

**WHOLESALE SUCCESS**

www.onfarmfoodsafety.org  
www.familyfarmed.org

**FAMILYFARMED** **USDA** USDA is an equal opportunity provider.

**Trainer: Atina Diffley**

Welcome to Growing Success!

1. Manuals – WS or DMS
2. Food Safety Binder
3. Online Food Safety Plan Tool

**DIRECT MARKET SUCCESS**  
A Manual Guide to Selling Fresh Produce, Livestock, and Eggs  
Third Edition

**WHOLESALE SUCCESS**  
A Manual Guide to Food Safety, Selling, Post-harvest Handling, and Packing Produce  
Fourth Edition

www.onfarmfoodsafety.org

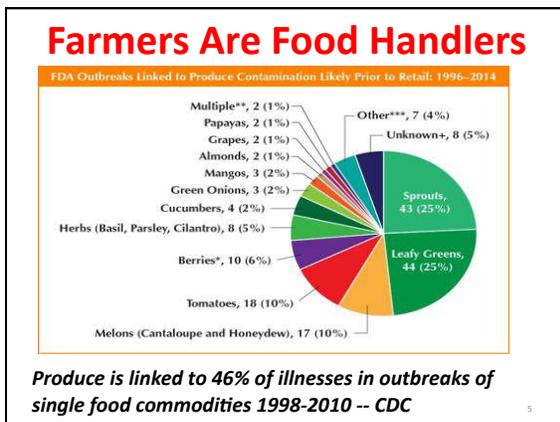
**Farmers Are Food Handlers**  
Responsible For The Safety Of Their Product

Atina Diffley, FamilyFarmed.org trainer, [www.atinadiffley.com](http://www.atinadiffley.com)

**Farmers Are Food Handlers**  
Center for Disease Control and Prevention (CDC)

- 48 M cases of food poisoning (1 in 6 Americans)
- 128,000 hospitalizations
- 3,000 deaths

*We are Responsible for the Safety of our Product!*



**Crops More at Risk**

- Raw vs. cooked
- Salad mix
- Netted melons
- Tomatoes
- Niches and textures that holds moisture

**Food-Borne Illness Attributed to Produce from the Farm**  
 CDC can only identify 40% of the **causes**. Of those:  
 – From 1998-2008, 5% might come from a farm.  
 – From 2009-2013, up to 2% might come from a farm.

**Develop A Food Safety Culture**



**Sources Of Food Borne Illness**

- 1. Physical:** such as glass, metal, stones, plastic, bone, or bullets
- 2. Chemical:** such as pesticides, lubricants, or cleaners
- 3. Biological:** such as bacteria, viruses, fungi, or parasites

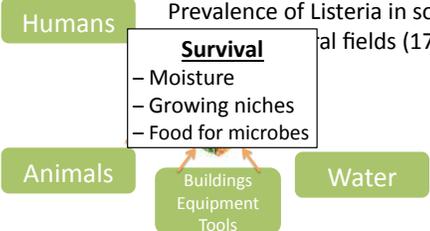


*The most significant carriers of biological contaminants are soil, water and fecal matter.*

**As bacteria and viruses are not easily washed off produce, limiting contamination is the best policy.**

**Contaminants Are Present On All Farms**

- 1. Potential Sources: Perform a risk assessment**
  - Create maps and descriptions
  - Identify potential sources
  - Reduce survival and reproduction of pathogens at source



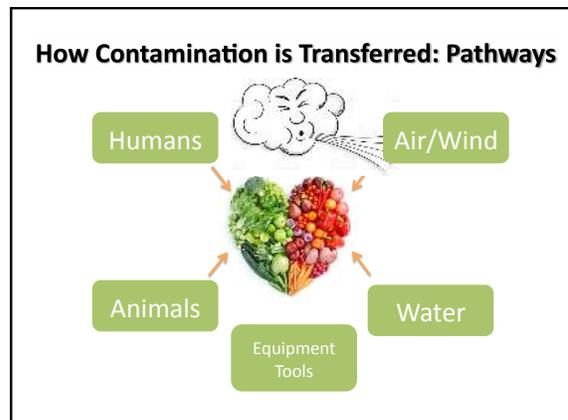
Prevalence of Listeria in soil  
 Survival  
 – Moisture  
 – Growing niches  
 – Food for microbes

**Contaminants Are Present On All Farms**

- 2. Prevent Spread - Transfer**
  - Prevent contaminants from getting on produce
  - Prevent contaminants on produce from spreading to other produce



Always wash hands before handling produce, wash produce thoroughly, and wash hands after handling with soap and water.



