

Tips on How to Have a Successful Food Safety Audit or Inspection While Advocating for Farm Conservation Practices



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Food Safety Plans

Most often, a farmer's buyer triggers the need for a food safety plan. This is especially true for anyone looking to sell to government institutional food programs, such as the USDA National School Lunch Program or correctional facilities. That plan typically covers personal hygiene of people on the farm, water testing, use of soil amendments, land use history, neighboring issues, wild and domestic animals, and harvesting. For assistance with creating a food safety plan, contact CAFF.

Food Safety Auditors

Sometimes the buyer requires a third party audit of the farm. If that is the case, they will either request a specific food safety auditor(s) be used, or will let the farmer choose the auditor. A third party audit can be mandatory if the farmer opts to sell to a handler who is part of a USDA recognized commodity group such as the Leafy Green Marketing Agreement. The USDA Agricultural Marketing Service offers food safety audits, as do some states, and there are many private auditing companies. They usually have a very specific checklist and make general observations. The purpose of the auditor's visit is to verify that your written food safety plan "says what you do – and you do what you say."

Food Safety Inspection

The FDA or State health enforcement officer may appear on your farm, but the chances of this occurring are small, unless you are growing a crop considered by them to be risky, or your produce is linked to a food borne illness.

When a food safety visitor comes to inspect a farm operation—be it a third party auditor, the local or state health department, or the Food and Drug Administration (FDA)—it may be helpful to follow the 'Co-management Principles', 'General Rules of Thumb', 'Do's and Don'ts,' and 'Follow-Up' outlined below. The farmer will have a more successful food safety audit or inspection and the food safety visitor will benefit from the farmer being prepared. If at the end of the visit, a recommendation is made to which the farmer does not agree, having a conversation with the inspector's/auditor's supervisor may be helpful in correcting the issue.

Addressing Co-management Principles

Farmers can address food safety without sacrificing responsible on-farm conservation measures. According to the Produce Safety Alliance (run by Cornell University, FDA and USDA), farmers can more effectively advocate for their farming practices with food safety auditors by using risk assessment strategies that help identify risks, and by explaining their rationale for management decisions that address those risks. This risk-assessment approach can be used for conservation measures included in a farming operation, such as maintaining streamside habitat or other non-crop vegetation.

Determine risk reduction protocols that address risk identified for your farm's situation. Assess risk such as pathogens coming from a livestock area; conduct necessary corrective actions that address the problem such as installing a diversion as shown in #3 of the illustration; monitor periodically and write down changes in risk; and implement any other corrective actions if necessary, such as using a cover crop as part of a waiting period between a flooding event and planting the next crop, as shown in #16.

Explain rationale for management decisions. Use descriptions of practices in the key to the illustration above to help craft co-management rationale for decisions made.

General Rules of Thumb

Have a written policy for inspections by food safety auditors and government enforcement officers visiting the farm.

- There should be a clear and concise written policy (program) following the farm's food safety plan while auditors and enforcement officers are on the farm. Everyone in the organization should review this policy in its entirety.
- Official food safety auditors and enforcement officers should be "guided" through your farm operation, but you should not impede them in going where they need to go.

What To Do During the Audit or Inspection

Treat food safety auditors and enforcement officers professionally:

- Consider every visit from them as official.
- Always be courteous to them, such as asking if they would like water, coffee or use of the restroom, but keep a professional distance.
- Recognize that they are not paid to be consultants or to assist you with your food safety management.

Require identification and ask for the reason of the visit:

- Have the auditor or enforcement officer sign in on the visitor's sheet.
- Ask that the auditor or enforcement officer provide appropriate credentials and identification, including their business card.
- Ask for their supervisor's name and contact information.
- Ask the auditor or enforcement officer if the inspection is routine or if there is a specific reason for the inspection.
- Require the auditor or enforcement officer to state his/her specific intentions, and in the case of a FDA inspection, to provide Form FD 482-Notice of Inspection.
- Ask the auditor or enforcement officer what s/he wants to see or do, how long it might take, and what resources s/he might need to assist with the inspection.

Take charge of the visit:

- Provide the auditor or enforcement officer with an overview of your farm, including risk assessment strategies for co-managing food safety with conservation and other issues. These practices can be described in detail as part of your food safety plan.
- Escort the auditor or enforcement officer at all times and proactively explain rationale for co-management and other food safety decisions. If possible have two people from your farm present during the inspection.
- Have all policy, management contacts, and standard information records in organized and clearly labeled binders to facilitate and set a positive tone for the inspection.
- If the auditor or enforcement officer asks for records, provide them with a photocopy while you retain the original.
- If the auditor or enforcement officer asks for a produce sample, ask them to make a duplicate one for you and ask what they intend to specifically test for with the sample. Also ask for the expected time to obtain test results so the physical quarantine of the impacted harvested lot may be anticipated. Send the duplicate to a qualified lab of your choice for the same tests.

Strive for clear communication:

- Listen well and ask lots of questions.
- Answer all questions honestly and take time to fully explain each of your answers.
- Stay focused on questions that are asked and only volunteer information when it is related to specific inspection criteria.
- Ask if any minor infractions can be fixed immediately. Don't necessarily accept any advice or recommendations, orders, directions, or instructions without appropriate justification.

Conditions Under Which an Automatic "Unsatisfactory" Will be Assessed in an Audit or Inspection

- An immediate food safety risk that has or would reasonably cause the produce to become contaminated.
- The presence or evidence of general unsanitary conditions, chemical or allergen hazards, rodents, or excessive pests in the produce.
- Personal hygiene has jeopardized the safety of the produce.
- Falsification of records.
- Not having a written and established food safety plan.
- Not having a designated, qualified person on the farm to implement and oversee an established food safety plan.

