



University  
of Idaho

# CREATING HYGIENIC HABITS ON THE FARM

AN INTRODUCTION TO THE  
FSMA PRODUCE SAFETY SERIES

Webinar will begin at  
10 am PST | 11 am MDT  
April 2020



# HOUSEKEEPING



**Close all other programs running on your computer**



**Check your sound – problems with clarity, speed, etc. switch to the phone**

Call-in number provided in the welcome email

Mute computer sound when using phone



**Type in questions for speakers (or for help with viewing & sound) into question box**



**Handouts are available to download on your computer**



**This webinar and Q&A will be focusing only on the FSMA Produce Safety Rule**



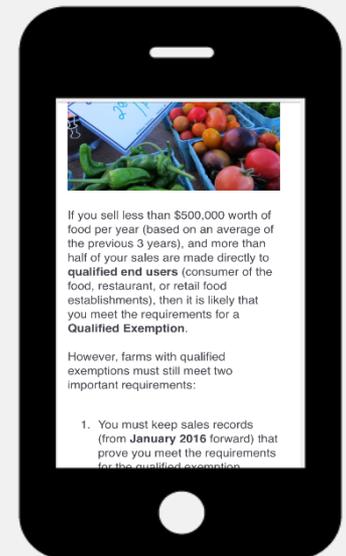
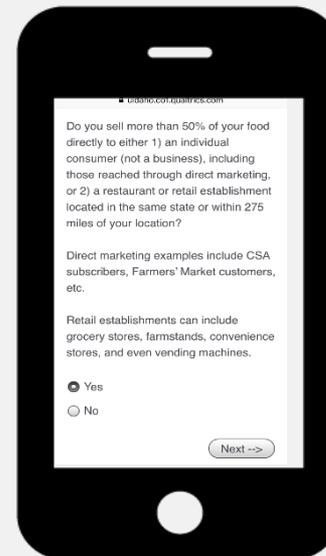
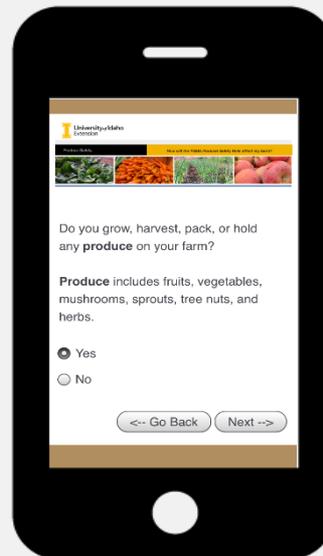
# FSMA & THE PRODUCE SAFETY RULE

## IF YOU HAVEN'T HEARD...

- I The Food Safety Modernization Act, or FSMA for short, was signed into law on January 4, 2011
- I Gives the FDA the authority to regulate food from farm to fork
- I First sweeping food safety regulation overhaul in the United States since 1938
- I The Produce Safety Rule (PSR) establishes science-based minimum standards for safe growing, harvesting, packing and holding of fresh fruits and vegetables for human consumption
- I Not all farms are subject to the Produce Safety Rule (PSR)

[bit.ly/psrdecisiontool](http://bit.ly/psrdecisiontool)

<https://www.uidaho.edu/extension/food-safety-for-produce-growers>





# PSR COMPLIANCE TIMELINE

Business Size	 Compliance Dates for Sprouts	 Compliance Dates For Most Produce	 Water Related Compliance Dates <sup>1</sup>	Compliance Date for Qualified Exemption Labeling Requirement <sup>2</sup>	Compliance Date for Retention of Records Supporting a Qualified Exemption
All other businesses (>\$500K)	1/26/17	1/26/18	1/26/22	1/1/2020	1/26/16
Small businesses (>\$250K-500K) <sup>3</sup>	1/26/18	1/28/19	1/26/23		
Very small businesses (>\$25K-250K) <sup>4</sup>	1/28/19	1/27/20	1/26/24		

<sup>1</sup> According to the [Proposed Rule](#) issued 9/13/17, Compliance dates for Subpart E, Agricultural Water, allow an additional four years.

<sup>2</sup> A farm eligible for a qualified exemption must notify consumers as to the complete business address of the farm where the food is grown, harvested, packed, and held.

<sup>3</sup> A farm is a small business if, on a rolling basis, the average annual monetary value of produce sold during the previous 3-year period is no more than \$500,000.

