

Objectives

Upon completion of this hour, you should:

Understand training requirements.

Be able to create a training plan.

Define key records and the ones you need to sign.

Qualifications and Training: Who to train

- All personnel who contact produce, food contact surfaces or supervise must receive...
- "...Adequate training, as appropriate, to the person's duties...
- · Upon hiring
- Periodically thereafter
- At least annually § 112.21(a)



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Qualifications and Training: How to train

- Education, training and experience for each worker to perform assigned duties ensuring compliance
- Must be understood by trainees
- Must be repeated as necessary



Qualifications and Training: Basic Content of Training

- Training must include:
 - · Principles of food hygiene
 - Why personal hygiene is important
 - Symptoms that result in contamination
 - Other food safety rules that match job responsibilities (ie handling compost, etc)



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Qualifications and Training: Harvest Worker Training

Harvest workers must also know:

- Recognizing contaminated produce
- Inspecting harvest containers
- Correcting problems and reporting them to supervisors
- At least one responsible party must have been through a standardized curriculum recognized by FDA.



Sick Workers: Symptoms and Procedures

Prevent contamination of covered produce... from any person with an applicable health condition..."

- Infection
- Open Lesion
- Vomiting
- Diarrhea

The measures you must take must include:

- Excluding the person from working
- Notify their supervisor if they have a health condition



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Behaviors to Look For

- Increased water consumption.
- Frequent trips to the bathroom.
- Increased toilet paper use.

How to Assess Them

- Preharvest tailgate.
- OSHA required stretching
- Temperature checks
- Watching workers

Personnel Hygienic Practices



Personnel must use hygienic practices that include:

- Maintaining adequate personal cleanliness
- Avoiding contact with animals
- Washing hands
- Removing or covering hand jewelry
- Not eating, chewing gum, or using tobacco in the production area

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Proper Handwashing

Wash hands

- Before starting work
- Before putting on gloves
- After using the toilet
- After a break
- After touching animals or animal waste
- Any other time the hands could get contaminated



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Let's Build a Training Plan... Get a blank sheet of paper. Fold the paper "letter-style" in thirds. Have a pen or pencil handy.

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Make a list and include... • Anyone who touches the produce • Anyone who moves food contact surfaces • Write them down in the first column on your paper grouped by job classes. • Pesticide applicators • Crop scouts • Harvest workers • Supervisors • Graders • Truck operators

What do I want these folks to do?

Listing skills

Identify critical behaviors you want to see all the time, every time.

Just FSMA PSR skills?

GAPs requirements?

Special industry standards?

Write them down.

What training do they need to get these behaviors?

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Identify trainings that address skills

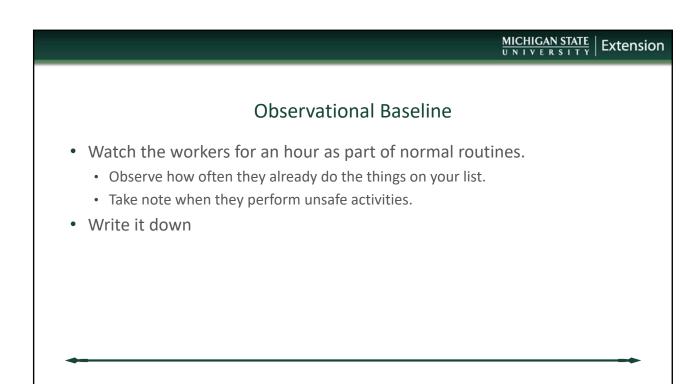
- Think through which training resources can help you in getting workers to behave how they need to:
 - Extension Classes?
 - Morning Meeting Reminders?
 - Incentives?
- Focus on the behaviors.
- Write them down in the third column.

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From List of Behaviors to Plan of Action

- Once you have a list of behaviors, think about how you can:
 - TELL your farm workers about the behaviors.
 - **SHOW** your workers best practices.
 - Have **WORKERS SHOW** you the right behaviors
- This becomes your educational plan



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Train, Train, and Retrain Training is perpetual Every interaction should be part of training. AT LEAST SOME of the training should be logged as having been done. Always follow up a goof with a little training.

Observe results

- Watch the workers again for an hour as part of normal routines.
 - Observe how often they do the things you taught them.
 - Take note when they perform unsafe activities.
- · Write it down
- Compare the two observations to see if it made a difference.

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Requirements for All Records

- All records must have:
- Name and location of the farm
- Description of the produce that the record relates to.
- Location of the growing area.
- Date and either signature or initial of the person who did the activity.



