Recordkeeping and Traceability

Good recordkeeping to track profitability, inform decision making.

2002 Bio Terrorism Act
- Where did you get it from?
- Where did you ship it to?

Traceback Is A Not Recall

TRACEBACK is a System: an unbroken record of documentation
RECALL is an Action: what you do when there is a problem

Traceability

How fast can you trace?
Lawsuit: Can you do it correctly?

Your Traceback Plan should demonstrate the ability to trace back and forward by lot through the supply chain.

Two-way Information flow

Back: ID, input/production practices, post harvest
Forward: Who bought, when, how much

Traceback Plans

Production/Business Records Do Double Duty

- Field maps
- Land history
- Seed lots/source
- Manure/compost
- Harvest records
- Cleaning records
- Sales records
- Worker time cards

- Start with organic record keeping requirements
- Add additional information based on learning needs
- Add food safety (cleaning/monitoring)

Design Record Keeping for Success

- Avoid duplication
- Document as part of work, not a separate activity
- Instruct staff at the same time as record keeping
- Improve staff performance and accountability

Record keeping needs to be routine – a habit – like brushing your teeth.
Food Safety: Recordkeeping, Recalls, & Traceability

Work With Your Record Keepers’ Strengths

Significantly Raised the Risk of Listeria M.:
• Irrigating fields within three days of harvest
• Cultivating fields within a week of harvest

Follow The Money

Ex: Food borne illness can be seed borne

IFFT: If This Than That

Press a button to track work hours in Google Drive
This makes a widget you can add to the home screen on your mobile device. With another time-tracking widget, I can put my work, pass the button without, or even work, press it again. Your work hours will be tracked automatically in a Google spreadsheet for submission.
Cleaning Record Strategies
- Utilize service contracts (SOP)
- Create records that instruct

Lot Numbers & Traceability

Allow you to trace each specific box/carton:

**ON A LABEL:**
- Name and address of the farm (phone)
- Commodity
- Variety
- Pack/Size

**IN A LOT NUMBER:**
- Location of the growing area
- Harvest Date
- Harvest Crew
- Packing Date/Crew
- Shipping Date

GTIN Number
http://www.producetraceability.org/
https://www.foodlogiq.com/ (free, print on Avery)

No Food Safety audit programs or regulations REQUIRE a technology based system

THARO V-SERIES PRINTERS
Lot Numbers & Traceability

Make sure your traceability system is described in your food safety plan!

Lot Number For A Direct Market Farm

<table>
<thead>
<tr>
<th>Production Area</th>
<th>Harvest Date</th>
<th>Sales Outlet</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grown in greenhouse #5</td>
<td>July 15, 2016</td>
<td>harvested on July 15, 2016</td>
</tr>
<tr>
<td>Premium Crop broccoli</td>
<td>by Billy Bob’s crew</td>
<td></td>
</tr>
</tbody>
</table>

Traceability and Retail Sales

What is working? What is missing?

UrbanFarming

Checklist #1 - Farmer's Market Sheet

<table>
<thead>
<tr>
<th>Market Date</th>
<th>Market Name</th>
<th>Series on the Day</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Cash Beginning, Cash Ending, Total Earned</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Vegetable/ Fruit</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Apples, Red delicious</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Apples, Yellow delicious</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Basil, sweet</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Beans, green</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Beans, yellow</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Carrots</td>
</tr>
</tbody>
</table>

What is working? What is missing?

Sample 8b: CSA Weekly Box (Tuesday pick-ups)

Week of: 9/23/03

Lot Tracking: Product Identification at Harvest

Policy: All containers of harvested produce leaving the field must be labeled with field and date lot numbers.
The Bottom Line

• **Start with good recordkeeping.** This will help you put traceability into action and enable you to develop a recall plan.
• **Designate one person** to be in charge of your traceability program.
• For smaller-scale production and fewer markets, go low-tech.
• Even if you go high-tech, have a back-up plan for when the printer jams...

