State Inspectional Observations

NORTHEAST PRODUCE SAFETY REGULATOR MEETING
NECAFS ANNUAL CONFERENCE AND MEETING
JANUARY 18 & 19, 2022
Context & Background

Follow-up to NECAFS 2021 presentation

Most common misunderstandings, noncompliance issues, and technical assistance needs

Persistent misunderstandings and noncompliance issues

Looking ahead
  ◦ Proposed Rule on Agricultural Water
  ◦ Proposed Rule for Food Traceability
Questions

What common misunderstandings did farms have about either food safety or PSR regulatory requirements during inspections in 2021?

What were the most common noncompliance observations or issues you observed on farms during inspections in 2021?

What types of technical assistance do you need in your state? Are there specific knowledge areas or delivery formats you’ve identified as a need for in your state?
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<th>State</th>
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## 2021 Topic Summary Table

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<th>TOPIC</th>
<th>MISUNDERSTANDINGS</th>
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Common Misunderstandings

- Cleaning & Sanitizing
- Audits vs. Inspections
- Records
- Produce Safety Rule Coverage & Qualified Exemption
- Agricultural Water Requirements
Misunderstandings: Cleaning & Sanitizing

- Difference between cleaning and sanitizing
  Need to clean before sanitizing
- Difference between detergents and sanitizers
- Using appropriate detergents and sanitizers
- Identifying food contact surfaces
- Adequacy of cleaning tools and equipment
- Cleaning and sanitizing frequency: lack of suggested frequency causes confusion
- Difference between hand-washing and hand sanitizing
Misunderstandings: Audit vs. Inspection

Continued confusion about audits vs. inspections

Some growers do not understand why they need both a USDA GAP and a Produce Safety Rule (PSR) inspection.

Some growers think if they are GAP certified, they don't need a PSR inspection.

Others think the GAP audit is the PSR inspection.

Farms without audit experience are intimidated by the Produce Safety Rule inspection.
Misunderstandings: Records

General lack of recordkeeping

General record requirements outlined in Subpart O

Identifying which equipment needs documentation for cleaning and sanitizing
Misunderstandings:
Produce Safety Rule Coverage & Qualified Exemption (QE)

Growers not knowing whether they are covered by the rule, qualified exempt, or not covered

Whether a farm is a covered “large” farm or a small or very small farm which may qualify for QE status

Understanding QE farm requirements

Covered produce vs. non-covered produce (vs. selected commodities as in GAP)

Food sales vs. produce sales

How to determine QE status by using total food sales vs. produce sales, etc.
Misunderstandings: Water

The idea that because Subpart E is under review, paying attention to water is not important

Number of water tests to be required and water rule compliance

How to monitor and maintain postharvest water treatment systems (e.g., UV treatment)

How to accurately monitor sanitizers and turbidity in re-circulated postharvest water
Additional Misunderstandings

Adequacy of cleaning tools and equipment

Risks related to stored tools, equipment and produce not properly assessed

Difference between washing, buffing/wiping, and rinsing produce and associated risks

Understanding that GAP or other food safety training is not a substitute for the Produce Safety Alliance Grower Training

The need to retrain farm employees each year in food safety and hygiene principles despite them working on the farm for many years and already understanding farm policies.

Food handling and produce safety training vs. general job training, pesticide training, etc.

Handing covered and non-covered produce – harvest, shared equipment, and storage
Common Noncompliance Issues

- Records
- Cleaning & Sanitizing
- Equipment, Tools & Buildings
  - Equipment or tools that cannot be cleaned
  - Contamination from buildings and storage
- Worker Training
- Hand-washing
Noncompliance: Records

General record requirements and components
Which records to establish and keep
Cleaning and sanitizing
Worker training
Treatment of biological soil amendments of animal origin
Water
Noncompliance: Cleaning & Sanitizing

Lack of cleaning and sanitizing

Understanding the difference between cleaning and sanitizing

Cleaning and sanitizing food contact surfaces

Condition and cleanliness of harvest containers

Condition and cleanliness of non-food contact surfaces
Noncompliance: Equipment, Tools & Buildings

Equipment or tools that cannot be cleaned due to—
- Design, construction, or workmanship
- Damage or inadequate maintenance

Contamination from buildings and storage
- Preventing produce contamination through floors, walls, and ceilings
- Condensate drip onto produce or in a product flow zone
- Proper storage of produce in walk-in refrigeration units
- Pest control in buildings
- Location of packing material and harvest bin storage
Noncompliance: Worker Training

Lack of worker training
No documentation of worker training
Hand jewelry that cannot be adequately cleaned and sanitized worn when workers handle covered produce
Eating, chewing gum, or using tobacco products in areas used for covered activities

“Getting growers to implement daily procedures and then training staff to follow those procedures has proven challenging. Growers have expressed frustration with staff not following procedures, even if repeated corrections have been made on the spot.”
Noncompliance: Hand-Washing

**Hand-washing facilities** lacking soap, running water, and/or a drying device

**Employees not washing hands** before starting work or before putting on gloves
Technical Assistance Needs

- Cleaning & Sanitizing
- Revised Agricultural Water Requirements
- Postharvest Water Maintenance & Treatment
- Equipment, Tools & Buildings
- Worker Training Materials & Translation
- Traceability Plans & Recall Procedures
Technical Assistance: Cleaning & Sanitizing

Understanding cleaning vs. sanitizing

How to clean and sanitize, including information about zones

How to develop effective cleaning routines and standard operating procedures

Where to source appropriate cleaning and sanitation supplies

Examples of efficient apple bin cleaning practices for large orchards
Technical Assistance: Water

Revised agricultural water requirements, including information and training

Information on water quality risk assessments and testing

Guidance on adjacent land use

Agricultural water sanitation and treatment, including monitoring and maintenance of postharvest water treatments systems

In-field services to help growers understand how the water requirements apply to their operations
Technical Assistance: Equipment, Tools & Buildings

- Retrofitting old wash/pack areas
- Maintaining cooler condenser units
- Pest management in packing houses and storage areas
- Additional information about proper storage
Technical Assistance: Training & Translation

General food safety planning
Creating logs and records
On-farm food safety videos
On-farm pathogen fact sheet
Training tools for supervisors to train field crews

Translation Assistance

- Materials and training resources in additional languages
- A list of reliable trainers or Produce Safety Alliance trained individuals who can provide translation services in the field
Technical Assistance: Traceability & Recall

Resources for developing traceability plans and recall procedures

Proposed Rule for Food Traceability
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Persistent misunderstandings and noncompliance issues across the region

Growers would benefit from technical assistance in several areas

- Cleaning & Sanitizing
- Recordkeeping
- Equipment, Tools & Buildings
- Worker Training
- Agricultural Water
- Food Traceability
Contact Vermont

agriculture.vermont.gov/produceprogram

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