Required Records Under FSMA PSR

- Exemption documentation (if applicable)
 - Qualified Exemption
 - Processing Exemption
- Worker training
- Cleaning and sanitizing
- Water System Inspection

- Water testing
- Water Treatment (if used)
- Soil amendment documents
 - Composting records
 - Certificate of Conformance

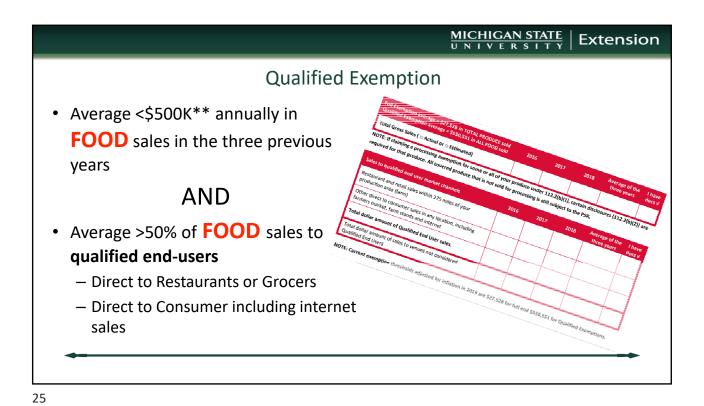
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Records Needing Supervisor Review

- Qualified exemption
- Worker training
- Water test results
- Water treatment monitoring
- Waiting period for water risk mitigation
- Time, temp and turn records for onfarm composting
- · Cleaning and sanitizing





Extension **Processing Exemption** • Your **PRODUCE** is processed with a kill step - Cucumbers for pickling TIME (ARRIVED AT GRADER): - Carrots for baby food FIELD NUMBER: - Mint for oil - Red beets for dye EX INITIALS *:

PROTES TRUE & SAS EXPECTED FOR FOREIGN OFFICES BET • Must disclose in documents accompanying produce: "Not processed to adequately reduce the presence of microorganisms of public health significance;" [112.2(b)(2)].

Record Keeping Requirements for Training

- Record of training must include:
- Date of training
- Topics covered
- Persons trained § 112.30 (b)
- Signed by Supervisor § 112.161 (b)



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Record Keeping for Cleaning

Record of cleaning must include:

- Date of cleaning
- Method of cleaning

§ 112.140 (b)

Signed by Supervisor

§ 112.161 (b)



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Sample Inspection Log for Water Sources									
MICHIGAN STATE U N I V E R S I T Y Extension Annual Water System Inspection Log Example									
Name of the Water Source (Use whateve name you identify the	and Time	Nature of Water Source 21CFR112.42(a)(1) Municipal, Ground or Surface	Extent of Control 21CFR112.42(a)(2) High, Moderate or Low	Degree of Protection 21CFR112.42(a)(3) High, Moderate or Low	Adjacent Land Use 21CFR112.42(a)(4)	Likelihood of Introduction of Hazards 21CFR112.42(a)(5) High, Moderate or	Corrective Actions Taken, if needed	Initials	
Dad's Pond (Example)	5-1-18	Surface	Moderate	Moderate	Grass yard	Low Moderate		P.T.	
		Supervisor's Sign	nature	Date	_				

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Record Keeping for Water

Water records must include:

- Findings of annual water system inspection
- Water test results if done
- Agricultural water assessment for preharvest water

If you use a water treatment:

- Results of monitoring the treatment
- Science behind die off rate for any washing and storage reduction. § 112.50 (b)(5)
- Documentation of actions for TTH die off.



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Water Treatment Records

- Required any time you add chemicals to water.
 - Preharvest and post-harvest
- What you monitor depends on sanitizer.
 - Cl based: Concentration, pH, turbidity and temperature
 - PAA based: Concentration, turbidity and temperature



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Record Keeping Requirements for Compost

Bought Compost

• Needs a Certificate of Compliance

Assurance that the process is scientifically validated [112.60(b)(1)(i)]

Assurance that the compost wasn't contaminated from making it to its arrival on-farm [112.60(b)(1)(ii)]



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Record Keeping Requirements for Compost

DIY Compost

• Needs the following records:

A record outlining the scientific validity of the process used to make the compost [112.54]

time, temp and turning records showing the process was followed on the farm [112.60(b)(2)]



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Record Retention

- Offsite storage allowed with conditions.
- Records can be kept electronically (considered "onsite")
- Retain records 2 years after creation.



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Module Review

- If it wasn't recorded, it never happened.
- You need to review key records to ensure accuracy and completeness.
- You can keep records digitally as long as they can be retrieved within 24 hours.