for **enhancing produce safety and preventive controls training, education, & outreach among small and medium sized farms and small processors in the Northeast** (the goal of NECAFS), by opening up conversation and collaboration between regulators, academia, and producers. Through this, best practices and common challenges can be shared, which allows for the consolidation of efforts to work on the gaps that are identified, and the solutions that can be found. The objectives of NECAFS and of the conference were as follows:

- 1. Establish foundational network structure
- 2. Build capacity, competency & collaboration
- 3. Develop and deliver educational programs
- 4. Evaluate & assess progress and impact
- 5. Sustain good work.

Also highlighted were some of the successes NECAFS has had since it began in January 2015 as NE-PHRESH, which was a small group discussion (funded by a NEED/NERA grant) to focus on postharvest research and needs. Some highlights of the successes include:

- Improved Regional Communication The e-newsletter, which has grown from 19 subscribers to 433
- The NECAFS Clearinghouse (a database that houses produce safety and preventive controls resources), which has 6,847 page views
- Hosting 14 webinars, with 938 attendees and 1,205 contact hours
- 3 years of extended funding through USDA NIFA, FSOP, which runs from August 2018-August 2021 to continue to build regional capacity and facilitate conversations and collaborations
- Training support stipend program (TSSP) has produced 41 trainers and 13 events



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Day 1, Tuesday, Feb. 5th, 2019

10:30am: State and Regional Project Updates

State by State Review

Connecticut

- Collaborated with MA and RI for buyer outreach through educational programs
- PSA trainings attended by most exempt growers
- Delaware
 - Working with growers to convert poultry houses
 - FDA commissioned study of Biological Soil Amendments of Animal Origin (BSAAOs)
- Maine
 - Creating new collaborative network with other in-state groups
 - 87% PCQI participants plan to start plan within 6 months. Follow-up showed that 60% started within 6 months of attending training
- Maryland
 - Increased focus on water testing labs
 - Recordkeeping sheets developed
 - Held GAP workshops with pre/post knowledge testing, 38 farmers documented change in sanitation knowledge
- Massachusetts
 - Created master list of farms to aid in farm registration, inspectors working to give growers overview on rules
 - Produce and processing safety collaborations with many other states
- New Hampshire
 - Tracked behavior change from different programming, including sanitizers and record keeping
 - NHDAMF expanding outreach efforts quickly, including on-farm readiness request (OFRR) form, and produce safety meetings
- New Jersey
 - Created a model for OFRR's, conducted over 75, implemented pre/post review, showed knowledge gain
- New York
 - 1,104 manufactures received resources on FSMA
 - Inspection program is being updated to include PC and PS
- Pennsylvania
 - o Created educational toolbox to distribute at OFRRs
 - \$45k saved by growers with reduced training costs
 - Gave unique PSR training to Amish and other plain sect growers



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- Rhode Island
 - Developed educational toolbox and handouts for OFRR's, including PSR exemption calculator
 - Created multilingual resources
- Vermont
 - Awarded \$74k in produce safety improvement grants, including a grant for testing surface and ground water on produce farms
 - Helped transition farms into PSR compliance
- West Virginia
 - Grant for improving fruit drying practices
 - SPGP funding leveraged into additional work, seeing increase in new farmers passing audits connected to outreach throughout the state on the PSR.
- In 2018, the NECAFS region supported the delivery of a total of 503 trainings for PC and PSR, reaching 4,291 participants.



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10:30am: State and Regional Project Updates (continued)

URI PSR Qualified Exemption Spreadsheet – Lori Pivarnik and Sean McCormick

- Excel Spreadsheet- created to assist processors with recordkeeping and determining eligibility for PSR qualified exemption.
- QE sheet 2: template outline for spreadsheet columns for farmers to learn how to use the spreadsheet
- Columns in spreadsheet include: amount of sale, purchased by, purchase designation, qualified user? (yes/no generated)
- Spreadsheet determines QE after farmer personally inputs sales information.
- The sales may be entered in groups, not each individual sale. Whatever is easiest for the farmer using the spreadsheet.
- All information over the years is automatically entered into an output sheet. Answer "am I qualified exempt" is answered in "Yes" or "no"
- End sheet is used as official records as opposed to receipts for proof of exemption.
- There are three sheets for three years, fits requirements for qualified exemptions
- If you are interested in the spreadsheet, please contact Lori, Sean or Amanda. They are looking forward to receiving spreadsheet feedback.
 Sean McCormick: Sean.McCormick@health.ri.gov
- **Q**: What if farmers have 2 or 1 year of sales
- A: There are alternate spreadsheets available for 1 or 2 year farmers. They can't use the 3 year spreadsheet, as it would avg. incorrectly.

National Young Farmers Coalition – Cara Fraver

- Young farmers fighting for the future of agriculture. Tackling barriers young farmers face through policy change, local chapters and business services
- Local food safety collaborative: provides outreach, education and training to small and local producers and processors on the PS and PC rules of FSMA.
- Provide PSA trainings (21) around the US (560 growers)
- Designed guidebook on HOW to make food safer on-farm and what to know about PSR- drafts available, expect to be released in early 2019
- Short videos to encourage small scaled growers to attend trainings, working to demystify on-farm food safety



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- Goals for 2019- case studies, informal versions of OFRRs, online food safety plan writing class, information videos, outreach at regional conferences
- **Q:** What is considered a "Young" farmer?
- A: 58.8 years or younger- national standard

Cornell Cooperative Extension- Artisan Dairy Food Safety Coaching – Barbara Williams

- Host/teach workshop intended for artisan cheese makers.
- Participants bring in their started food safety plans to review and work through with the coaching team.
- The course covers: GMPS, HA, PC and Recall Plan in a class format (NOT a PCQI certification course, but taught in a similar style)
- 2-day workshops (12-17 participants usually. Cap at 20 for 1 on 1 time)
- 2-4 coaches at each workshop (taught by PCQI lead trainers)
- National Food Safety Dairy Coalition websitehttp://www.dairyfoodsafetycoalition.com/
 - You can request a workshop in your area
- First Class: Cornell 2017
- Next class- Minneapolis- Mar. 21-22.
- Low fee of \$49/ workshop.
- **Q**: will you be at the cheese makers conference next week in PA (has since passed)
- A: tentative yes, she will email to confirm.

Penn State Extension- Bilingual PS Educational Programming for Hispanic/ Latino Fresh Produce Growers & Farmworkers in PA - Maria Gorgo-Gourovitch

- 2012 U.S Ag census: 21% growers of new Hispanic farmers in US, 24% growth of new Hispanic farmers in PA
- Spanish is the native language of 81% of farm workers. 66% said they could understand/read English.
- Produce Safety training must be given to 100% of employees handling produce or in contact with food-contact surfaces in a way easy for the trainee to understand.
- USDA NIFA grant objectives: GAPs education and training in Spanish, culturally appropriate outreach materials
- As of 2019: training needs and priorities of knowledge gaps were identified. Educational materials were developed and trainings are being held in Spanish. Certificates were given with documentation on what was covered in the course. Bilingual certificates were produced.
- As of Feb. 2019- 3 educators, 36 participants, 4 presentations



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- Mushrooms: Mar. 2018- 2 educators, 20 participants, 5 presentations
- Holistic horticulture: Apr. 2018- 3 Educators, 85 participants, 4 presentations, 2 field demonstrations.
- Latino outreach: Apr. 2018- 6 educators, 2 master gardeners, 30 participants, 4 presentations.
- Mid Atlantic Fruit & veg convention- Jan 2019- 8 educators, 32 participants, 16 undergrad students, 2 grad students
- Translation of Current Educational materials online- Penn State Extension Website
- Development of New bilingual produce safety curricula spiral bound books.
- Maria Gorgo-Gourovitch: <u>mag38@psu.edu</u>



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Produce Safety Meetings

1:00pm: Produce Safety Workgroup Meeting

Gretchen Wall - Cornell / Produce Safety Alliance

- Working to bring together people to talk about issues through soil and water summit
- Creating outcomes from meetings, water summit info published
- Fact sheet from water summit coming out that is more succinct
- With UC Davis did advanced trainer course, created more material to fill gaps from trainer knowledge
- PSA manual revised- version 1.1 and now have Spanish version that can come online
- International trainings
- New extension associate with bilingual resources hired
- Hosted 1,300 grower trainings
- 31,000 participants, 1/3 international
- 2,479 train the trainer, ¹/₄ international, 77 courses
- Trainings in all 50 states
- More trainers in west and south regions
- Two train the trainer courses offered in the northeast
- Need for train the trainer declining
- Quite a bit of turnover could need more trainers
- Locations where people could fly into
- Sign up for general list serve to get info on new resources available
- PSA online course being offered with interactive elements and an instructor in 2019
- Supporting trainers is a goal- make sure have resources and contacts
- Key pages translated into Spanish from website
- Fully Spanish lead trainer
- Publications on evaluations from courses
- Pursuing ongoing funding
- 3 ways to get info- general listserv, educators listserv, PSA trainers or lead trainers listserv
- Update contact info online
- Facebook, twitter, Instagram, YouTube, website
- Want region specific resources for online course for growers
- No current talk of future water summit
- Have cooperative agreement through 2022 with USDA, have funding through 2021



