"PRACTICAL FOOD SAFETY" FOR FARMERS AND HANDLERS

A Wallace Center Program

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Introduction: Wallace Center

• Wallace Center at Winrock International
  – 501(c)3
  – Funded by philanthropy, government and businesses

• Wallace role in the Practical Food Safety Program
Introduction to the Practical Food Safety Program

• Inspired by new pressures on smaller growers
  – FSMA
  – Buyer desire for certification

• Food Hubs
  – High trust relationship with growers
  – Market access
  – Grower community resource center
  – Most are continuing to build their supply
Food Safety “Thinking”

• In compliance with FSMA Produce Rule
• Not training to a particular standard
• More like a liberal arts education:
  – The *thinking* behind keeping food safe
  – Practice at executing a plan
• For hub staff
  – Enough knowledge to support farmers:
    • to direct them to resources
    • not spread misinformation (not expert)
• For farmers
  – The tools, confidence and good start toward building a proper food safety plan *for their farm*
Hubs & Local Food Safety Experts

• Hub - Local Source, Food Bank of Northeast Georgia (GA)
  • Beth Oleson, GA Fruit & Vegetable Growers Association

• Hub - LINC Foods (WA)
  • Tricia Kovacs, WA State D of Ag
  • Karen Ullman, WA State D of Ag

• Hub - Headwater Foods (NY)
  • Robert Hadad, Cornell Extension

• Hub - La Montanita (NM)
  • Steve Warshawer
Agenda and Handouts:

http://ngfn.org/foodsaftytraining
Your Starting Screen

Presentation  Control Panel
Local Food Safety Experts - PLEASE unmute yourself and jump in with questions as needed!

Active Participation is Important in this webinar
You can type questions

Type your question in the small box at the bottom of the Questions box.

Press “Send”!
Farmers are Food Handlers (As are Hub staff)

Center for Disease Control and Prevention (CDC)

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

You are Responsible for the Safety of your Product!
Causes of illness in outbreaks of single food commodities 1998-2010 -- CDC

46% From Produce
Food-Borne Illness Attributed to Produce

• Of the 46% of the illnesses documented by the CDC that were attributed to produce, the causes include the farm, processing, storage or shipping; handling by a store, or preparation in a restaurant or home.
Food-Borne Illness Attributed to Produce from the Farm

• CDC can only identify 40% of the causes. Of those identified:
  – From 1998-2008, 5% might come from the farm.
  – From 2009-2013, up to 2% might come from a farm or dairy.
Types of produce Associated with Outbreaks, 1996-2009 (N=87)

Source Credit FDA/CFSAN 2011
Crops More at Risk

- Raw vs. cooked
- Fresh cut ready-to-eat leafy greens
- Netted melons
- Tomatoes
Why the Increase in Foodborne Illness and who is most sensitive?

• More at-risk people – many organic shoppers
  • Elderly
  • Auto-immune diseases
  • Organ transplants
• Increasingly complex food distribution
• Lack of resistance from evolving pathogens
• Pregnant women and children – higher risk
Why Care About Food Safety?

- Wellness of Your Customers
- Farm Liability
- Quality and Shelf Life
- Market Position
- Public Perception of Local Food

- Legal Requirements
- Buyer’s Demands
- Farm Responsibility (GAP)

On-farm food safety and good postharvest practices protect farmers as much as they protect customers.
1938 Federal Food, Drug, and Cosmetic Act (FDCA)

It is illegal to sell adulterated food:

- if the food was “prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health

- is “adulterated” if it bears or 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”
Food Safety Modernization Act – FSMA

FDA PRODUCE RULE: Establishes science-based food safety requirements for growing, harvesting, packing, and holding produce on domestic and foreign farms. (first time)

1/2013 Original rule proposed
9/2014 Supplemental rule proposed
11/2015 Final rule issued, so new, still being interpreted

- Virtually all fresh produce is “covered”
- Primarily deals with biological hazards
- Does not require a written Food Safety Plan, risk assessments, or 3rd party certification (yet)

WILL REQUIRE RECORD KEEPING AND TESTING

Bottom Line: GAPs & FSPs are many buyer’s expectation
FDA Produce Rule regulations include sprout production

