

Produce Safety

A L L I A N C E

Produce Safety Educator's Monthly Call #6

February 10, 2014

2 PM EST

Meeting Summary

Total Attendance (Web & Call In): 37

Meeting recording available at:

<https://cornell.webex.com/cornell/lsr.php?RCID=59c7caed8c0e9123206a3ff8232a75a4>

Agenda

- Discussion on Soil Amendments, Preliminary Survey Results
- Discussion on Packing, Holding, and Handling Produce, Preliminary Survey Results

Discussion

**Specific details included in these notes are reflective of where we stopped for conversation during the phone conference when reviewing the preliminary survey data. The data itself, aside from comments is not included since only 11 people had the opportunity to take the survey prior to the meeting. We plan to share survey results after more have had the opportunity to participate. The survey will remain open until March 3rd.*

I. Discussion on Soil Amendments & Preliminary Survey Results

- We all seem to be getting questions/comments from growers about key provisions in the proposed rule related to stretching the application of raw manure to 9 months as well as questions about packing, handling, and storage of produce. To get a better sense of what practices are common on the farm and how we can better address these challenges from an educational and outreach standpoint, a survey was developed to collect feedback.
- Survey was sent to Produce Safety Educator's Group on February 7, 2014
https://cornell.qualtrics.com/SE/?SID=SV_6A39vnz5PSq4ZBX
- Eleven had completed the survey in time for Monday's meeting (thank you), but we will plan to keep the survey open longer as many expressed they needed more time to collect data from their state and enter in accurate estimates.
- Please feel free to share the survey with other educators who may not be on this listserve but who might have helpful input to contribute to the survey.
- If you have already completed the survey, but wish to fill it out again because you have collected more accurate data, please feel free to do so. We appreciate your input.

Questions posed in the survey and on the call:

- How many produce farms do you work with that use raw manure or treated compost every year?

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- Of the farms you work with who may be impacted by the proposed soil provision of the produce rule, can you estimate the number of acres they may have in fruit and vegetable production?
- Of the farms you work with, can you estimate what percent are considered organic growers?
- What is the primary reason for using manure or compost on the farms?
- For soil amendments, are the farms you work with using: (choices include only raw manure, only compost, compost and raw manure, combo of raw manure and other nitrogen sources, combo of compost and other nitrogen sources)
- Do you think raw manure is a critical source of nitrogen on produce farms?
- What are your thoughts on raw manure use?
 - FDA comments on extending application to 9 months:
 - NOP does not have a safety standard to it. Scientific literature indicates that pathogens in raw manure can survive easily to 6 months, even up to 9 months, and in some rare cases depending on the pathogen – up to a year or beyond. 9 months covers the higher risk situations.
 - Was there a focus on any specific pathogen or typical pathogens prevalent on produce?
 - Discussions were based on pathogens that have been associated with fresh produce and other common pathogens. *Salmonella* tended to be the heartiest in terms of survival. Research is difficult to compare. Research was chosen to be representative of what is what indicative of a farm situation and what would be considered the 'riskiest' situations.
 - Used properly, it can be a good source
 - Depends on how it is handled and applied
 - Good, cheap resource – keeps manure on farms and not in landfills
 - FSMA should align with existing NOP standards
 - Farms in my area cannot meet composting standards without infrastructure investment
 - Generally less desirable, re: odors, runoff
 - Necessary for Plain Growers
 - Highly risky for small farms who do not have training in food safety
 - 'Aged' manure is an issue
 - Some growers have given up on the idea of manure because they are aware of food safety issues
 - Dairy farms NEED to be integrated for nutrient cycling
- How frequently are the growers you work with using alternative nitrogen supplements (i.e. not manure or compost)?
- Are there any limitations to using alternative sources of nitrogen (i.e. not manure or compost)?
- If you work with farms who are using animal manures or composts, what is the primary animal species of origin?
- Is the consistency of the manure or compost primarily solid or liquid?