### 2009 Listeria Case

- 147 infected
- 33 + 10 dead
- 1 miscarriage



**Source – Survival/Reproduction – Transfer**



### RISK ASSESSMENT

- Land Use
- Water Quality
- Wild and Domestic Animals
- Worker Health & Hygiene
- Worker Training
- Harvest/Packing/Transport

### Written Food Safety Plan

- Organic, plan, train
- Required for food safety audits
- Not required for FSMA

**Source – Survival/Reproduction – Transfer**

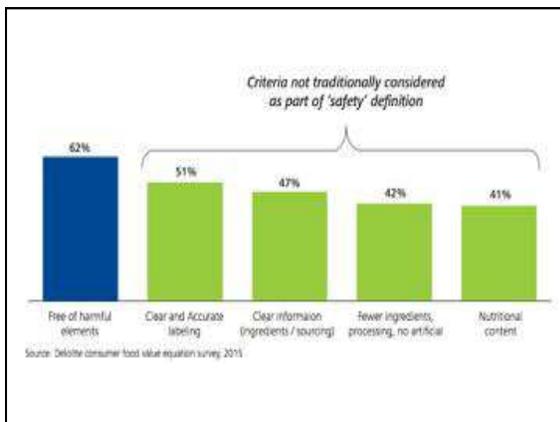
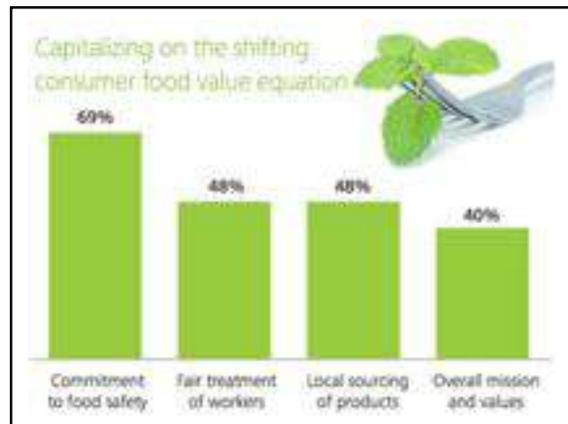
### Fill-It-Out

Fill out “Designated Food Safety Person”

- H-GAP: Designated person needs to be a manager
- On small farms there might not be an alternative

DESIGNATED FOOD SAFETY PERSON	
Farm Name	
Address	
Phone	
Designated Food Safety Person	
Name	
Address	
Cell #	
Phone # at work	
Phone # at home	
Alternate Food Safety Person	
Name	
Address	
Cell #	

★ B



### This Training Is Not Designed To Address Sprout Production



**1938 Federal Food, Drug, and Cosmetic Act (FDCA)**

- Became illegal to sell adulterated food: contains any poisonous or deleterious substance which may render it injurious to health

**History: Good Agricultural Practices (GAPs) and Audits**

- 1998 - FDA's Guide To Minimize Microbial Risks in Fruits and Vegetables (GAPs)
- 2000s – Over 12 different FS standards developed
- 2009 - Harmonized GAP Standards “one audit by any credible third party, acceptable to all buyers”

**FDA PRODUCE RULE AND YOUR FARM**

Establishes **science-based** food safety requirements for growing, harvesting, packing, and holding produce on domestic and foreign farms.

**1/27/16 Rule into effect**  
**So new, still need guidance**



- Risk based, **not as prescriptive as** GAPs and 3<sup>rd</sup> party audits
- Virtually all fresh produce is “covered”
- Primarily deals with biological hazards
- Doesn't require a Food Safety Plan or 3<sup>rd</sup> party audit (yet)

**WILL REQUIRE RECORD KEEPING AND WATER TESTING**

20

Is your operation

- Exempt
- Qualified Exempt
- Required to be in full compliance




**Am I Affected by the FSMA Produce Rule?**

The Produce Rule sets standards for farms that grow, harvest, pack, or hold produce for human consumption.

```

    graph TD
        A[Is any of the produce you] --> B{Do you grow, harvest, pack or hold produce (e.g. fruits, vegetables)?}
        B -- YES --> C{You are likely NOT covered by the Produce Rule}
        B -- NO --> C
    
```

**Exemptions include produce that:**



- Is processed with a “kill step.”
- Farms that have an average annual value of **PRODUCE** sold during the previous three-year period of \$25,000 or less.
- Produce for personal consumption.