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- Budget would be 1.5 million for team
- PSA role in inspections- growers need technical support and time, advanced train the trainer to address more specific questions, rules not finished but can still make water safe, PSA can give help day in and day out because it is their main job
- Valuable to have PSA once inspections occur
- Trainings are just a small part if what PSA does
- Is there going to be redundancy with NECAFS, PSA, etc.
- Things will become regionally different, commodity differences- helpful that PSA team is spread out
- May need to monitor regionally only and use research to back it up
- Translate research to how it impacts farms

Dominique Giroux – VT Agency of Ag, Food and Markets

- Assess On Farm Readiness Reviews (OFRR)
- OFRR northeast collaboration
- Determined group guidelines, and reported 11 northeast states on calls
- Each month two to three states shared their on farm readiness reviews
- Second half discussion topics on call
- Fact sheet to get ready for OFRR, cleaning and sanitizing record, booklets
- Identified best practices on farm- wash lines, employee safety, restrooms
- Areas for improvement- cleaning vs sanitizing, bird management, enclosed buildings
- Expanding beyond OFRR
- Want increased participation and engagement
- Specific topic prompts for people to share
- Identifying areas where resources are missing
- Inspection program approach could be beneficial moving forward
- Recordings and resources can be found online
- OFRR will continue into next year, but will go down a little because some groups will be doing inspections now, mixed depending on state

Betsy Bihn - Cornell / Produce Safety Alliance

- OFRR survey results
- 429 surveys completed
- A lot of the farms are 1 to 9 acres in the northeast that did survey
- Northeast lines up with national
- Small farms are bringing in a lot of money with specialty crops
- Priorities on improvement in northeast- #1- postharvest sanitation



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- Postharvest sanitation- need help with recordkeeping, maintenance of buildings, pest control, proper sanitizer
- Growers have questions on what a washable surface is, how to improve drainage- which is best
- Worker hygiene can be more easily addressed
- Covered and non-covered produce difficult to differentiate
- Inadequate frequency unclear for growers
- 34% meet minimum standards, 53% minor, 13% major- had lined up originally, then realized that actual inspections would not have passed everyone
- Needs for assistance is more time, technical assistance, none, facility upgrade, significant money
- Answer survey differently, not all info is represented, some states don't use surveys

Gretchen Wall (Cornell / PSA) and Tucker Diego (VT Ag Food an Markets)

- Share best practices of regulatory and educational
- Ways to improve OFRR
- Identify what questions need to be answered about inspection process
- As a regulator, very important to educate while the regulation is going on
- Need a strong knowledge of PSR before doing an inspection
- One person from state, one from extension for every OFRR
- Lead for OFRR is the person with most PSR knowledge, usually a regulator
- Regulator will explain PSR
- Extension brings own background
- A lot of trainings for team members, did not have lead, but shared responsibilities
- Tell difference between FSMA and GAP audits to growers
- Vermont goes as team for OFRR
- Opportunity for case management and start relationship with farm
- Connecticut deciding to get away from OFRR as state is preparing for inspections
- Rhode island will also use inspection guidelines more instead and additional technical assistance
- Valuable for inspectors to be on farm and figure out questions may have once inspection actually occurs
- How to provide technical resources to farmers once you leave- in new Hampshire don't take any notes but just tell growers to send email and they do



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- Do not understand why can't take notes back with them without making dialogue
- If FOI-able, don't want to take back knowledge from OFRR that may throw off buyers
- OFRR curriculum is recommendations, PSA grower training cannot be deviated from
- OFRR is all a state decision and can be researched within state
- Did not want to identify farms that volunteered for OFRR because meant were probably under rule and didn't want list of that
- Didn't want it to say that certain farms were out of compliance with federal rule
- FSMA came about because some thought they were having a government business that was not what was expected so they don't want to be put onto a list
- Can be creative to implement in best way
- Regulators and extension know farmers work with and need to reach out to others that don't
- Can take notes and leave with the farmer
- Can ask the farmer what they would be most comfortable with
- Resource needs- will growers be able to see inspection checklist
- FDA and NASDA are creating observation form with states being able to modify, with a cover sheet, attachments- forms not yet completed
- Sheets are recommended framework but states can modify



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3:00pm: Produce Safety Workgroup- Regulatory Focus

Filtered farm inventory data sets:

- Purpose to give overview of how data sets filtered and created
- Recommendations for filtered data set
- Set up account to get data sets
- List of farms with farm data inc data
- Huge file tough to use so have filtered through
- Two data sets- all and filtered
- Filtered should be more usable
- Created filtered subset of data to determine commodities would be covered
- 51 of 85 are covered
- Based off of rarely consumed raw list
- Filtered off of produce sales also, use greater than 1million produce sales
- Can filter data on your own
- Data seems accurate and focuses on active produce farms
- Dunn and Bradstreet (D and B) data can be used to create farm inventory
- D and B can be used for cross checking farms, verifying
- Sales data not totally accurate
- Gathering data from public data bases and contacting businesses via email or phone
- Filter data given end of December
- Account will be decommissioned soon, delayed after shutdown
- Will get a new web portal
- Tucker from Vermont filtered original data set and handpicked commodities, new jersey also filtered by hand
- Once Vermont filtered had 700 farm, before had thousands
- Had a lot of useless data before filter
- USDA pays for data like a subscription for access, want to make sure is being used

Discussion items:

1. Abbey Willard from VT

- Vermont team thinking of OFRR- would it be valuable to gather what is being seen on farms after inspections
- To achieve consistency across country
- What surprised to see or what are seeing in compliance
- What resources need to develop, what assistance is needed

Maine department of agriculture



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- Wondering how many phone calls cover same info
- If talking about same things, should not replicate topics on calls
- Can have calls one time
- Can share info with other groups if more regional

Tucker Vermont

- Don't have a good way to keep track of trends or observations from inspections
- Have mechanism for OFRR so should consider for inspections
- There are workgroups to aggregate inspectional data

Aaron NY

• Put educators and regulators on the same page

Rhode Island

• Difference between data and opinion to collect for data from inspections

Aaron NY

- What data should be shared?
- Defined by what data want to keep track of

Vermont

- Following inspection, need to provide support to growers and see where there are challenges and develop resources on, tell extension
- Can also share as a region
- If the end goal is compliance, states and trends will help where need to fill in resources

Does a state have a way to aggregate data?

- Rhode Island- constantly filter their data and enter into excel so can constantly update what they need to do. Use excel with filters. Transcribe into map form now, categorize into topics
- Aaron NY- added new spreadsheet with filters that is saved to FDA version, may start mapping
- Rhode island- mapping good management tools, can filter who need to contact for concerns

Are chain stores willing to help with farm inventory?

• Would have to be checked

Insurance companies as farm data?



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- Might not work out as well
- No other states use

2. Qualified exemptions

- Have you come across farms that don't want to claim exemption?
- RI- some farms want to be qualified and covered since doing it anyway, no big deal for record keeping
- NY- take word for how much they say they are making to be covered or not
- Use calculator to see if people are exempt
- Conn.- register farms with self- identification, inspect anyone who requests it even if not covered
- Maine- also making calculator, fact sheet, link radius with calculator. Would only inspect for minimum of rule if non-compliant requested inspection
- Conn- would want inspection because then buyers may request it. Fear of smaller growers being outed by larger ones that are inspected. Some sellers won't let sell unless inspected
- RI- if federal minimum standards required then should be for all food- what buyers ask. People don't want to be squeezed out if not inspected
- NY- all buyer driven to do this. NY would inspect every two years for suppliers so buyers like it. Farm would have to ask for inspection. Farms eligible for exemption must maintain that they are yearly
- Vermont- based on forms for exemptions, not meant to have market access outcome from inspections. Develop strategy to reach out to buyers
- NY- all stakeholders should be in line with what inspections are
- MA- support uncovered crops if they ask for an inspection
- Conn- if someone asks for inspection it must be given
- Vermont- can condemn adulterated product doesn't matter what it is
- Doreen- cap pays for covered funding, if doing something outside of that, then must tell her
- MA- same infrastructure for covered and uncovered so inspect commons areas
- Conn- do have authority to find a problem reported?
- Vermont- can enter farm if has adulterated even if uncovered- pre PSR, or farms would call and ask, still resides at secrecy level

3. What records will states use for exemptions?

- NY- PSA template would be submitted by owner of farm. If they don't get a qualified exempt form then assume the farm is covered. Must submit the form annually
- Vermont- requirement is for farm to do assessment once a year and keep but don't have to submit it



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- RI- annual review, you are covered unless you say you aren't
- Conn- documents go with registration, have to maintain documents, but don't have to email them to them
- MA- collect info when registering farm, get sales info
- WV- take word in maintaining records, but don't send to them
- Delaware- registration, self- report, if there is a problem would recognize it
- Maine- use what they want as forms that must be submitted annually

