

Balancing Food Safety and Organic Requirements for: Written Plans

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Introduction

The National Organic Program (NOP) requires farms to develop a written Organic System Plan (OSP) that documents a farm's compliance with NOP standards. The Food Safety Modernization Act (FSMA) does not require farms to create a

written farm food safety plan. However, similar to organics, the best way for a farm to document that they are in compliance with the regulations is to have a written plan on the topic.



Photo by E. Chris Wisner

Requirements for Each Regulation

National Organic Program

- The NOP regulations state that a producer must develop an organic system plan that includes:
 - Description of farm practices
 - List of all inputs used on farm
 - Monitoring practices description
 - Record keeping description
 - Processes to prevent commingling of organic and non-organic products (if applicable)



Photo by E. Chris Wisner

FDA FSMA Produce Safety

- FSMA does not require farms to write a food safety plan.
- FSMA fully covered farms are required to document all of the items below. It may be helpful to keep these records in a farm food safety plan:
 - Personnel qualifications and training
 - Water test results, results of water treatment, annual inspection of water system, and microbial die-off rates and water corrective actions, if used*
 - Certificate of Conformance from all suppliers of amendments that contain animal components

**As of the time of publication the FDA was reviewing the current water requirements, thus some requirements may change in the future. Please see the FDA's website for the most up to date information.*

Frequently Asked Questions

If FSMA has no requirement for farms to write a food safety plan why should I create one?

In food safety, just as in organics, if there's no written record of your plan and actions then there's no evidence to prove you were actually implementing food safety practices.

- **Legal:** In the unfortunate event that a foodborne illness outbreak is linked to the farm, having a food safety plan and associated records will help demonstrate that the farm was actively doing its part to reduce food safety risks. If you are qualified exempt from FSMA and an outbreak is traced to your farm, but you can show FDA that you were using good agricultural practices related to food safety, you may be less likely to lose your exemption.
- **Market options:** Some buyers require growers to provide a copy of their food safety plan before the farm is able to sell to them. Farms with food safety plans demonstrate that they take food safety seriously, because they made the effort to create written policies, procedures, and records. This could result in better business sustainability, as laws and industry require farms to reach new food safety benchmarks.
- **Operational efficiency:** Writing down a food safety plan allows for easier training and adherence by employees to company policies.

What is a farm food safety plan?

A farm food safety plan is a “living” document that is a written record of a farm's food safety policies and procedures and references where records are kept or can be found on the farm. When developing a farm food safety plan it is essential to write down only what the farm is actually doing, not what you hope to do. Once a farm creates a food safety plan, similar to an OSP, it needs to be reviewed at least annually and updated to reflect any changes in practices on the farm.

I'm not doing any food safety on my farm. How do I start writing a food safety plan?

You probably are already doing food safety practices without knowing it. Start with a risk assessment. You can reference the CAFF risk assessment template for guidance (see resources section). Second, once you are familiar with food safety risks, use one of the farm food safety plan templates to create your own plan. Remember that no two farms are exactly alike, so it does not work to take another farm's food safety plan and stick your farm's name on the cover. It is in each farm's best interest to develop a unique plan for their operation. Food safety plans do not have to be highly complex or dozens of pages long. Depending on the size, crops, and business model, plans can be fairly simple and still effective.

I've heard of a Good Agricultural Practices (GAPs) plan before. Is that the same thing as a food safety plan?

Simply, yes. Good Agricultural Practices cover the main areas on the farm (water; compost/manure; wild & domestic animals; equipment, tools, buildings; and health and hygiene) where you need to assess risks and incorporate food safety practices to reduce these risks. A farm food safety plan incorporates information on GAPs throughout the plan.

Can I use records I am already keeping for my OSP for food safety, too?

Yes! Organic farms can use documents in their OSP for their food safety plan; there is no need to duplicate records. For example, you can add food safety features (e.g., water sources, toilet locations, general wind direction) to the farm map you have in your OSP (see the farm mapping resource in the references section of this factsheet). Your field input logs can also be food safety records if you include the dates when you first harvest from a field. Tracking time between applications of a raw animal amendment until harvest demonstrates that you waited the appropriate amount of time to reduce food safety risks.

