FOOD SAFETY TRAINING FOR FARMER SUPPORT ORGANIZATIONS, PART 1
SUCCESSFUL FARM FOOD SAFETY AUDITS

March 21, 2017
Presentation Outline

• Introductions
  
  **Jeff Farbman**  
  *Wallace Center at Winrock International*

  **Cathy Carlson**  
  *Carlson Food Safety Consulting*

• Successful Farm Food Safety Audits
• Questions and Answers
• Upcoming Sessions
Facilitating Food Safety for Small, Sustainable Farmers

Objective: Strengthen capacities of professionals working with small-scale farmer on food safety compliance and counsel them on adoption on appropriate food safety certifications options, including GroupGAP.

Project of the Agriculture and Land-Based Training Center (ALBA) in Salinas, CA supported by Western SARE.
WALLACE CENTER at WINROCK INTERNATIONAL

• Market based solutions to a 21st Century food system
• Work with multiple sectors – business, philanthropy, government
• Healthy, Green, Affordable, Fair Food
• Scaling up Good Food
NATIONAL GOOD FOOD NETWORK: VISION
**Supply Meets Demand**
- There is abundant good food (healthy, green, fair and affordable) to meet demands at the regional level.

**Information Hub**
- The National Good Food Network (NGFN) is the go to place for regional food systems stories, methods and outcomes.

**Policy Change**
- Policy makers are informed by the results and outcomes of the NGFN and have enacted laws or regulation which further the Network goals.

http://ngfn.org | contact@ngfn.org
Presentation Outline

- Welcome
- Successful Farm Food Safety Audits
- Cathy Carlson
- Questions and Answers
- Upcoming Sessions
Successful Farm Food Safety Audit

CFSC Workshop
2017
First Questions any farm should ask:

– Who is the buyer of the farm product?
– Which Food Safety Certification will they accept?
  • USDA GAP/GHP
  • Harmonized GAP/GHP
  • LGMA
  • Primus GAP/GHP or GFS
  • GlobalGAP (HPSS)
  • Other?
Why Food Safety?

• It is the right thing to do for you and your customers: your level of professionalism

• 1 in 6 Americans become ill annually (source: CDC website link - http://www.cdc.gov/foodborneburden/)
  – The Young: underdeveloped immune system
  – The Old: tired immune system (60+ years old)
  – Compromised immune systems:
    • Diabetes
    • * HIV

• Industry requirements:
  – Poor personal hygiene and improper hand washing
  – Cross contamination
  – Contaminated ready-to-eat foods such as salad items and processed meats (source: McSwane, Rue & Linton)

• Customer (buyer) liability:
  – Illness and Allergens

• It is the right thing to do for you and your customers: your level of professionalism
Food Safety Plan: The basic GAPs are based on Risk Assessment

- Water
- Soil
- Hygiene
- Surfaces
- Animals
  - domestic and wild

Most farms already perform GAPs, only need to document them now.
Preparing for your first audit:

– Which matrix (checklist) will your buyer accept?
– Print out the checklist
– Perform a ‘Self Audit’ (this becomes part of your FS Plan review) – look for:
  • Trash and debris (e.g. weeds and stored items around well head)
  • Labels and signage
  • Broken glass, plastic and brittle plastic
  • Animal intrusion in the growing area(s)
  • Signs of flooding
  • Signs of vandalism
  • Other

![?
Prepare for your audit (con’t.):

– Gather all your documents that support your operations; store in a:
  • Binder
  • File Cabinet
  • Designated tote

– Step thought the checklist questions – notes at side
  • This saves time and money
What is in a Food Safety Plan?

– Say what you do, do what you say
– Each farm is different; NO one-size-fits-all
– Each farm is its own ecosystem; so farm operations vary
– Most farms are already doing food safety – now they are asked to write this down
  • If it wasn’t written down, it didn’t happen
  • Traceability
  • Training
What is a Policy?

– A course or principle of action adopted or proposed by the farm operations.
– The set of basic principles and associated guidelines of the farm operation.
– What is the mission or standard that this procedure must meet?
What is a Procedure?
How to create an SOP:

– An SOP is a policy and procedure document, which describes the regular recurring activities appropriate to quality operations.

• Policy: Within the farm operations, specific tasks are performed: What, Where, How, When, How Much, etc.

• Procedure: How is this task performed or completed?

• Responsibility: Who will be held accountable for this procedure, directly or shared?

• Corrective actions, root cause, logs and records (as applicable)
What are the key policies across audits: GAPs

– Hand Washing and Hygiene
– Worker Training
– Water Quality: irrigation, drinking, post harvest handling, surfaces
– Sanitizers and chemicals (use and storage)
Areas that may vary a bit across audits: GAPs

— GAP details:
  • Water Sources
  • Numbers of Bathrooms
  • Food Defense
  • Etc.

— Specialized Training
  • CPR
  • First Aid Training (Basic)
Basic GAPs overlap Organic Practices

- Organic Cert Requirements
  - Land Use History
  - Soil Amendments (NOP)
  - Sales and Labeling (Traceability)

- 3\textsuperscript{rd} Party Certification Requirements
  - Training
  - Water
  - Surfaces (Sanitation)
  - Growing area inspections

- FSMA Requires a bit more than that found in a 3\textsuperscript{rd} Party audit.