4. FDA survey for readiness

- NY- verified 375 farms, 80 large farms, short of goal
- Vermont- exceeded estimation, verified 18 farms
- RI- estimate 310 farms, think is underreported, 1/3 verified, 10 large covered farms
- Maine- supposed to have 2200 produce farms and 500 covered, 14% of farms info have
- Delaware- 150 covered farms, may have more or less, do not have a lot of info on
- Maryland- use gap audits to get list
- Conn- trying to take multi-faceted approach
- NY- regulatory authority store, adopted by reference most subparts of the rule, some did not because thought would be FDA
- Conn- have state law with legislation, perform inspections based off of state law
- Vermont- authority to enforce PSR, citation fixes and more details that legislatures wanted, don't go into details about regulation, just authority for PSR
- MA- statutory authority on supplemental budget, writing before inspections start
- NJ- FDA authority
- NY- wasn't part of deliverables, 150 large farms, goal is to inspect all large farms
- Maine- 30 large farms, will inspect all of them
- Vermont- 18 large farms will inspect all
- NJ- 1300 covered farms, plan to do 35 inspections or more
- Delaware- still identifying farms, probably around 10
- Maryland- 40 inspections of large farms
- Conn- 10 verified large farms, 30 to 50 in Conn
- MA- 53 large covered farms, inspect all
- RI- 10 large covered, will inspect all of them
- NY- has hired all of safety inspectors- have five



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- Vermont- 2 inspectors hired, maybe a third
- New Hampshire- 2 inspectors
- NJ- 3 inspector, 2 in training
- CA- 5 inspectors
- Ohio- 24 inspectors
- Conn- 3 inspectors with at least 1 more
- MA- 5 inspectors
- Delaware- 1 inspector
- Maryland- 5 inspectors
- RI- 2 inspectors
- Maine- 4 inspectors
- Regulators should attend webinar update
- MA- inspector training, PCQI, harmonized gap, sprouts, audited 20 farms a piece
- NJ- iso training
- Maine- plumbing backflow protection for growers

5. How to adopt enforcement

- Conn- took from other enforcement revisions
- MA- same as Conn
- NY- compliance and food safety divisions, letters and monetary, does not have produce safety specific needs



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Day 1, Tuesday, Feb. 5th, 2019

3:00pm: Produce Safety Workgroup – Educational Focus

Elizabeth Newbold - UVM / NECAFS

- NECAFS clearinghouse resource overview
- Username and password is required to post and modify resources on NECAFS. Shift in resource ownership is now available.
- Searches can be done by keyword. Keyword searches with no results will soon be documented so it is aware that there is no current posting on that topic.
- There is a tally tracking the amount of resources (people, project, publications and videos) posted on Clearinghouse
- Option to opt in "automatic email" and will be notified by email whenever a resource is being added. However, you can also opt into "weekly, or monthly" email updates.
- An excel sheet can be generated including: post title, author, type of resource, topic, state and summary of each resource posted.
- Newsletters will be more frequent to let users know of new resources and resources that are lacking.
- Even if you feel your resource may not be completely relevant, there is a chance it can help your peers. Feel free to send any and all resources to Elizabeth for review if you are unsure about posting it.
- Q: can notifications be filtered by subject or topic of the postings?
- A: good question, we will look into it. We're not sure.
- Q: Can you filter by Spanish listings?
- A: if you use "Spanish" as the key word, it will provide all resources listed that have the word "Spanish" in the description or title. (if you are posting a resource that is in Spanish, be sure you include the word "Spanish" in the title or description. Good practice in general, include keywords and even multiple spellings of keywords. E.g. "hand washing", "handwashing", "hand-washing", "washing hands")
- Feel free to post the same resource in multiple languages!
- We (very briefly) reviewed how a resource was added!
- Descriptions should be as specific and in-depth as possible to allow for keyword searches to be inclusive for a maximum amount of resources.
- Q: are you concerned about links going dead?
- A: there is a "bot" that checks for when links go inactive. Elizabeth receives a notification and reaches out to the poster of the resource. If you have posted a resource and are aware the link or main website domain is going to change,



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you have the ability to go into the post and update the link. It is your responsibility as a poster to do so.

- Q: What if we find a resource that is not ours and we think they should be posted?
- A: Please upload any and all resources that are found. To be approved as a poster, you're seen as a reliable source and we trust that the information you post is credible. If you're aware of the source, please cite them or ask them to post it if you know who the author is.

Andy Chamberlin – UVM Extension Ag Engineering

UVM Factsheets Available:

- Practical Resources for Improving Produce Safety
- Packing Sheds & produce safety- lots of risk factors post-harvest. Final steps before consumer. Often an improvement area on the farm.
- PSR: equipment and tools. 112.123(d)- maintain and cleaning food contact surfaces. 112.123(a) Tools that are adequate design, construction and workmanship to enable them to be cleaned and properly maintained. 112.123(c) seams on food contact surfaces must be smoothly bonded or maintained to minimize buildup.
- Hygienic design workshop:
 - Accessibility- if you can't see/reach it, you can't clean it
 - smooth and cleanable surfaces- surfaced should be smooth and enable thoroughly cleaning
 - no collection points- niches, sandwich joints, lap joints, and flat or concave horizontal surfaces should be avoided to prevent collection of water or material
 - compatible materials- with the product being handled on that surface& the cleaning and sanitation process
 - Preventing contamination- systems and building should prevent the product from further contamination.
- Flow of water- plumbing, hose hangers, trolleys, multiple drains for hoses
- Insulation- foam boards, rock wool or mineral wool, spray foam, generally try to about cellulose or fiberglass in high moisture environments.
- CoolBots- low cost, easy to retrofit into existing space, efficiency beneficial, build your own box. CONS- slow to pull down temp, slow to recover from rises in temp, can't freeze.
- Fact sheet available for harvest containers- things to consider: venting, durability, clean-ability, light-blocking, UV resistant, what's going in the box? Closed or open?
- Wash sinks, tanks, tubs and basins. What's recommended? Is it cleanable?



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- Hoses- cheaper than a spray nozzle, a little less durable.
- Smooth and cleanable materials overview and pricing.
- Rodent and pest control. Removing food, limit access through construction and corner blockage.
- Precooling- for prolonging crop viability.
- Brush washers- How do we clean?? Replacing the brushes? Replacing the machine? There are ways to clean it!! But it takes time and nobody wants to do it!
- Rinse conveyor- washing bunched crops. Very high flexibilty for produce washing with this machine. Washing bins! These machines are also customizable. Stainless. ~\$7,000. The machine recirculates water. PSR 112.48 requires the water to be managed as necessary. Must monitor and maintain water temp. (to avoid infiltration) Volume ~150 gallons.
- Discussion: no farmer can use it as just \$7,000. Necessary upgrades are going to be required by farmers for on-far usage including conveyors and pre-wash soak tanks. *noted to not be a 1 person wash team. 2-3 ppl required for proper usage*
- User reviews of the rinse conveyor are online. As well as resource videos
- Spinners- small scale to full-scale spinners info available. Appropriate usage and management covered.
- Case studies from UVM follow (also on Clearinghouse):
 - Mighty Food Farm: special use building (VT) for wash and pack, CSA room. Only 1 operator. Stainless sinks, deep tanks for bulky greens, grindstone barrel washer. (Cleaned, maintained, allowed to dry. SOP available)
 - Footprint Farm: triple dunk, spin, pack system. Converted washing machine used. 10x14 cooler powered by CoolBot.
 - Last Resort Farm- Dairy Barn renovated to produce washing. Bright, cleanable, surface material treatment and proper drainage. Trusscore-type of PVC material used. Humidity control in barn, custom cooler, humidity and temp highly controlled.
 - Root 5 Farm- cleanable & drainable. (Fact sheet in the works) versatile outdoor space. Organized, consistent with a high volume of easy to clean bins. Bins clean Methods: up dirty, down clean. Many new renovations in the works.
- Post-Harvest case studies also available online.
- Resources on the way!: Drains, Brush Washers, Drum Washers, Greens Bubblers, Spray Tables, Doors, Materials for smooth surface easy to clean, insulation.



