Produce Safety Educator’s Monthly Call #27  
October 2, 2017  
2 PM Eastern  
Meeting Notes

Total Attendance: 76  
Meeting recording available at:  
https://vod.video.cornell.edu/media/Produce+Safety+Educator%E2%80%99s+Monthly+Call+27/1_kgkiuzo2

Speakers:

- Stephen Hughes, Team Lead FDA Produce Safety Network  
- Bob Ehart, Senior Policy & Science Advisor, National Association of State Departments of Agriculture (NASDA)

October 2, 2017 Meeting Notes

I. State Produce Implementation Cooperative Agreement Program  
   a. Stephen Hughes – Team Lead, FDA Produce Safety Network  
   i. FDA Implementation of FSMA  
      • Three main components to Produce Safety Rule implementation  
        a. Substantial investment in industry training  
        b. Collaboration with state partners  
        c. FDA’s Produce Safety Network  
   ii. Purpose:  
      • Advance concepts to nationally integrate a food safety system  
      • Funding to enable states to plan, establish, and enhance produce safety programs  
   iii. Funding: First year of program: October 2016-2017- $21 million in funding to states to start developing state produce safety programs. Second year: $30.9 million to states.  
      • Competition A & B: 43 states participating; 3 in Competition A, 40 in Competition A & B.  
        a. Comp A: Infrastructure for produce safety programs, education, technical assistance, developing farm inventory. FDA will handle inspections for those only participating in Competition A.
b. Comp A & B: All above, plus developing an inspection and compliance program.

- Four key components
  a. Evaluate educational needs and implement an educational system
  b. Research and identify sectors with unique needs in state or region
  c. Utilize existing programs and resources
  d. Develop and implement technical assistance and education to address local and regional practices and conditions

- Industry Education – Examples of how states are currently using funds
  a. Some states helping to ensure growers have access to PSA Grower Trainings by providing funding for growers to attend trainings
  b. Other trainers developing a cadre of trainers and lead trainers
  c. Working with trainers to defray cost of registration, cost of educational materials, etc.

b. Bob Ehart - Senior Policy & Science Advisor, National Association of State Departments of Agriculture (NASDA)
   i. Extension’s Role in Working with the States
      • Every state’s department of agriculture is different
      • Most states used Year 1 as a planning year
   ii. FDA Commissioner, Dr. Gottlieb, announced at annual NASDA meeting that there would be a delay in inspections so that states can prepare to conduct inspections and engage in more training opportunities.
   iii. States are looking into their authority; half of states have ability to adopt rules by reference (more straight-forward). In the other half, the state has to go to the legislature to get authority in order to implement the Produce Safety Rule. States can also apply for credentialing – this is a stop-gap process or a longer-term strategy to take part in the implementation of the Produce Safety Rule.
   iv. FDA asked NASDA to establish a National Consortium for Produce Safety. Independent first meeting held – March 2016, next scheduled for March 2018. Good opportunity for states to get together to learn about what is going well/not going well. Upcoming meeting will have time for regional dialogue and discussion of ‘tiers’.

c. Questions & Answers
   i. Q: Are there any updates for the On Farm Readiness Review (OFRR)?
      A: Last development meeting happened last week. Start trainings by mid-December. Planning to give all states the opportunity to get to a training between December 2017 and March 2018.
ii. **Q:** How will the OFRR being used in the new inspector training? Are there other steps being taken to help harmonize what the OFRR projects about an inspection versus what the inspection will actually be like?

**A:** Other than mentioning it in inspector training, the inspectors will have a separate training. The idea is to have Extension, state regulatory, and FDA person to make up teams to go out on farms. We are still working on being able to make sure those individuals are fully trained, and those individuals would have gone through the inspector training basic program. PSA Training is also a pre-requisite. In development – a mentorship program that allows for anyone who has been trained to be able to access a mentor to make sure they are ready to conduct OFRRs.

iii. **Q:** How is Extension engaging with this process?

**A:** In many ways – most states are involving their state staff as well as county staff. In many cases, it will depend on the state department who received the cooperative agreement and their relationship with Extension.

iv. **Q:** Are there any additional funds for Extension to engage in these activities?

**A:** FDA’s current method has been to work with a state agency that could be involved in the enforcement and compliance portions of the program. There are some limitations on the amount of money that can go from any state agency where it was awarded to any sub-grantee or Extension group. Therefore, those are being worked out on a state-by-state basis. Funding in addition to that have been made available through the four Regional Centers and National Centers. The Association of Public & Land Grant Universities – NASDA have been looking into working with Extension directors as well as possibilities through the Farm Bill.

There is a lot of flexibility for how money is awarded. The states were awarded flexibility to reallocate money after announcement of the delay of inspections. It’s not a long-term funding mechanism, but in the near term it will provide more flexibility.

