

The Produce Safety Rule from a Distributor's Perspective



REGULATIONS

Michael Jantschke
PRO*ACT

National Network of Local Distributors



56+ MILLION CASES OF PRODUCE PURCHASED ANNUALLY

26+ MILLION SQ MILES IN DISTRIBUTION COVERAGE

71 DISTRIBUTION CENTERS

1,950+ DISTRIBUTION TRUCKS

35+ MILLION SQ FEET OF WAREHOUSE SPACE

7,200+ EMPLOYEES



ALASKA

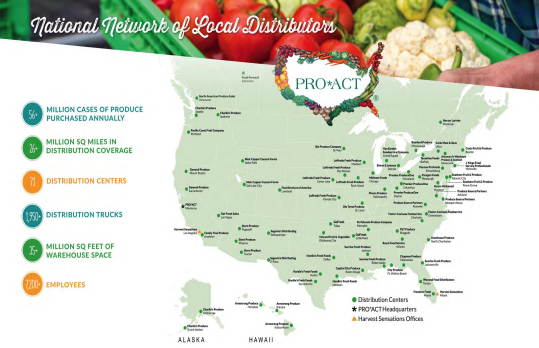
HAWAII



The Impact of the Produce Safety Rule on PRO*ACT

- PRO*ACT and its distribution companies are not subject to the regulation.





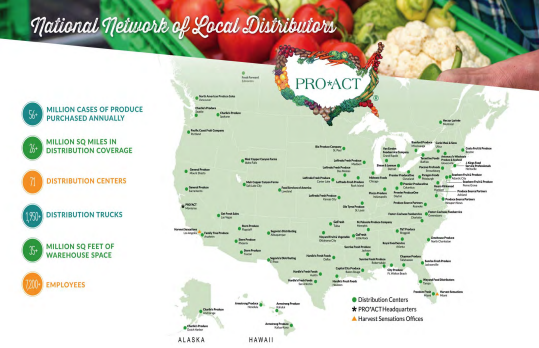
The Impact of the Produce Safety Rule on PRO*ACT



- Supplier/product risk
- Business risk



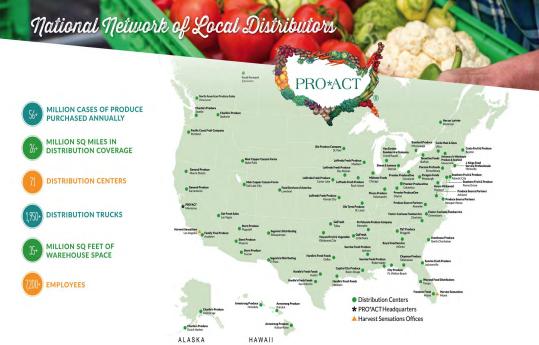
- Supplier trust vs. verification



The Impact of the Produce Safety Rule on PRO*ACT

- Principal impact areas on our business:
 - Supply chain management
 - Local farms





Supply Chain Management

- Enhanced food safety requirements as part of our supplier approval program

| | High-risk products | Low-risk products |
|-----------------------|--------------------|-------------------|
| Ag Water | ✓ | Enhance |
| Soil amendments | ✓ | Enhance |
| Animal intrusion | ✓ | ✓ |
| Equipment, facilities | ✓ | ✓ |
| Sprouts | Enhance | X |

- Value of LGMA, commodity-specific best practices
- Regulatory timelines

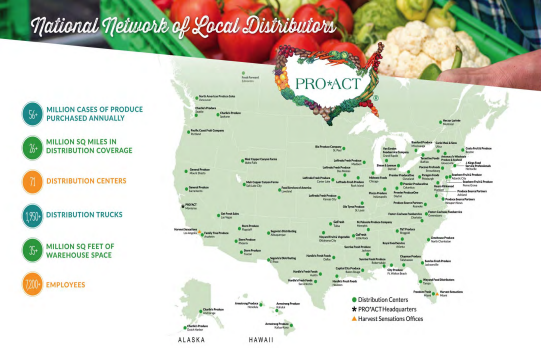


Supply Chain Management

- Important regulatory intersection: Produce Safety - Preventive Controls (Subpart G)