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- **TAKEAWAY**: UVM Extension Ag Eng blog (<u>http://go.uvm.edu/ageng</u>) has MANY resources available for post-harvest cleaning and sanitation practices. Also on the NECAFS Clearinghouse (<u>http://go.uvm.edu/clearinghouse</u>)
- The questions below are suggestions for upcoming resources
- **Q**: farmer aren't fond of the public being aware of the high water usage. It would be interesting to see science based alternatives to the high volume of water being used. Most wash houses are facing issues with sediment build-up in drainage systems. Are there new designs that could prevent this?
- A: There are definitely drain systems designed for sediment handling. 12" wide trench drains with a removable standpipe outlet allow for cleaning out sediment.
- **Q**: comparing cleaning and sanitation for areas underneath equipment vs. high contact surfaces would be interesting.
- **Q**: there is concern for people who do not understand composting toilets.
- A: Hans- I spent hours on this in VT. There are plenty of farms who legally have composting toilets. 1. Spend a lot of money w a septic engineer and ensure the toilet is safely away from all product. 2. A 50-gallon drum can be placed in the ground and properly disposed in a landfill when appropriate. A hand washing station is also required. Contact Hans for more info on composting toilets

Gretchen Wall

- Produce Safety Alliance Educational Resources
- Highlighting NEW resources in hopes for feedback from the crowd
- PSA resources: the difficult task of finding them! Go to "resources" tab from home page of PSA website.
- "Trainer resources" or "general resources" page. They are separated due to resources more appropriate for educators (trainers) some resources are cross-listed. More in-depth resources are listed in trainer resources.
- Feedback received: online resources to practice material learned during produce safety & grower training.
- 3 most frequently used: Exemptions and Exclusions PPT, Compliance Timeline Chart (printable), Produce Safety BINGO!
- Module 2: Required Record for the FSMA PSR. Editable templates, 7 total records included. Hand washing video included (English and Spanish)
- Feel free to reach out to PSA if you have video development ideas that you would like to see as a resource
- Module 3&4: Fecal Contamination "poop pillow" activity. Not available for public use, but if you would like access to this activity, please feel free to email PSA and they are happy to share it with you. (consider your audience)



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- Module 5.1: resources on agricultural water. People are not updating growers on proposed extension for compliance and expansion of test methods!! It is absolutely critical, if you are hosting a grower training, to update your participants and students on all Ag water regulations.
- 5.1: coliform supplemental activity, webinar: How to Create a Water Lab Map for Farms in Your Area.
- 5.2: Post-Harvest water module. Post-Harvest Sanitizer Tool, fact sheet and excel tool included.
- Module 6: Name that Zone Activity- supplemental activity. Includes photos, ppt and teaching notes.
- Module 7- Farm food Plan writing Resources. Including previous related projects, (SOPs, template plans), being developed now: Farm Food Safety Plan Template incorporating USDA harmonized, GHP/GAP and PSR standards.
- Resources are available in Spanish! They have made great progress and continue to update resources.
- New policy: if your organization wishes to translate these resources to another language, be sure to keep in contact with the PSA as they require and overview and approval to ensure the resources are up to PSA standards.
- #1 email to the PSA: "where can I get updated resources for teaching PSA" PSA is on version 1.1 for curriculum. Contact PSA for link.
- To update your contact info: <u>www.producesafetyalliance.cornell.edu/training/directory/</u> then select "update my entry"
- What would you like to see the PSA develop?
 - Worker training video? --- USDA FSOP developing. Hopefully to be out summer/fall. Old worker training video works, but does not include EVERYTHING that FSMA requires. This resource will likely be split into 2 videos to improve engagement.
 - People have asked for paper materials to incorporate specific information such as: bathroom location and farm layout. It would be helpful to have a format for the growers to fill out and provide their workers for farm specific information.
- Pre and Post testing "scannable" so it is easier to interpret.
- How do you connect growers to their local experts? Is there a better way than the PSA local directory?
- Has there been progress on fish emulsion research?
 - One thing being worked on, came up a lot in Texas compost meeting.
 PSA has been trying to collect final opinions from FDA for publication.



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Consolidating the information while highlighting all important material is currently being worked on.

- Hydroponic operations, aquaponic operations and some greenhouse (not soil) resources are hard to find. How does standard and water testing supply in these situations? I've found that growers think because they are growing inside, they are at a reduced risk.
- NECAFS clearinghouse: Aquaponic resources are working to be found & updated. The Western Center is working on FSOP in final stages focusing on the development of resources dealing specifically w hydroponics and aquaponics.
- Comparison PSA and FSMA document.
 - Kansas state and university of Utah working on this and have resources. USDA will also have a table at poster session on this
- Are there any more advanced trainer workshops? It sounded awesome but it was so expensive!
 - Looking at advanced training collaboration with Southern center. Hopefully this can reduce costs
- On the PSA website maybe trainers can ask for "training of the trainer" workshops

Betsy Bihn

- NECAFS is here today to collectively think about what to do and where to go next. Moving objectives forward! What does this group want to do or organize collectively? Maybe a webinar? Working together in a lacking area?
 - Water Testing Labs! If each state chose 1-2 people to facilitate water testing labs outlines for an accessible resource to growers.
 - We can all agree ag. water must be safe. There is a large group of growers who have never tested ag. water.. Maybe we can implement 5 simple steps to easing into safe ag. water practices. Let's see if these practices are reasonable and useful for when it is law. (Module 5.1 talks about this including water testing lab map). We see labs giving growers wrong test results!! This is a problem! Water testing can be done 1-2x per year and it would still be great strives in safe ag water.
- How often should harvest bins be cleaned and sanitized?
 - It seems like farmers are unaware of this.
 - "As needed" is loosely defined.
 - With 600 harvest bins, growers are unable to routinely clean all of their bins.
 - A guideline for this would be great.
 - WHAT IS "as needed"
- Primer course of workshop for QE growers 3-4 years out from compliance.



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- What can these growers do now to prepare for this compliance so the transition is smooth?
- We can maybe develop SOPs for this.
- Has anyone looked at the differences in ag water compliance issues between Small, medium and large farms? How does this affect their economy?
 - There is some data on economist's desk waiting to be processed on food safety implementation.
- Actual risk assessment for different fruits. We should be able to sort risk assessments to avoid "apple growers" taking useless precautions due to "leafy green growers" needing to control that risk.
- "As appropriate" won't ever really be answered by the FDA.
- What do we tell farmers in terms of "dropped" definition
 - State adoption of PSR is responsible for defining "dropped" This is a HUGE problem! States define this term differently. We should get a universal definition for this term.
- Sooner than later- coming together to discuss draft guidance comments as a group prior to submission of comments
- Can we as a group
 - 1. Collect things begging for research answer OR
 - 2. Have a conversation with FDA to point out gray area and ask for clarity.
- If we can define those critical points, wouldn't it be useful to gather these questions and demand answers from the FDA before new regulations are put out.



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Day 1, Tuesday, Feb. 5th, 2019

Preventive Controls Meetings

1:00pm: Preventive Controls Workgroup Meeting

National Preventive Controls Updates

Donna Schaffner

- Food Innovation Center 2017-2018 -> ran more classes, but had less participants. The companies are requesting smaller trainings specifically at their facilities for their employees.
- HACCP trainings -> numbers are decreasing, however there is indication that this training will continue going forward as it is still needed due to 3rd party audit requirements.
- 2017 HACCP: 7 courses, 101 participants. 2018 HACCP: 4 courses, 47 participants.
- 2019 expectations: # of hybrid classes will increase. Not necessarily a certification course, but training for personnel to understand the regulations and compliance.
- Processors most commonly ask "What is the difference between PCHF and HACCP? "
- 2017 -> 2018 IFPTI numbers: PCHF courses 26% decrease. Animal food 41% decrease. FSVP courses 31% decrease. Customized trainings for medium-small companies 14% decrease.
- "Consultant-type" help needed. DFS team does NOT "write" plans, however works with companies to "critique" their plans.
- Clientele for Food Innovation Center includes international businesses trying to bring product into the US. These businesses do not require a HACCP plan per say, however they must be in compliance with regulations.
- Covered an overview for "course name" and "who needs to attend" for GMP courses, HACCP courses, GAPs, PS, PCQIs, IA.
- **Q**: Would there ever be a possibility to eliminate the need for HACCP certification if they have taken PCQI? or combine the 2?
- A: from a regulatory standpoint, taking one does NOT cover the material in the other course. This is due to the specifics covered in Juice and Seafood HACCP for example. This is a common misunderstanding.
- **Group Discussion:** Buyers should be made more aware of the regulatory standards and differences in these plans... How can we effectively communicate with these buyers? we are unsure.
- **Difference B/w HACCP and PC:** Being covered in podcast next week. "The Small-Holder Food Business Development Institute Podcast" Thursdays at 5.



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- **Q**: are the courses held 2.5 or 3 day online? Why do you think there is a consistent decrease in attendance for the trainings?
- A: all courses are held in person over 2.5-3 days. There could be a decrease in course attendance due to getting "over the hump". A lot of companies jump on board early with certification regulatory compliance. Other companies wait until they are "threatened" shut-down to become trained.
- **Q**: is there any course we can work on for small producers for "steppingstones" for them to take to prepare themselves for when they are required to have a FSP?
- A: GMPS! Small-processors can ease into PC by becoming familiar with food safety regulation involved in GMPs. These small-processors also do not want to hear about the PC regulations until their required to comply.

Angela Shaw

- North Central Regional Center
- Deals with small and large producers. Some producers deal w 1-2 million dollars, however they have ~5 employees. Therefore, they are supplying massive amounts of processed foods.
- Online document "checklist" including PCHF and PCAF, GMPs, supply chain incorporated into document. What are the rules saying? Hints to being in compliance. Helpful for when these companies are working through their FSPs.
- **Q**: have you been marking your success rates for businesses that have used the checklist vs. not,
- A: there have been 5,000 downloads of this list, however there is not data on whether this document is used, or who is using it. There is no tracking involved.
- Document can be found on NCRFSMA.org and on the NECAFS Clearinghouse

Renee Schneider

- Southern Regional Center
- Original proposal included added "add-ons" (things that can help growers/ processors implementing PSR or PCR in a deeper way than in class)
- The time was focused on a beginners guide (currently available), advanced guide (still being developed), compliance guide (being developed), tool for developing Food Safety Plans (being developed)
- Beginner's guide- smaller processors who are starting from scratch with HACCP and FSMA, covers the major components of what goes into thinking about food safety in an effective way. Thinking through product development, processing, sanitation and WHERE TO START.



