ON-FARM FOOD SAFETY AND ACCESS TO LARGER MARKETS

February 21, 2013
Presentation Outline

- Technical Orientation
- Welcome
  - Jeff Farbman
  - Wallace Center at Winrock International
- Food Safety Modernization Act
- Group GAP
- Questions and Answers
**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
NATIONAL GOOD FOOD NETWORK: GOALS

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.
Presentation Outline

- Technical Orientation
- Welcome
- **Food Safety Modernization Act**

**Ariane Lotti**
*National Sustainable Agriculture Coalition*

- Group GAP
- Questions and Answers
SUSTAINABLE FOOD SYSTEMS AND THE FOOD SAFETY MODERNIZATION ACT PROPOSED RULES

Ariane Lotti, National Sustainable Agriculture Coalition
NSAC is an alliance of grassroots organizations that advocates for federal policy reform to advance the sustainability of agriculture, food systems, natural resources, and rural communities.

- Started in 1988; currently have 90+ member organizations from around the country
- We bring farmers and grassroots advocates across the country to the policy table in DC
- Our job is to make sure that federal policy helps farmers succeed while protecting the environment and keeping our food safe and accessible!
Everyone has a role in ensuring safe food
Focus on highest risk
One size does not fit all
Based on scientific evidence when possible
Overview of Food Safety Modernization Act

- First major overhaul to food safety laws since the 1930s
- Debated in Congress in 2009-2010
- Signed into law January 4, 2011
- Main pieces of the bill:
  - Title I: Preventing food safety problems
    - Standards for Produce Safety
    - Preventive Controls for Facilities
  - Title II: Detecting and responding to food safety problems
  - Title III: Improving safety of imported food
  - Title IV: Miscellaneous provisions
Sustainable Ag Provisions in FSMA

- Scale appropriate regulations and options for small and mid-sized farms serving local and regional markets (Tester-Hagan Amendment)
- Ensure protection of beneficial on-farm conservation and wildlife practices
- Complement – not contradict – National Organic Program regulations
Minimize extra regulations for low-risk processing that is part of value-added production

Streamline and reduce unnecessary paperwork for farmers and small processors

Allow farm identity preserved marketing as an option in place of government trace-back controls

Funding for training through new competitive grants program
Proposed Produce Rule

- Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption
- Focuses on microbial contamination
- Standards for:
  - Personnel qualifications and training
  - Health and hygiene
  - Agricultural water
  - Biological soil amendments
  - Domesticated and wild animals
  - Growing, harvesting, packing, and holding activities
  - Equipment, tools, buildings, and sanitation
  - Sprouts
Exemptions

- Produce rarely consumed raw
- Produce for personal or on-farm consumption
- Farms selling an annual average value of food during a 3-year period of $25,000 or less

Modified Requirements

- Farms that qualify under Tester-Hagan Amendment
Tester-Hagan Provisions in FSMA

- Concept: Scale appropriate regulations and modified requirements for small and mid-sized farms serving local and regional markets

- Produce Standards
  - Average annual monetary value in previous 3-year period less than $500,000 AND
  - Sell 51% or more directly to a consumer or retail food establishment in the same state or within a 275-mile radius THEN
  - Provide information on label or sign at the point of sale
Focuses on facilities that manufacture and process food for human consumption

Codifies “farm mix-type facility”

Two major requirements:
- Hazard Analysis and Risk-Based Preventive Controls
- Updated Good Manufacturing Practices
Exemptions

- Certain low-risk manufacturing/processing activities by small and very small businesses
- Seafood, juice, low acid canned foods, dietary supplements, alcoholic beverages
- Activities within the ‘farm’ definition
- Certain facilities that only store packaged foods or raw agricultural commodities (not F&V) for further processing

Modified Requirements

- Facilities that qualify under Tester-Hagan Amendment
Preventive Controls

“Very small business” OR

Average annual monetary value in previous 3-year period less than $500,000 AND

Sell 51% or more directly to a consumer or retail food establishment in the same state or within a 275-mile radius that sells food directly to consumers THEN

Submit documentation of status AND

Submit documentation of compliance with other non-Federal food safety law AND provide notification to consumers OR

Submit documentation identifying potential hazards and monitoring or preventive controls
Withdrawal of Modified Requirements

- Direct link to an active investigation of an outbreak
- Material conduct or conditions:

If the Secretary determines that it is necessary to protect the public health and prevent or mitigate a foodborne illness outbreak based on conduct or conditions associated with a qualified facility/farm that are material to the safety of food produced or manufactured, processed, packed, or held at such facility or farm.
Challenges for Sustainable Food Systems

- Lack of knowledge at FDA about farming and sustainable and organic production
  - Assumptions around production practices
  - Factory-type approach to farming
- Modified requirements are not full exemptions
- Challenges for producers and businesses looking to scale up
- Lack of adequate data to determine impact of new rules
- Lack of clarity around how the two rules interact
- Lack of funding for training
- We need all hands on deck
- Comments on proposed rules due May 16, 2013
- Two subcommittees of our Food System Integrity Committee
- Plus legal and technical experts
- Major grassroots and organizational comment campaign in March, April, early May
- Sign up to get involved: http://sustainableagriculture.net/fsma
Questions?