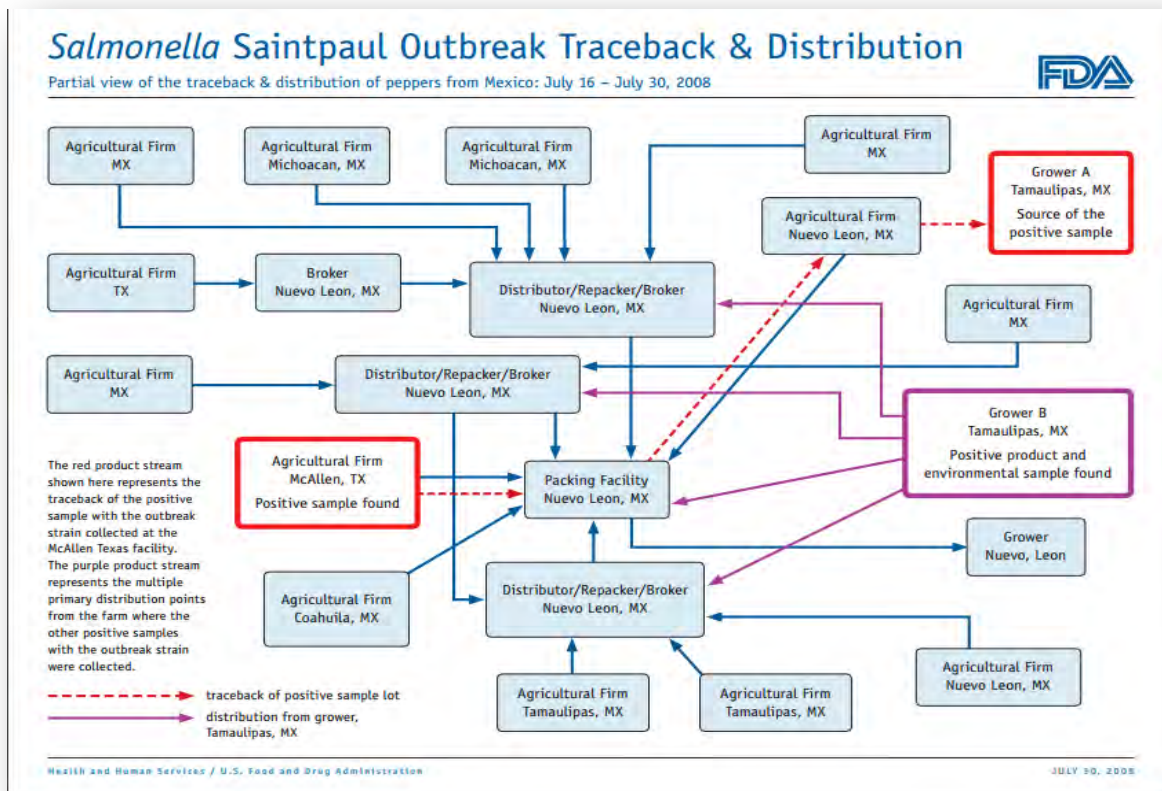


- Suppliers vs. contractual suppliers
- Approval and verification of suppliers



Supplier Verification

- Complexity of the produce supply chain





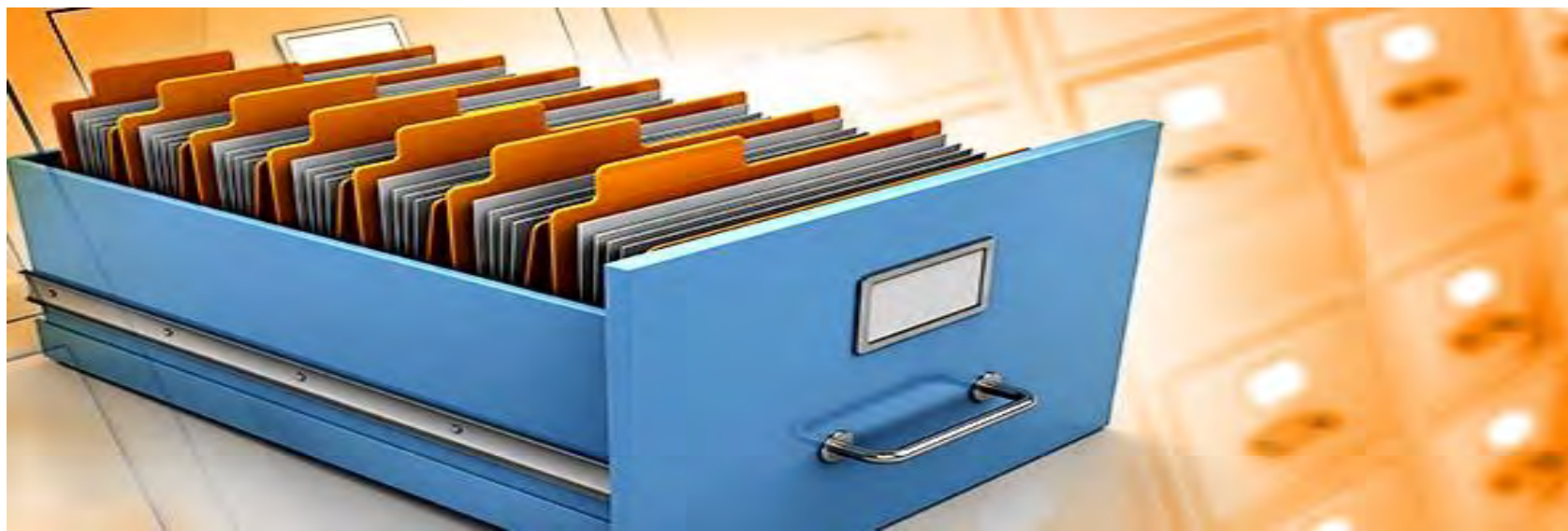
PRO*ACT

- 50 MILLION CASES OF PRODUCE PURCHASED ANNUALLY
- 10 MILLION SQ MILES IN DISTRIBUTION COVERAGE
- 11 DISTRIBUTION CENTERS
- 130 DISTRIBUTION TRUCKS
- 75 MILLION SQ FEET OF WAREHOUSE SPACE
- 100 EMPLOYEES



Supplier Verification

- Collecting and managing grower and shipper documentation
- Sharing the information with our distribution network and customers

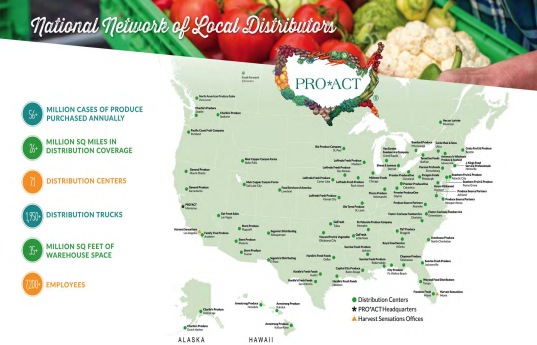




Supplier Verification

- Contractual suppliers as a partner in grower verification
- Enhanced PRO*ACT-wide document management system
 - Suppliers
 - Distributors
 - Customers



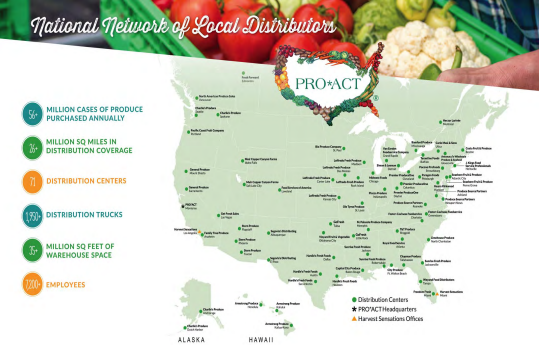


Local Farms and the Produce Safety Rule

- PRO*ACT's sustainability program:



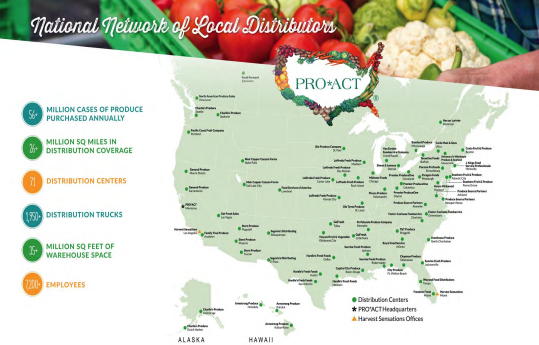
- Established PRO*ACT food safety and 3rd party audit requirements for local farms



Local Farms and the Produce Safety Rule

- Challenges for local farmers:
 - Lack of resources and technical know-how
 - Lack of familiarity with implementing a major new regulation
- PRO*ACT's mandates:
 - Compliance with the Produce Safety Rule per the regulatory compliance timelines
 - Farm size exemptions: None





Local Farms and the Produce Safety Rule

- Online food safety resources and webinars
- One-on-one technical assistance
- Greener Fields Together audit (free-of-charge)
- Regulatory compliance outreach (2018 focus)
- Grant program





PRO*ACT and the Produce Safety Rule

- 1. Incorporation of regulatory mandates in our food safety requirements for suppliers**
- 2. Supply chain controls and enhanced supplier verification**
- 3. Local farm outreach and assistance**



Supplier Assurance

FSMA Produce and Preventive Controls Rule



FRESHER
ideas



FRESHER
experience



FRESHER
results

Mann Packing Approved Suppliers

Romaine supplier selection

- Ability to meet Mann Packing quality and food safety requirements
- Supplier Food Safety Requirements
 - ✓ FSMA and LGMA Compliance
 - ✓ GFSI third party certification
 - ✓ (Farm and Harvest)
 - ✓ Supporting documentation on file





