Food Safety Plans and Third Party Audits

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Good Agricultural Practices

GAPs Awareness and Training

→

Farm Self Assessment

→

Written Farm Food Safety Plan

→

Plan Implementation

→

Third Party Audit

→

Certification
Start with What You Know!

- Assess your operation, pre-plant through postharvest handling.
- Identify areas that you know are high risk or areas of concern.
- Consider changes that will reduce the risks AND are economically feasible.
- Document your progress.
Farm Food Safety Plan

- Describes farm
- Identifies person responsible for food safety
- Defines policies
- Outlines procedures
- Includes examples of recordkeeping forms used to verify GAP
Types of Documents

- Policies (What You Do)
- Procedures (How You Do It)
- Records (Who Did What When)
- Maps (Where Is It)
- Flow Chart (How It Works)
Farm Food Safety Plan Covers:

- Farm operation and farm facilities
- Manure storage and handling
- Animal exclusion (domestic & wild)
- Irrigation and drainage management
- Equipment sanitation
- Harvest and postharvest handling
- Employee training program
- Restroom & hand washing facilities
- Traceability system
- Crisis management strategy
Plan Writing Tips

• Write a plan for your operation
• Include what you WILL do
  (not what you hope you will do)
• Update your plan regularly
Use a Template or Audit Checklist as a Guide

FSP4U Univ. of Minnesota Template
safety.cfans.umn.edu/FSP4U.html

On Farm Food Safety onfarmfoodsafety.org

USDA Audit Checklist
www.ams.usda.gov/

Follow links to ‘Grading, Certification, Verification
-> Audit and Accreditation Programs
-> GAPs & GHPs

Harmonized GAP Standards
www.unitedfresh.org/newsviews/gap_harmonization
<table>
<thead>
<tr>
<th>Questions</th>
<th>Points</th>
<th>YES</th>
<th>NO</th>
<th>N/A</th>
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<tbody>
<tr>
<td>G-10 All toilet/restroom/field sanitation facilities are serviced and</td>
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<td>cleaned on a scheduled basis.</td>
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<td>G-11 Smoking and eating are confined to designated areas separate from</td>
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<td>where product is handled.</td>
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<td>G-12 Workers with diarrheal disease or symptoms of other infectious</td>
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<td>disease are prohibited from handling fresh produce.</td>
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<td>G-13 There is a policy describing procedures which specify handling/</td>
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<td>disposition of produce or food contact surfaces that have come into</td>
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<td>contact with blood or other body fluids.</td>
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<td>G-14 Workers are instructed to seek prompt treatment with clean first</td>
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<td>aid supplies for cuts, abrasions and other injuries.</td>
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<td>G-15 Company personnel or contracted personnel that apply regulated</td>
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<td>pre-harvest and/or post harvest materials are licensed. Company</td>
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<td>personnel or contracted personnel applying non-regulated materials have</td>
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<td>been trained on its proper use.</td>
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<td>Requirement</td>
<td>Procedure</td>
<td>Verification</td>
<td>Corrective Action</td>
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<td><strong>1.</strong> General Questions</td>
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<td>1.1. Management Responsibility</td>
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<td>1.1.1. A food safety policy shall be in place.</td>
<td>A written policy shall outline a commitment to food safety, in general terms, how it is implemented and how it is communicated to employees, and be signed by Senior Management.</td>
<td>The auditor observes the food safety policy, observes that it is signed by Senior Management, and observes that it has been communicated to all employees in a manner that can be understood.</td>
<td>The operation creates or revises the policy, or its communication to employees, to be in compliance.</td>
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<td>1.1.2. Management has designated individual(s) with roles, responsibilities and resources for food safety functions.</td>
<td>The food safety plan shall designate who has the responsibility and authority for food safety, including a provision for the absence of key personnel. Twenty-four hour contact information shall be available for these individuals in case of food safety emergencies. The organization’s senior management shall determine and provide, in a timely manner, the resources needed to implement and maintain the food safety plan.</td>
<td>Auditor observes that the food safety plan has identified individual(s) for key food safety activities. Auditor verifies that procedures include provisions for when the identified individual is not present. Auditor observes whether Senior Management has provided the resources needed to implement and maintain the food safety plan.</td>
<td>Operation identifies individual(s) for key food safety activities in the food safety plan. Operation identifies actions to be taken when the identified individual(s) are not present. Senior Management commits resources needed to implement and maintain the food safety plan.</td>
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<td>1.1.3. There is a disciplinary policy for food safety violations</td>
<td>There shall be a policy that establishes corrective actions for personnel who violate established food safety policies or procedures.</td>
<td>Auditor observes the policy and checks for examples of enforcement</td>
<td>The operation creates or revises the policy, or its communication to employees, to be in compliance.</td>
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<td><strong>1.2.</strong> Food Safety Plan</td>
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<td>1.2.1. There shall be a written food safety plan that covers the operation.</td>
<td>The food safety plan shall identify all locations of the operation and products covered by the plan. The plan shall address potential physical, chemical, and biological hazards and hazard control procedures, including monitoring, verification and recordkeeping, for the following areas: water, soil amendments, field sanitation, production environment, and worker practices.</td>
<td>Auditor shall observe the food safety plan and verify that the plan has considered potential biological, chemical and physical hazards and has identified preventive controls for hazards that may reasonably affect food safety.</td>
<td>Operation develops or completes a food safety plan for all locations of operation.</td>
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Example Farm Food Safety Plans

