



Great Lakes Fruit, Vegetable & Farm Market EXPO

Michigan Greenhouse Growers EXPO

December 9 - 11, 2014

DeVos Place Convention Center, Grand Rapids, MI



Food Safety

Tuesday afternoon 2:00 pm

Where: Grand Gallery (main level) Room E & F

Moderator: Phil Tocco, Extension Educator, MSU Extension, Jackson, MI

- 2:00 pm Digital Recordkeeping: What Are My Choices?
- Phil Tocco, Extension Educator, MSU Extension, Jackson, MI
- 2:30 pm Group GAP As an Alternative to Individual Certification
- Natasha Lantz, Marquette Food Co-op, Marquette, MI
- 3:00 pm How Effective Are Different Sanitation Techniques for Tree Fruit Storage Bins?
- Karen Killinger, Extension Food Safety Specialist, Washington State Univ.
- 3:30 pm The Food Safety Modernization Act and the FDA Proposed Produce Rule: What Produce Growers and Marketers Need to Know
- Gretchen Wall, Produce Safety Alliance, Cornell Univ.
- 4:00 pm Session Ends

U.P. Food Exchange Group GAP Pilot Study:

Group GAP as an Alternative to Individual Certification

Overview

The U.P. Food Exchange (UPFE), a partnership between the Marquette Food Co-op and Michigan State University Extension with support from the Western U.P. Health Department, is a food hub that serves as a resource portal for farmers, businesses, and individuals looking to connect with and actively participate in their local food system.

The U.P. Food Exchange (UPFE), located in Michigan's Upper Peninsula, was selected to partner with the USDA to be a part of a pilot study exploring new ways to address small farm food safety certification. Due to changing federal regulations related to the Food Safety Modernization Act as well as pressure from buyers and insurance companies, it appears that, in the near future, any farm (regardless of size) may at least need a farm food safety plan to sell to certain markets. This study will investigate group certification as a scale-neutral (no matter what size operation) way to make food safety certification attainable and more cost effective for even the smallest of farms. The pilot study "group" is comprised of pioneering small-scale (less than 5 acres) Upper Peninsula farms interested in assisting UPFE, the USDA, and the Wallace Center in developing a Group GAP (Good Agricultural Practice) model.



Why was The U.P. Food Exchange Selected to Participate?

UPFE was already helping to prepare farms in Michigan's Upper Peninsula for accessing the wholesale institutional market by actively offering food safety training, developing a Quality Management System (QMS) and recruiting farms for a food safety pilot project. This work was noticed by the Wallace Center and USDA. Michigan's Upper Peninsula (U.P.) has 1/3 of the land mass of Michigan and only 300,000 Michigan's 9.8 million residents. This geographically remote region is known for its hay and potato production as well as dairy farming. Recently, there has been an increase in the number of diversified vegetable farms coming on the scene—young farmers starting out and retired people starting a second career. The direct to consumer market has, up until this point, been the primary market for these farms. This is changing as institutional demand for local food increases and these farmers see the value in selling beyond direct to consumer. In order to access the wholesale institutional market, these small-scale, diversified farms must address issues like food safety that can be a barrier to them accessing this growing market.

Setting the Stage for a Pilot

UPFE hosted food safety trainings in 2011 and 2012 for farmers across the U.P. that consisted of a combination of classroom education and a mock USDA audit at a local farm. In 2013, UPFE put out a call for farms to volunteer to participate in a group food safety certification pilot. At the same time, UPFE was developing a Quality Management System (QMS) to oversee the group's activities and requirements. Next came training by USDA-AMS for those who would serve as internal inspectors for the group by performing both initial Gap Analysis visits and then inspections using the USDA GAP/GHP audit checklist sections 1-4. The self-selected farms then went through a day-long training that combined food safety and how to operationalize what they learned into a food safety manual for their respective farms.

What is Group GAP?

Essentially, Group GAP is a group of partners working together to achieve a collective Good Agricultural Practices (GAP) certification. These partners can be farmers, buyers, distributors, food hubs, local non-profits, etc. The concept is that a group provides internal verification that its members are meeting GAP standards by performing internal inspections. These activities are managed through a Quality Management System (QMS). The USDA then audits a statistical sample of the members, and also audits the group's QMS. If the sample is good and the system is good, that provides the USDA enough confidence to issue a group certification.

What is a QMS?