<sup>4</sup> A farm is a very small business if, on a rolling basis, the average annual monetary value of produce sold during the previous 3-year period is no more than \$250,000.

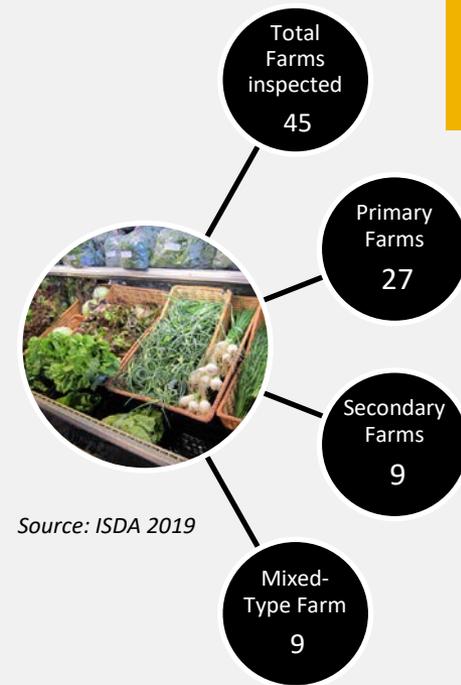
Before the compliance date, every covered farm that does not qualify for an exemption must have a supervisor (such as a farm owner/operator) complete a standardized food safety training program. You can find out more about food safety training from the Produce Safety Alliance. <https://producesafetyalliance.cornell.edu/training>

Revised 10/09/17



# FSMA IN IDAHO - 2019

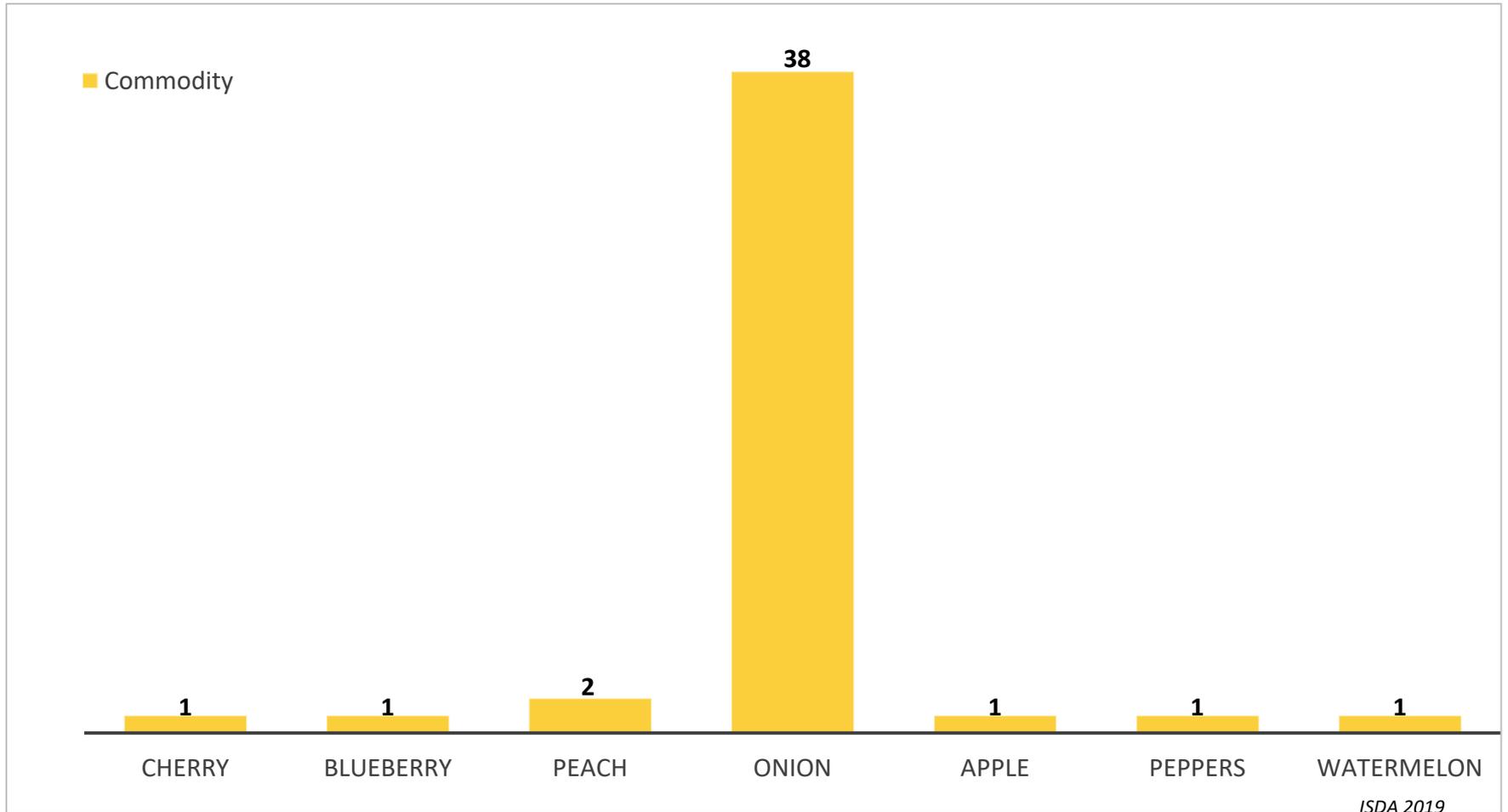
- I The Idaho State Department of Agriculture enforces the PSR through regulatory inspections
- I Inspections began for large farms in the summer of 2019 and are tiered as indicated below
- I PSR commodities inspected in 2019:
  - Onions
  - Peaches
  - Cherries
  - Blueberries
  - Apples
  - Peppers
  - Watermelons