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• Spent a lot of time developing teaching modules. For example packaging methods and materials.

Amanda Kinchla

- UMass Extension
- FSOP Grant awarded partnered with URI
- Issues: shared-use facilities challenged with regulation and food safety compliance.
- Mission: provide a focused educational delivery of customized training to food entrepreneurs to understand critical food safety considerations
- Idea to be more proactive by making new processors aware of food safety and regulation from the start, rather than after their product is "ready"
- Approach: conduct a needs assessment, develop a curriculum and online training tools, pilot test and evaluate, implement a sustainable food safety training program targeted specific to small/ new processors.
- These processors may not necessarily need to be in immediate compliance with PC, however it is beneficial for them to be aware of these regulations before they are required to follow them.
- PLEASE HELP!! Encourage small emerging food businesses to complete our survey by Feb. 28th
- For ever participant there is a raffle for an amazon gift card
- Q: are you looking for processor or for client? Is there an online option?
- A: Client. If you have 10 processors, please take 10 surveys. ANY entrepreneur. There is an electronic version available!!
- Contact Nicole Richard from URI or Amanda Kinchla from UMass

Luke LaBorde

- Penn States Good Manufacturing Practice Course
- Food Safety and Sanitation for Food Manufacturers- Online Course
 - 1. The Science of Safe Food
 - 2. Preventing contamination
 - 3. Sanitation Process
 - 4. Smart Design for Food Safety
 - o 5. Regulations and Hazard control Systems
- In comparison to Cornell online trainings: split into 5 sections. They are working to translate into Spanish as well.
- Course Handouts are included: for example proper soil identification and appropriate cleaners.
- Evaluations: online courses are 12 hours. 100% of participants were willing to take another online course.



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- On-campus vs. on-line evaluations presented the same % for course ratings, "learned-something" & "likely to use on job"
- Online course takes about 12 hours of work, however you are given up to 1 year to complete the training.
- Q: what does it cost?
- A: Live course up to \$800/person. Online \$419/person
- Q: is there a mini-course version for on-field workers instead of supervisors?
- A: We have done them in the past, specifically with the mushroom business. It was a day-long course in-person and was requested by the industry.

Day 1, Tuesday, Feb. 5th, 2019

3:00pm: Preventive Controls Workgroup Discussion

Last year, three areas of focus were identified- Evaluation, Awareness and Resources

Evaluation Sub-Group: Training to Implementation- Gap Analysis

- Issue: Standardized PCQI training curriculum
 - Does disservice to small/medium processors with less resources
 - What can we do to help them get more from the class?
 - Targeted knowledge
 - Targeted resources
- Audience
 - Indirect- Food Processors
 - Primarily less-experience, small/medium processors
 - May or may not need to fully comply with PCHF, but have some requirements
 - Direct- PCQI lead instructors
 - People who are making/distributing PCQI program evaluations
- Plan
 - Develop evaluation tools for:
 - Knowledge before and after
 - Which topics were most challenging
 - Issues with implementation of best practices
 - Demographics
 - $\circ \quad \text{Determine how to identify support}$
- Approach
 - Assess evaluation tool format
 - Develop evaluation to ID support needs of target processor audience before, during, and after PCQI training course



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- Determine best way to share and distribute within NECAFS
- o Promote tool usage
- (the idea is to have a cycle of reporting, ID'ing, and developing)
- Outputs
 - Evaluation tools
 - Preliminary
 - Post-training
 - Extended post-training (i.e. "one year later")
 - Communicate data to NECAFS
- Discussion
 - Q: will lead instructors actually use this tool? There are concerns with "dragging" info out of people
 - A: The goal is to balance using this tool with using a personal evaluation. If done right, it could help reduce efforts by instructors as a whole.
 - Q: what are the key metrics of this evaluation
 - A: currently being worked on this year
 - Q: What is the FSPCA evaluation like, what does the data look like?
 - A: has not been released
 - $\circ\quad$ Q: how can we get lead instructors on board?
 - A: Be considerate of the timing of when you give the survey, aim for it to be "quick" or "easy" questions, done at the end of the course
 - $\circ~$ Q: Do the North Central Region and Southern Region have evaluations, how do they do it?
 - A (NC): Most of the training is done by consultants, they go to Chicago to get lead trained. NC then deals with the technical assistance
 - $\circ~$ A (S): Follows FSPCA instructor evaluation, also does pre- and posttest to measure knowledge gained

Awareness Campaign: Tool Development and Dissemination

- Issue: All food facilities that manufacture, process, pack, or hold food are covered by at least part of PCHF
 - Smaller operations lack the time and resources to figure out how
 - How can we get them to "wake up" and learn more about PC
- Goal
 - Increase awareness of PCHF
- Audience
 - Primary
 - Food safety communicators- work directly with small and medium processors
 - Secondary



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- Small/medium food processing facilities
- Approach
 - $\circ~$ Small and very small processors are unaware of regulatory status under PCHF
 - To combat this, we must develop and disseminate focused/targeted messages on how the rule might affect them, which includes
 - Increased awareness
 - Places to look for resources
 - Incentives to take action- why they should care
- Plan
 - Contact food safety communicators, conduct awareness assessment
 - Develop useable and adaptable branded outreach awareness resources
 - Print, presentations, news articles
 - Not just NECAF branded, but also point of contact (i.e. cooperative extension program)
 - o Disseminate to food safety communicators, other NECAF stakeholders
 - Evaluate what materials were actually used
- Outputs
 - Awareness communication portfolio tool kit- NECAFS and local affiliation brand
 - NECAFS resource finder for NE region
 - If I do _____, I should contact _____
- Budget
 - o \$15k expenses
 - o **\$0** income
- Discussion
 - Q: is there any way to interface with small business development community?
 - $\circ~$ A: will be working on it/adding to it
 - Q: Have we figured out what is successful/what the motivators are?
 - A: Comes down to weather buyers ask for it, need to work on developing a "sales pitch". The goal is build partnerships with people who can influence motivation- buyers, shared-use facilities
 - Q: Are there parallel industries we could model for adoption practices?
 - A: Insurance companies, as an example, that sell something that they will hopefully never use (similar to worst case scenario with food safety plan/recall plan)
 - Comment: Clients wear ten hats, won't do it until it's mandatory. Many want to do it right, and feel they're (mostly) doing it right



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- Response: The goal isn't to go into PC compliance, just alert people that it exists. Hopefully state regulators in inspections can mention casually "you might want to do this"
- Issue: hard to quantify this problem for grant-work that want hard numbers
- Try to frame as a way to improve business operations
 - Through food safety plan, easier to grow, can ID challenge spots in operations
 - Improve product development

Resources: Roadmap to Resources

- Issue
 - Resources are spread across a variety of areas (academia, consultants, etc.)
 - Consolidation would help with implementation
 - Create framework for how to walk people through PC
- Audience
 - o Direct
 - Small processors affected by PCHF
 - May/may not need to comply
 - May/may not need to do training
 - o Indirect
 - Extension educators
- Plan
 - o Use roadmap
 - Catalog with categories (clearinghouse)
 - Electronically publish and distribute list
- Approach
 - Content online
 - Copy in categories from clearinghouse
 - Open to suggestions for other categories?
 - Possible product development
 - ID and pool resources
 - This should help to find knowledge gaps
 - Also a means of communicating what is currently being worked on
 - Review/finalize list of pooled resources
 - Design content layout
 - Pilot and evaluate
 - Rework based on feedback
 - o Final review



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- Publish/distribute
 - Extension
 - Others
- Timeline
 - o March 2019
 - Create content online
 - September 2019
 - ID/pool resources
 - December 2019
 - Finalize
 - o February 2020
 - Distribute



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Conference Notes

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Day 2, Wednesday, Feb. 6th, 2019

8:00am: Federal Updates

Stephen Hughes- FDA

- Goal is to Educator while and before we regulate
- Key terminology
 - Standard curriculum
 - Modified curricula- accommodations to suit audience
 - Equivalent curricula- training that is equivalent to standardized curriculum, but with a few different objectives
 - o Alternate curricula- FDA recognized equivalent curricula
 - Add to clearinghouse (added: <u>http://www.uvm.edu/extension/necafs/clearinghouse/resources/fd</u> <u>a-recognized-training-programs-and-materials-standardized-</u> <u>terminology</u>)
- Technical Assistance Network (TAN)
 - Answer questions about FSMA
 - Since 2017, about 300 questions
 - Most about coverage/qualified exemptions
- What is the Regulator TAN?
 - Resources available to FDA investigators and state inspectors. It is an appointment system and phone-based to obtain timely technical assistance. Discuss questions during appointment period. The FDA will take notes on the questions asked and will NOT include farm info (name, address, operator, etc.)
- Building institutional knowledge of the unique growing conditions, practices and compliance challenges
- Domestic on-farm readiness reviews
 - ONs offering On-Farm readiness reviews in certain states
 - Demonstration OFRR conducted in Puerto Rico and Kentucky, and well-received by industry.
- International on-farm readiness reviews
 - Why is the FDA doing this? FSMA section 305- expectation of international assistance
 - Limitations of OFRR- staff, funding, language barriers
 - Conduct a limited # of foreign university personnel in Latin America to offer OFRRs to farmers in their countries
 - Focusing on Latin America due to the high import of produce from these countries.
- Collaborating with stakeholders to prevent, detect and respond to foodborne outbreaks.



