

Produce Safety ALLIANCE

Produce Safety Educator's Monthly Call #1

September 9, 2013

2 PM EDT

Meeting Summary

Total pre-registered (online): 64

Call-in Only Participants: 13

Actual Total Attendance (Web & Call In): 63

Webinar Recording Link:

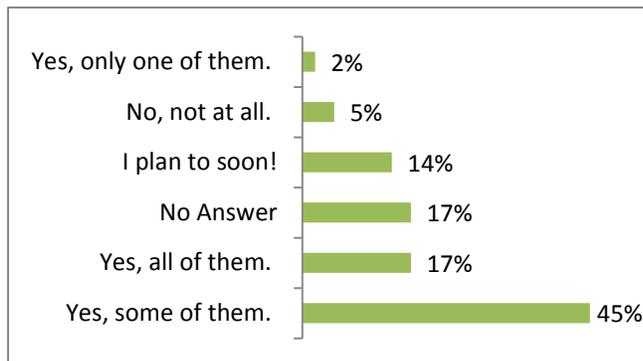
<https://cornell.webex.com/cornell/lsr.php?AT=pb&SP=EC&rID=15588887&rKey=37786990dd976411>

Comments submitted through chat feature (public & private) and through follow-up e-mails.

*Note: On the webinar polls, the rate on non-responses was fairly high due to a high proportion of call-in only participants who were not able to access the WebEx polling feature.

Webinar Poll Results & Associated Comments

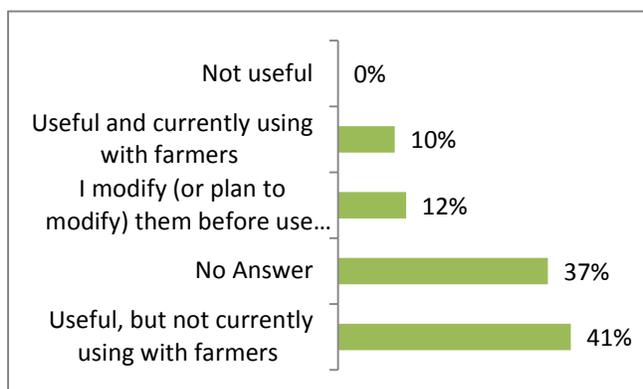
1. Have you read the FDA fact sheets?



Comments

- Didn't know they existed
- I have included these factsheets in my berry grower newsletters but have received no feedback to date, so answered, "have not used with growers" for that reason...

2. Do you find them useful and are you using them with farmers?



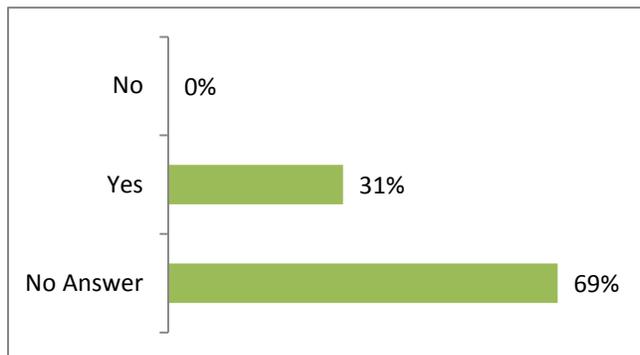
Comments

- Growers will manage business risks as they seem imminent. Drop-off in participation could also be due to getting back from the winter months to raising produce. Many are not so internet engaged during the growing season.
- I found the fact sheets helpful – I walked them through the water standards and proposed testing requirements, the “I Have a Farm – does preventive controls apply to me?” Some of them had trouble with the longer fact sheets that were put out. But generally people felt better that there are simple things they could do to comply with the standards.
- I find that with very small farmers, a one page format works best. I looked over the Preventive Controls fact sheet – I know it’s a complex proposal, so sometimes it’s difficult to put that kind of thing in a short format. I do find the fact sheets helpful and am using them.

3. Do you think the fact sheets have increased grower understanding of the proposed produce rule?

Skipped due to small percentage of participants on call currently using factsheets.

4. Would additional factsheets be helpful?



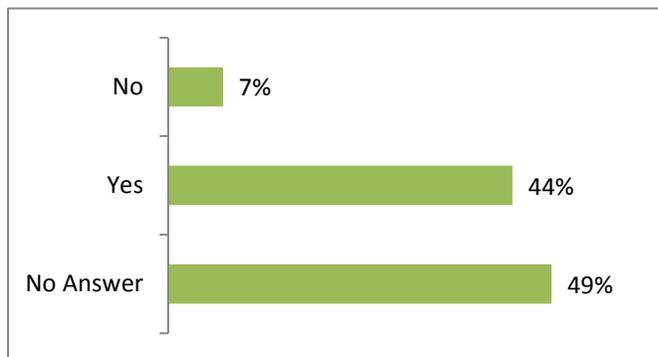
Comments

- Specific question on proposed ag water standard - what is "treated agricultural tea"?
- A lot of small farmers are afraid of the "loophole" exemptions
- Worksheet/spreadsheet (.xls) on how to calculate costs of implementation
- Where farmers/grower can get trained
- I can't think of a specific topic - but visuals are excellent!
- Manure/compost standards
- Inspection guidelines, on water distribution systems, monitoring wildlife
- It would be nice to have one factsheet with links to the regulations, both the shorter texts of the Federal Register, and the longer full texts