Business Size	Dates for Inspection
All other businesses (>\$500K)	2019
Small businesses (>\$250K-\$500K)	2020
Very small businesses (>\$25K-\$250K)	2021



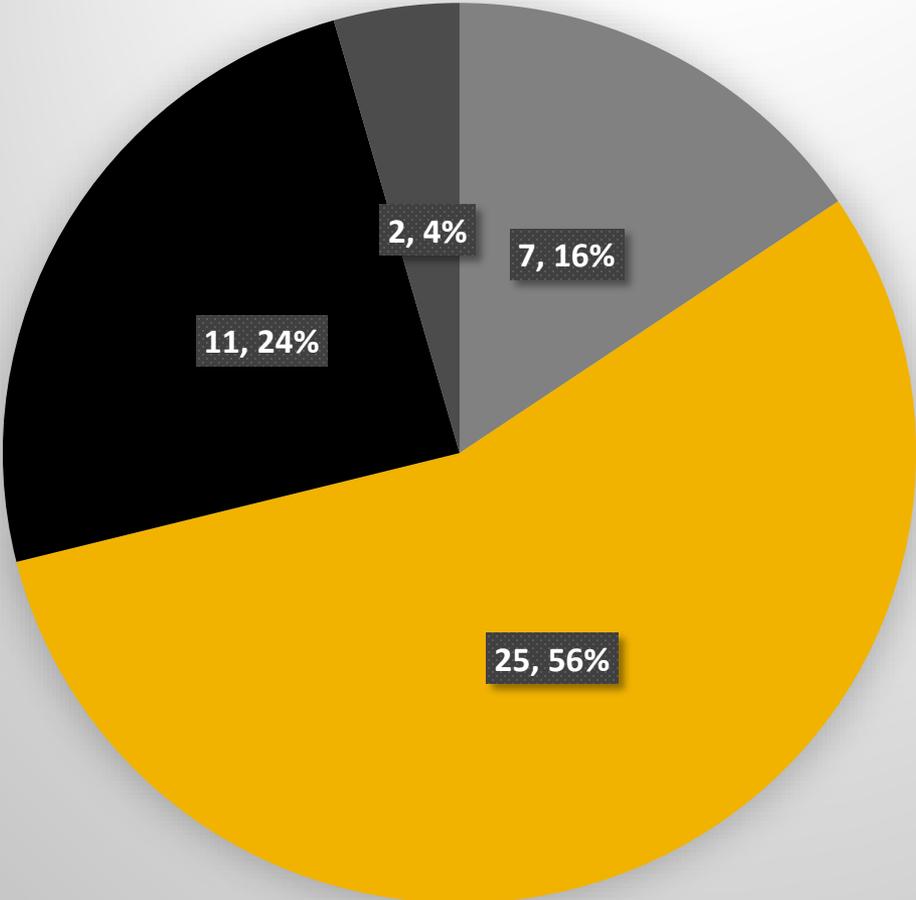
# INSPECTIONS PER COMMODITY





# 2019 INSPECTIONS AT A GLANCE

## Activities



- All
- Growing/ Harvesting
- Packing/ Holding
- Growing/ Harvesting/ Holding



Of the 45 inspected Idaho farms in 2019...