Email: alotti@sustainableagriculture.net

Get involved: http://sustainableagriculture.net/fsma
Presentation Outline

- Technical Orientation
- Welcome
- Food Safety Modernization Act
- Group GAP

**Steve Warshawer**
*NGFN Food Safety Coordinator*

- Questions and Answers
GROUP GAP: **Why?**

- Producers attain benefits of scale e.g. in-house skilled technical support Yielding...
  - Trust
  - Access
  - Locally-appropriate solutions
  - Buffer between farmers and external food safety interests
- Shifts funds from paying external bills to building internal capacity
“It’s not a new idea!”

- Global GAP Option 2
  - More farms audited as a group than single-farm
- USDA
  - Single-farm audits starting in 2002
  - Group GAP: Good Natured Family Farms (GNFF) pilots for 2010 and 2011 growing seasons with Amish growers
GROUP GAP: REPORT

- Background
- Group GAP Implementation Guide and Assessment Tool
- Key Lessons
- Next Steps and Recommendations
- Additional Resources
- Appendices

GROUP GAP: Ask ... ASK!!

• Next we will go through the group GAP progress factors

• Ask your questions by typing them in
  • We may not get to all of them in the webinar BUT...
  • We will be generating a FAQ from these questions and others we get
GROUP GAP PROGRESS FACTOR 1: LEARN AND COMMIT

- In response to buyer demand, food hub coordinates discussion with value chain
  - Buyer
  - All farmers
  - USDA Auditors
- Producer group assess capacity
  - Time
  - Cost
GROUP GAP PROGRESS FACTOR 2: ID FINANCIAL SUPPORT

- Group estimates budget & finds $ for
  - Grower training
  - Development of Quality Management System (QMS)
  - Training of internal auditor / inspector
  - Implementation of on-farm improvements (as needed)
  - Auditing costs
GROUP GAP PROGRESS FACTOR 3: QUALITY MANAGEMENT SYSTEM (QMS)

- Identify internal team
  - QMS Responsible Person (QMR)
  - Internal inspector
  - Internal auditor
- Identify external support
- USDA provides QMS template
- QMR creates customized QMS
- QMR & Farmers find opps for centralization
- Group determines compliance methods
- QMR is able to maintain document
- QMS submitted for review: technical service provider, buyer, USDA
GROUP GAP PROGRESS FACTOR 4: FARMER TRAINING

- Find qualified trainer
- Training materials created
- Participants identified
- Farmers trained
GROUP GAP PROGRESS FACTOR 5: INTERNAL AUDITOR TRAINING

• Internal auditors trained
• Records maintained
• All member farms inspected
• Data available to buyers
• Buyer reviews reports
• After compliance adjustments, buyer ... buys!
**Group GAP Progress Factor 6: 3rd Party Audit**

- Develop 3rd party audit plan
  - QMR, technical service provider, buyer and USDA work together
- USDA provides audit
  - Delineates corrective action (as needed)
GROUP GAP PROGRESS FACTOR 7: **LONG TERM MAINT.**

- USDA’s audit and certification process reviewed to verify integrity
GROUP GAP: CHALLENGES / NEEDS FOR GROUPS

• Funding for support work
• Finding qualified Quality Management System Responsible Parties, Auditors, Inspectors
• Understanding the system
  • Buyers
  • Growers
  • Hubs
GROUP GAP: CURRENT ACTIVITY

- Wallace Center / USDA working group
  - Meet every 2\textsuperscript{nd} month
- Wallace Center / NGFN
  - Help shape process to represent food hubs, their value chain partners, and producer cooperative needs
  - Identify pilot projects & emerging groups
  - Outreach & Education
  - Develop a community of practice
GROUP GAP: “SYSTEM” NEEDS

- ID key regional and national collaborators
- Funding to develop
  - Support resources
  - Technical assistance
- “The gap in GAP”
Questions and Answers

Ariane Lotti
National Sustainable Agriculture Coalition
alotti@sustainableagriculture.net

Steve Warshawer
National Good Food Network
contact@foodhub.info

Jeff Farbman
Wallace Center at Winrock International
contact@ngfn.org
Webinars are Archived

TOPICS!

http://ngfn.org/webinars
NGFN Webinars

- 3rd Thursday of each month
  3:30p EST (12:30p PST)

http://ngfn.org/webinars

Support Good Food education!

Upcoming NGFN Webinars

- March 28 (4th Thursday!)
  One Page Risk Management Plan
- April 18
  Local Meats Processing: Successes and Innovations

http://ngfn.org/webinars
Three Notable Websites

- **www.FoodHub.info**
  - Food Hub “hub”
  - Research, case studies, list and map of hubs across the country, much more.

- **www.HUFED.org**
  - About the initiative
  - Grantee profiles
  - Library of many of the best food access resources

- **www.FoodshedGuide.org**
  - Case study-based business and financial training
  - Includes a “One Page Business Plan” and a “One Page Financial Plan”
Get Connected, Stay Connected

http://ngfn.org/database

National Good Food Network Database
Click to learn more

Search for: Wallace Center

YouTube

contact@ngfn.org

Wallace Center at Winrock International

twitter @ngfn
http://ngfn.org

contact@ngfn.org