

Food Safety Modernization Act - How is NCSU Preparing?

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NCACES Group Meeting

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FDA Produce Safety Rule

Scheduled for release on or before **October 31, 2015**

§ 122.22(c) **At least one supervisor or responsible party for your farm must have successfully completed food safety training** at least equivalent to that received under standardized curriculum recognized as adequate by the Food and Drug Administration.

Compliance Dates for the Preventive Controls and Produce Safety Rules

	Preventive Controls Rules (Human and Animal)	Produce Safety Rule*
Final Rule Scheduled for release	Aug 30, 2015	Oct 31, 2015
Other than small or very small	1 year (Oct 30, 2016)	2 years (Dec 31, 2017)
Small business	2 years (Oct 30, 2017)	3 years (Dec 31, 2018)
Very Small business	3 years (Oct 30, 2018)	4 years (Dec 31, 2019)

*Note that for the Produce Safety Rule, compliance with provisions for water quality and testing frequencies is extended for two years beyond the applicable compliance date.

Other important dates for release of FSMA RULES:

October 31, 2015: Foreign Supplier Verification and Third Party Accreditation
March 31, 2016: Sanitary Transportation
May 31, 2016: Intentional Adulteration

Possible Inspection Schedule for Farms of Various Sizes, based on compliance dates

Inspection Type	Very Small Farms (\$25K-\$250K)*	Small Farms (\$250K-\$500K)*	All Other Farms (>\$500K)
Initial	2019	2018	2017
Follow-up	2020	2019	2018
Delayed Implementation (Water Quality)	2021	2020	2019

*Including farms eligible for a qualified exemption

- Staggered implementation based on farm size
- Delayed implementation of water quality testing requirements

Impact on North Carolina Agribusiness:

Conservatively estimated that approximately **3,000** produce farms impacted

Some farms will fall under both the Fresh Produce and Preventive Controls Rules

Each rule has separate training requirements

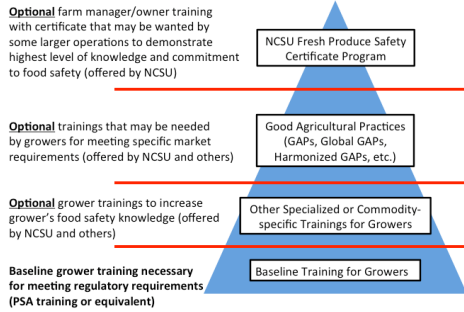
Optimal Schedule and Target Audience for Training?

Commodity based

Volume/Business size based

Risk based

Training Options Available to NC Farmers



Delivering the Required Baseline Training in NC

- Tiered approach
- Team based training
- Coordinated efforts through NC Fresh Produce Safety Task Force
- Optional offerings for additional training through NCSU and others

On-farm Readiness Reviews

Non-regulatory

Entirely voluntary

Goal:

Food safety concepts introduced in the classroom to be brought back to the farm

Provides a process for assessing current on-farm practices against the food safety concepts required through FSMA

Funding

Currently, FSMA as a whole is an **“unfunded mandate”**

Lack of available funding will adversely impact:
States Ability to develop outreach and education programs

Long-term sustainability of any programs that are developed

Timeline

Draft document

- History
- Requirements of pending Rules
- Training requirements/needs/options
- Comments for members of NCFPSTF > assimilated comments and questions

Begin work on Implementation Plan for NC

- Determine Number of farms that will need both Produce and Preventive Controls training
- See and understand what the final rules actually encompass
- Develop qualified trainers (for ex. PSA curriculum)
- Systematic and coordinated training efforts for trained trainers



FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE



Regulatory Requirements



Produce Rule

§ 122.22(c) **At least one supervisor or responsible party for your farm must have successfully completed food safety training** at least equivalent to that received **under standardized curriculum recognized as adequate by the Food and Drug Administration.**

Preventative Control

117.180(c) (1) To be a qualified individual, the **individual must have successfully completed training in the development and application of risk-based preventive controls** at least equivalent to that received **under a standardized curriculum recognized as adequate by FDA or be otherwise qualified through job experience to develop and apply a food safety system.**