**29%**

had an  
observation  
out of  
compliance

**61%**

of those  
with an  
observation  
had multiple  
observations

**54%**

with  
observations  
corrected  
observations  
on site

**71%**

had no  
observations

ISDA 2019

What does it mean  
to have an observation?

a condition is observed that is **in violation** of the  
FDA's requirements



# THE BIGGEST AREAS OF NON-COMPLIANCE

- I** Subpart D – Health and Hygiene – **6 Observations**
- I** Subpart L – Equipment, Tools, Buildings, and Sanitation – **19 observations**
- I** Subpart O – Records – **2 observations**





# **PSR SUBPART D**

## **Health and Hygiene**

# RULE REVIEW – HYGIENE BASICS



people as a source of contamination

- I** Workers must receive training appropriate for their duties on the farm and must also be trained on food safety, specifically, if they handle produce.
  - One supervisor (at least) must attend Produce Safety Alliance Grower training or an FDA-approved equivalent
- I** Employees must be trained on how to recognize contamination, potential sources of contamination, and to not harvest contamination and/or to correct issues that arise.
  - Signs of sickness
  - Handwashing – when and how
  - Jewelry policies
  - Eating and drinking – where
  - Contact with animals



<https://www.uidaho.edu/extension/food-safety-for-produce-growers>

# SECTION REVIEW – THE BASICS



people as a source of contamination

- I** Training must occur upon hire, at least annually thereafter and in a format that is easily understood by all workers (i.e. cognizant of language barriers, literacy levels, learning methods, etc.)
- I** Hygienic facility maintenance and accessibility
- I** Visitor policies
- I** Records



# What can non-compliance look like regarding employee hygiene?

(And how can I fix it?)



1.

## Access to handwashing facilities is inadequate or non-existent

*Subpart D 112.32* - Personnel must use hygienic practices while on duty

*Subpart L 112.130* - You must provide personnel with adequate, readily accessible hand-washing facilities

### Observation Example

Operation does not have handwashing facilities on site

### Outcome

Employees are unable to wash their hands prior to contact with produce

#### Rule Review:

- Employees cannot do their job safely without proper facilities.
- The Produce Safety Alliance recommends OSHA standards which require one facility per 20 workers within  $\frac{1}{4}$  mile of the working area
- Facilities do not need to be fancy, but they **do** need to be:
  - Easily accessed
  - Well-stocked with the required items
  - Clean

# DIY HANDWASHING STATIONS

no frills – all the function

You likely have many of these items on hand, but if not, it would cost roughly \$32 to create a compliant handwashing station

- Jug (7-gallon) with open/close valve: \$15
- Paper towels: \$5
- Soap: \$3
- Catch: 5-gallon bucket: \$4
- Bungee cords: \$5

## Also needed

Trash receptacle, ideally with hands-free lid

Water that is free from detectable E.coli

Surface for it to sit on – truck bed works, too



# What can non-compliance look like regarding employee hygiene?

(And how can I fix it?)



2.

## Bathrooms are present but aren't clean or need supply restocking

*Subpart D 112.32* - Personnel must use hygienic practices while on duty

### Observation Example

Observing a bathroom facility with trash on the floor, overflowing trash, and empty toilet paper bays

### Outcome

Trash can contaminate the floor and employees' shoes. If there is no toilet paper, what are employees using in lieu?

#### Rule Review:

You **must** provide the necessary items for employees to wash their hands and maintain their personal hygiene while at work.

#### Facilities need

- Soap
- Paper towels / hand dryer
- Toilet paper
- Handwashing water free of E.coli
- Sanitary disposal of trash and wastewater
- Regular servicing to clean and restock

# What can non-compliance look like regarding employee hygiene?

(And how can I fix it?)



3.