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Ken Peterson- USDA Harmonized Gap Program

- Late 2015 USDA and FDA formed a working group to review the on farm audit plans and PSR to identify similarities and differences. Gap harmonized standards was developed
- Early 2017 updated standard was published
- Jan 2018- launched updated harmonized gap audit plan
- FDA provided the USDA with a formal letter of acknowledgment in June 2018
- An audit will NEVER replace an FDA inspection but is a tool for growers to meet those requirements
- First government agency in the world to achieve technical equivalency
- "one stop shopping" for producers
- continuing to adopt harmonized gap standard- the FDA will be providing financial assistance for 16 states (mainly NE)

Jodi Williams - USDA NIFA Food Safety Outreach Program

- NIFA working in partner with FDA to help implement FSMA through trainings
- FSOP program outcomes- **Please report findings to your regional center**
 - New education, training materials, resources, delivery mechanisms, commodities or common FS issues, target audiences, best practices, # of education and training sessions, # of participants, etc.
- 2018- reestablished regional centers
 - University of Florida lead regional center to coordinate across US
 - 60 active multistate project
- 2019 Request For Applications- mid way through approval process. Gov't shutdown did slow it down, but not a lot. Expect a similar 2018 timeline, maybe earlier. This will not effect proposal application due dates.
- Current project director are NOT eligible to apply. You must get a PD who has not yet been awarded
- Matching will only be waived for projects within the first year

Discussion Panel

- Q: Regarding FSOP grant for 2019- if a PD is already awarded, can we apply for any different FSOP grants?
- A: As an already awarded PD from any time 2015-current, then you are unable to apply as a PD for any other FSOP grant
- Q: Is there a plan for collecting answers in regulator TAN to be summarized?
- A: yes, but there are challenges because a question can only apply to a specific circumstance, not a broad scope. That information is eventually



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made available, but the response is owned by the person who asked the question.

- Q: modified curriculum, is it possible to take the exact modified curriculum and split it up over multiple days or a month for example? Or does it have to be in 1 day?
- A: there is nothing is the rule or plan that prevents that. PSA curriculum was designed so as long as they receive all modules, it doesn't matter how long it takes to complete. It may even be better for learning outcomes to deliver the information over a period of time. If this is the case, be sure you can effectively keep track of everyone who is in the room to ensure each participant receives each module.
- Q: One of the major flaws of these trainings is a one time deal and the participants may have trouble retaining this information. Is there any way that we can develop an ongoing and continuous training?
- A: That may be a challenge, but we would have to consult the people in charge of guidance.
- Q: webinar for educators reviewing inspections it was recorded but we couldn't find it anywhere online
- A: we will get that information across and send the recording out ASAP. The recording is still being reviewed by the office of compliance.



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Day 2, Wednesday, Feb. 6th, 2019

9:00am: Buyer Workgroup Meeting

Discussion based on surveys and what we wish to tackle in this workgroup

- <u>Common survey response themes (below)</u>: In the northeast there are some states that have state specific audits, other states are moving in that direction...
- There's the question of "we have these audits, who's going to accept them and are they going to work?"
- On the other hand, buyers are adjusting to multiple audits, are these audits reliable? Do we have to comply with FSMA?
- Now, we have a mix of buyers and growers. Growers must know what they need to do to be present in the market place. This comes with a cost. Even if the audits themselves do not have a cost, there is still audit preparedness costs. This also does not include buyer expectation costs.
- The survey also brought up concerns of the expression: "what goes on at retail is an unknown quantity", how is the produce handled once it is in retail? What if grimy customers put their dirty hands on produce? How are retailers to digest that list?
- We also should explore service delivery issues with the audit and inspection programs, Mass is currently trying to review and modify this. With OFRRs this may be confusing for growers. We may be prancing around the issues to not upset farmers. There is a major difference in an inspection and an audit, and auditors cannot give recommendations so for a small state with limited options, it is illogical for growers to pay directly for market access. We could discuss this. → GOAL for later discussion and actions
- How do we fit farm and wholesale aggregators into this? Now it seems like we are ignoring them. (decided to discuss RAP aggregators)
- In the new world with PSR can we explore the possibility of buyer flexibility in comparison to state-by-state basis? Buyer perspective on **inspection VS audits.** What if inspections are needed annually? Is this feasible? Mass is currently inspecting all farms annually. About 80% of large farms are to be inspected annually.
- We should clarify what we anticipate the outcome of an inspection to look like. Do we have similar expectations? If not, what are our differences in opinion?

Discussion of State by State Inspection and Audits

• MD- Inspections are prioritized by large farms (1st tier) with the hope to hit as many as possible, after the inspections there is an observation document given, but there are no certificates awarded. With 40 first tier large farms, it



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is maybe possible to inspect all of them, we will see what happens. 5 inspectors.

- MA- 53 farms currently in the state audit program. This past season ~100 farms large → small were inspected. This season all large farms will be audited, and the plan is to also inspect each farm that are to be audited. Mass does not see consistency in buyers, with the exception of Wegmans. Market access certificates are given after inspections. Hoping to transition onto PSR inspections. 350 covered farms. 5 inspectors.
- NH- no present
- DE-~150 farms approx. 25 large. This year ~10 inspections will be done after prioritizing which farms. The farms will receive a certificate. They are absolutely NOT planning on inspecting all farms.
- NJ- very large list of farms that are being prioritized. There is over 100 large farms. Prioritizing is based on commodities and existing audits. They will leave all inspection materials, however no certificates will be given. The FDA tells NJ who to inspect (only state) FDA CREDENTIAL
- ME- no present
- NY- Rolls PSR into food inspection program. Growers are given notice of inspection, A, B, C letter grade for farms. An inspection certificate will be mailed to growers at a later date 1500 farms covered after 3 years. There is probably more with market access. It is impossible to reach these farms every year. 5 inspectors.
- VT- ~30 covered farms total as of today (likely to go up). 18 large farms will be inspected this year. There should be capacity to inspect all farms annually. Smaller farms in the state have participated in buyer requested inspections. Smaller farms that are not covered with buyer access may also receive inspections. Observation forms are given, but there is no scoring criteria or certificate. There are 2 inspectors
- CT-~20 farms with market access audit this year. Plans to register all farms. In the registration process, an initial inspection is required with documentation. In the following season, another inspection would be completed, granting registration and a market access certificate. This is plan is still being formulated, hoping to provide farms with annual inspections. Potential for 200-300 large farms. There are 3+ inspectors. (potential for 1-2 more)
- RI- Hopeful to inspect all farms annually. There aren't a lot ~10 large farms. Expectations for no more than 50 farms total. There will be an observation form after inspection. market access certificates are given by staff other than inspectors (probably a different inspection). Annual inspection program with hopes for 25-50 farms/year. 2 inspectors.



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• PA- no present

Buyer Challenges and Expectations

- Wegmans- Comes down to relationships so there is flexibility, with a changing landscape, states have different programs. Wegmans will try to adapt with each state's regulations and what is available. As long as there is confidence with what the states are doing, they are fine with what regulations are in place. However, they do request <u>annual audits (w documentation) and verification</u>. They reimburse for auditing to help manage food safety costs. Growers are provided annually with a list of all accepted forms of verification testing.
- Hannaford- definitely expecting some kind of <u>annual certification</u> to prove safe practices. There must be a passing, "safe to operate" certificate or documentation of some kind. Again, relationships with farms are very important so there is a wide variety of inspections and auditing accepted. There is a reimbursement process for food safety auditing. Growers are provided annually with a list of all accepted forms of verification testing.
- Q: are there different expectations for local or nationwide growers/ buyers?
- A: (Hannaford) 80% of local growers are directly to stores. Stores are provided with a list of approved local growers. It is maybe possible a farm is missed and local stores decide to buy from a non-listed grower. This grower must have an annual proof of safe practice as well, corporate will then take the necessary steps to get these farms to standard.
- A: (Wegmans) Very similar. Nobody is supplying produce without food safety passing documentation. If there is not annual documentation, that grower is immediately taken off the buyer list. There is no store level purchasing, everything is purchased at a corporate level. For local growers, 1st year is standard gap audit to allow for adaptation of practices. 2nd year is a harmonized gap audit or equivalent. There is a very specific list of produce permissible to be purchased from aggregators. If this is the case, the certifications from each farm must be obtained before any purchase.

