

# Food Safety Update

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## California Citrus Good Agricultural Practices

CCQC Annual Meeting

January 25, 2011

# Food Safety Modernization Act

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- Most significant expansion of food safety requirements and FDA food authority since enactment of FD&C Act in 1938
- Will require over a dozen rule makings and at least 10 guidance documents
  - Implementation to take >3 years
- Shifts regulation to prevention
- Supports risk-based approach to regulation

# FSMA – Registered Food Facilities

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- Requires facility registration with FDA biennially
  - Regulation by July 2011
- Requires Preventative Controls Plan
  - Hazard analysis
  - Preventative controls
  - Monitoring, corrective actions, record keeping, verification
  - FDA regulation by July 2012
    - Take effect then with extension for small facilities

# FSMA – Produce Safety Standards

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- FDA to establish minimum standards for production and harvesting
  - FDA must prioritize implementation based on risk
  - Priority to commodities involved in outbreaks
- Proposed Rule by January 2012
  - final rule w/in 1 year following undetermined comment period
- Publish updated GAPs guidance by January 2012

# FSMA – Produce Safety Standards

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- To address: soil amendments, hygiene, packaging, temperature controls, animal encroachment, water
- Flexibility for small farms
- Exemptions
  - Small farms marketing direct to consumer or directly to restaurant or retailer within state or within 275 miles

# FSMA - Inspections

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- Establishes frequency of facility inspections based on risk
- FDA must prioritize high risk facilities
- No additional funding for inspections provided to FDA

# FSMA - Imports

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- Each importer required to have verification program
  - guidance and regulation by January 2012
- FDA can require 3<sup>rd</sup> party certification of imports
- Establishes minimum inspection frequency of foreign facilities

# FSMA

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## ■ Traceability:

- FDA must establish a system to improve ability to trace food
- Must include at least one pilot project specifically for fresh produce

## ■ Recall Authority

- FDA granted mandatory recall authority

# CA Citrus GAPs

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- New food safety legislation and impending regulations
  - FDA encouraging commodity groups to develop commodity specific GAPs guidance
- Multiple/ conflicting demands from buyers
  - standards based on produce commodities involved in outbreaks - little relevance to citrus production practices and risk profile
  - standards that go beyond food safety

# CA Citrus GAPs

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- Participants:
  - CCQC, CCM, CRB, Marketing entities, shippers, growers, harvest contractors, UC Coop. Ext.
- Communications with FL and TX citrus / others
- Used AFDO Model Code as starting point
- 1<sup>st</sup> draft long - scaled back
  - lack of science available
  - keep it simple
- Two documents (for growers and harvesting) available on industry websites including [www.calcitrusquality.org](http://www.calcitrusquality.org)

# CA Citrus GAPs

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- Field assessment
- Adjacent Land Use
- Water
- Soil Amendments
- Health & Hygiene
- Field Sanitation
- Animals
- Pesticide Use
- Traceability

# CA Citrus GAPs – Next steps

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- Developing sample “Grower Plan”
  - Standard Operating Procedures
  - Sample forms
  - Supporting guidance
- Fit to Harmonized Standard for Produce GAPs

# Harmonized Standard

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- Coordinated through United Fresh
- Objective:
  - Harmonize existing standards to a single standard
  - Avoid multiple audits
  - North American focus but globally recognized
  - Commodity-specific/ scale appropriate
- Participants – Technical Working Group
  - Growers/shippers – trade associations
  - Fresh-cut processors
  - Buyers – food service, retail
  - USDA
  - Auditing companies

# CA Citrus GAPs – Next steps

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- Pilot test
  - Implement citrus GAPs in grove(s)
  - Invite parties involved in Harmonized Standard development to conduct mock audit, evaluate
- Address research needs
  - CRB
  - Center for Produce Safety – UC Davis
- Await FDA Proposed Rule and adapt citrus GAPs as needed