

# Produce Safety Supervisor Refresher

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## 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.

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## 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



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## 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.



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## 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



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## 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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## Who is Responsible for Produce Safety?



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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




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What do I want these folks  
to do?



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## 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.
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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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## Observational Baseline

- Watch the workers for an hour as part of normal routines.
  - Observe how often they already do the things on your list.
  - Take note when they perform unsafe activities.
- Write it down



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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.



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## 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.



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## 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
  - OR
  - 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 on-farm composting
- Cleaning and sanitizing



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## Qualified Exemption

- Average <\$500K\*\* annually in **FOOD** sales in the three previous years

AND

- Average >50% of **FOOD** sales to **qualified end-users**
  - Direct to Restaurants or Grocers
  - Direct to Consumer including internet sales

NOTE: Current exemption thresholds adjusted for inflation in 2018 are \$27,528 for full and \$50,551 for Qualified Exemptions.

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## Processing Exemption

- Your **PRODUCE** is processed with a kill step
  - Cucumbers for pickling
  - Carrots for baby food
  - Mint for oil
  - Red beets for dye
- Must disclose in documents accompanying produce:
 

“Not processed to adequately reduce the presence of microorganisms of public health significance;”  
[112.2(b)(2)].

\*\*This shipment of cucumbers was not processed to adequately reduce the presence of microorganisms of public health significance.

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## 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

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**Annual Water System Inspection Log Example**

Name of the Water Source <small>(Use whatever name you identify the source as)</small>	Date and Time	Nature of Water Source <small>21CFR112.42(a)(1)</small> Municipal, Ground or Surface	Extent of Control <small>21CFR112.42(a)(2)</small> High, Moderate or Low	Degree of Protection <small>21CFR112.42(a)(3)</small> High, Moderate or Low	Adjacent Land Use <small>21CFR112.42(a)(4)</small>	Likelihood of Introduction of Hazards <small>21CFR112.42(a)(5)</small> High, Moderate or Low	Corrective Actions Taken, if needed	Initials
Dad's Pond (Example)	5-1-28	Surface	Moderate	Moderate	Grass yard	Moderate		P.T.

Supervisor's Signature \_\_\_\_\_ 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 <sup>[112.54]</sup>

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



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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.

