

# Produce Safety

## ALLIANCE

### Produce Safety Educator's Monthly Call #10

June 2, 2014

2 PM EST

### Meeting Summary

**Total Attendance (Web & Call In): 35**

**Meeting recording available at:**

<https://cornell.webex.com/cornell/lr.php?RCID=e80bdaf73e8978be864472db9028e084>

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## Agenda

- Update from the Sprout Safety Alliance
  - Ms. Robin Kalinowski – Director, Center for Specialty Programs, Institute of Food Safety and Health
  - Dr. Tong-Jen Fu - Research Chemical Engineer, FDA Division of Food Processing Science and Technology
- Discussion of PSA training plans and training prior to final regulation
- Update on estimate of training needs

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## Discussion

### I. Update from the Sprout Safety Alliance (SSA)

- Sprout Safety Alliance - created by a partnership grant from FDA to Institute of Food Safety and Health. Currently includes 45 committee members which include sprout growers, seed producers, testing companies, retail, state and federal government, and academia.
- Dr. Stephen Grove, previous SSA coordinator, has taken a job with private sector and Robin is now the new coordinator. Two working committees:
  - Technical working group – draft curriculum development
  - Outreach & Education group – organizing training and working with Extension to deliver programs.
- Most sprout growers are very small. Finding sprouters to communicate messages and the fact that FDA even has a proposed rule has been and they anticipate will continue to be very difficult.
- SSA is hoping to reach out and connect with PSA Extension collaborators that are working with sprouters or know of sprouters in their area.
- Hoping to identify individuals who can attend a Train-the-Trainer to deliver the curriculum. The steering committee is still working on these details but some of the PSA Educators Group may be interested in becoming trainers.
- Would like our group to assist with 1.) Identifying sprout growers for outreach 2.) Consider becoming trainers to deliver the Train-the-Trainer program.

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## A L L I A N C E

- SSA has hosted 2 pilot feedback sessions so far (in DC and Chicago). A third is scheduled for San Francisco in August. Information about date and time will be posted on their website and shared with Gretchen and Betsy to forward along if you are interested.

### Questions & Comments

- Will pea shoots (i.e. actually have some true leaves, not just sprouts) be covered under the sprout rules?
  - This may fall under microgreens – not considered to be a sprout. This would be covered by the Produce Rule and not the Sprout portion. The difference between a microgreen and sprout will need to be further defined.
- Barbara Hanson (Alaska) had a sprouter give a presentation to other growers at a local training to communicate the risks of sprout production and the implication of an associated outbreak to sprouts.
- Phil Tocco has a larger sprout grower in his area. FDA has visited.
- We have sunflower sprouts (and pea shoots) grower in Placer County. How is the size for a producer defined? Is it value?
  - Proposed Exemptions:
  - \$25,000 complete exemption (all food sales)
  - Tester Amendment: <\$500,000 and > ½ direct to qualified end users
- Sprouters are covered by the entire proposed Produce Rule AND the special section for sprout production. Sprouts are subject to just about any route of contamination that could affect any fresh produce item. In addition, because of their unique production practices they have unique hazards and need for additional controls. The subpart for sprouts are ADDITIONAL requirements on top of the Produce Rule.
- Any help our group can provide in identifying sprout producers, especially smaller ones that may not be aware of the new proposed rules is welcomed by the SSA.

### SSA Contact Information

#### **Robin M. Kalinowski**

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#### **Dr. Tong-Jen Fu**

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### II. PSA Training Plans & Training Prior to the Final Regulation