Training Scenarios for USDA and Third Party Auditors on the Co-management of Food Safety and Conservation as well as Small Farm Concerns

Before a food safety auditor comes to your farm, suggest that they first review training scenarios on co-management and small farm issues posted at www.wildfarmalliance.org. The materials are presented in the accepted food safety industry format of the USDA Harmonized Standards for Field Operations. If the auditor works for, or is accredited by USDA, they can receive continuing education units. By having them learn about co-management and small- and mid-size farm issues, they will be better informed when they arrive at your farm. Farmers may also find value in reviewing these training scenarios, and may want to reference them, if a food safety auditor who has not seen these materials is already on the farm and needs further clarification.

- Ask for references (book, paragraph and line number) to all inspection findings.
- An exit briefing will occur at the end of the audit or inspection, but if one is not done, ask for it, taking good notes. During this debriefing, the auditor or enforcement officer will describe what may be a concern. This will be helpful to know, in case they plan on taking future actions. If the official also asks you to sign a paper with the alleged concern outlined, you may want to defer until you can have your attorney review it.

What Not To Do During the Audit or Inspection (Unless required by proper legal authority)

- Do not admit to any fault or deficiency or sign any forms admitting to fault, without proper legal advice.
- Do not volunteer the following information: recipes, formulas, any item that is strictly proprietary, financial records, research data, customer lists, sales information, pricing information, personnel records, accident data, distribution records, or inventories of products.

Follow-Up Right After the Audit or Inspection

When agreement is not reached:

- If for any reason you do not agree with the auditor or enforcement officer, absolutely have them make complete notes of your objections in their report or provide them (before they leave the farm) with a statement explaining the situation and all facts of the matter.
- At this point it is also recommended that you immediately contact this individual's supervisor and state your concerns. The supervisor wants to talk to you and correct the issues.

Follow-Up Some Time After the Audit or Inspection

Audit results:

- Once the audit is processed, either a final copy of the passing audit, or a letter describing what corrective actions are need to be implemented within a designated period of time will be sent.

Inspection results:

- You should be provided with an inspection report (this can take some months). Respond to any deficiencies noted in the report by making corrective actions in a timely manner (FDA requires 15 days) and telling them you did it. If you do not hear back from the inspecting agency, call them on the phone number they provided to you during the initial visit.
- If you do not agree with the findings, contest them with the advice of an attorney.
- If a warning letter is received, check with your attorney before responding.



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By using risk assessment strategies that help identify risk as well as explaining the rationale for management decisions that address that risk, farmers can effectively advocate for their conservation-based farming practices including cover crops and wetlands.

Selected Resources

Co-management Materials

- Farming with Food Safety and Conservation in Mind authored by Jo Ann Baumgartner and Dave Runsten; published by Wild Farm Alliance and Community Alliance with Family Farmers. Updated 2013.
- Co-Management of Food Safety and Sustainability authored by Mary Bianchi and published by UC Davis. 2012.
- Safe and Sustainable: Co-Managing for Food Safety and Ecological Health in California's Central Coast Region authored by Karen Lowell, Jeff Langholz, and Diana Stuart; published by The Nature Conservancy of California and the Georgetown University Produce Safety Project. 2011.

Small and Mid-Size Farm Websites with Food Safety Information

- Community Alliance with Family Farmers (<http://caff.org/programs/foodsafety/>)
- Wild Farm Alliance (www.wildfarmalliance.org)
- Carolina Farm Stewardship Association (<http://www.carolinafarmstewards.org/tag/food-safety/>)
- Northeast Organic Farming Association (<http://www.nofa.org/advocacy.php>)
- National Sustainable Agriculture Coalition (<http://sustainableagriculture.net/category/food-safety/>)
- Maine Organic Farmers and Gardeners Association (<http://www.mofga.org/>)

Good Agricultural Practices (GAPs) Websites

- On Farm Food Safety Project has a free online tool, based on a comprehensive risk-based framework, which generates customized on-farm food safety plans based on user input (<http://onfarmfoodsafety.org/>).
- Produce Safety Alliance is developing a nationwide curriculum to increase understanding of the principles of Good Agricultural Practices (GAPs) and to facilitate the implementation of food safety practices on fresh fruit and vegetable farms and in packinghouses (<http://producesafetyalliance.cornell.edu/psa.html>).
- Global GAP certifies safe, sustainable production of food, flowers, and ornamentals. They work with more than 140 independent and accredited certification bodies to carry out certification worldwide (http://www.globalgap.org/uk_en/for-producers/crops/).
- USDA GAPs is a voluntary program by USDA Agricultural Marketing Service that provides independent audits of produce suppliers throughout the production and supply chain (<http://www.ams.usda.gov/AMSV1.0/HarmonizedGAP>).
- Produce GAPs Harmonized Food Safety Standard Field Operation and Harvesting offered by USDA is another independent audit that was created by United Fresh with input from the produce industry (<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5102511>).
- California Leafy Green Marketing Agreement (LGMA) membership requires verification of compliance with the accepted food safety practices through mandatory audits conducted by USDA trained auditors (<http://www.caleafygreens.ca.gov/>).

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This guide was written by Jo Ann Baumgartner of Wild Farm Alliance, and edited and co-published by Community Alliance with Family Farmers, October 2013.