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- Is the compost or manure used on the farms you work with: (choices include: produced by farm, purchased from another farm, treated at a commercial facility, comes from some other source)
- What do you feel will be the impacts to growers in your area of the required time periods between application of biological soil amendments and harvest of fresh produce as outlined in the proposed in the produce rule?

Severely limit or eliminate its use

- Will change grower practices (fall appl. rather than spring)
 - Less healthy/productive trees, more drought susceptible
 - Growing season too short for 9 mo. to be practical
 - **Most do not have storage capacity for 9 mo. (3)**
 - Storage is a big issue in NY, NJ, with dairy farms and is a large added cost
 - Growing season in NH is short and growers would have to apply on frozen ground which may contribute to run-off, water quality issues
 - Vermont has laws that you cannot spread in winter
 - Variances may address issues related to specific state conditions. Governments could apply for exceptions to this with scientific data to support a shorter application time frame which provides the equivalent level of public health protection.
 - More data needed on pathogen survival in cold soils
 - Additional time substantially reduces fertilizer value of manure – with respect to N
 - Has to be done at source
 - Will add to cost
 - Standards need to be clear on what is meant by proper curing and insulating
 - Difficult for Plain Growers
 - Composted manure can be safe, reduce costs, more sustainable
 - Emphasis needs to be placed on proper composting techniques
 - Absolutely essential – adding organic matter is key to soil health
 - Need educational materials on this for small farms
- How can the industry best facilitate the transition from raw manure use to composting practices?
 - Do your state regulations differ from the proposed produce safety rule with regards to the soil amendment provisions?
 - If your state requirements are different from what is proposed in the rule, then the FDA would like to be aware of these type of situations.
 - Massachusetts is moving towards not using raw manure for environmental impact on water sheds. This would be a state regulation.
- II. **Discussion on Packing, Holding, and Handling Produce, Preliminary Survey Results**
- How common is it for farms to have their produce packed, stored, or held by another company that is not legally owned by the farm?

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- Is this type of packing, storage, or holding more prevalent in certain types of commodities (i.e. apples, leafy greens, nuts)?
- Why do farms decide to contract packing, storing or holding to other companies?
 - No sense in every farm having a packing/storage area
 - It's not necessarily contracted
 - More product than they can sell on their own
 - To broaden farm offerings
- How common is the practice of farms buying, packing, or holding produce grown on another farm?
 - On Connecticut farms – lots of product is being bought/sold from other farms – somewhat similar to 'trading' or exchange of product. Would these be considered retail operations?
- Is this practice of farms buying, packing, or holding produce grown on another farm more common with some commodities than others?
- Is it impacted by farm size (i.e. more common on small farms or big farms)?
 - More common on small farms
 - CSA/co-op situations
 - Lack of inventory to fill order
 - Desire for buyer to receive mixed loads
 - If you cannot grow profitably, you buy
 - Crop failure
 - Customers expect diversity of products
 - Items are generally purchased locally to fill orders
 - To expand variety offering (such as apples)
 - Opportunity to 'rent' pack house space

Call Wrap Up:

- Suggested to leave the survey up until the end of the month because the information is interesting – especially the information on why growers/packers do specific practices. Several people felt they did not have enough info to respond, so they were encouraged to reply with the best info they had or feel free to forward on the survey to any collaborators who might be able to contribute. We welcome state partners who may be more on the production side who are working with farmers to fill out the survey.
- Survey link will remain open through March 3, 2014
https://cornell.qualtrics.com/SE/?SID=SV_6A39vnz5PSq4ZBX
- **Future Produce Safety Educator Meeting Agendas:** Let us know what you would like to talk about! Send us your ideas, concerns, comments and we will add it to the next monthly meeting.
- **Next meeting: Monday March 3rd, 2014 at 2PM EST**
 - **Departure from our typical every four week schedule, but thanks for accommodating Betsy & Gretchen's crazy schedules!**