



Incomplete worker training records are frequently noted in Produce Safety Rule inspections.

Produce Safety Rule inspections: What you need to know

By Taylor O'Bannon, Matt Krug, Michelle Danyluk, Chelsea Peebles and Kirby Quam

Produce Safety Rule (PSR) inspections conducted by the Florida Department of Agriculture and Consumer Services (FDACS) are continuing throughout the state as compliance dates for all farm sizes have now passed.

The industry is also nearing the compliance date set by the Food and Drug Administration (FDA) for agricultural water (Subpart E), with large farms to begin in January 2022. While FDA has not released guidance or extended the current compliance dates for agricultural water, the hope is that

these dates will be further delayed to allow time for education and compliance with rule changes.

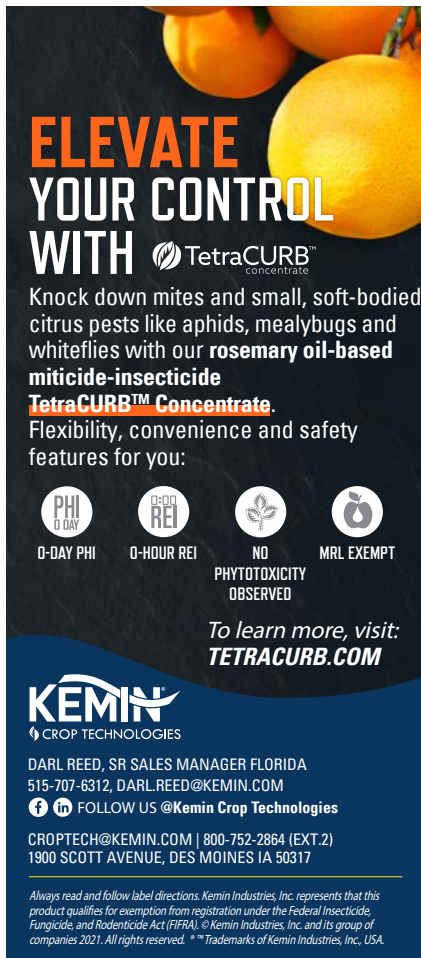
Scheduling of inspections generally follows the patterns of produce production across the state. Florida citrus farms with seasons in the fall and winter should be preparing for inspections. Citrus growers and packers who are “large farms” and have not yet received a PSR inspection by FDACS should expect their inspection to be scheduled soon.


As more farms receive inspections throughout the state, trends among findings are emerging. One of the main trends being seen is centered around recordkeeping. Deficiencies related to recordkeeping include: record components, (date, time and supervisor review), missing worker training, cleaning and sanitation, and Biological Soil Amendments of Animal Origin (BSAAO) records.

RECORD COMPONENTS

The description of the components that must be included in a record for the PSR are detailed in the Code of Federal Regulations Title 21, Section 112.161 (Subpart O). The citrus growing, harvesting and packing industry is encouraged to review all records to ensure they contain the legally necessary components. According to the PSR, records must include these general requirements:





- The name and location of the farm
- Actual values and observations obtained during monitoring (not a checklist)
- An adequate description of covered produce applicable to the record (commodity, lot numbers



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Handwashing and good hygiene are essential practices for workers who handle fruit.

- and other identifiers)
- The location of a growing area that defines the specific field, packinghouse or location applicable to the record
- The date and time of the activity documented
- Created at the time an activity is performed or observed
- Accurate, legible and indelible
- Dated and signed or initialed by the person who performed the activity documented
- Records reviewed, dated and signed by a supervisor within a reasonable time period after the record was created (i.e., weekly or when a log sheet is completed)

WORKER TRAINING

Worker training records are frequently noted as not meeting all the rule requirements. They must be kept for *all* workers who handle covered produce, touch food-contact surfaces or supervise covered activities. Each farm is required to train personnel before they begin covered activities, at least once annually, and periodically as needed. Training for farm workers must include:

- Principles of food hygiene and food safety
- The importance of health and hygiene for all workers and visitors, and how to recognize symptoms of foodborne illness
- Any PSR or food safety principles that are applicable to the employees' responsibilities on the farm

Additionally, those who take part in harvest activities must be trained to:

- Recognize and not harvest produce that may be contaminated
- Inspect harvest containers to ensure they are working properly, clean and maintained to prevent contamination of fruit
- Correct problems and report problems to a supervisor

Records for worker training must also include the:

- Date of the training
- Topics covered during training
- Person(s) trained
- Other record requirements outlined in Subpart O

CLEANING AND SANITATION

Cleaning and sanitation records must be kept by farms who conduct or contract third parties to conduct covered activities. Frequently, third parties are contracted to conduct harvest or cleaning and sanitation activities on farms. Farms are responsible for keeping records of the covered activities performed by their own employees and by the third parties.