Sprout production is beyond the scope of this training
Exemptions include produce that:
- Is not a raw agricultural commodity.
- Is on the exhaustive “rarely consumed raw” list: asparagus; black beans; great Northern beans; kidney beans; lima beans; navy beans; 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
- Is used for personal or on-farm consumption
- Farms that have an average annual value of produce sold during the previous three-year period of $25,000 or less

If you only grow produce found on FDA’s list of “rarely consumed raw,” then this rule does not apply to you, because that is not considered “covered” produce.

http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm334114.htm
Qualified Exemption and Modified Requirements

- Food sales averaging less than $500,000* per year during the previous three years; 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 calculating the adjustment for inflation is 2011.
A farm sells $240,000 in grains to a grain mill for processing, and then also has a CSA that grosses $250,000 selling to members in the same state.

Is this operation
- Exempt
- Qualified Exempt
- Required to be in full compliance
If, however, the farm sells $250,000 in commodity crop grain and $240,000 in produce, then the farm would not be qualified exempt, because the direct sales do not exceed the other sales.
Now take a farm selling $475,000 in produce — $200,000 through a food hub, $200,000 to a local restaurant, and $75,000 to a local grocery store.

Is this operation
- Exempt
- Qualified Exempt
- Required to be in full compliance
If, however, the grocery store was in the next state over, and 300 miles away from the farm, then all the conditions would not be satisfied and the farm would not be qualified exempt because the grocery store would not be considered a “qualified end user.”
Before we discuss what “exempt” and “qualified exempt” actually mean . . . .

Is your operation
- Exempt
- Qualified Exempt
- Required to be in full compliance
Qualified Exempt Farms Are Subject To 4 Sub Parts Of The Produce Rule

**Subpart A** (General Provisions) 1/1/20

You must prominently and conspicuously display, at the point of purchase, the name and complete business address where the produce was grown, on a label, poster, sign, placard, or label

**Subpart 0** (Records)

General record keeping requirements

(we’ll cover record keeping details in session 2)
Qualified Exempt farms are subject to parts of the Rule

Subpart Q (Compliance and Enforcement)
It is illegal to sell adulated food: food grown, harvested, packed, or held under conditions unfit for food

Subpart R (Withdrawal of Exemption)
Exemptions may be withdrawn if:
- there is an investigation due to foodborne illness linked to an exempt farm
- if the FDA determines it is necessary to protect public health
## Produce Rule Compliance dates

Exempt or not, what is your compliance date?

<table>
<thead>
<tr>
<th>Size of covered farm</th>
<th>Time period starting from the effective date of the Produce Rule (Jan 27)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>for certain specified agricultural water requirements</td>
</tr>
<tr>
<td>Very small business</td>
<td>6 years</td>
</tr>
<tr>
<td>&gt; $250,000</td>
<td>5 years</td>
</tr>
<tr>
<td>Small business</td>
<td>4 years</td>
</tr>
<tr>
<td>$250,000 - $500,000</td>
<td>5 years</td>
</tr>
<tr>
<td>All other business</td>
<td>4 years</td>
</tr>
</tbody>
</table>
Qualified Exemption Compliance Dates

1. 1/27/16 – Compliance date for retention of records supporting eligibility for qualified exemption

2. 1/1/20 - Packaging, label, placard indicating farm name and complete address

3. 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

*putting adulterated food into interstate commerce is a “prohibited act”, regardless of whether the farm is covered by the Produce Rule or not*
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.
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.
THE FOOD SAFETY MODERNIZATION ACT: LEARN MORE, ACT TODAY!

Everyone has a role in ensuring safe food from field to fork. The Food Safety Modernization Act (FSMA) is the first major overhaul of our nation’s food safety practices since 1938, and it includes new regulations for produce farms and for facilities that process food for people to eat. It represents some big changes to our food system – and it is extremely important for the Food and Drug Administration to get these regulations right.
FSMA Food Facilities Rule

Large facilities can only source raw materials/ingredients for which they have identified hazards requiring preventive controls from “approved” suppliers (farmers). This could include:

- Onsite audits of the farms they purchase from;
- Review of the farm’s relevant food safety records; and
- Other activities based on supplier performance and the risk associated with the raw material or other ingredients.
Pathogens of Concern in Produce

• Bacterial Pathogens
  – Shiga toxin-producing *Escherichia coli*
  – *Salmonella* spp.
  – *Campylobacter* spp.
  – *Listeria* spp.