**Putting adulterated food into interstate commerce is a “prohibited act” for ALL farms!**

22

**Exemptions include produce that:**



Audits do not exempt

- Is on the exhaustive “rarely consumed raw” list: asparagus; black beans, great Northern beans, kidney beans, lima beans, navy beans, and pinto beans; garden beets (roots and tops) and sugar beets; cashews; sour cherries; chickpeas; cocoa beans; coffee beans; collards; sweet corn; cranberries; dates; dill (seeds and weed); eggplants; figs; horseradish; hazelnuts; lentils; okra; peanuts; pecans; peppermint; potatoes; pumpkins; winter squash; sweet potatoes; water chestnuts

23

**BOTH COVERED AND EXCLUDED PRODUCE?**

If the excluded produce is not in accordance you must:

- Keep covered produce separate from excluded produce, (except when they are placed in the same container for distribution)
- Adequately clean and sanitize, food contact surfaces that contact excluded produce before using on covered produce.




**Covered produce** means produce that is subject to the requirements . . .  
 The term “covered produce” refers to the harvestable or harvested part of the crop.

**Covered activity** means growing, harvesting, packing, or holding covered produce on a farm. Covered activity includes manufacturing/ processing . . . within the meaning of “farm” . . .

**Qualified Exemption and Modified Requirements**

- Food sales averaging less than \$500,000\* per year during the previous three years;
- **Food is all food, consumed by animals or humans**
- **and**, More than half of sales are sold to “qualified end-users”.

A qualified end-user is the consumer of the food or a restaurant or retail food establishment that is located:

- in the same state
- or the same Indian reservation as the farm
- or not more than 275 miles away



\*Adjusted for inflation, the baseline year for is 2011.

Farm grossing \$490,000		
QE	Not QE	
	\$240,000	Commodity grains to an elevator
\$250,000		To CSA members in the same state
\$250,000	\$240,000	Totals

- Exempt  
 - Qualified Exempt  
 - Required to be in full compliance

Farm grossing \$490,000		
QE	Not QE	
	\$250,000	Commodity grains to an elevator
\$240,000		To CSA members in the same state
\$240,000	\$250,000	Totals

- Exempt  
 - Qualified Exempt  
 - Required to be in full compliance

Farm grossing \$75,000		
QE	Not QE	
\$20,000		Meat to local consumers through Craig’s List
\$5,000		Sweet corn wholesale to local CSA
\$5,000		Honey to local nursing home
\$5,000		Fresh fish to local restaurant
	\$40,000	Commodity grain to elevator
\$35,000	\$40,000	Totals

Before we discuss what “qualified exempt” means

Is your operation

- Exempt
- Qualified Exempt
- Required to be in full compliance


**Am I Affected by the FSMA Produce Rule?**

The Produce Rule sets standards for farms that grow, harvest, pack, or hold produce for human consumption.

```

    graph TD
        A[Is any of the produce you] -- YES --> B[Do you grow, harvest, pack or hold produce (e.g. fruits, vegetables)?]
        B -- NO --> C[You are likely NOT covered by the Produce Rule.]
        B -- YES --> C
    
```

**Qualified Exempt farms are subject to parts of the Rule**

- **Subpart A** General Provisions, "QE" and Labeling 1/1/20
  - Personnel Qualifications and Training
  - Health and Hygiene
  - Agricultural Water
  - Biological Soil Amendments of Animal Origin
  - Domesticated and Wild Animals
  - Growing, Harvesting, Packing, and Holding Activities
  - Equipment, Tools, and Buildings
- **Subpart O** General record keeping requirements. 1/27/16  
1 year later: Record reflecting an annual review and verification of continued eligibility for qualified exemption
- **Subpart Q** (Compliance and Enforcement)  
*It is illegal to sell adulterated food*
- **Subpart R** (Withdrawal of Exemption)
- Traceability



**Qualified Exemption Compliance Dates**



- 1/27/16 – Compliance date for retention of records supporting eligibility for qualified exemption
- 1/1/20 - Packaging, label, placard indicating farm name and complete address
- 1 year from the general compliance date: Record reflecting that the farm has performed an annual review and verification of continued eligibility for the qualified exemption

**B**

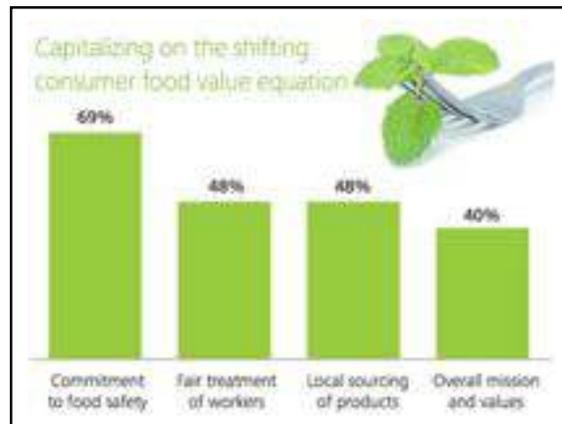
1938 Federal Food, Drug, and Cosmetic Act  
*putting adulterated food into interstate commerce is a "prohibited act", regardless of whether a farm is covered by the Produce Rule or not*

**Produce Rule Compliance dates**

Exempt, or not, what is your compliance date?