Discussion on Audit Acceptability

- There are always issues. For example, recall and deathly outbreaks have been known to occur days after an audit with a 95 rating. 3rd party audit system is broken. There is conflict with regulatory framework
- It is frustrating to see large retailers that do not provide annual audits. This is unfair to farmers who maintain audit approval practices and stress about keeping their practices up to the high standards of retailers that require annual documentation.



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- States who use services with farms, there could be mistaken terminology with is what is in compliance. If growers are "in compliance" it could possibly place the low on the priority list for state inspection and auditing.
- We are in a unique phase with new resources & new schools of thought with inspection and audits. Produce is new to inspections and audits in comparison to the rest of the food industry. We have to ask ourselves, is produce different? If so, why? We must also be aware of outliers in the trends of state regulations for on farm audits and inspects.

Discussion on "What would make our food safer?"

- We know audits (cantaloupe outbreak) do not always work
- Grower perspective: the reason there are audits and inspections are to consistently raise the bar. However, accidents happen! Minimizing risk does not mean NO risk. Basically there is a zero tolerance game. If there is one mistake, people could die. In that sense, why is the grower still liable for the produce once it leaves their care/ enters retail? How have these regulations changed over time?
- Audits and inspections are simply confirmation in snapshots of time. It is not day-in-day-out. We need a way to confirm ongoing food safe practices. There is also no way to confirm that an audit or inspected did actually prevent an outbreak. Improvements through the relationship occur between grower, buyer, and state regulations. If the farms are consistently improving and being inspected, there is constant growth in their food safe efforts.
- The growers will ask "why do I have to do this when I haven't in the past and nothing bad happened" Perhaps as an effort to ensure ongoing food safety practices, raising knowledge and awareness of growers in food safety and potential hazards could be beneficial. If they knew the specifics of the potential risks, they may be more willing/ adamant about food safety practices. We cannot confirm they are handling produce properly other than the one day of inspection or auditing.
- With regard to other food and produce, education and knowledge will in fact make things safer. Auditing stores is not enough. Outreach can provide buyers and growers on the recent problems in the last 1, 2, 5 or 10 years. This information can signal what to look for and how to prevent potential issues. This a is great resource for the consistent improvement of practices.
- Worker comp rates and insurance costs are through the roof, and it made growers and businesses pay much more attention to safety due to the high cost associated with this. Now, consumers are pushing for safe food, so citations being public knowledge would urge farmers to avoid citations and outbreaks at all cost from a PR and cost standpoint.



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- PSA training: workers are frontlines of defense. How can we ensure line workers are being well informed on practices, regulations and hygiene?
- Getting better regional labeling on crops and agriculture products maybe help the burden of produce outbreaks. TRACEABILITY
- Perhaps more outbreaks can signal outbreak investigations, allowing for more data. More data leads to preventive actions that going forward will be for the greater good. Obviously, nobody ants more foodborne outbreaks. However, we must keep a positive attitude when addressing foodborne outbreaks.
- Lori feels we are just now getting to the realization that we had with every other food group (seafood, PC), the facts made today remind Lori of back when people said "this will go away" about HACCP and PC. So it is reassuring that one-day, PSA will be well understood and well implemented. The resources and record keeping are on the trend to improve and provide insight on what to do next.
- It is reassuring to see the strong network for education and regulation between regulators and growers. The back end of this is being able to follow up with strong technical assistance with a strong resource of solutions for growers.

Discussion of inspections vs audits: can we come to a consensus?

- Some people see this as bad because it is new, the rest of the industry does both inspections and audits
- In another sense, others want to see inspections and audits joint to ensure all farms are able to get an annual review. There isn't enough resources to do both for each.
- There are some states that want to cover inspections and auditing independently, so we are in a stage of evolution when it comes to determining regulation and requirements.
- Other states/ regulators & growers want regulation and auditing to be national?
- Evolution of inspections may happen, what do we think it is going to look like? Regardless of regulation, we see growers still growing, buyers still buying and consumers still consuming! Most people are not being sick, regardless of this new way of thinking, growers still need to be in retail locations!
- Do we need to do things differently?
- We believe eventually this is going to be fine! But we can't improve until we understand what we're doing and why.



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- There are auditing programs that are not scientific based, how does this effect liability in outbreaks? Everything regulatory is supposed to be science based, however yet it is not there. We have a joint optimism about getting to this point eventually.
- Liability in this sense is irrelevant because whoever has the most money and best lawyers WIN. The farmer is going to get tagged and go out of business and they will eventually be forced to liquidate.
- Q: How to buyers feel about produce food safety at a store level? How do you deal w high risk situations such as people touching?
- A: (H) All employees are required to take an annual training for their area of employment (ex. deli, produce, etc.). There is record keeping, and (ex.) if produce is sliced, that temperature is taken ~4 hours. There are hand-washing expectations and storage conditions expectations. There are food safety practices in place with SOPs in high-risk areas, such as produce. There are signs present to ask patrons to refrain from touching and eating products. There is a constant challenge with service animals and other challenges such as that.
- (w) there are inspectors as well as food safety coordinators employed full time. The food safety issues are also always on their radar. Wegmans is constantly watching customers from surveillance to avoid adulteration. Dealing with the public always introduces more risks, and we are as vigilant as possible for being the first line of defense.

Discussion on how to transition discussion points into executable next steps

- What did we learn that is of value?
 - - Did not know the crazy state variations that exist in inspection and auditing regulation.
 - - Hearing new perspectives on known topics is always beneficial.
 - - We need to access more buyer opinions and try to get them to NECAFS. Buyer contact info is not public!
- Sometimes buyers are not made aware that there are issues in their supply. They are satisfied with their programs, and do not see the need for a constant changing regulations and standards.
- Lets try to outreach to more buyers! Buyers also recognize the hardships in building a buyer network.
- Why don't retailers have to take safety regulation trainings? Is the food code enough? Food safety is not always made a priority to these retailers because they pass an inspection and believe it's enough.
- There is a lack of knowledge in the PSR with retailers and how they have to comply.



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- NYC area has many small retailers who do not have the resource of ability to adapt to these regulations, and they rely HEAVILY on distributers to ensure safe food practices. These distributers should be made aware that they are holding responsibility for these food safety risks.
- Some buyers do not care about FSMA exemption, and want small farms to adapt to new regulations, regardless of size.
- In a company, we are focusing on the buyers, meanwhile regulatory compliance employees need to have more stress for knowledge and obtaining supplemental education to further their understanding of risks and safe practices.
- State legislations may not supplement costs when the money runs out. Stateby-state varies if practices will continue once money runs out.
- It was never expected that there would be revenue and resources to inspect all farms annually. About 20% was expected and those are the resources available.
- With the gov't shutdown, there was a concern from the public about the food supply regulation. Gov't or not, safe food is the only way to sustain our country. People will always eat, and if food is not always safe we will see major problems in our country. It's ridiculous to consider a stop in funding for safe food regulation after 5 years.

Group Discussion on "Action Items"

- Who is going to put together a new and updated "standard for food safety" perhaps annually
- Do we want to work on outreach to buyer networks?
 - Is there a way to put together a template and get these resources to the buyers? A half-day workshop? Reach out at a local level and connect buyers and growers.
- Make a working document for states to update with the regulations on inspection and auditing. Maybe 1-2 people from state will have editing access to this document. The document will be made public.
- Q:(H): we require annual certification or documentation of auditing. If they are not provided by state, how do we provide resources to these farms for 3rd party auditing services so we don't have to revoke market access from these growers?
 - $\circ~$ Reach out to PMA to see where they are at in this process! ^
- Would it be beneficial to share information about state auditing and inspection reports without identifying states?
 - Keeping this document up to date with a date each time it is updated, this will prevent farmers from following out of date regulations.