A Food Safety Plan Developed In New York As an Example for Growers

The Henderson Farm Grower Food Safety Manual

Available from UMass Extension

Food Safety Manual

ABC Farms
123 Main Street
Springfield, IL

- John Smith is Food Safety Manager
- All employees and all visitors are required to follow proper sanitation and hygiene practices.
- All workers are required to wash their hands before returning to work.
- Smoking, gum chewing and eating are not allowed where product is stored or handled.
- Workers and visitors with diarrheal disease or symptoms of other infectious diseases are prohibited from handling fresh produce.
- All employees are taught to wash their hands by following this procedure:
  - Wet their hands with warm water. Apply soap and working up a lather.
  - Rub hands together for at least 20 seconds.
  - Clean under the fingernails and between the fingers.
  - Rub the fingertips of each hand in suds on palm of opposite hand.
  - Dry hands with a single use towel.
- All toilets and restrooms are serviced and cleaned on a daily basis and logs are kept.
- All conveyances are inspected at time of arrival.
- Conveyances are required to be clean, in good physical condition and free from obvious objectionable odors, dirt and/or debris at time of loading.
- The facility is clean and maintained in an orderly manner.
- Refrigerated rooms are monitored for temperature and logs are maintained.
- Measures are taken to exclude animals or pests from the facility.
- There is an established pest control program for the facility.
- Service reports for the pest control program are available for review.
- A recall program is in place and a mock recall is done every six months.
3rd Party Food Safety Audits

• Who? Private companies and USDA
  – Primus Labs, SCI, ABI, others

• What?
  – Review food safety plan
  – Check that you are following it

• Why?

• Cost?
Do You Need an Audit?

- Do buyers want one?
- Which one?
  - USDA GAPs and GHPs – which parts?
    - Farm Review, Field, Packinghouse, Storage and Transport, Wholesale Distribution, Food Defense
  - Harmonized GAPs from USDA
  - Primus
  - Other?
Path to an Audit

• Choose an audit
• Review checklist and guidelines
• Write a food safety plan
• Optional: mock audit
• Contact auditor
  – Send plan for review
  – Schedule visit
What Happens During the Audit?

• Review documents and records
• Walk around the operation, observe, ask questions to verify processes
  – What Do You Do?
  – How Do You Do It?
  – How Do I Know You Have Done It?
  – What If?
• Exit Meeting: audit report, questions, corrective action report, prepare for follow-up or unannounced visit
Automatic Unsatisfactory (USDA)

- Immediate food safety risk
- Rodents, insects, or other pests
- Employee practices (e.g. not washing hands after restroom)
- Falsification of records
- No Food Safety Manager
- No Food Safety Plan
Food Safety To-Do List

✓ Learn about food safety risks
  • Assess your operation
    – Where are the biggest risks?
    – How can you reduce the risk?
  • Plan to improve
  • Write a farm food safety plan...and follow it
  • Consider an audit or certification
  • Keep learning and improving
Questions?

Thank you