• Protozoan Pathogens
  – *Cryptosporidium* spp.

• Pathogens with Antimicrobial Resistance
Bacteria in Us Would Fill a Half Gallon Jug
Factors that Influence Pathogen Reduction

• Biotic
• Abiotic
Biotic Factors - Microbial Interactions

- Kill and consume pathogens
- Outcompete pathogens for food, water, space
- Make conditions unfavorable by exuding toxins
Biotic Factors - Harborage

- Biofilms
- Amoebas
- Algae
Abiotic Factors – Sunlight/UV Exposure
More Abiotic Factors

• Salinity
• pH
• Nutrient Sources
• Temperature
• Moisture and
• Microscopic Niches
Pathogen Routes to the Farm

- Waterborne
- Airborne Dust
- Wildlife
- Livestock
- People
Pathogens Are Present On All Farms

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

2. Prevent Transfer
   – Prevent pathogens from getting on produce
   – Prevent pathogens on produce from spreading to other produce

3. Reproduction
   – Prevent reproduction of pathogens

Contamination From Microorganisms Can Happen At Every Stage of the Produce Handling Process.
Jensen Farms Listeria Case

- 33 + 10 dead
- 1 miscarriage
- 147 infected

A truck used to haul culled cantaloupe to a cattle operation was parked adjacent to the packing facility.

Six misdemeanor counts of introducing adulterated food into interstate commerce.

Where - How it got there - How it transferred - How it survived
Jensen Farms Facility Design

- Pooling of water on packing facility floor adjacent to grading stations and employee walkway
- Packing facility floor not easily cleanable;
- Packing equipment not easily cleaned and sanitized
- No equipment to remove field heat before placing in cold storage.
- Conviction based on “strict liability” no need to prove intent to harm
- Primus gave Jensen Farms - 96% a “superior” rating
- Potato packing equipment allowed water to pool
- No sanitizer was used in the wash water
Federal misdemeanor charges
unknowingly introduced adulterated (Listeria-tainted) cantaloupe into interstate commerce.

The 6-count indictment stated that the cantaloupe was prepared, packed and held under conditions which rendered it injurious to health.

The Jensens faced up to six years in jail and $1,500,000 in fines each. They eventually pleaded guilty and were sentenced to five years of probation.
RISK ASSESSMENT

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

Specific places in the process to assess and intervene to prevent a potential food safety hazard
Food Safety Modernization Act

- Take into consideration, consistent with ensuring enforceable public health protection, conservation and environmental practice standards and policies established by Federal natural resource conservation, wildlife conservation, and environmental agencies; and in the case of production that is certified organic, not include any requirements that conflict with or duplicate the requirements of the national organic program established under the Organic Foods Production Act of 1990 (7 U.S.C. 6501 et seq.), while providing for public health protection consistent with the requirements of this Act.
Buyer Conflicts with Conservation Goals

• In 2006, spinach contaminated with *E. coli* O157:H 7 caused the death of five people.

• In 2007, 89% percent of growers managing 140,000 acres on California’s Central Coast reported that they had actively discouraged or eliminated wildlife from crop areas.

• Over a 5 year period after the contamination, about 13% of the remaining riparian habitat in CA’s Central Coast region had been eliminated or degraded.
Buyer Conflicts with Conservation Goals

Before

After

J. Baumgartner

Lighthawk
Buyer Conflicts with Conservation Goals

- A recent 2015 study found that reducing wildlife habitat and conservation practices does not reduce pathogen risk.

http://www.wildfarmalliance.org/resources/FS_PNAS.htm
Differences Between a Food Safety Plan, an Action Plan, an Audit, and an Inspection

