Western Growers Reactions to
FSMA Proposed Produce & Preventive
Controls Rules
February 19, 2014

Farm Foundation
About Western Growers

• approx. 50% of the fresh fruits and vegetables

• 99% of the tree nuts

• 1/3 of the organic produce
Some Overarching Thoughts

• **Every** operation, regardless of scale, should have a food safety plan

• Rules should result in reduced need for multiple, redundant audits

• All operations should be covered by only one rule, rather than the fragmented rules- PC and Produce- under FSMA
• Every operation should have a written food safety plan
• Definitions should be clear, concise and stand alone
• Ownership of product should not determine the rule to which one is subject
• An operation should be subject to either one rule or the other
• Apply uniformly to domestic and foreign operations
Create greater flexibility by expanding the potential for alternative approaches

- Allow use beyond water and soil amendment
- Establish criteria to evaluate “same level of public protection”
- Provide expert review
- “Approve” alternatives
- Eliminate “meet same microbiological standards”
PR - Subpart C: Personnel Qualifications and Training

- Acknowledge existing training programs
- Separate training, education and experience
- Allow for individuals to demonstrate qualifications
• WG is **not** supportive of rote testing programs
• Instead, customized testing programs based on demonstrated control of source(s) & system

*Critically, the rule needs to recognize that one size does not fit all and that different waters in different settings on different commodities may be acceptable with different standards*
PR - Subpart F: Soil Amendments

• Discourage use of raw untreated manure
• Require composting of “yard trimmings;”
• Do not mandate invalid testing
PR – Subpart I: Animals

• Recognize varying levels of risk
• The bottom line is to protect against feces in food
• Producers should evaluate risk and act accordingly
PR - Subpart K: Growing, Harvesting, Packing, Holding

• Do not make washing mandatory
  – It is complicated
  – It may adversely affect many commodities
• Variances are complicated
• Rationale and science may need to be developed
• Allow third parties to petition on behalf of crop or group
• Equivalent industry programs demonstrate compliance

• Focus on prevention
  – Use existing mechanisms
  – Develop guidance & tools
  – Prioritize risk
PC - Subpart B: Current GMP

- Reduce confusion between mandatory vs non-mandatory
- Delete *all* non-binding provisions
- Use separate “guidance” for recommended practices
PC - Subpart C: Hazard Analysis and Risk-Based Preventive Controls

- On site - Food Safety Plan
- Facility Profile Database
  - Type
  - Products
  - Size
  - Schedule
- Should not include
  - Hazard analysis
  - Preventive controls
  - 3rd party audit
  - Training