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- More specific fact sheets with examples of how to comply
- Definitions of all the key terms would be great, a one pager
- What counts as 'material conditions' for losing an exemption, the appeal process, and how exemptions can be regained
- FSMA check sheet for farmers would be really helpful
- How can small rural irrigation water districts help their members
- What is the difference between manure application and timing of animals run in the orchard or field?
- We have developed several one-page infosheets related to viral contamination of fresh produce
- What are the advantages of having a farm plan that addresses the key issues AND how can a farmer easily train their usual small number of employees on the most needed safety practices
- We have numerous farms that both pack what is grown on their immediate property and bring in product grown on other properties not necessarily under their personal control - need a better explanation of compliance under multiple rules.
- I think it would go a long way to develop a worksheet for farmers to show them what the differences would be between GAPS or audit requirements and what the proposed rule says.

5. The last time we met in June, the biggest area of confusion was agricultural water; do you feel like you have a better understanding now?



Comments

- My question for NY is if water testing is required on a weekly basis, will we have sufficient labs to do this in a timely manner at a fee that is not cost prohibitive?
- From Colorado: ditch irrigation systems here are (like other) part of a larger system beyond growers' control for input of pathogens. If out of compliance, how do they manage this business risk when they can't control the inflows to the ditch system? How can they interrupt use for irrigation of water sensitive veg crops in the arid west?

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- The concern I have is that we know agricultural water is a problem – we don't have the science to back up a lot of things that are being proposed – so what are we trying to train growers to do is not clear.
 - Response: 1. Having comments from growers is so important and 2 – I've found that a lot of growers are not testing their water at all – for anything – and never have. So they don't even have a baseline – why should you test? Why is generic E.coli important? Even if it's not the best indicator out there, it's an indicator.
- Criteria that is finally established, say for threshold nos. of generic E. coli has based on good data and sufficient data
- Last week, I conducted a workshop with some very small farmers – most of the growers farm less than 20 acres) – the weekly testing of water was a hot topic – cost prohibitive was the phrase most used. In California, we also have the problem of ditch water – and most farmers would fail any audit involving testing that water. When you have a single operator or limited labor on a farm that's when you have so many issues with these extra requirements outside the actual growing, harvesting, packing.
- Where my confusion lies is a general area – why are we doing a lot of training on something that is a proposed rule – that could change in the final form?
 - FDA Response: We expect there will be some changes between the proposed and the final rule – what we hope is that you can help growers understand what is being proposed and get them thinking about how they can do these things right now – and to 1. Reassure them that this is not set in stone but 2. That food safety won't go away – that there are basic things that growers should be doing.
 - FDA Response: We think the basic principles in the proposed rule won't change – for instance, we don't see the potential routes of contamination we've identified changing. What might change are things like the water numbers we're proposing (the 235 number, for instance) – we're constantly reviewing the proposal based on what we're hearing from stakeholders. The training should be based on GAPS – that foundation essentially won't change.

6. The second biggest area of confusion identified on our last call was related to exemptions; do you feel like you have a better understanding now?

Skipped due to time constraints.

7. What area is still generating the most questions from farmers?

Comments

- We work with farms mostly in audit situations – the problem I'm having with the proposed produce rule is that we don't seem to be able to attach particular costs to it. We need to

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have some scenarios to show the real numbers – if the produce rule were enacted today, this would be the cost for certain activities.