• A Food Safety Plan (FSP) is a written plan for how growers will manage food safety on their farm. A FSP includes the name and contact information of the designated FS person, maps, fs policies, supplier / buyer information, records, SOPS, test results
• FSPs should only include what is being done on the farm
A food safety plan is a risk assessment done by the grower who identifies areas or activities that may directly or indirectly expose crops to pathogen contamination. The assessment usually covers:

1. worker health and hygiene
2. the surrounding environment
3. water quality
4. soil amendments
5. wild and domestic animals
Wash tank water is changed [how often] and water sanitizer [product] levels are maintained at [insert levels], and tested [testing method and how often] and documented on the Water Sanitizer Log.

http://safety.cfans.umn.edu/
What is the On-Farm Food Safety Tool?

• Free and easy to use online tool
  – OnFarmFoodSafety.org
• Based on Harmonized GAP Standards
• Simplifies complex food safety guidelines
• Self-directed and confidential
• Can be used to:
  – LEARN about food safety risks
  – ASSESS and REDUCE your farm’s risks

*Risks can’t be completely eliminated, but they can be identified, documented, and reduced!*
On-Farm Food Safety Plan Tool is Based on Harmonized GAP Standards

A Completed On-Farm Food Safety Manual is the first step to becoming Food Safety Certified!

OnFarmFoodSafety.org
Sample Question

Simple, yes or no answers.

Is there a person(s) at your farm who has responsibility and authority for food safety?  
- Yes  
- No

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

Best Practices Links Available

View Best Practice information

Best practice information will appear in your food safety plan as a useful resource.

It is recommended that you read the best practice information provided through a series of questions. Each best practice link will provide you helpful information that can help you complete your plan and help you to improve your food safety practices.
What if the answer is no?

Are you sure your answer is no? It is important to have a written product traceability program in place. This non-compliance will be reflected in your food safety plan which may negatively impact your ability to gain entry to wholesale and retail markets and/or gain certification in Good Agricultural Practices.

View Best Practice information on traceback.

You can always keep your answer as “NO” if you need to.

Change your answer to “Yes” Keep answer as “No”

Tool notifies when “NO” may be unacceptable.

Provides Links to Best Practices to Address Issues
Checklist with links provided:

**Food Safety Plan Actions and Documentation Checklist**

<table>
<thead>
<tr>
<th>SECTION</th>
<th>SUBSECTION</th>
<th>ACTION TYPE</th>
<th>ACTION</th>
<th>COMPLETE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of Operation: Lily Baker</td>
<td>1.4 Traceback</td>
<td>Form</td>
<td>Print and complete Example Traceback Log. Attach to the end of your manual.</td>
<td></td>
</tr>
<tr>
<td>Prepared By: Lily Baker</td>
<td>1.5 Recall</td>
<td>Area Of Development</td>
<td>Conduct an annual recall exercise to ensure records and systems are sufficient to all recall of products.</td>
<td></td>
</tr>
<tr>
<td>Date: June 3, 2013</td>
<td>1.5 Recall</td>
<td>Form</td>
<td>Print and complete Recall Information Form. Attach to the end of your manual.</td>
<td></td>
</tr>
</tbody>
</table>

Direct links to questions and resources.

What kind of action is needed?

*Easy to keep track of what you’ve accomplished!*
Tool Creates Confidential, Customized Food Safety Plan from your Answers!

Mesa Top Farm Food Safety Manual

Prepared by Steve Warshawer
on January 17, 2012

Click this link to download a full sample manual
Differences Between a Food Safety Plan, an **Action Plan**, an Audit, and an Inspection

If you have a laptop along, the Action Plans can be downloaded for digital use in this class at [http://ngfn.org/foodsafetytraining](http://ngfn.org/foodsafetytraining)

<table>
<thead>
<tr>
<th>Area of Food Safety Action</th>
<th>What</th>
<th>How SOP or Practice</th>
<th>Who</th>
<th>When</th>
<th>Training</th>
<th>Record</th>
<th>Rank 1-3</th>
<th>Check-in</th>
<th>Done</th>
<th>Will By</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policies To Reduce Risk</td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>POLICY: Everyone who handles or supervises produce must use proper hand-washing techniques.</td>
<td>Written SOP</td>
<td>Everyone on the farm must understand and practice proper hand washing, regardless of their job or activities on the farm. This includes farm workers.</td>
<td>Workers are required to wash their hands Before: - Beginning work - Putting hands in tank water After</td>
<td>Everyone who handles produce on the farm is trained in proper hand washing techniques when they begin</td>
<td>Records are kept of training on hand washing in the Training 3-ring binder.</td>
<td>1</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