BREAKOUT
1. On the FSMA Record Keeping Requirements document, identify what Produce Rule required records you already are keeping.
2. Are there other records you want to keep?
3. For records not being kept,
   - identify which you want to add keeping
   - is there a system already it could be added to?
   - what system do you want for keeping it?

Where must I store records?
(a) Offsite storage of records is permitted if such records can be retrieved and provided onsite within 24 hours of request for official review.
(b) Electronic records are considered to be onsite if they are accessible from an onsite location at your farm.

How long must I keep records?
- At least 2 years past the date the record was created.
- Records to satisfy the criteria for a qualified exemption, (3 years preceding the applicable calendar year) must be retained as long as necessary to support the farm’s status during the applicable calendar year.
- Records that relate to the general adequacy of the equipment or processes or records that relate to analyses, sampling, or action plans being used by a farm, including the results of scientific studies, tests, and evaluations, must be retained at the farm for at least 2 years after the use of such equipment or processes, or records related to analyses, sampling, or action plans, is discontinued.

Your Recall Plan should clearly define responsible parties and critical actions in the event of an incident.

Establish Procedures:
1. Who is in charge: names, contact info and duties
2. Description of lot tracking system
3. Timeline and process for alerting buyers
4. List of resources with contact information: buyers and suppliers, St Health Dep, St Ag Dept, extension, media, testing labs, lawyers, medical personnel, grower association available to help

www.atinadiffley.com
www.onfarmfoodsafety.org/forms-and-templates/
Food Safety: Recordkeeping, Recalls, & Traceability

Two Volunteers Please To The Front Of The Room

Mock Recall – Day 1

- how simple a mock recall can be
- can serve as a relationship building tool
- demonstrates the importance of trace systems

Grower: “Will you help us out by participating in this year’s mock recall exercise? This is NOT a real recall. We are just tracking some of our product to check our traceability.”

Buyer: “Sure! Of course! WOW! I wish all our growers had traceback and recall plans. How does a mock recall work?”

Mock Recall – Day 1

Grower: “We’ll make our usual shipment to your store tomorrow. The day after, I’ll call you and ask how much of that shipment is still at your location.”

Buyer: “Ok, we’ll be ready for you.”

Mock Recall – Day 3

Grower: “Hello, this is _____ from ___ farm. Calling about the MOCK recall exercise.

Buyer: “Hi. Thanks for setting up this process. What’s next? By the way, that was beautiful produce you sent.”

Grower: “Thanks! Could you tell me how many boxes you have already sold and how many remain at your location? The lot number on the box label is “6.15.16 E9 00 66”

Buyer: “Sure. According to our records, we received 20 boxes, sold 12 and have 8 on site.”

© 2013 Atina Diffley

Prepared and Presented by Atina Diffley,
Organic Farming Works LLC
Grower: Thank you. Would you please email this to me for my records on your letterhead and date it?
Buyer: Of course. Thank you! I really appreciate that you have good traceability and a recall plan. I like doing business with you.

1. What is your Food Safety System goal?
- Compliance with Produce Rule
- Compliance with an audit’s standards
- Setting up safe practices to protect farm and customers

Protected: Food Safety Binder Supplemental Forms

Food Safety Action Plans
- Basic
- Produce Rule
- Harmonized GAP

http://www.dev.onfarmfoodsafety.org/food-safety-binder-supplemental-forms/
Password: FSactionplans

On-Farm Food Safety Plan Tool Is Based on Harmonized GAP Standards

Easy to Switch to Spanish
Saves incomplete and completed manuals for later use

Manuals can be saved for completion later.
OnFarmFoodSafety.org

Sample Question

Simple, yes or no answers.

Best Practices Links Available

Extra Info, Links to resources, and recommendations are provided.

THANK-YOU
- Evaluations
  www.atinadiffley.com
  www.familyfarmed.org