The Romaine Rules of FSMA

- **Preventive Controls for Human Food:** Requires that food facilities have safety plans that set forth how they will identify and minimize hazards. Original rule proposed January 2013; supplemental rule to add specific language for important provisions proposed September 2014. Final rule issued: Sept. 10, 2015.
- **Preventive Controls for Animal Food:** Establishes Current Good Manufacturing Practices and preventive controls for food for animals. Original rule proposed October 2013; supplemental rule to add provisions geared specifically to animal foods proposed September 2014. Final rule issued: Sept. 10, 2015.
- **Produce Safety:** Establishes science-based standards for growing, harvesting, packing and holding produce on domestic and foreign farms. Original rule proposed January 2013; supplemental rule to amend key areas proposed September 2014. Final rule issued: Nov. 13, 2015.
- **Foreign Supplier Verification Program:** Importers will be required to verify that food imported into the United States has been produced in a manner that provides the same level of public health protection as that required of U.S. food producers. Original rule proposed July 2013; supplemental rule to provide, among other provisions, more flexibility in determining appropriate verification measures proposed September 2014. Final rule issued: Nov. 13, 2015.
- **Third Party Certification:** Establishes a program for the accreditation of third-party auditors to conduct food safety audits and issue certifications of foreign facilities producing food for humans or animals. Proposed July 2013. Final rule issued: Nov. 13, 2015.
- **Sanitary Transportation:** Requires those who transport food to use sanitary practices to ensure the safety of food. Proposed January 2014. Final rule deadline: March 31, 2016.
- **Intentional Adulteration:** Requires domestic and foreign facilities to address vulnerable processes in their operations to prevent acts intended to cause large-scale public harm. Proposed December 2013. Final rule deadline: May 31, 2016.

Sec. 105. Standards for Produce Safety

- Considers risk posed by commodities and practices
 - Covers growing, harvesting, packing and holding produce
- Science and Risk-based
 - Standards associated with identified routes of microbial contamination of produce
 - Minimize the risk of SAHCODHA

SAHCODHA - Serious Adverse Health Consequences or Death of Humans or Animals

Covered Produce

- Produce defined as fruits and vegetables



fresher **EXPERIENCE**

Leafy Greens Marketing Agreement LGMA



fresher **EXPERIENCE**

Leafy Greens Marketing Agreement LGMA



The food safety practices cover five key areas:

1. GENERAL REQUIREMENTS

Member companies are required to have a complete food safety compliance plan, an up-to-date list of growers, and a written trace back program.

2. ENVIRONMENTAL ASSESSMENTS

Pre-season and pre-harvest assessments are required to make sure conditions that can affect food safety, such as animal intrusions, flooding, proximity to animal feeding operations, etc. are not present, or have been properly mitigated.

3. WATER USE

Extensive testing and record-keeping for all sources of water used in the production of leafy greens is required.

4. SOIL AMENDMENTS

Extensive testing, certification and record keeping for soil amendments, including compost and fertilizers, are required by the program.

5. WORK PRACTICES AND FIELD OPERATIONS

Field audits verify that farmers are in compliance with the program's requirements in the areas of worker practices and field sanitation.

The LGMA food safety practices are grounded in the latest food safety science, and are updated as new research and information becomes available.



Sec. 103. Hazard Analysis and Risk-Based Preventive Controls (HARPC)

- Evaluate hazards that could affect food safety
- Identify and implement preventive controls to prevent hazards
- Monitor controls and maintain monitoring records
- Conduct verification activities



What is in the Preventive Controls Rule?

There are 7 Parts:

- A. General Provisions
- B. Current Good Manufacturing Practice
- C. Hazard Analysis and Risk Based Preventive Controls
- D. Modified Requirements
- E. Withdrawal of a Qualified Facility Exemption
- F. Records Requirements
- G. Supply Chain Program

Part G: Supply Chain Program

- **Approved Supplier Program**
- **Conduct and document supplier verification activities**



Sec. 111. Sanitary Transportation of Food

- Sanitary transportation practices
- Does not include transport from farm to facility
- Does include transportation to customers





Thank You



FRESHER
ideas



FRESHER
experience



FRESHER
results

A Grower's Perspective

Implementing FSMA's
PRODUCE SAFETY RULE

Grower's To-Do List

- Training
- Timing
- Risk Assessments – various types
- Harvesting
- Documentation, recordkeeping

FSMA General Steps for Food Safety

- Assess produce safety risks
- Implement practices – Food Safety Plan
- Monitor practices
- Use corrective actions
- Keep records

Food Safety Training

- Everyone has a role in food safety on the farm
- PSA (or other equivalent) training for grower or one supervisor on the farm
- How to identify and reduce food safety risks
- Specific to the worker's responsibility
- Address visitors on the farm
- Document –SOP's, Policies, Training Records

Training Plan

- Overseen by a qualified person
- Prior to beginning work and at least annually
- Principles of personal health and hygiene including recognition of symptoms of foodborne illness
- Easily understood
- Harvest workers additional FSMA specified components that must be addressed