Produce Sales of Covered Farm	Time period starting from effective date 1.27.2016	
	For Certain Water Requirements	For All Other Requirements
Very small: Less than \$250,000	6 years – 2022	4 years - 2020
Small: \$250,000 to \$500,000	5 years – 2021	3 years - 2019
Large: More than \$500,000	4 years – 2020	2 years - 2018



**MARKET EXPECTATIONS**

**1. What market demands does your food safety system need to satisfy?**

- Do your buyers require a 3rd party audit?
- Can you negotiate with your buyers to accept a risk-based Food Safety Plan or instead of a 3<sup>rd</sup> party audit?

**B**

**Bottom Line: Audits & FSPs are many buyer's expectation**

**Audit Verification Checklist**

- Ask your buyer if they require a specific audit program
- Write to the audit

**Worker Health & Hygiene**

Questions	Points	Yes	NO	N/A	Doc
G-3 Potable water is available to all workers.	10				R
G-4 All employees and all visitors to the location are required to follow proper sanitation and hygiene practices.	10				P
G-5 Training on proper sanitation and hygiene practices is provided to all staff.	15				D
G-6 Employees and visitors are following good hygiene/sanitation practices.	15				
G-7 Employees who handle or package produce are washing their hands before beginning or returning to work.	15				
G-8 Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work.	10				
G-9 All toilet/restroom/field sanitation facilities are clean. They are properly supplied with single					

**c. Fresh Fruits and Vegetables:** All fresh fruits and vegetables must be at the appropriate stage of ripeness for menu service and be clean and free of debris. Whole produce must be US Fancy or US No. 1 grade quality unless otherwise specified. It is understood that the FPC and fruit and vegetable producers are not required by this Agreement to have GAP, GHP, or other third-party food safety certification. However, at a minimum the producers are expected to meet the following food safety standards:

- i. Anyone involved in the harvest, handling, or packing of produce has access to and utilizes clean toilet and handwashing facilities.
- ii. All workers practice proper handwashing when involved in harvest, product handling or packing activities and wash their hands before work, before and after meals, eating, and toilet use.
- iii. Water used for overhead irrigation or application of pesticides is from a treated municipal source or a properly constructed, capped well, in good condition and has been tested by a State hygiene at least once in the previous year.
- iv. Water used from surface ponds is only used for drip irrigation.
- v. Pesticide use follows the labels specific to each pesticide product and record of each pesticide application including date, field applied, active ingredient, and rate is maintained for at least one year.
- vi. Raw animal manure must be composted unless it is incorporated into the soil not less than 120 days prior to the harvest of a product whose edible portion has direct contact with the soil at least one year.
- vii. Produce is never grown in fields that might receive manure run-off from other fields or barnyards.

**Northland College Food Service Contract**

**Fill-It-Out**  
General Section



**1.2.1. Food Safety Plan of**

Farm Address:	
Phone:	
Farm Email:	
Farm Website:	
Type of Business:	
Signature of person(s) preparing this plan:	
Date written or revised:	

**WHOLESALE SUCCESS**

**THANK YOU!**

- Resources
- Follow-up

[james@familyfarmed.org](mailto:james@familyfarmed.org)  
[onfarmfoodsafety.org](http://onfarmfoodsafety.org)  
[familyfarmed.org](http://familyfarmed.org)  
[atinadiffley.com](http://atinadiffley.com)

[www.onfarmfoodsafety.org](http://www.onfarmfoodsafety.org) [www.familyfarmed.org](http://www.familyfarmed.org) **FAMILYFARMED** **USDA** This institution is an equal opportunity provider.

**FDA PRODUCE RULE**

**1. At a minimum . . . EVERYONE is trained on**

- Principals of food hygiene and food safety
- Human health and personal hygiene

- upon hiring
- at least once annually
- as needed

- Additional training based on assigned duties

- Persons who conduct harvest must receive. . .