Produce Safety Alliance



PSA Expansion: Building regional collaboration

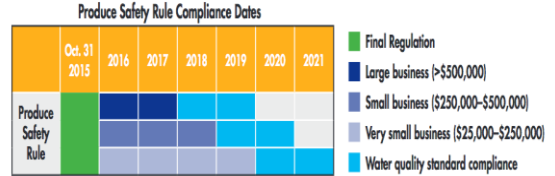
- ✦ Regional Extension Associates (SW, NW, MW, and SE)
- ✦ PSA Extension Aide

Trainer Certifications:

- ✦ Certified Lead Trainer
- ✦ Certified Trainer (under the direction of Certified Lead Trainer)

Pilots and TTT's: 2 days

Remembering the timeline from the Proposed Produce Safety Rule...



Certified Lead Trainer

Attend the two-day PSA Train-the-Trainer Course

Successfully complete an interview to demonstrate their competency:

- 1) Knowledge of microbiology as it relates to produce safety
- 2) Knowledge of fruit and vegetable production, harvesting, packing, and transportation, and
- 3) Knowledge of the FSMA Produce Safety Rule.

Information about how to prepare for and complete this process is included during the PSA TTT Course
Certification through AFDO

PSA Grower Training Curriculum

Content:

- Module 1: Introduction to Produce Safety
- Module 2: Worker Health, Hygiene, and Training
- Module 3: Soil Amendments
- Module 4: Wildlife, Domestic Animals, and Land Use
- Module 5—Part I: Production Water; Part II: Postharvest Water
- Module 6: Postharvest Handling and Sanitation
- Module 7: How to Develop a Farm Food Safety Plan

Growers Trainings:

- 1 day (8 hrs.)
- ~ \$75 (materials only) + Trainer Costs (\$150-200 estimated)

Certificate of Attendance through AFDO

How are we positioned in North Carolina?



~ Possibly as many as 4500 farms

Lead Instructors (4-5 soon)

Host to Regional Train-The-Trainer in Kannapolis, NC (Confirmed)

Grower Trainings for Winter 2016 (in planning process)

NCFPSTF Co-Chairs



Chris Daubert, NCSU FBNS



John Dole, NCSU HORT

Specialized Agents for Food Safety

NCSU is filling the training gap!

8 positions total for FSMA and Consumer Food Safety

Working in a coordinated team



FSMA Area Specialized Agents

Primary responsibility in:
Produce Rule –
Preharvest & Postharvest

Preventive Control Rule –
Produce Processing & Food Processing &
Animal Feed



CFS Area Specialized Agents

Consumer Food Safety Education (2)

Overall Coordinator

Teamwork is Key

Cross area awareness – all will be resources

Working with external partners



Duration

Three years

Reevaluation based on priority and funding

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Questions Remaining for the Task Force

Where should the priorities be for training (Should it be large farms? A certain commodity type? A certain geographic region? Risk/compliance history? We need to discuss these questions.)

Would the commodity groups/Farm Bureau be a resource for supporting the cost of training (to the grower)?

Is the PSA training appropriate for all NC growers? Will other types of baseline training be available?

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Questions Remaining for the Task Force

For the PSA training:

- a. Do we deliver training as a single 7 hour class or split the class into two days (Day 1 afternoon + Day 2 morning)?
- b. What is the optimal class size?

Costs of the PSA training and possible cost shares

- a. The task force should develop estimates on the number of trainers needed to complete this training, the amount of money that it may cost to develop and deliver.
- b. What type of cost-shares or scholarships should be offered to maximize participation?

Are there other stakeholders that can participate in messaging/outreach?

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Questions for Fellow Specialists

Do you feel prepared to answer questions about FSMA training requirements from your growers?

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Questions for Fellow Specialists

Are you interested in becoming a trained trainer in the PSA training curriculum?

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Questions for Fellow Specialists

Would you be interested in becoming a certified lead trainer?