**Additional Comments:**

- Arizona Extension is working with the Arizona Dept. of Ag. Currently working on sub-award agreements to disseminate training.
- Vermont is also working on sub-awards through University of Vermont. Extension and Agency of Ag to conduct OFRR.

v. **Q:** Is there any issue related to the allocation of funding based on number of farms within particular states? Some states are finding more covered farms than they had expected.
• Vermont – Thinks they may find more covered farms than they originally thought. Competition A funding can be for outreach and education for any produce farms, but the Competition B portion (inspection and compliance) will only apply to those farms who need to comply – so it may even out in the end.
• There is a general interest in farms that are qualified exempt – because they may want to expand their business at some point. Education and outreach will still be key for exempt/not covered farms.
• Arkansas – Working closely with Ag department to roll out training. Did not include OFRR in Year 2 funding – can we make a revision? A: Yes, there will be an opportunity to make revisions.

vi. Q: Is there any schedule for OFRRs publicly available yet?  
A: NASDA is revamping training schedule to consolidate trainings. NASDA is working around growing seasons as well as availability of trainers. Between December and March, there will be availability for all states to participate in at least one opportunity. A hold has been put on announcing dates until NASDA has confirmed they have the budget to conduct their scheduled trainings.

vii. Q: Who needs to attend inspector training?  
A: Extension person will likely be lead in most instances – they will likely be the ones to answer the questions about what an inspection might look like. NASDA is not expecting individuals hosting OFRRs to become inspectors, but they will need to understand the inspection process and attend the training.

d. Other Announcements  
i. Rarely Consumed Raw Produce Factsheet now available:  

ii. Local Food Safety Collaborative Survey  
Needs Assessment Survey to Enhance Food Safety Knowledge among food producers. Launched June 20th and open until the end of October. 700 participants so far, looking for more. Attached to this e-mail is a media tool kit to share the survey with participants via e-mail, social media, etc. We appreciate any help in distributing the survey to a wider audience!

iii. Recent FDA Announcements  
• Small Entity Compliance Guide (9/5/17)  
https://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/ucm574281.htm

• Equivalent Water Test Methods (9/11/17)  
https://www.fda.gov/Food/FoodScienceResearch/LaboratoryMethods/uc
• **Announcement: Inspections will not begin until 2019** (9/12/17)

  [https://www.fda.gov/Food/NewsEvents/ConstituentUpdates/ucm575532.htm](https://www.fda.gov/Food/NewsEvents/ConstituentUpdates/ucm575532.htm)

  “At a speech in New Orleans at the annual conference of the National Association of State Departments of Agriculture (NASDA), FDA Commissioner Scott Gottlieb, M.D., outlined a number of immediate next steps in a comprehensive approach to ensuring successful implementation of the Produce Safety Rule established by the FDA Food Safety Modernization Act (FSMA). During the conference, he discussed FDA's approach to agricultural water challenges including an extension of agricultural water compliance dates, stakeholder engagement on agricultural water standards, and equivalent water testing methods. In addition, produce farm inspections and training opportunities for producers and regulators were discussed as part of the comprehensive plan.”

• **Proposed Rule: Extension of Compliance Dates for Subpart E** (9/13/17)


  “The FDA issued a proposed rule that, if finalized, would extend the compliance dates for the agricultural water requirements by an additional two to four years (for produce other than sprouts). The proposed extension will give the agency time to take another look at the water standards to ensure that they are feasible for farmers in all regions of the country, while protecting public health. The new agricultural water compliance date the FDA is proposing for the largest farms is January 26, 2022. Small farms and very small farms would have until January 26, 2023 and January 26, 2024, respectively. The proposed rule is open for public comment for 60 days.”

iv. **Additional Soil Summits**

  • South Central: Dec. 12-13, 2017 – Houston, TX - [Registration](#)
  • Southeastern: Jan. 21-22, 2018 – Atlanta, GA – [Registration](#)

v. **Water Summit**

  • Working with FDA on details and scope of this meeting, very preliminary stages of planning
• Likely in the February-March 2018 time frame
• Location, TBD

vi. **PSA Materials**
Currently working on Version 1.1 of PSA curriculum
Updates include:
• Correction of typos
• Clarification of PSR requirements or section symbols
• New resources & references
• No date set yet, but hoping to make new version available in time for winter grower trainings along with V 1.0 change log
• Materials now available in English (3-hole punched) & Spanish (bound)

vii. **Online PSA Grower Training Course**
• Working towards goal of early 2018 launch
• Currently testing Module 2 with growers, collaborators, and regulators to ensure current approach including structure, interactive components, and content review features are effective and acceptable to participants.

e. **Next Meeting**: Tentative Monday, December 4, 2017 – 2 PM Eastern
i. Send any agenda items or topics for discussion to Gretchen at glw53@cornell.edu
ii. Call in information will be sent closer to the date of the meeting