Chicken or the Egg???'s

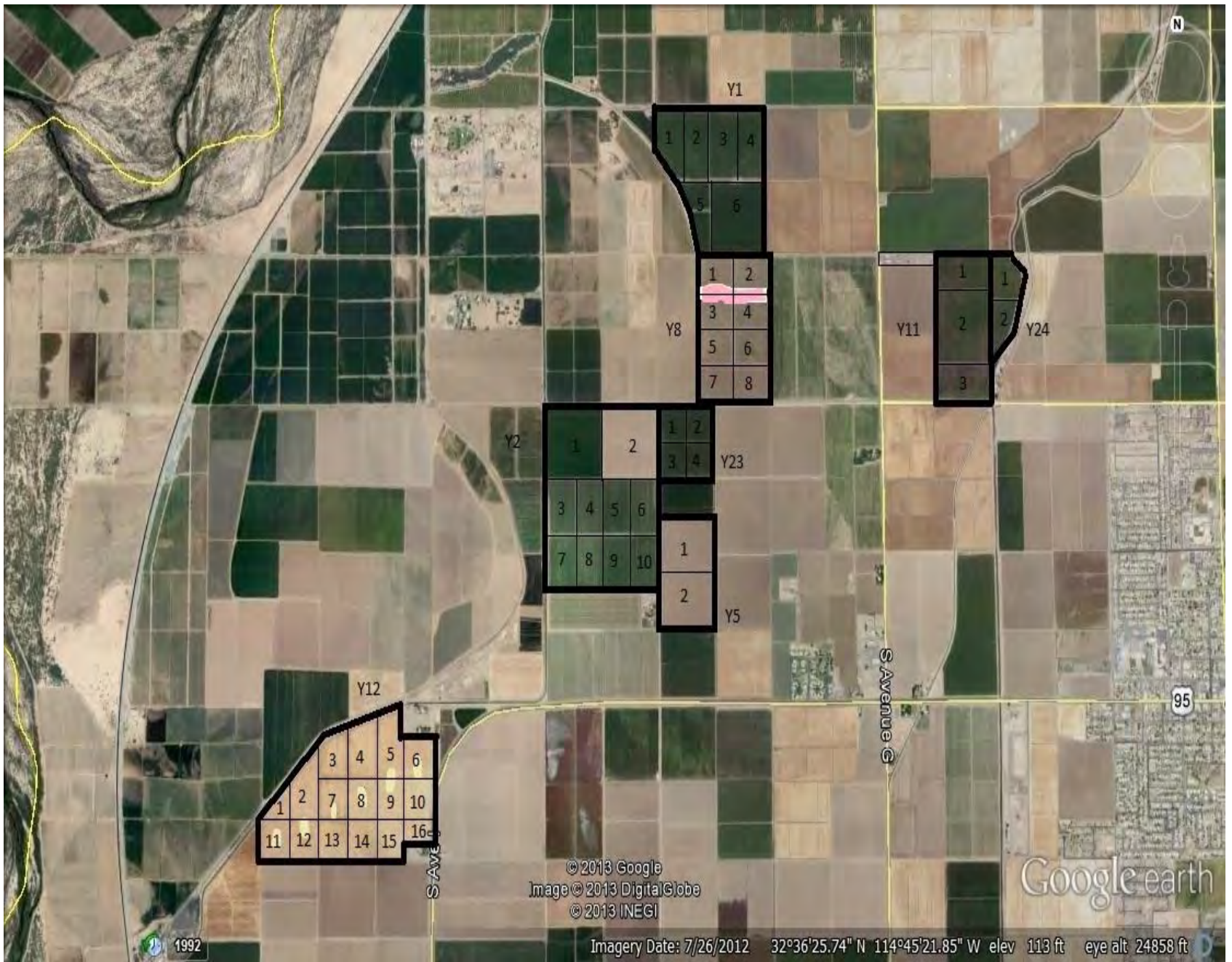
- Planting schedule is created
- Ranch/farm and commodity is assigned
- May be pre-plant inputs or actions taken that will affect risk assessments
- Food Safety Assessments are performed
- Water quality evaluations on-going
- Training
- Other Practices

Risk Assessments

- Field selection – Land Use
- Adjacent land activities
- Domestic and wild animal risks
- Water
- Soil amendments
- Practices to grow, harvest, pack or hold

Land Use

- History (grazing, landfills, manure, flooding)
- Residential, commercial or other uses
- Adjacent land characteristics
- Vegetative, riparian, wildlife habitat
- Septic systems
- Chemical storage, composting or manure
- Wind patterns, topography



© 2013 Google
Image © 2013 DigitalGlobe
© 2013 INEGI

Imagery Date: 7/26/2012 32°36'25.74" N 114°45'21.85" W elev 113 ft eye alt 24858 ft