Section 11.140(b)(2) requires that farms keep a record of the date and method of cleaning and sanitizing used in covered activities. Records that may be kept in a citrus growing or packing environment include: cleaning and sanitation of harvest or packing tools, equipment and transportation vehicles, in addition to the worker training requirements detailed above.

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BSAAO

Biological Soil Amendments of Animal Origin are applied by the citrus industry to increase organic matter for water and nutrient retention in Florida's sandy soils. The risks associated with application of BSAAO must be addressed to prevent fresh fruit contamination. Section 112.51 requires documentation of handling and treatment methods or a third-party supplier certificate of conformance records and application records.

GROWER RESOURCES

Recordkeeping templates and resources are available to assist growers with compliance of the PSR, including a recordkeeping tool developed by FDACS.

To best prepare for PSR inspections, growers, harvesters and packers should, at a minimum, follow Good Agricultural Practices, and a supervisor should attend a Produce Safety Alliance (PSA) grower training. This training continues to be offered at the highly subsidized price of \$30 for remote and \$40 for an in-person class through collaborations with the University of Florida Institute of Food and Agricultural Sciences (UF/IFAS) and FDACS. See crec.ifas.ufl.edu/extension/events for a list of upcoming PSA grower trainings.

The On-Farm Readiness Review (OFRR) program is another way to help growers prepare for a PSR inspection through a personalized site visit. UF/IFAS and FDACS representatives can address questions about specific practices or conditions at a farm or packinghouse. There is no cost associated with an OFRR. Sign up at fdacs.gov/FSMA for an OFRR.

For more information on resources and training, contact Taylor O'Bannon (taylorlangford@ufl.edu).

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Pathway to a Sustainable Industry



By Rick Dantzler, CRDF chief operating officer

The last month of what has been a tough year is a good time to look at where we are and prepare for 2022.

The Citrus Research and Education Foundation (CRDF) has been taking stock of where we are in the fight against HLB. Do we have a plan or are we simply chasing the latest shiny thing?

I assure you we have a strategy, so we put it on paper. It is still being massaged by research leaders from industry and academia, but a pathway to achieve a sustainable Florida citrus industry is in place.

It has been a long and difficult road, but many of the building blocks are up and running. The projects CRDF and other entities have funded — and continue to fund — have brought us to this point. However, additional funding will be required to finish the task. Research successes tend to be sequential in nature, meaning that one advancement sets up the next project until the goal is achieved. But we believe we are nearing the point where industry sustainability and growth will be achieved.

Assuming this pathway is correct, the work remaining has been identified. It is not the kind of exploration that has marked much of the work over the last 12 years, work that was necessary since so little was known about the disease when we started. It is, instead, work that is focused on specific advancements, discoveries and solutions.

Bridge work will carry us to the point of eradicating HLB or making it functionally irrelevant, probably with a resistant or sufficiently tolerant tree. The necessary technologies for these breakthroughs have been built. CRDF will accelerate the work required to see that these projects get into the field as quickly as possible.

There are potential pitfalls that must be acknowledged. First, necessary regulatory approvals might not be forthcoming. Second, the citrus industry must make a collective decision to accept what is proposed, something that has not yet been done. Third, it is unclear if the genes that allow HLB to do its damage have been successfully identified. Fourth, plants have the genes they have because they need them. So, if the genes that allow HLB to express itself are silenced, there could be negative effects on the trees. These potential obstacles should be able to be overcome.

The approaches outlined revolve around the advancement of eight categories of products, production practices, technologies or trees: peptides, citrus tristeza virus, tree injection, production practice improvements, rootstock and scion testing, transgenics, clustered regularly interspaced short palindromic repeats (known as CRISPR), and other methods of plant breeding. The first categories are designed to work in combinations to reduce disease enough to allow the industry to survive until the more effective longer-term solutions are developed and amplified for widespread commercial use. These longer-term approaches will need continued funding for this period.

A strategy is in place. We know what needs to be done. We are going to get there.



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