



On-Farm Readiness Review: A FSMA Resource for Farmers

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Since the implementation of FSMA, questions surrounding farm food safety compliance have been at the forefront of the Produce Safety Rule conversation. As growers continue to obtain education in Good Agricultural Practices (GAPs), as well as the Produce Safety Rule at Produce Safety Alliance (PSA) Grower Trainings, there is another resource that will be available to Hawai'i growers to assist with becoming in compliance with the FSMA Produce Safety Rule.

The On-Farm Readiness Review (OFRR) is a national educational program for FSMA compliance that is part of the National Association of State Departments of Agriculture (NASDA). While each state will function differently, in Hawai'i, UHM Cooperative Extension will be working in partnership with the Hawai'i Department of Agriculture to deliver the OFRR beginning in 2019.

If you are a grower who is looking for more guidance on preparing for a future FSMA Produce Safety Rule inspection an OFRR may be the next step you are looking for.

What is an On-Farm Readiness Review?

The On-Farm Readiness Review was developed by a team of produce safety leaders from the National Association of State Departments of Agriculture (NASDA), State, FDA, and Cooperative Extension to “foster a dialogue between the farmer and the regulator and/or educator about the requirements of the Produce Safety Rule”.

This is different than going through an audit checklist, as OFRR is

- Non-regulatory
- Voluntary
- Free assessment of a farm's readiness for inspection under the FSMA Produce Safety Rule

What are the Benefits of OFRR?

- Education Before Regulation: Learn from educators as you walk through your farm together. Receive suggestions and feedback from the educator to improve your farm food safety practices.
- Peace of Mind: Become familiar with the inspection process and applying FMSA Produce Safety Rule.
- Confidentiality: Your farm information will be protected unless your operation is an immediate threat to public health.



What to Expect During an OFRR

The OFRR educator will spend a few hours with you on your farm, discussing and observing your operations, specifically looking at practices and conditions of the following topics:

- Health and Hygiene
- Biological Soil Amendments of Animal Origin
- Wild and Domesticated Animals
- Preharvest, Harvest, and Postharvest
 - Worker Training
 - Sanitation
 - Water

At the end of the OFRR, the educator will make recommendations for improvement and connect the grower with educational resources and materials to assist with FSMA Produce Safety Rule compliance.

OFRR Training Experience in New Mexico

In October 2018, Hawaii Extension Agents met with Extension faculty from other universities and professionals from State Departments of Agriculture to attend an On-Farm Readiness Review training hosted by the New Mexico Department of Agriculture and New Mexico State University in Las Cruces, New Mexico. The training consisted of a mock walkthrough of the New Mexico State University Leyendecker Plant Science Center where educators played the role of assessors and station staff were farm managers.

Given brief descriptions of farm employee health and hygiene, worker training, and other OFRR topics mentioned above, “assessors” used a keen eye and conversational skills to obtain further details of food safety practices as they made their way through each staged area of the farm. With each question or problem that arose, assessors discussed with farm managers reasonable recommendations to correct those food safety issues, which is one of the most important outcomes of completing an OFRR.



A farm worker harvests chile peppers at the Leyendecker Plant Science Center



The OFRR Training group entering the first site of the mock walkthrough at the Leyendecker Plant Science



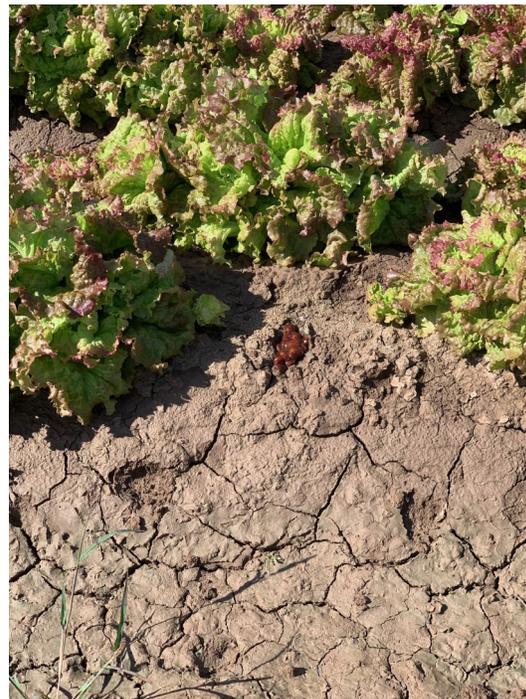
Scenes and scenarios that triggered food safety flags or further questioning in the training exercise are listed below.

Scenario Issue	Topic	Recommended Solution
Animal tracks leading into lettuce beds	Wild and domestic animals	Monitor for animal intrusion before each harvest. Do not harvest contaminated produce.
Water exceeds E. coli thresholds used for furrow irrigation of	Harvest water	Use a time interval between last irrigation and harvest (based on water tests) for microbial die-off.
Workers arrived at farm site following another job at a nearby dairy	Preharvest worker training, sanitation	Require workers to arrive at farm site in clean clothes.
Portable toilet at harvest site lacked handwashing station	Harvest sanitation	Immediately install handwashing station. Halt sales of and destroy any suspected contaminated crops.
Workers not washing hands after using the toilet or talking on the cell phone	Harvest worker training, sanitation	Train workers on proper handwashing practices and farm policies. Halt sales of and destroy any suspected contaminated crops.

This OFRR exercise served as a great introduction and training for educators who will be working with farmers that need to comply with the FSMA Produce Safety Rule. OFRR will be a resource available to Hawaii growers in 2019 through the Hawaii Department of Agriculture. For more information, or to express interest in having an OFRR, please contact a farm food safety Extension Agent on your island.



Staged animal tracks demonstrating wildlife intrusion into the growing area



Staged animal droppings in a lettuce field