Soil Amendments

- What type of soil amendments are planned for the crop
- Evaluate prior to acceptance/use
- Adhere to your SOP's for stockpiling, application and days to harvest

Wildlife & Domestic Animals

- Assess the ranch for animal intrusion as needed during the season
- Is there evidence of the feces, flocking, feathers, feeding, tracks, or other animal signs
- Are there domesticated animals on adjacent land
- Are the risks manageable or excessive
- Take corrective actions such as fencing or other exclusionary methods

AMIGO FARMS PRE-SEASON FOOD SAFETY & SECURITY ASSESSMENT

Ranch Internal Audit.gwr

| | | | |
|--------------------|------------------------|--------------------|---|
| RANCH NAME | Y S | LOCATION | SOMERTON, AL. |
| BLOCKS/LOTS | 1, 2, 3, 4, 5, 6, 7 #8 | | |
| COMMODITY | ROMAINE | PLANT DATE* | 9.16.14 |
| DATE | 8.28.14 | BY | VALENTIN O. STERRA <i>Valentin O. Sterra</i> *Per Schedule-Estimated |

| | | |
|---|---|---|
| LAND HISTORY | | |
| Has the growing area been used for food/fiber for the past 5 or more years? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | Notes: |
| Landfill, municipal waste storage, toxic waste, CAFO, hazardous activities? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |
| Grazing within the last year? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |
| Have any changes to the growing area occurred in the past year? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |
| History of Flooding? Within last 60 days? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Yes <input checked="" type="checkbox"/> |
| List: | | |

| | | | |
|--|-----|-----|-----------------|
| ADJACENT LAND USE | | | |
| Indicize surrounding properties & land uses on map below. | | | |
| Are the following present on Ranch? | YES | NO | LGMA BUFFER MET |
| CAFO | | X | Yes No |
| Composting Operations | | X | Yes No |
| Compost or Non-Synthetic Stockpiles | | X | Yes No |
| Domestic Animals, Grazing | | X | Yes No |
| Septic Systems | | X | Yes No |
| Sanitary Facilities | | X | Yes No |
| Distance from unprotected manure to irrigation water sources | | N/A | Yes No |
| Waterways, vegetative non-farm areas where wildlife observed | | X | Yes No |
| Other Concerns | | X | Describe below |

| | | | |
|---|---|------------------------------|-----------------------------|
| ANIMAL ACTIVITY | | | |
| Is the Ranch free of the presence or evidence of animal hazards and/or feces? | | | |
| | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | |
| If not, is the hazard: | | | |
| Low Risk | N/A | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Medium /High Hazard | N/A | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (Describe corrective actions below.) | | | |

| | |
|---|---|
| FERTILIZERS/SOIL AMENDMENTS | |
| Chemical (Synthetic) Fertilizers | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Compost | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Non-Synthetic Crop Treatments | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Certificates of Analysis-COA's, Letters of Assurance Received | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

| | | | |
|-------------------------------|----------|--------|---------|
| PEST CONTROL PRACTICES | | | |
| | Observed | In Use | Method |
| Insects | | ✓ | PCA |
| Rodents | | ✓ | Program |
| Amphibians | ND | | |
| Birds | ND | | |
| Domestic Animals | ND | | |
| Wild Animals (other) | ND | | |

| | |
|------------------------------|-------------------------|
| WATER USAGE | |
| Irrigation District | YCWUA |
| Conveyance | Concrete Pipe |
| Method of Delivery | Pressure-Sensitive Drip |
| Sanitary Survey | 7.22.14 |
| Water Testing Generic E.coli | ACCEPTABLE |

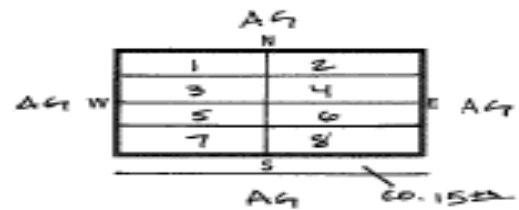
| | | | | | | |
|--|-----|------------------|---|---|---|---|
| SANITATION & CONTAMINATION PREVENTION | | | | | | |
| | N/A | (1-Best; 5-Poor) | | | | |
| Weeds, Brush, Riparian | 0 | 2 | 3 | 4 | 5 | |
| Trash, Foreign Materials | 0 | 2 | 3 | 4 | 5 | |
| Harvest or Staging Areas | N/A | 1 | 2 | 3 | 4 | 5 |
| Employee Practices & Hygiene | 0 | 2 | 3 | 4 | 5 | |
| Field Equipment Storage | N/A | 1 | 2 | 3 | 4 | 5 |
| Pesticide/Fertilizer Storage | N/A | 1 | 2 | 3 | 4 | 5 |

| | |
|-------------------------|---|
| FOOD SECURITY | |
| Signs Posted | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Harvest or Staging Area | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

| | | |
|--|--------------------|--|
| REVIEW PRIOR SEASON RANCH FS DOCS | | |
| Date | By | |
| 8/2/14 | Valentin O. Sterra | |