Example of Part of the CAFF Simplified Food Safety Plan

Below is a section from the water part of the template where the farmer determines their water sources and identifies the uses of that water on the farm. The farm would explain where every water source came from and how they used the water for each source. For example, using more risky water (e.g. surface water from a pond) for less risky tasks (e.g. drip irrigation on fruit trees) is one way to reduce your food safety risks on the farm.

In this example below the farmer has an agricultural well, domestic well, and surface water and they have chosen to use each water source for the uses listed below. Filling out this table, mapping your water systems, and annually inspecting them are ways one helps monitor and reduce risk.

Water Source	Propose of Use		
City Water	<ul style="list-style-type: none"> Irrigation Other _____ 	<ul style="list-style-type: none"> Washing & Cleaning Chemical Application 	<ul style="list-style-type: none"> Ice Making Hydro-cooling
Agricultural Well	<ul style="list-style-type: none"> Irrigation Other _____ <p>drip & overhead</p>	<ul style="list-style-type: none"> Washing & Cleaning Chemical Application 	<ul style="list-style-type: none"> Ice Making Hydro-cooling
Domestic Well	<ul style="list-style-type: none"> Irrigation Other drinking water 	<ul style="list-style-type: none"> Washing & Cleaning Chemical Application <p>post-harvest</p>	<ul style="list-style-type: none"> Ice Making Hydro-cooling
Surface Water Identify Source(s):	<ul style="list-style-type: none"> Irrigation Other _____ <p>only drip</p>	<ul style="list-style-type: none"> Washing & Cleaning Chemical Application 	<ul style="list-style-type: none"> Ice Making Hydro-cooling
<ul style="list-style-type: none"> Reservoir Creek River Ditch / Runoff Other _____ Other _____ 			
Other Source:	<ul style="list-style-type: none"> Irrigation Other _____ 	<ul style="list-style-type: none"> Washing & Cleaning Chemical Application 	<ul style="list-style-type: none"> Ice Making Hydro-cooling

See CAFF Simplified Food Safety Plan template (listed in resources) to view the entire Word document.

Conclusion

The NOP requires farms to complete an OSP and FSMA does not require farms to complete a farm food safety plan. However, there are strong legal, marketing, and operational reasons for why the Food and Drug Administration, CAFF, and many other organizations encourage all farms to have a food safety plan.

Resources

To Help Write a Plan:

1. CAFF simplified food safety template is available in English and Spanish: <http://www.caff.org/programs/foodsafety/templates/>
2. Colorado State food safety plan template: <http://farmtotable.colostate.edu/grow-files/2012-ColoradoFarmPlanFillableForm.pdf>
3. Family Farmed Farm Food Safety Plan electronic tool can be found here: <http://onfarmfoodsafety.org/create-a-food-safety-manual/>

Sample Food Safety Plan:

1. Penn State Extension: <http://extension.psu.edu/food/safety/farm/how-do-i-write-a-food-safety-plan/sample-harmonized-food-safety-plan>

Mapping Food Safety Risks:

1. Family Farmed and Wild Farm Alliance mapping activity: <http://www.familyfarmed.org/wp-content/uploads/2012/12/Mapping-Food-Safety.pdf>

References

1. National Organic Program Federal Regulation part §205.201. Accessed at: <https://www.gpo.gov/fdsys/pkg/CFR-2011-title7-vol3/pdf/CFR-2011-title7-vol3-sec205-201.pdf>; <http://www.ams.usda.gov/rules-regulations/organic/handbook>
2. The FDA states the recordkeeping requirements in Subpart O of the Federal Regulation of Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption in parts §112.161-112.167. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2427>
3. The FDA states the agricultural water requirements in Subpart E of the Federal Regulation of Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption in parts §112.41-112.50. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2149>
4. The FDA states the biological soil amendments of animal origin and human waste requirements in Subpart F of the Federal Regulation of Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption in parts §112.51-112.60. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2231>

Acknowledgments

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Recordkeeping ■ FSMA 101 ■ Monitoring Animals ■ and other topics!
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