

# Farm Food Safety in Massachusetts

## Some History, and The Landscape as of August 2016

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*Tangerini's twilight meeting, August 10, 2016*

All growers, regardless of scale, should have a fundamental awareness of on-farm food safety risks, and basic strategies for identifying and mitigating those risks.

UMass Food Safety Education: <https://ag.umass.edu/vegetable/resources-services/food-safety-for-farmers>

### **Good Agricultural Practices (GAPs)**

- In response to a few well-publicized, widespread food-borne illness outbreaks associated with fresh produce, in 1998 FDA and USDA issued "[Guidance for Industry – Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables](#)". *Not regulatory!*
- Outlines good practices for managing risks in major focus areas:
  - Water
  - Manure & Municipal Biosolids
  - Worker Health & Hygiene
  - Sanitary Facilities
  - Field Sanitation
  - Packing Facility Sanitation
  - Transportation
  - Traceback.
- Basis for USDA-GAP audit programs

### **United States Department of Agriculture (USDA)-GAP voluntary audit program**

- In January 2002, USDA Agricultural Marketing Service (AMS) formally implemented the USDA Good Agricultural Practices & Good Handling Practices (GAP&GHP) audit verification program.
- Market-driven, *not regulatory*
- The program does not guarantee the product is free from microbial contamination, but verifies the participant has taken proactive measures to reduce the risk of contamination by adhering to generally recognized industry best practices.
- Requires a written farm food safety plan, specific recordkeeping, and annual audits at the farmers' expense (in MA, generally ~\$800-\$1000 per year).
- Many buyers (mostly large grocery chains) began requiring certification. Today, smaller distributors and wholesalers are asking for some kind of certification.
- ➔ Other USDA-GAP audit services:
  - Commodity specific GAP – Tomato, Mushroom, California Leafy Greens, Arizona Leafy Greens
  - Harmonized GAP – 2009; effort to combine & simplify duplicative standards across the industry. Goal of the Initiative is "one audit by any credible third party, acceptable to all buyers."

- GroupGAP – new in 2016. Makes food safety certification accessible for small and middle-sized producers by allowing farmers, food hubs, and other marketing organizations to work together to undergo GAP certification as a group.

### Commonwealth Quality Program (CQP)

- Rolled out in 2010, Massachusetts brand and audit program, through MA Department of Agricultural Resources (MDAR); *not regulatory*
- Based on GAPs guidelines, and other best practice standards, determined in partnership with UMass Extension
- 3 core areas:
  - Food safety – prevent food-borne illnesses by minimizing the risks for microbial contamination
  - Environmental sustainability – IPM practices, water usage soil amendments
  - Local production – enforcement of native law
- “GAP light”: No written farm plan required, less intense with respect to paperwork
- No cost for participation
- MDAR provides technical support and grant funds
- Currently, only major retailer not accepting CQP is Stop & Shop – this is dynamic; MDAR works with/talks to buyers to explain CQP and support growers’ market access
- Requirements will be merged with those of FSMA, particularly with respect to agricultural water testing.
- CQP will be enforcement mechanism for FSMA – “educate while you regulate”: support technical assistance; promote Agricultural Food Safety Improvement Program (AFSIP) – grant program for capital improvements for harvest, wash, and pack infrastructure; will support ALL farms, regardless of FSMA exemptions if impacted by market access issues

### Food Safety Modernization Act (FSMA)

- Signed into law in 2011; rules finalized 2015-16; **REGULATORY!**
- Major rules affecting MA produce growers:
  - Produce Rule
  - Preventive Controls Rule
- Recommends written farm plan, requires some records, including those that demonstrate criteria for exemptions (**effective January 26, 2016**)
- Qualified exemptions and modified requirements based on size (b/w \$25,000 and \$500,000 gross) and market channels (> 50% of sales to “qualified end users” = direct to consumer, eg CSA, farmers’ market, or restaurant or retail food establishment within the same state or 275 miles)
- Exhaustive list of crops that are NOT COVERED (rarely consumed raw)
- Farms grossing **\$25,000 or less** are EXEMPT from requirements.
  - \$25,001 - \$250,000:** 4 years to comply (1/26/2020) + 2 years for water regs
  - \$250,001 - \$500,000:** 3 years to comply (1/26/2019) + 2 years for water regs
  - \$500,000 or more:** 2 years to comply (1/26/2018) + 2 years for water regs