COMMENTS: (Explanation of food safety risks, applicable LGMA metrics, any mitigation or corrective measures)

NONE



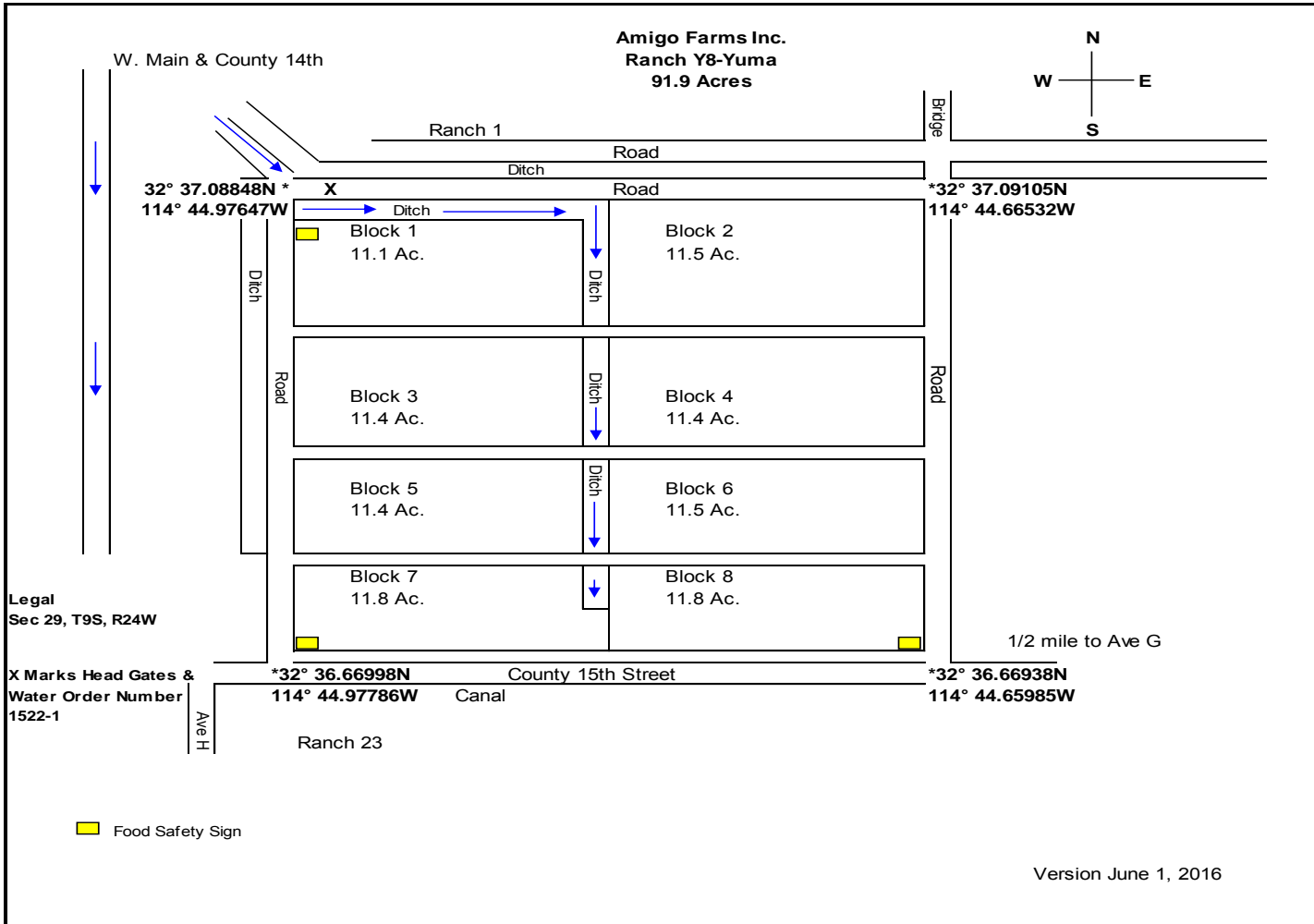
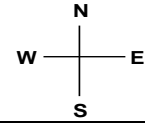
Agricultural Water

- Inspection of canals, laterals, field ditches associated with the distribution system for a ranch at least annually
- Includes water sources and surrounding areas
- Map of system