- Most farms are already performing GAPs, just need to write them down now.
FSMA requirements a bit more than found in 3rd party audit scheme:

– Agriculture Water: Water Quality (GM and STV)
– Biological Soil Amendments
  • Raw Manure (e.g. NOP)
  • Stabilized Compost (e.g. CA Title 14 ch.13.1 Art 7)
– Domestic and Wild animals: Pre-Harvest inspection.
– Worker Training, Health and Hygiene: job descript.
– Equipment, tools and buildings: measure to prevent contamination (e.g. storage and maintenance)
– Exemption: see FSMA website for details

https://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm334114.htm
Certification Principals: What are they looking for?

– Culture of Food Safety (FDA)
– Say what you do – do what you say (all checklists)
– If it is not written down, it did not happen.
– A place for everything, everything in its place, and label it when possible.
– Every day is audit day
– Provides a level of professionalism (to your buyers)
What will any 3rd party audit look for:

- **Water sources** – bacteria lab tests (e.g. well, pond, rain catchment, creek, canal, etc.)
- **Land History** – grow areas history and adjacent land use
- **Hygiene** – Personal hygiene and symptoms of illness (training)
- **Soil amendments** – Compost, Fish, Gypsum, etc. (LOG and COA)
- **Sanitizer use** – type used and scheduled frequency
- **Traceability** – one step back, one step forward
  - Mock recall, invoices, log and records
  - Required for exempt farms as well
- **Corrective actions required** *(CAR)* – documented root cause and actions taken
Third Party Certifiers: 80% of checklist questions are the same – Some areas covered in more detail

– CDFA
  • USDA, Harmonized, LGMA, Cantaloupe, Tomato, and others.
– NSF
  • Harmonized, Primus, and others?
– Primus
  • GAP/GHP and GFS
– GlobalGAP (CCOF)
  • IFS, HPSS and others
Auditor and Inspector experience:

- Matched to product operations when ever possible
- Ask them for a business card on arrival
- Can not accept anything offered to them, except coffee or water
- They are there only to verify – they can not make recommendations
- Opening meeting and closing meeting
  - Expects to Sign-in on visitor sign in sheet
- Auditor must be escorted at ALL times: do not allow them to wonder unattended.
Audit Steps:

– Introductions; business card exchange
– Paper work: food safety plan, records, logs, etc.
– Harvest: auditor will need to see harvesting in action
  • Questions to harvest workers

– Closing meeting: review and follow up (needed items, CARs, etc.)
Automatic Failures include:

– NO FS Plan or Self Audit
– Use of bio-solids or human sewage
– Misuse of chemicals or reentry
– No operational sanitation facilities (toilets and/or hand washing stations).
– Presence or evidence of rodents and excessive insects
– Observation of employee practices (personal or hygienic) that jeopardizes the safety of the produce.
– Falsification of records (no white-out)
Your role during an audit:

– You can....

• Ask questions at any time
• Ask auditor what they want to do or see first (e.g. harvest, paperwork, water source, bathrooms, etc.)
• Ask if a minor infraction can be fixed immediately
  – Usually ‘yes’, but this will be noted on audit report regardless
    – usually without loss of points.
Your role during an audit:

– **DO NOT**....
  - Do not offer dinner, lunch or gifts
  - Do not offer extra information

– **Do**......
  - DO....Answer questions honestly
  - DO...Treat auditor professionally
  - Auditors are there to verify, only
At the end of the Audit:

– Auditor can not tell if you pass, fail or score
– Auditor will provide designated time to perform and submit corrective actions.
– Final copy of audit report will be provided to you
Providing a copy of audit documents to your buyer:

• Audit certificate
• Audit report (points, comments, etc.)
• Audit corrective actions taken (pictures, written description, supporting documents, etc.)
What is buyer looking for in these Audit documents:

– Review the comments
– Take note of what areas were scored
– Keep a copy on their files (supplier approval pgm)
– Professionalism
What the farm should do:

– Continue to ‘do what you say –and- say what you do’
  • Living document; line item strike-out, date and initial

– Maintain records for 2-3 year minimum, however, I recommend that you hold on to lab tests forever (baseline):
  • Water tests
  • Soil tests
  • Lab tests

– Review FS Plan annually: what affects re operations?
  • What worked last year
  • What didn’t work last year
  • What operation changes will be effected in our FS plan
  • Same produce / products next year?
  • Same vendors next year?
Tools to help farmers build food safety plans:

– Adult education: Workshops, Classes, Community College, etc.
– Food Safety Plan Templates: CB websites, Group GAP programs, etc.
– Record Keeping: Binders, Notebooks, Excel, Cloud Designed Software, etc.
– We are all in this together: Customers / buyers are required to approve their suppliers. A food safety plan and audit provides a level of professionalism.
Questions and Resources:

Please contact me with any questions including:
– 1-on-1 FS Plan development
– GAP implementation
– Training
– Internal Audit
  • Mock Audit
  • Self Audit
– Cathy Carlson cell no. (831) 818-4109

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Questions and Answers

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Please email Kaley to schedule appointments:

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Food Safety Training for Farmer Support Organizations
All Sessions Start at 12:30 ET, 9:30 PT

- √ Tue 3/21
  Successful Farm Food Safety Audits

- Tue 4/4
  Water Requirements for FSMA and GAP; Sanitation Standard Operating Procedures (SSOPs)

- Tue 4/25
  Food Safety Certification Options

- Tue 5/16
  Developing a Quality Management System

- Tue 6/6
  Equipment Sanitation: SSOPs and Practices
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