*Human Health and Hygiene Action Plan*
State clearly what you plan to do and create accountability
Differences Between a Food Safety Plan, an Action Plan, an Audit, and an Inspection

Food Safety Action Plans
- tap into and organize with a can-do style of planning and implementing
- help farmers identify potential risks and develop cost-effective, and scale-appropriate strategies
- create a culture of food safety
- support continuous improvement with a system for prioritizing and tracking progress
- can function as FSPs
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.
SOPS you might include:

• Standardized practices that address food safety risks
• Pest monitoring method
• Cleaning/sanitizing material preparation and process
• Monitoring of cold areas
• Inspection procedure

Beware of SOPing Your Staff To Death!
Write a Standard Operating Procedures (SOP) to Minimize Potential Risks

**SOPs should include:**
- **Title, Date, and Author:** Descriptive title, date written and updated, and who wrote it
- **Responsibility:** Who does it and who makes sure it gets done
- **When:** When and how often the procedure is performed
- **Materials:** A list of the items needed to accomplish the task
- **Detailed Procedure:** Step-by-step, in order, list of what one must do

**Additional information that is often included:**
- **Policy:** Rules on practices on your farm to minimize risks
- **Purpose:** “Description” or “Why we do this”
- **Records:** What records will be kept of the action

**Suggestions for easy to follow SOPs**
- Keep SOPs Focused On Action
- Start with a verb (action word) when possible
- Break steps into numbered tasks
- Be concise
- Be specific

Don’t SOP Your Employees To Death!
• A 3rd party audit uses a set of food safety GAPs to compare the food safety plan to what is actually occurring on the farm.

- Not required by the FDA Produce Rule
- May be required by buyers
# Audit Verification Checklist

Option: Write to the audit

## Produce GAPs Harmonized Food Safety Standard

### Post-harvest Operations - USDA Checklist

### AUDITEE INFORMATION

<table>
<thead>
<tr>
<th>Name of Auditee:</th>
<th>0</th>
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</thead>
<tbody>
<tr>
<td>Date of Audit:</td>
<td>1/0/1900</td>
</tr>
</tbody>
</table>

### Q # | Requirement                                                                 | DOC | C | CAN | IAR | NA |
<table>
<thead>
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</thead>
<tbody>
<tr>
<td>1</td>
<td><strong>General Questions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1</td>
<td><strong>Management Responsibility</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1.1</td>
<td>A food safety policy shall be in place.</td>
<td>WP</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1.2</td>
<td>Management has designated individual(s) with roles and responsibilities for food safety functions.</td>
<td>WP</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>1.1.3</td>
<td>There is a disciplinary policy for food safety violations.</td>
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</tr>
</tbody>
</table>
• An inspection is carried out by a FDA or State health enforcement officer to check that the grower is complying with food safety regulations.
Start Where You Are: **Self-Assessment**

1. Evaluate current management strengths & weaknesses to identify potential food safety risks.
2. **Develop strategies** in management and production practices that can reduce risks.
3. **Develop plans** to improve the food safety of produce grown/packed on your farm.

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**Physical – Chemical – Biological**
Our Goal - At the end of this training, you will have:

• Started your *Land Use Map*
• Filled out *Designated Food Safety Person* document
• Have a good start on creating your Action Plans, that includes identifying records to be kept and SOPs to be written.
  • *Health and Hygiene and Training Action Plan*
  • *Land Use Action Plan*
  • *Cleanliness Schedule Action Plan*
  • *Harvest, Post Harvest, Transportation Action Plan*
• Have written a SOP
• Begun to think through recordkeeping systems you want to use
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 Food Safety Action Plan or Food Safety Plan instead of a 3rd party audit?

2. Share a Take-Away

Break-out