**Amigo Farms Inc.
Ranch Y8-Yuma
91.9 Acres**



Legal
Sec 29, T9S, R24W

X Marks Head Gates &
Water Order Number
1522-1

 Food Safety Sign

Version June 1, 2016

Agricultural Water

- Water Conditions
- Trash & Debris
- Animal Intrusion
- Vegetation
- Buffers to Contaminants
- Flood events
- Use corrective actions for issues under your control
- Establishment of the Water Quality Profile
- Geomean and Statistical Threshold values
- Food Safety Professional oversees or collects water samples for generic E.coli
- Collect samples as close to harvest as practical

AMIGO FARMS SANITARY SURVEY

Sanitary Survey of Irrigation Sources & Inspection of Surrounding Areas

Inspect canals, laterals and field ditches associated with the water distribution system for the ranch. If corrections are needed, list and note the date(s) of correction and the initials of the person verifying the completed action(s).

| | |
|----------------|--|
| Ranch | |
| Sampling Point | |
| Date | |
| Inspected By | |

| | Acceptable | Needs Attention | | Corrections Required |
|--|------------|-----------------|--|----------------------|
| Water Conditions: Are water conditions generally good, are there waters of unknown quality draining into the water source, is unusually dirty or contaminated water present. | | | | |
| Trash & Debris: Are canals, laterals and field ditches that serve the ranch free of trash and debris. | | | | |
| Animal Intrusion: Is there evidence of animals (observed animals, fecal material, carcasses, tracks, burrows/nests). | | | | |
| Vegetation: Are there trees, bushes, weeds in or near the water sources. | | | | |
| Buffers to Contaminants: Are acceptable buffers in place to prevent contamination from nearby livestock, sewers, septic systems, and other possible contaminants. | | | | |

Additional Comments:

Disclaimer notice: The information contained in this document is limited and/or qualified by the following: (1) the information gathered is based upon the Amigo Farms' inspectors' reasonable inspection and/or observation at a given time in date, as noted in the document, and Amigo Farms' inspectors' actual knowledge or belief, and not on the basis of any studies or constructive knowledge; (2) Amigo Farms' does not warrant or hold itself liable to advise the recipient of facts or changes occurring after the date of this document which might affect the information expressed herein, except as required by applicable laws, if any.

Harvesting

- Take all measures reasonably necessary to identify and not harvest produce that is reasonably likely to be contaminated
- Visible animal feces
- Contact of cut surfaces with the soil
- Use food packing material that is cleanable or single use
- Equipment and tools – toilets, hand washing
- Train harvest workers

Harvesting

- Pre-Harvest Assessment before harvest
- Determine if contamination exists from animal intrusion or other chemical, biological or physical contaminants
- Establish corrective actions such as no harvest buffer zones
- Can harvest safely proceed?

| PRE-HARVEST FOOD SAFETY ENVIRONMENTAL FIELD INSPECTION | | | |
|---|-------------------|--|-----------------|
| DATE | 2/5/2016 | | |
| EST. HARVEST DATE / | 2/6/2016 | | |
| GROWER | AMIGO FARMS, INC. | | |
| RANCH | Y8 | | |
| LOT | 5,A | | |
| PRODUCT | Green Cabbage | | |
| Evaluation of Potential Contamination Risks | | | YES or NO |
| 1. Is there presence or evidence of wildlife or livestock intrusion in the block? (ie. fecal matter, tracks, downed fencing, signs of feeding, etc. of: deer, pigs, sheep, cattle, domestic animals, rodents, reptiles, rabbits, horses, birds, snails, slugs etc.) | | | No |
| 1. a. If the answer to question #1 is "YES", was the contamination determined to be MEDIUM/HIGH? Document answer in the box to the right. | | | LOW or N/A |
| 1. b. If the risk was LOW, was the Company SOP for Low risk followed? | | | N/A |
| 1. c. If the risk was established to be Medium/High, were required LGMA buffers implemented and documentation completed? Attach corrective action report. | | | N/A |
| 2. Is there evidence of flooding? | | | No |
| 3. Are potentially contaminating materials (e.g. compost, manure, etc.) present in such a manner as to pose a likely contamination risk to the fields to be harvested? | | | No |
| 4. Is there any evidence of foreign material contamination? (i.e.. glass, plastic, paper, metal, leaves, roots, wood etc.) | | | No |
| 5. Is there any evidence that the irrigation delivery system being managed may potentially be compromised? | | | No |
| 6. Is there any evidence that field workers have not complied with employee hygiene rules as outlined in the company food safety programs? | | | No |
| 7. Are there any other potential contamination risks present? Any unexpected adjacent land activity? (i.e.. leaking equipment or bathrooms etc.) | | | No |
| Person assessing Evaluation/Verification: | | | Shane Breschini |
| NOTES/COMMENTS: | | | |

Documentation-Recordkeeping

- Without exception, all of your activities should have some type of record that documents your food safety activities
- Conform to your SOP's and the frequencies established by FSMA

THANK YOU

Vicki Scott

Amigo Farms

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928-726-3738