A QMS is a system of interrelated processes designed to identify and gather customer inputs and deliver a product or service that meets them in a consistent, continuously improving way. For the USDA Group GAP program, it must be built on ISO 9001 or an equivalent standard. This is the tool that allows the USDA to issue a group certification without physically visiting each member. Manufacturers have been using QMS to deliver a consistent, verified output for decades. Group GAP adopts those same principles and applies them to food safety monitoring. Globally, more farms are GAP certified in groups than as individuals. Using a systems approach to food safety, Group GAP develops a culture of food safety that will promote wide adoption of food safety standards.

Why Group GAP?

Most things in life are better when done as a collaborative effort. Only a sample of members go through a USDA audit, and the cost burden is shared by the group, so this method certainly has the potential to be more cost-effective than an individual certification. The real benefit, however, comes from the interactions within the group, the sharing of knowledge and experience, and the technical assistance available to each member by their participation. Rather than striving to comply with a baseline standard, the members of the group can learn from each other and continuously improve their compliance.



UPFE Group GAP Pilot Study Project Phases

16 farms started as part of the group in April

- 1 | Development of Quality Management System (QMS) (2013-2014)
- 2 | Development of Farm Food Safety Manual by UPFE Management Team (March-April 2014)
- 3 | Internal Inspector Training by USDA (April 2014)
- 4 | Farmer Training by MSU Extension & UPFE Management Team (April 2014)
- 5 | Gap Analysis Visits to Participating Farms (June & July)

4 farms left the group at this point

- 6 | Pre-Official Internal Inspection Check-In Phone Call With Farms
- 7 | Internal Farm Inspections (end of July – early September)

2 farms left the group at this point

- 8 | USDA Audit of 4 farms in our group (early September)
- 9 | Internal QMS (quality management system) Audit (end of September)
- 10 | USDA QMS Audit (early October)
- 11 | Unannounced Surveillance visits to farms that include verification of corrective actions if applicable (mid September – beginning of October)

10 farms are USDA GAP/GHP certified in 2014 for the 2014/2015 season

What Is Meant By Good Agricultural Practices (GAP)?

Protecting Water & Soil

- Performing A Water Risk Assessment That Includes Testing Water (irrigation and processing and drinking)
- Performing A Soil Risk Assessment That Includes Testing Soil

Separating Animals From Crops

- Keeping Wild & Domestic Animals From Contaminating Crops
- Having An Effective Pest Control Program For Rodents And Other Identified Pests

Maintaining Clean Equipment

- Using Clean Harvesting Containers
- Properly Storing Harvesting and Packing Materials
- Using Clean Harvesting Equipment/Implements
- Using Clean Transport Vehicles
- Routinely cleaning wash/pack and storage areas

Having A Plan To Address Potential Contaminating Products & Situations

- Properly Storing And Applying Manure
- Storing “Chemicals” Properly & Away from Crop Production & Processing Areas
- Having A Plan to Address Potential Contamination Issues From Things Like Field Sanitation/Bathroom
- Having A Plan to Address Worker Injuries, Especially Those That Pose A Risk to Produce From Blood

Keeping A Healthy Workforce

- Not Picking When You Are Sick: Practicing Good Worker Health and Hygiene

Following Recommended Handling Practices

- Maintaining The Cold Chain (storing and transporting produce at appropriate temps)

Being Able To Prove Compliance With Food Safety Practices

- Having An Effective Traceability Program
- Providing Appropriate Staff Training
- Having a Food Safety Plan for Your Farm
- Documenting That You Have Done The Above



Upper Peninsula Farms Participating in the Group GAP Pilot Study

Eastern Region: Ski Country Farm (Sault St. Marie)

Central Region: Blueberry Pier (Menominee), Hannah's Garden (Marquette), Reh-Morr Farm (Eben Junction), Rock River Perennial Garden & Greenhouse (Chatham), Slagle's Family Farm (Felch), Sleepy Hollow Farm (Munising), Treasa's Treasures (Munising)

Western Region: Anya Farms (Chassell), Wintergreen Farms (Ontonagon)

Agency/Business Partners

The following agency/business partners designated staff to serve as internal inspectors for the project.

