

Produce Safety

ALLIANCE

Critical Edits for Version 1.1 to Version 1.2

Module	Slide #	Summary of Change	Notes for Trainers/Course Attendees
All	All	Edited throughout to use 'FSMA Produce Safety Rule' when referring to the regulation.	Consistency
All	Several	Photos changed throughout modules.	To reflect diverse farming practices, racial and gender diversity in U.S. farmers, and to replace poor quality images. Trainers may continue to add or use different photos to suit their audiences' needs per curriculum use policy.
1	19-23	Slides 19-23 in V 1.1 have been reordered in V 1.2 to follow the order of curriculum delivery. The reordered slides in V 1.1 should be in the following order: 19, 22, 20, 21, and 23. (Workers, Soil, Animals, Water, Sanitation)	Some PSA Trainers had noted the slide order did not match the module order so this was corrected. Trainers may still deliver slides in a different order per curriculum use policy, recognizing that they will not match the V 1.2 printed manuals.
1	7	Addition of FSMA Inflation Adjusted Cut Off Limits for farms to determine if they are covered by the FSMA Produce Safety Rule or could be eligible for a qualified exemption.	Inflation adjusted cut offs are updated annually in March. Be sure to check back on the FDA website: https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-inflation-adjusted-cut-offs
1	8	Compliance date table has been updated to include water related compliance dates, along with new supporting notes.	Additional information is included in the notes to provide background for the extension of agricultural water compliance dates, as well as what growers should do in the interim.
2	3	Learning objectives have been reordered to match module divider.	Consistency. The objectives on the slides did not match those that appear on the divider.
2	30	New bullet after Subpart O - 1 and 2. "Records satisfying § 112.30(b) must be reviewed, dated, and signed, within a reasonable time after the records are made, by a supervisor or responsible party (§ 112.161(b))."	Omitted on Version 1.1 and important to note for growers.
3	14	Change § 112.52 to § 112.52(a)	Handling and storage considerations to prevent contaminating fields and equipment are only addressed in § 112.52 (a).

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3	14	Add bullet to notes: "Note: Specific provisions of the FSMA Produce Safety Rule that are related to particular GAPs are noted, however GAPs and GAPs audit schemes are not required by the Rule."	Clarification to avoid confusion.
3	17 & 25	Replace "edible" with "harvestable"	Important to be consistent in the use of terminology from the FSMA Produce Safety Rule.
4	12	New bullet and sub-bullet: <ul style="list-style-type: none"> ▪ Current research in the southwestern United States involves the use of birds of prey to rid produce fields of nuisance birds and rodents, a practice known as falconry. <p>If live animals are used as wildlife deterrents, be aware of and takes steps to minimize risks that they may introduce (e.g., excreta).</p>	Additional research on falconry by Rivadeneira, P. (2018) describes the use of raptors to prevent wild bird and rodent intrusion into fresh produce fields. Poster presented at the Center for Produce Safety Annual Research Symposium.
4	13	<ul style="list-style-type: none"> ○ New bullet: "Tactile repellents deter wildlife by making it uncomfortable for them to touch surfaces such as sticky substances and spikes." 	Previous description of tactile repellents omitted in notes, but shown on slide.
4	18	Replace "edible" with "harvestable"	Important to consistently use terminology from the FSMA Produce Safety Rule.
5.1	3 (New)	New slide added "FDA Water Compliance Date Extension"	Provides updates on the final rule for extending the compliance dates for Subpart E.
5.1	22	Significant changes made to Slide 22, V 1.1, "Geometric Means and Statistical Threshold Values"	Please review new V 1.2 version of this slide.
5.1	22	Change to: "Tools are available to assist in calculating the GM and STV. It is important to understand that, depending on business size, growers will have between January 2022 and January 2024 to begin sampling for a MWQP and otherwise come into compliance with the agricultural water requirements, unless the requirements change in the interim."	To reflect final rule for extension of Subpart E compliance dates.
5.1	25 (New)	New slide added after Slide 25 in V 1.1, "Assessing Water Quality Now"	Slide addresses grower questions about what they should be doing about water testing now, even though water compliance dates have been extended.
5.1	28	Significant changes made throughout Slide 28, V 1.1 "Where Do I Go For Testing?"	Please review new V 1.2 version of this slide.

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5.1	New	Two optional slides were added to address Equivalent Water Testing Methodologies.	Slide 32, V 1.2 covers tests that can be used for both production and harvest/postharvest agricultural water. Slide 33, V 1.2 covers presence/absence methods which can be used for water used during harvest and postharvest.
5.1	32	Significant changes made throughout Slide 32, V 1.1, "Corrective Measures: Treating Production Water"	Please review new V 1.2 version of this slide.
5.2	46	Change to: "Treatments of water that contact produce, including the use of sanitizers, must be registered for that use."	Removed EPA from prior version, as the FDA and others could be involved in establishing use parameters.
5.2	60	New resources added to the notes.	<ul style="list-style-type: none"> ▪ Clements, D., Wall, G., Stoeckel, D., Fisk, C., Woods, K., & Bihn, E. Introduction to Selecting an EPA-Labeled Sanitizer. Produce Safety Alliance. ▪ U.S. FDA Decision Tree for Determining Whether any Particular Antimicrobial Intervention for Food is Regulated by the Environmental Protection Agency or the Food and Drug Administration.
5.2	61	Change to: "For any treatment using a sanitizer, growers should comply with all relevant laws and regulations, including following any applicable treatment labels. Growers covered by the FSMA Produce Safety Rule must monitor their treatments as frequently as necessary. Especially for some chlorine-based sanitizers, monitoring the pH level is critical for effective use."	<ul style="list-style-type: none"> ▪ Edit made to focus on use of sanitizers, not other treatment methods (e.g., filtration).
5.2	62	Change to: "Measurement of ORP can help growers stay within the effective range for some antimicrobial products"	Modification made to clarify statement.
7	27	Change to: "The owner, operator, or person in charge of a farm that is eligible for the qualified exemption in § 112.5 will need to comply with modified requirements for labeling."	Change from "grower" to "owner, operator, or person..."