- Plan to train (and certify) growers prior to the final regulation
  - First ever regulation for fresh produce – many growers are not aware or prepared
  - Increasing buyer pressure even for small scale producers means there is a need for training now. The PSA curriculum can provide needed training to help growers meet market demand and prepare for the regulatory requirements now.
- Ability to reconnect after final rule release
  - We will have the ability to reconnect with people after the final rule is released.
  - Certificates will be held by AFDO and they will maintain a list of everyone who has a certificate so that we can offer webinars or direct mailings to fill in details that change in the final rule.
- Are there concerns/thoughts about training prior to release of final rule?
  - Some may prefer to wait until the rule is final. This is fine.
- What are your plans for smaller growers who may not need a certificate?
  - In NY, we are planning to maintain a multi-day training. Day 1: PSA certificate program. Day 2: Growers bring laptops and we help growers write their plans. Growers still need to meet market demands for either a plan or audit.
  - Many states feel that the vast majority of their growers will be exempt from the training. May still need trained though not certified.
  - New Jersey plans to use PSA one-day training and add a second day for plan writing.
- What is the downside of training before the rule?
  - Will take a concerted effort to circle back and capture everyone who has already been trained. Also, it could be potentially costly if some of the provisions change. For instance, if the grower is educated to test their production water every 7 days (proposed rule) and the final only requires once a month. We need to make sure trainers are very clear what information is proposed and that this information is available so that growers will not incur unnecessary costs. We may know more once the re-proposal is released this summer.
- What is the status of requirements for trainers?
  - Recently have discussed the three competencies: technical produce safety knowledge, produce specific agricultural experience and knowledge, and training experience. The three competency areas will be incorporated into the application for the applicant to demonstrate their proficiency in each prior to attending.
  - Also pursuing a Mentoring Program where trainers who have attended the Train-the-Trainer must have a mentor present at their first training to provide technical assistance and ensure the curriculum content is being delivered accurately.
  - Testing was discussed previously and decided that it is not a reasonable solution for determining competency for several reasons (psychometrics of test development, keeping tests confidential, administration, etc.)
- What is the procedure for course equivalency?
  - This is still being discussed.
  - Not likely to be the PSA or AFDO that determines equivalency.

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## A L L I A N C E

- How do we address training for producers who have been heavily involved with food safety practices on farm under programs like the CA and Arizona LGMA, who have now multiple years of food safety plans, and for whom the PSA training may be too simplistic. Is there flexibility in content for producers like these?
  - There is tremendous benefit to having growers who have been involved with food safety for a long time attending training; however, it could hurt credibility of Extension professionals who will need to encourage growers who already ‘live and breathe’ food safety on a daily basis to attend a very simplistic workshop (PSA curriculum).
  - While it may be great to do broad education, there may be a real need to have more advanced training available. Some growers are ready for ‘graduate level’ produce safety education.
  - FDA is considering options moving forward. The value of program/curriculum equivalency and experience is valuable to take into consideration.
  - There is opportunity to use the PSA curriculum and expand with another day or through other FDA options.
  - Difficult position to have growers attend a training that may “turn them off” and could affect credibility of the educator.
  - A day of reviewing material to meet regulatory requirements may not be as onerous as we think.
- Who is going to be performing the audit?
  - The regulation does not require audits. This curriculum is not directed towards passing an audit.
  - There will be small growers who will be exempt from the regulation, but still required by their market to have a food safety plan or audit. We are trying to help growers meet regulatory and market requirements by assisting them in developing a food safety plan.
- For those who are not required to attend the training in person – can these be videotaped and shared on a DVD? We think this is a great suggestion!

### III. Update on Estimate of Training Needs

- Thank you for responding to Claire’s questions. If you have not been contacted by Claire, please let us know. We don’t want to miss anybody. Claire has 5 more states to go, but plans to get through them soon. Otherwise, please respond to her e-mail or call her back.
- Thank you to Claire for doing this work for the PSA!
- It is also helpful to know even the growers who are exempt but may be interested in training.
- Claire’s contact info: Claire Zoellner [cez23@cornell.edu](mailto:cez23@cornell.edu)

### IV. Update on Re-proposal of Produce Rule

- Now called a ‘supplemental proposal’ or ‘supplemental review’. It is currently with OMB. There is still much to be done before the supplemental rule is released. Still targeting summer, but likely after June.

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- From the PSA standpoint, once we see the supplemental release, we will look it over and organize calls, webinars, and other steps to support understanding and commenting process as we did during the last comment period.
- We will be sure to notify the listserv when the release occurs as well as how to comment.

### Call Wrap Up:

- **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 July 7th, 2014 at 2PM EST**
- **This meeting will be a special session on the FSMA Operational Strategy. It will not be hosted on WebEx, but will be a larger conference call with Q & A available through a moderator. We will send more information out closer to the date of the meeting.**