- Chippewa/Luce/Mackinac Conservation District
- Keweenaw Co-op
- Marquette Food Co-op
- Michigan State University Extension
- Western U.P. Health Department

Sponsorship & Funding

This pilot project is sponsored by the U.P. Food Exchange, a partnership between the Marquette Food Co-op and Michigan State University Extension, with support from the Western U.P. Health Department. The Marquette Food Co-op is funding this project with supplemental financial support from MIFFS (Michigan Food & Farming Systems) and the CRFS (MSU Center For Regional Food Systems).

A case study is being written by the MSU Center for Regional Food Systems on the U.P. Food Exchange's work. The written report will be available in early 2015.



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The FDA Food Safety Modernization Act & The Proposed Produce Rule: What Produce Growers and Marketers Need to Know

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Fresh produce safety has been at the front and center of news articles, grower meetings, and regulatory affairs within the past decade. This session, focused on produce safety and the **draft** Produce Safety Rule of the Food Safety Modernization Act (FSMA), will enable you to walk away knowing a.) why more fresh produce outbreaks are occurring b.) if and how the regulation might impact your business or farm, c.) how you can get involved, and d.) what you can do to further prepare yourself and your business for future produce safety requirements.

In 1998, the Food and Drug Administration (FDA) published the *Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables* that outlined Good Agricultural Practices (GAPs) and their importance to the safety of fresh produce. Over the past fifteen years, some produce growers have been pressured to adopt formal food safety practices such as GAPs, primarily due to buyer requirements and the need for third-party audits while other growers have not experienced any pressure from their markets. Despite these voluntary guidelines and buyer requirements, outbreaks linked to fresh produce have continued to occur.

On January 4, 2011, the Food Safety Modernization Act (FSMA) was signed into law by President Obama. Two years later, on January 4, 2013, the official draft Produce Safety Rule was released for public comment. Over 15,000 comments were submitted during the first open comment period, causing the FDA to revisit certain provisions to make the regulation less burdensome and more practical for produce growers. On September 29, 2014, the FDA released a supplemental proposal for the Produce Safety Rule, with major revisions to the agricultural water testing requirements, soil amendment use, definition of mixed-use facilities, and the process for withdrawal of qualified exemptions. The supplemental proposal will be open for comment until December 15, 2014. We encourage growers, educators, and those involved in the growing, harvest, and handling of fresh produce to submit comments to the docket.

The draft regulations currently cover primary areas of food safety risks on farms including: worker training health and hygiene, agricultural water, soil amendments, domestic and wild animals, and sanitation of equipment, tools, and buildings. The best way to get involved in the process is to read and submit comments on the regulation to make your voice heard. Once the rule is published in the Federal Register (due October 2015), farms, depending on their average annual monetary value of all produce sold, will have different lengths of time to comply with the regulations (See Fig 1). Again, this is currently a draft regulation, so all information is subject to change through the comment and revision process.

Prior to this regulation, fresh produce had not been regulated for food safety. While the regulation does propose exemptions to some farms based on average annual value of food sold, markets sold to, and certain types of commodities, all farms, large and small, need to be concerned about the safety of the produce they grow. Ultimately, the regulation will set the ‘floor’ while buyers of fresh produce will likely set the ‘ceiling’ for food safety requirements. Regardless of whether growers are exempt from the regulation, it is likely that many growers will still be subject to food safety requirements from their markets. Even small market venues such as farmer’s markets, Farm-to-School programs, and auction

houses are now requiring that their suppliers, at minimum, have food safety plans and in some cases, a third party audit.

In effort to educate growers on produce safety and the newly proposed regulations, the Produce Safety Alliance (PSA) was formed as a cooperative agreement between the FDA, United States Department of Agriculture (USDA), and Cornell University to provide fundamental, science-based, on-farm food safety education and training to fresh fruit and vegetable farmers and regulatory personnel. This standardized curriculum will help prepare farmers to meet the first ever fresh produce regulation and will aid in providing a consistent food safety message to both growers and regulatory personnel.

It is easy to become overwhelmed by requirements or talk about food safety at the farm level, especially with the limited time and resources that most growers face. Regardless of the proposed regulations, the safety of the produce you grow and sell is the livelihood of your family, your business, and ultimately the health of your community.

Please visit the Produce Safety Alliance's webpage for more information regarding education and training opportunities, as well as to stay up-to-date with FSMA. Be sure to sign up for our listserve!
<http://producesafetyalliance.cornell.edu/>

Information on the draft Produce Safety Rule Supplemental can be found here:
<http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm334114.htm>

Fig 1: Tentative time frame for the implementation of the FSMA Produce Safety Rule

