

# Commission's Food Safety Program Continues

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**E**arlier this year the Commission conducted food safety trainings for growers – the fifth series of food safety workshops since 2012. Meetings were held in San Luis Obispo, Santa Paula and Fallbrook. Based on the large grower attendance and participation at all three meetings, it is evident that industry interest remains strong in becoming Good Agricultural Practices (GAP) certified.

This high level of engagement is a positive signal that the industry recognizes the importance of GAP certification and sends a vital message to consumers, foodservice operations and retailers: California avocado growers are willing to stand behind, and further strengthen, our premium brand by certifying our practices are safe.

There remain two driving forces for food safety certification in the United States. First, the Food Safety Modernization Act (FSMA), which became law in January 2016, places responsibility for the safety of all fresh produce and meat sold in the United States on the Food and Drug Administration. This law covers all produce sold in the United States including offshore supplies. Over the last five years, as FSMA was being finalized, the Commission has provided growers with continuous updates concerning FSMA compliance requirements. Specific information on exemptions and compliance dates can be found in the FSMA box in this article.

There are two important parts of FSMA that will impact current California avocado industry practices. First is the harvesting of windfall fruit. Under FSMA, the distribution of produce that drops to the ground before harvesting is prohibited. While the California Department of Food and Agriculture (CDFA) currently allows for the harvest of windfall fruit, CDFA acknowledges that federal law will preempt state law and is in the process of helping to change the CDFA law. CDFA expects a change in California law before the end of 2017, which will then make the harvesting of windfall fruit illegal within the state.

The second item under FSMA law that impacts our industry is the disallowance of harvesting produce that comes in

contact with the ground unless it grows naturally on or in the ground. Examples of produce that grows on or in the ground are strawberries and carrots. In the strictest interpretation of this section, avocados that contact the ground – such as those hanging from a low branch – will be illegal to harvest.

The other driving force behind food safety certification are the buyers of our fruit. As reported during the recently conducted trainings, some buyers will soon require audit certification, at a minimum, to comply with the Global Food Safety Initiative (GFSI) standards. As such, in late 2016 the Commission modified the food safety manual to support a grower audit against the GFSI standard.

The GFSI audit, as with FSMA and previous audits, remains focused on the core areas associated with potential pathways for microbial contamination:

- People – worker hygiene and health
- Water – hand washing, drinking, irrigation, application mixes, run off
- Soil – soil amendments, prior uses, adjacent uses, contamination
- Animals – wild or domestic

The biggest changes associated with the GFSI audit are the additional record-keeping requirements. In many instances these are records growers already maintain but have not previously been asked to provide. For example, you must be prepared to show pesticide use reports, crop protection material labels, pre-harvest intervals and harvest dates. All necessary licensing, such as pest control adviser (PCA) and qualified applicator licenses (QAL), will be reviewed, and a list of all suppliers must be developed (pesticide and fertilizer suppliers, applicators, restrooms, etc.). Requirements also call for Letters of Guarantee from each supplier confirming they meet the specifications listed under Supplier Requirements. According to GFSI standards, each grove must now have a restroom. Compliance can be met by having a portable facility brought to the grove.

If your harvest contractor(s) is Good Harvesting Practices (GHP) certified, you will simply need to provide a copy of

their audit and a copy of their certificate. However, if the harvest contractor has not been certified, you will need the copies of GFSI training materials, quarterly training records (dated and signed) and copies of bathroom servicing records for your harvest contractor(s). Obviously, it is best if your harvest contractor has been GHP certified. To encourage them to become certified, the Commission will be conducting another series of GHP workshops for that sector.

In the GFSI audit a few questions can result in an “Automatic Failure.” For example, if you harvested fruit before the pre-harvest interval was completed that would be an automatic failure. However, most questions allow for “Corrective Actions.” For these questions, you will be allowed 30 days to correct the issue.

You also will need to set up a Food Safety Committee, even if it’s just a committee of one – YOU! While some of these requirements may seem onerous and even ridiculous, it’s important to remember the purpose of their creation. Simply stated, the objective of these requirements is to help you create a culture where you (and your employees) continuously evaluate and, when necessary, modify your farming practices with an eye on food safety. This can only occur if you are aware of possible pathways for microbial contamination, monitor all activities on your grove and then verify through appropriate documentation.

If you are interested in learning more about becoming GFSI certified, the Commission recommends you first talk

with your handler. Most handlers have staff who are experienced in assisting growers to prepare for the audit process. The Commission also has food safety manuals available for growers upon request. The first step is a review of the Pre-Season Self-Assessment Checklist in the food safety manual to evaluate your level of readiness for an audit. Then you will pull together all the necessary records, conduct employee training, get water testing done, etc. The audit will take a few hours depending on the size of your operation and typically costs around \$700 annually.

The full presentation from the workshops provides examples for many of the items discussed in this article and may be found at this link: [www.californiaavocadogrowers.com/sites/default/files/documents/CAC-Food-Safety-Presentation-1-17.pdf](http://www.californiaavocadogrowers.com/sites/default/files/documents/CAC-Food-Safety-Presentation-1-17.pdf).

While becoming GFSI certified may seem like a daunting task, it is one that you are strongly encouraged to consider. There is, and will remain, multiple supply options for the prospective buyers of your fruit. Don’t put these buyers in the position of not buying your fruit because it doesn’t meet their food safety requirements. Or, even worse, call into question our premium reputation. If we want to maintain California’s reputation as producer of the premium avocado, then we must back it up with our actions.

If you would like to contact the Commission, request a food safety manual or get additional help, please send an email to [cac.iaf@avocado.org](mailto:cac.iaf@avocado.org) or call 949.341.1955. 🍌

## FSMA EXEMPTIONS

### *The Rule does not apply to:*

- Farms that have an average annual value of produce sold during the previous three-year period of \$25,000 or less
- Or a qualified exemption based on two requirements:
  - The farm must have food sales averaging less than \$500,000 per year during the previous three years; and
  - The farm’s sales to qualified end-users must exceed sales to all others combined during the previous three years.A qualified end-user is either (a) the consumer of the food or (b) a restaurant or retail food establishment that is located in the same state or the same Indian reservation as the farm or not more than 275 miles away.

## FSMA COMPLIANCE DATES

- Very small businesses: More than \$25,000 but no more than \$250,000 in average annual produce sales during the previous three-year period – January 26, 2020
- Small businesses: More than \$250,000 but no more than \$500,000 in average annual produce sales during the previous three-year period – January 26, 2019
- All other farms: January 26, 2018