

FSMA, 3rd Party Certification, GAPs... *What's the Difference?*

With the new FDA Food Safety Modernization Act (FSMA) proposed regulations and increased discussion of food safety on the farm, there may be some confusion with some of the lingo being used. In this article, we'll define the FSMA, 3rd Party Certification for Food Safety, and On-Farm Food Safety Management Tools.

Food Safety Modernization Act:

FSMA was signed into law by President Obama on January 4, 2011. It enables the FDA to focus on preventing food-borne illness rather than reacting to problems after they occur. The FSMA rules were finally released in January 2013.

Two of the rules will impact farmers and processors:

- Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption (Produce Rule)
- Risk-Based Preventative Controls for Human Food (Preventive Controls Rule)

These rules outline measures required to be taken by farmers and processors in order to be in compliance with federal law. The Produce rule covers sections on covered crops (those crops required to follow rule), exemptions to the rule, agricultural water; biological soil amendments (manure and compost); health and hygiene; domesticated and wild animals; and equipment, tools and buildings and record keeping, and a special section on sprouts. The Preventive Controls Rule covers sections on hazard analysis, preventative controls, monitoring, corrective actions, verification, and record keeping.

These rules are not yet finalized. Once they are finalized, farms under the produce rule will have between 2 and 4 years to be in compliance, depending on farm size. Facilities under the preventive controls rule will have between 1 and 3 years to be in compliance after the rule is finalized, again depending on facility size.

FSMA is a federal rule and must be followed by growers and processors. Inspections of facilities and farms will be done to ensure compliance with the rule. Certain farms and processing facilities may be exempt from the rule, however, if an outbreak occurs from those products, enforcement measures may be taken.

3rd Party Certification:

3rd party certification is buyer (either retailer or wholesaler) requested. Many 3rd party food safety certification schemes (commercial food safety programs with certifiable food safety standards) are available for third party certification in Washington State. Buyers may request certification by a certain scheme, or may request certification by a scheme that includes certain criteria. Third party certification schemes may differ in breadth of aspects covered, record keeping requirements, and cost of audit.

In 2000, a group of international retailers identified the need for private food safety schemes to be backed up by recognition by an international standard. They formed the Global Food Safety Initiative (GFSI), a non-profit

foundation which sets the requirements for food safety schemes recognized by this organization. This was done in order to develop credibility for the individual standards that currently exist. A set of benchmarks have been determined which must be met by food safety certification schemes; these are a common foundation of requirements, but schemes can differ in the way the standards are carried out. Third party schemes are tested against the set of benchmarks and will become recognized if they are found to be in compliance with those benchmarks.

Two well known food safety standards are not GFSI recognized. In 2002 the USDA created a set of food safety standards, known as the USDA GAP standards. In Washington State these standards are audited by Washington State Department of Agriculture (WSDA). United Fresh, a trade organization of fresh fruit and vegetable producers and processors, developed a food safety standard in 2009 called Produce GAP Harmonized Initiative. Currently, USDA is performing audits under this scheme.

Some buyers may require certification by any one of food safety certification standards; this could be covered by the USDA or Harmonized standards. If a buyer requires certification by a GFSI recognized standard, then the choices are more limited. Some large retail outlets also have their own third party certification standards. A certification standard should be chosen by knowing what is required by the chosen buyer of the product as well as which standard fits best with the farming operation. For example, a small local grower with a local market may not need a GFSI recognized audit but a large grower supplying multiple national and international wholesale markets will most likely be required to follow a GFSI recognized audit.

Farmers who are not required to follow a certain set of standards should look at all applicable third party standards before selecting and identify which set of standards will work best based on an on-farm risk assessment. Once an appropriate third party certifier has been identified, develop a food safety program and policies to fit with the standards given. Find auditing firms associated with each standard on their website. Currently, there are 20 auditing firms available within the United States. To determine which to choose, ask other farms that you trust about their experiences with auditing firms. Contact the organization months before the audit is required to set up an auditing schedule. The audit is required to be performed during the harvest season; a pre-audit can be done before harvesting starts by the auditing firm or a consulting firm, but this will be at an additional cost.

Costs for third party certification vary between auditing agency. It ranges from \$90 per hour for the USDA GAP certification to \$1500 per day for an auditor from some GFSI recognized schemes. The audit should take one day or less, depending on the complexity of the farming operation and the number of sites.

On-Farm Food Safety Management Tools

Some farms will be exempt from the FSMA rule and may not be required to have 3rd party food safety certification from any buyer in the marketplace. In order to reduce food-borne pathogen risk on the farm, these farms may want to develop an on-farm food safety plan. This may follow guidelines from FSMA or any one of the 3rd party certification standards, but an inspection would not take place. This involves farmers identifying food safety risks on the farm, developing farm practices to reduce those risks and keeping records to document that those practices have taken place, just in case a food-borne illness is traced back to the farm.

All of these avenues help farms and processor to identify and reduce food-borne pathogen risks. Implementation of good practices will not eliminate all pathogen occurrences, but will only reduce the risk to a manageable level. As a farmer or processor, know which regulations or certifications you need to follow and start by working towards that goal.