An Overview of On-Farm Readiness Review and FSMA Produce Safety Rule Inspection Findings

Meredith Melendez
Leah Cook
Produce Safety Educator’s Call #53
April 5, 2021
Instructions

• All participants are muted.
• There will be time for questions and discussion at the end of the meeting.
• This session will be recorded and the presentation will be shared via the listserv and on our website after the call.
Presenter Bios

• Meredith Melendez has been an Agricultural Agent with Rutgers Cooperative Extension since 2010. She joined the On-Farm Readiness Review development team in 2017. As an agricultural agent she most typically works with diversified farming operations including agritourism, direct market, and organic certified farms.

• Leah Cook is the food inspection supervisor for the Maine Department of Agriculture, Conservation, and Forestry. Her team does USDA GAP audits, commodity crop inspections, and implements the Produce Safety Rule in Maine. Leah grew up on a farm and has worn many different hats in Maine’s food system before joining the Dept of Agriculture.
Impressions From the Field

A COMPARISON OF INSPECTOR OBSERVATIONS AND OFRR POST-FARM VISIT SURVEYS IN THE NORTHEAST

APRIL 5, 2021
Inspector survey:  
12 NE State Regulators, 3 Questions

1. What common misunderstandings about food safety or the PSR did farms have in 2020?

2. What were the most common noncompliance issues you observed during inspections in 2020?

3. What types of technical assistance do you see a need for in your state?

Northeast regulators informally canvassed themselves with these 3 questions in preparation for the NECAFS Annual Conference February 16-18, 2021.
OFRR post farm-visit survey: 12 NE States, 656 responses

- Acreage
- Produce sales range of the farm
- Total food sales of the farm
- Walk Around Questions used
- Top three Walk Around Question sections
- Individual priorities for improvement within each of the three areas
- Readiness of the farm for an inspection
- Needs of the farm
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Common Misunderstandings:

**TOP 5:**
1. Cleaning, Sanitizing, Food Contact Surfaces
2. Audits vs FSMA Produce Safety Rule
3. Who the Produce Safety Rule Applies To
4. Record Keeping
5. Hand-Washing

**RUNNER UPS:**
- General Water Requirements
- Antimicrobial Washes
- Visitor Policies
- Covered/Non-Covered Produce
- Dropped Produce
- Pest Control
- Food Safety Risks of Pets
- Contact With the Ground
Common Misunderstandings:

Education Takeaways:

- Biggest need is for sanitation TA.
- Training in sanitation fundamentals still a major need for produce sector.
- Applied/operational sanitation TA is another major need for growers.
- Clear communication targeted to auditee groups may be needed in each state.
- Record keeping likely to be addressed through inspections or 1-on-1 farmer coaching, not more templates.

OFRR Common Comments:

- Records for cleaning
- Harvest containers contacting ground?
- Lack of sanitizer use in postharvest water?
- Foam donuts as an inappropriate food contact surface?
- Postharvest water temperature monitoring?
- SOPs needed
Common Noncompliance Issues:

**TOP 5:**
1. Record Keeping
2. Cleaning, Sanitizing, Cleanability of Materials
3. Worker Training
4. Building & Facilities
5. Hand-Washing Stations

**RUNNER UPS:**
- Agricultural Water
- Miscellaneous Hygiene
- Handwashing
- Handling Covered Produce
- Animals in Exterior Settings
### Common Noncompliance Issues:

#### Inspection Takeaways:
- Record keeping issues will likely resolve through repeat inspections and observations.
- Growers may need additional resources to address sanitary design and construction of equipment and buildings.
- Growers may need employer training to prepare to deliver worker training.
- Need to build general familiarity with Subpart L and/or CGMPs for produce sector.
- Educators and regulators may need to calibrate recommendations to growers on field placement of hand-washing stations to keep messaging consistent.

#### OFRR Takeaways:
- Postharvest sanitation, 47%
  - Inadequate record keeping
  - Inadequate construction/maintenance of building walls, drains, or ceilings
- Worker health and hygiene, 35%
  - Inadequate visitor notification
  - Inadequate or missing records
- Preharvest worker training, 27%
  - Inadequate records
  - Lack of annual worker training
- Preharvest sanitation, 24%
  - Inadequate records
  - Inadequate cleaning and sanitation of equipment
- Preharvest water, 24%
  - Lacking testing results for water source
Technical Assistance Needs Identified by Inspectors:

**TOP 5:**
1. Cleaning & Sanitizing
2. Worker Training Materials
3. Water
4. Ag Engineering
5. Record Keeping

- Scientific Research & Guided TA

**RUNNER UPS:**
- Farm Definitions & QE
- Labeling & Traceability
- Specialized TA for Niche Farming Communities
- Cross-Sector Support
- Re-Used Containers
- More OFRR Capacity
### Technical Assistance Needs:

#### Inspection TA Takeaways:

- Biggest current need is in sanitation.
- Likely biggest upcoming need is in ag water.
- Methodology matters—don’t need more of the same handouts.
  - Need operational tools and resources.
  - Need for **applied, practical** TA or coaching.
  - Need to actually give growers recommended actions for equipment, sanitation, SOP and SSOP creation.
  - Worker training resources need to be materials growers can use to **give their workers trainings** in appropriate languages.

#### OFRR TA Takeaways:

- Postharvest sanitation how-to
- What are appropriate food contact surfaces, how to manage them, how to fix them
- How to conduct a water system inspection
- Wastewater management
- Specialized training for specific jobs
- What adequate farm worker training looks like beyond the Cornell video
- Fostering employee buy-in of food safety culture
Regulator Punchlines:

- Not all issues will be addressed through the same channels.
- Sanitation and sanitary design needs all of us working on it at every level.
- Record keeping issues are common, but are not the highest priority for regulators.
- Ag water will become a huge priority once Subpart E is finalized.
- Regulators see a need for more specific, individualized resources and TA approach.
- Regulatory environment & market access approach vary by state within the region.
- We need routine mechanisms to communicate between regulators & educators for shared visibility.
OFRR Final Thoughts

Farms having a OFRR and inspections represent the full spectrum of produce growers across the US.

Records continue to be an issue across all farm sizes and locations.

Agricultural water is a concern for farms who are new to produce safety and testing is a new concept. Many resources available and more being made available on how to find appropriate labs and what to look for.

Technical assistance resources continue to become available, most being posted on the NECAFS clearinghouse.

Improved communication between regulators and educators needed.
Additional Resource

• PSA Educator Call July 2018 “On-Farm Readiness Review (OFRR) Program and Toolkit” (presentation and recording)
  https://produc saf etyalliance.cornell.edu/resources/educators-group/
We’re Hiring!

• PSA Spanish Language Extension Associate
• Interested in joining a motivated produce safety team?
• For position description, visit: https://academicjobsonline.org/ajo/jobs/18362?fbclid=IwAR3X4EBa8YfsxXGYoOczvdi2yylyJL6KhrzwHSNOYoSHU6QAobSmITZ9-J0

• Review of applications will begin on April 12, 2021
Next Educator’s Call

• Next meeting: To Be Decided
  – Will email next call details to the Produce Safety Educators Group listserv
  – Details will also be posted on the Educators Group webpage:
    https://producesafetyalliance.cornell.edu/resources/educators-group/