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Day 2, Wednesday, Feb. 6th, 2019

9:00am: Educational Approaches to Training Delivery

Introduction

- Adult education is difficult, how do you meet the needs of training participants?
- Outline
 - Material delivery- Hans
 - Logistics/interpersonal connections- Lisa
 - Compile

Material Delivery Strategy

- Can have plans in place when things go wrong during training- learn best practices
- Key is to provide safe learning environment, making sure they know what you know and tell a story about it, let learners experiment and work together, let them make choices about it
- Meet the growers where they are
- Is difficult because of time rush and not much time to have experimenting
- Always can try to learn experience in the room, and then link what is happening with what they are doing
- Have to find intrinsic motivation, energy when teaching, traction plan to keep people focused
- Don't be afraid to show interests or ignorance
- Show energy- but can be in many ways- be present in the room
- Use micro stories
- Ask questions that can connect personally
- Use pointed questions
- Surprise, mystery can give focus
- Interruption or pause
- Pause after asking a question

Logistics and Interpersonal Considerations

- Provide a safe learning environment to create trust with attendees
- Think about details ahead of time to be comfortable with material
- PSR like classroom portion and offer like hands on portions
- Training is just an overview and intro as a resource to these growers
- Create positive feelings in the rule and get away from negative
- Create trust by telling people what the program will be like
- Welcome questions
- Have resources to offer
- Creating a relationship with these people about food safety



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- Opportunity to create extension relationship with growers
- Keep it light but take it seriously
- All in it together, working together
- Share other things that are motivating, like offering grants
- Know resources to offer
- Think about appropriate venue given how many people you expect
- Include nametags that are clear so that can communicate with people
- Ask about chairs, food, setup
- Think about logistics ahead of time
- Watch webinars for how to deal with interpersonal things
- When talking about culture change between growers and food safety be sensitive, and respect culture
- Trainer team is important to think of
- Don't plan too much, have some flexibility
- Have cards lined up and then decide which you will play, pay attention to crowd
- UMaine has a guidebook for teachers

Breakout Groups- Tips and Tricks (Group 1)

- General best practices
 - Write down key takeaways post-training
 - Use grower examples and stories, build a baseline
 - \circ Share with other educators
 - Resource for this could be useful
 - Use a blended trainer team
 - Different backgrounds (academia, regulator, etc.)
 - Also build with different strengths/weakness
 - Try to build synergy
 - Communicate as team
 - Provide comfortable environment
 - Literally (chairs, setups) and figuratively (encourage questions and sharing)
 - Express interest in practice/livelihood
 - Try to relate
 - Stick to agenda and times
 - Be present
 - Stay around during breaks/lunch, often where you'll have best conversations
 - Gives chance for questions that were afraid to be asked in front of class



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Shows interest/connects

Breakout Groups- Tips and Tricks (Group 2)

- Reach out to underserved groups because there can be a language barrier
- Feel a lot more confident if know material well
- Be prepared on all slides
- Train the trainer have good resources that are available to trainers
- Hear a lot of people say they don't have time to make the changes because they have to keep up with daily work
- To break stigma, have people say every way they know how to say poop
- Ask how many people have had sold food to someone that was pregnant, older, healthy- to explain risks
- Sometimes people don't understand differences between bacteria that are pathogens or ones that are spoilage
- Can get people motivated about food safety
- Don't make assumptions about farmers- what they do, think, farm
- Have to go over principles that can be used on every farm
- One challenge is that extension educators cover so many areas
- Have done five day training in costa rica- allows people to say connected
- Work with key communicator growers because they will spread the word about food safety- make connection and make sure they are correct about it
- One day may not have as much interactive time
- Try to get food from local places that the growers like
- In Conn- two short days, keep info retention

Group Discussion by Module

- 1. Introduction
 - Keep it fresh, update it with incidents/examples/data
 - Give background, why is PSR a thing, why is it good?
 - Try to create "buy-in" with audience
 - Example- records can help save money
 - Try to work to create hook
- 2. Worker health/hygiene/training
 - Give consideration on how to discuss cultures/backgrounds
 - Not an "ours vs theirs" discussion
 - Growers need to understand worker needs
 - Highlight importance of following health hygiene 100% of the time
 - One time is all it takes for something bad to happen
 - What are growers going to use to train workers?
 - Won't be PSA training, how do they know what to focus on?



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- Will have to find balance, think about flow of operation, definitely highlight handwashing, clothing, cross contamination, etc.
- Difficult module to have second, but it does fit here
- 3. Soil amendments
 - *under review*
 - o Bring composting examples, how to do it right
- 4. Wildlife
 - Grower struggle with conceptualizing broad info (animals are always out there in some farm)
 - Be honest about this reality, but be aware of the fact that it will happen, and what to do
 - Pets (generally) aren't ok, can be a tough thing to discuss
 - Could you call your dog out of a field at any point regardless of what's happening? Do they know not to relieve on crops/in fields? If no, can't have them out there
- 5. Production Water
 - Hard to present on
 - How do you respond about water testing?
 - New handout (October)
 - Testing methods- what to use and where?
 - Overarching question, what do we do when FDA doesn't know what to do?
 - Take at least one test, try to see (1 generic e. coli test)
 - Tie stories back to incidences where water was root cause
 - This is a risk management thing, tie it in
 - Make sure growers know what questions to ask labs
- 6. Post-harvest
 - \circ $\,$ Chances for hands on
 - Growers need to determine what is appropriate for farm

Educational Approach

- Delivery with trainer team
 - What to do when trainers aren't doing well on modules
 - Get right info out, correct in tactful way
 - $\circ~$ can't always have dream team, focus on strengths
 - $\circ~$ if you're new, run through presentation with peers
 - get together as a team and get on the same page with the modules



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Day 2, Wednesday, Feb. 6th, 2019

1:00 pm: Workgroup Meeting Outputs and Next Steps

Produce Safety Regulator Workgroup Summary

- There is not much aggregating of data on farms
- How we can collect and hopefully use data
- Sean's tool will be very useful for growers in compliance
- Some farms might want their own inspections
- Educate buyers on what is and not required by PSR
 - Confusion between audits and inspections
- Timing of exemption- provided annually
- Records will be looked at for farms, some brief overview, some a little bit deeper depending on state
- Determining exemption may take longer than inspection which don't want
- Inspectional program readiness
- FDA assessed readiness of inspection programs
- Farm inventory assessed
- State efforts
 - Some states plan on reaching all large farms, some a few
 - Staffing of inspection staff from 1-5, some covered by grants
 - Regulator training is similar among states
 - Higher risk large farms will be checked first
 - Some states will modify existing SOP's, some have new ones

Produce Safety for Educators Workgroup Summary

- Ag. Water was a big topic.
 - Water testing lab maps. Idea of creating a map of all the existing lab test plants for farmers to have access to.
 - We discussed ~5 top things for growers to do to come into compliance with the ag. water regulations
 - do small group discussion with growers after water test result to explain their results and express what should be looked for
- Big discussion on cleaning an sanitation
 - What does "as needed" mean?
 - should there be research for when a surface is considered "needs to be washed"
 - Define "dropped produce" and elevate this concern to the FDA to get a uniform definition to all growers.
- Research to get specific risk factors for specific produce to avoid growers taking expensive and unnecessary precautions.
- Pre-req course for PS training.



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Preventive Controls for Human Food Workgroup Summary

- 3 sub-groups \rightarrow Evaluation, Resources, Awareness Campaign.
- Evaluation
 - Knowledge and resource gaps aren't well known, want to better understand those gaps to provide the resources they need
 - Develop evaluation tools that can be used by FSPCA lead instructors
 - Will learn demographics, food product, plan help
- Resources
 - \circ $\;$ How small processors know where the resources are
 - o How they will know if the resources are reliable
 - Who to ask for help
 - Provide roadmap so know where resources are
 - Create a place to find resources
 - Electronically published and distributed
 - Compile resources
- Awareness Campaign
 - \circ Tools development and dissemination
 - o Small processors don't know their compliance/exemptions
 - Food safety communicators will communicate directly to small processors- goes beyond extension but also buyers, etc
 - All food facilities are covered under some part of the rule, but they may lack time and resources how to correct problems
 - $\circ \quad \text{Identify the grower communicators} \\$
 - Develop brandable awareness materials
 - Brandable materials distributed
 - Evaluate impact of the materials
 - Each group has a leader that can be contacted

Educational Delivery Workgroup Summary

- Looking at best practices for adult trainings & farmers
- PSA grower training was evaluated specifically
- - there's a lot of different kinds of information on the trainings about the material and the delivery.
- There are questions that we as teachers cannot answer. Like "when needed"
- How do we most effectively deliver this information? MOVING FORWARD we will aim to consolidate this information and provide a resource for the best information to relay to participants and in what way.

Buyer Workgroup Summary

• What is the difference between inspections and audits?



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- Buyer needs for expectations and practices
- The differences occurring in states
- What we took away- each state provided a summary on how they are doing inspections.
- There was a large discussion on engaging buyers!
- Overlapping expectations for food safety... a guide to combine all documents to encapsulates all necessary actions for growers
- National efforts for outreach and national knowledge sharing, let's not do work that has already been done!
- Regulator compliance workers at buyer companies- there are specialties with local engagement, food safety and regulatory compliance,
- We decided that the more people we are made aware of in these companies, the higher chance we have of engagement

USDA Update- Tricia Covax

- Grant programs that may be helpful in these efforts
- AMS perspective- specialty block crop grants
- Cold storage, famer improvement grants, keep these in mind and talk to state regulators about these
- Take a look at market access and food safety priorities. specific grant FSMP
- If you have opinions on the local ag. farm bill language and information please make suggestions to Tricia.
- Farm service agencies have farm facility loans if producers need funds for implementing food safety practices on farm.

Next Steps for NECAFS- Chris

- Specific and targeted potential actions are great to see! Lets work on putting "who's" and "when's" to these things. Please be proactive.
- Work on prioritizing these actions and volunteering yourself or others to get these things done.
- If you feel strongly about a specific action item, make sure you take steps to get the ball rolling.
- If you would like to head a workgroup meeting next year or otherwise be involved, let Chris Callahan or Elizabeth Newbold know by email <u>necafs@uvm.edu</u>.