**2. At least one supervisor or responsible party must have successfully completed food safety training at least equivalent to that recognized as adequate by the FDA.**

**“Food Safety Action Plans” Combine Risk Assessment, A Plan Of Action, A Training Tool, and Procedures, in one Food Safety Plan**



Farm Name: \_\_\_\_\_ Address: \_\_\_\_\_ Date I written by: \_\_\_\_\_

**Human Health and Food Safety Action Plan**  
State clearly what you plan to do and create accountability

Area of Food Safety Action	What	How SOP or Practice	Who	When	Training	Record	Rank 1-5	Check in
Policies To Reduce Risk		How is this done? Is the practice or SOP written?	Who is required to do this?	When is this done?	What training is done, who, and where?	What records are kept for this action? Where?	1 to 5	High priority
Hand Washing	<b>RELEVANT:</b> Everyone who handles or supervises produce must use proper hand-washing techniques.	Written SOP	Everyone on the farm must understand and practice proper hand-washing, regardless of their job or activities on the farm. This includes farm owners and family members.	Workers are required to wash their hands before beginning work - Putting hands in tank water after - Break - Urine etc.	Everyone who handles produce on the farm is trained in proper hand-washing techniques when they begin working, at the start of	Records are kept of training on hand-washing in the Training Training binder	1	High priority

- There are no requirements for a specific FSP
- FSPs need to be appropriate for your operation
- FSPs can be simple

**Policy: What we will do...**

- A policy is a "rule" that the operation states it will follow.
  - It doesn't matter if it is a regulatory requirement or the operation's own decision
  - Use definitive words like "shall" and "must". Words like "should," "could," or "may" are not used as they are not mandatory words.
- A policy can be written or not.

**How we will do it**

- Standard Operating Procedure (SOP)
- Practice

Policies can be implemented through SOPs or Practices, but the existence of a policy does not require a SOP or Practice.

**Standard Operating Procedure - SOP: How we will do it**

- Write SOPs when there is clearly a "right way" to do something and where **IN ALL** instances something should be done exactly the same way by everyone, every time.
  - Includes step by step instruction
- SOPs can be useful used as a training tool
- SOPs are always written and include a training record

**Practice: How we will do it**

- Use Practices when there is not set/preferred way to accomplish it. The outcome is what matters.
- Example: Training on not bruising produce
- Practices can be written or not, and include a training record.

**Need a SOP or a Practice?**

Consider regulatory requirements, adherence to a specific commercial standard, and the farms' accountability needs.

Form Name: \_\_\_\_\_ Address: \_\_\_\_\_ Date of issue: \_\_\_\_\_

**Human Health and Hygiene Action Plan**  
State clearly what you plan to do and create accountability

Area of Food Safety Action	What	How SOP or Practice	Who	When	Training	Record	Check in 1 to 3 months	Done: Write By
Hand Washing	POLICY: Everyone who handles or supervises produce must use proper hand-washing techniques.	Written SOP	Everyone on the farm must understand and practice proper hand-washing, regardless of their job or activities on the farm. This includes farm owners and family members, volunteers, and visitors.	Workers are required to wash their hands before beginning work. - Rubbing hands in lukewarm water. - Breaks. - Using the restroom. - Smoking. - Eating. Or otherwise compromising the sanitary nature of hands.	Everyone who handles produce on the farm is trained in proper hand-washing techniques when they begin working, at the start of each season, and/or additional training is provided. The hand-washing SOP is used for training. Signs are posted in bathrooms and eating areas.	Records are kept of training on hand-washing in the Training Training folder.	1	

**Your Food Safety Action Plan Can Serve As a SOP**

**Food Safety Action Plans and Whole Success Materials**

**Human Health, Hygiene and Worker Training**

- Human Health and Hygiene Action Plan
- Worker Training Documentation
- Sample Hand Washing SOP
- Write a Standard Operating Procedure

**Sanitation and Cleanliness**

- Zone Management
- Sanitation Plan

**Water and The Produce Rule**

- The Produce Rule and Agricultural Water
- Water Action Plan

**Postharvest**

- Harvest, Postharvest, and Transportation Action Plan

**Record Keeping, Traceability, and Recall Plans**

- Traceback and Recall Plan
- Produce Rule Record Keeping Requirements

**Land Use and Biological**

- Land Use Action Plan || W
- Examples for Land Use Ac
- Biological Soil Amendment

[www.onfarmfoodsafety.org](http://www.onfarmfoodsafety.org)

[www.atinadiffley.com](http://www.atinadiffley.com)