## Employees don't know when to wash their hands or just aren't

*Subpart D 112.32(b)(3)(iv)* - Employees must wash hands before returning to workstation after any break or absence from workstation

### Observation Example

Witnessing employees returning from designated break area and failing to wash their hands before returning to workstation

### Outcome

Employees are not washing their hands enough (or at all?)

### Rule Review:

You **must** train employees on when they are required to wash their hands.

- After using the toilet
- Before starting or returning to work
- Before and after eating and smoking
- Before putting on gloves
- After touching animals or animal waste
- **Any other time hands may become contaminated.**



# I DID TRAIN THEM...

## Now what?

- I Training is only half of the equation – employees are responsible for their actions, too.
- I But, at the end of the day, outbreaks fall on the employer
- I Explain the importance to food safety (again)
- I Educate and retrain annually and after observing inadequacies in practice
- I Hang up handwashing signs and visual reminders
- I Put handwashing stations in visible places to monitor activity (i.e. outside of bathrooms or require handwashing again in the field, etc.)
- I Implement a three-strike policy

# What can non-compliance look like regarding employee hygiene?

(And how can I fix it?)



4.

## Break areas aren't designated

*Subpart D 112.32 B (6)* - Personnel must not eat, chew gum, or use tobacco products in an area used for a covered activity (however, drinking beverages is permitted in designated areas)

### Observation Example

Witnessing harvest employees eating lunches at workstation and returning to work upon completion of lunch

### Outcome

Employees run the risk of contacting their mouths, food, and then produce

### Rule Review:

You should designate areas for employees to take their breaks.

- Break areas do not have to be a specific room or building.
- It just must be clearly communicated and located as to not become a potential source of contamination.
- For example, break areas can be the employee's car, or under a certain tree, near a fence, in a backroom of the packing house.
- Make sure there is somewhere to put trash, access to water, and the ability to wash their hands after breaks.

# What can non-compliance look like regarding employee hygiene?

(And how can I fix it?)



5.

## Your records aren't up to date or are non-existent

*Subpart C 112.22(a)* - All workers, including temporary, seasonal, part-time and contracted personnel who handle covered produce or food contact surfaces must be trained in health and hygiene.

*Subpart C 112.30 (b)* - You must establish and keep records of trainings.

### Observation Example

An inspector asks for your training records and observes that many of your staff that are actively harvesting are not indicated on your training log as having been trained on health and hygiene.

### Outcome

Regardless of whether these employees have been trained, an inspector will assume they have not been if it is not documented.

#### Rule Review:

A record includes:

- Date of training
- Topics covered in the training
- Names of persons trained
- Signature of Supervisor

We have templates available for all required records

# ADDITIONAL RESOURCES



## ON-FARM READINESS REVIEW

**I** On-Farm Readiness Review (OFRR) is a collaborative project between the University of Idaho and the Idaho State Department of Agriculture intended to help prepare farmers for compliance with the PSR.

**I** On-Farm Readiness Reviews:

- Assist farmers with understanding how the PSR applies to their operation.
- Are voluntary, non-regulatory reviews to prepare farmers for regulatory inspections if they are covered by the PSR.
- Provide specific educational tools to individual operations on how to comply with the PSR.
- Contact Lu Hauger at [Lhauger@Uidaho.edu](mailto:Lhauger@Uidaho.edu) for more information

## UI EXTENSION PRODUCE SAFETY WEBSITE

<https://www.uidaho.edu/extension/food-safety-for-produce-growers>

**I** Training videos

**I** Spanish resources

**I** Templates for documentation

**I** Free on-farm resource online ordering

**I** Produce Safety Newsletter

**I** Webinars



**University of Idaho**  
Extension



## PSR live Q&A with:



**Ariel Agenbroad**  
**Area Extension Educator**  
Community Food Systems and  
Small Farms



**Colette DePhelps**  
**Area Extension Educator**  
Community Food Systems



**Lu Hauger**  
**Associate Extension Educator**  
Commercial Produce Safety



**Casey Monn**  
**FSMA Program Manager**  
Idaho State Department of  
Agriculture

Thank you for all that you do.

## FSMA PRODUCE SAFETY WEBINAR SERIES

Mondays in April @ 10 am PST | 11 am MDT

**April 6**

Creating hygienic habits on the farm

**April 13**

Sanitation basics under the PSR

**April 20**

Simplifying recordkeeping



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