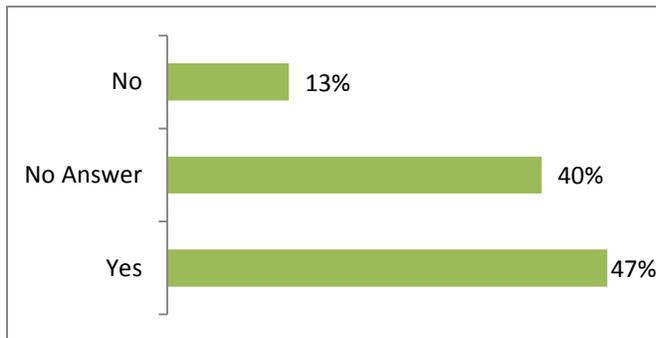
- FDA Response: in the economic analysis, we broke down the costs and the impact by ag water, soil, others – this may not be categorized by the area’s everyone would like. We also did some outreach to growers – we went to Michigan and discussed audits and post-harvest procedures. Essentially we came to the conclusion with growers and others I’ve talked to that most people wouldn’t incur any extra cost in implementing the produce safety standards – in fact, many are already exceeding what’s being proposed.
- I have found that questions from farmers on the produce rule have actually dropped off during the past 18 months
 - FDA Response: On the one hand, we had so much interest and so many comments on the proposed rule early on, but now, we are seeing that there are some groups putting out information on the proposals that is actually misinformation and scaring smaller growers, the sustainable agriculture community. One, we need to hear from farmers through comments to the dockets and 2 – we are concerned that if the only ones talking about the proposals and putting out information are the ones confusing farmers, that this is a problem. We know that people don’t agree with everything we’re proposing – there are things that FDA has found we need to change in the final rule – but we hope that you as educators would be able to help us share the correct information with growers.
- We still have many questions about manure management – particularly the nine-month interval requirement. How do you handle manure you are not applying to your soil – does storing it and how you store it have another potentially introduced risk?
- Ditch irrigation water, Disposal of wash water on small farms
- Water Quality and Soil Amendments
- How are distribution centers or cooperatives affected by the proposed rule? Individual farmers are exempt but what about marketing groups
- Will FSMA apply to me (as a farmer)?
- Coverage when a farm also is subject to the PCHF rule
- Degree of documentation and recordkeeping requirements
- Concerns about who will be covered under the preventive controls rule--especially when purchasing product from other farms to sell at farmers markets or CSA distribution
- What info is in the "don't know that I don't know" box?
- Compost/manure
- Water testing frequency
- Ag water and the reason they have to spend so much \$\$ on testing. Also manure management. And also if the exemptions will actually be honored over time.

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- I think irrigating with surface waters and regs that flag for ceasing use until mitigated is going to be a major hang up (p. 3 Ag Water Standards factsheet) for sprinkler irrigators. Switching to another source is not possible for most farms.
- Placement of manure piles might be the discussion: downhill and down wind. Yet some field layouts the logistics are easiest uphill and upwind.

8. Overall, do you think the produce rule will improve produce safety through implementation of food safety practices on farms?



Comments

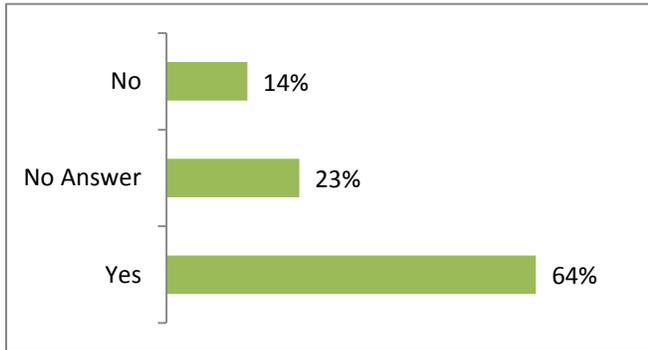
- Produce rule is raising visibility of food safety issues among farmers, which is a good thing.
- No, I don't think the Produce Rule does much to set a minimum floor on the safe production of food in the US (and abroad). REQUIRED toilets, hand wash sinks, properly used pesticides...need to be added to this water thing.
- Qualifying my answer to the last poll question. I feel strongly that the application of the produce rule would provide MUCH more safe food if it were changed to provide mandatory compliance for some things - such as manure use, minimum water standards for ALL farms (no exceptions for small farms). In spite of the Tester amendment, I believe that crafting minimum regulations for all farms, based on risk rather than income, seems much more in line with the goal of providing safer food.
- In response to Poll Question #8, improving food safety in the United States. I suggest the FDA develop a Fact Sheet on Strict Liability. Food safety requires management commitment. Those who are committed likely already have a food safety program of some form. Those who are not committed offer excuses of excessive cost, unreasonable requirements, etc. Bottom line - those growers will adopt food safety guidelines ONLY IF REQUIRED by either their customers or the government (Local, State or Federal).
- I think you don't give growers enough credit! They are eating the same food they produce!
- I think we need to make this about producing safe food.
 - Response: agree – when I stopped talking about rules and regulations and started talking about safe food – there is a big shift – there is a connection with growers.

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The light goes on. I talk about the field as the kitchen and the harvest machine as the kitchen table – we say you're food producers – not just crop growers.

- Also explain that the rule is not final – that we need them to comment.

9. Does Oct. 15th at 2PM EST work for you?



Call Wrap Up:

- FDA Outreach Plan to Generate Comments
 - Regional/State webinars
 - Contact Gretchen (glw53@cornell.edu) or Betsy (eab38@cornell.edu) if you are interested in hosting a webinar in collaboration with the FDA in your state/region. We are hoping to host as many as possible between now and the Nov. 16th deadline.
- Statement/video opportunity for Produce Safety Extension Professionals
 - Will follow up with educators who might be interested in submitting quotes or video clips talking about the proposed Produce Safety Rule, challenges and triumphs.
- 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.
- **Comment: We do need to move beyond what FDA needs. I think this would be a good venue!**
- Next meeting: Was to be Oct 14, but federal holiday (Columbus Day).
 - Tentative October meeting date: **Tuesday October 15th at 2PM EST**