



## Food Safety Modernization Act Produce Safety Rule: Worker Health, Hygiene and Training

Theresa Pittman<sup>1</sup>, Amber D. Vallotton<sup>2</sup>, Rachel Pfuntner<sup>3</sup>, Laura K. Strawn<sup>4</sup>

<sup>1</sup>Graduate Student/Extension Agent, Agriculture and Life Sciences, <sup>2</sup>Extension Specialist, Horticulture,

<sup>3</sup>Research Specialist, Food Science & Technology, <sup>4</sup>Assistant Professor and Extension Specialist, Food Science & Technology

### Overview

The Produce Safety Rule (PSR) is one of the seven food safety regulations that are part of the Food Safety Modernization Act (FSMA). The PSR sets a series of standards for the safe growing, harvesting, packing, and holding of produce grown for human consumption: 21 Code of Federal Regulations Part 112 (<https://www.federalregister.gov/documents/2015/11/27/2015-28159/standards-for-the-growing-harvesting-packing-and-holding-of-produce-for-human-consumption>). Similar to the other FSMA rules, the PSR aims to be proactive rather than reactive by focusing on high risk practices and identification of hazards within individual operations. For example, there are no requirements for uncontrollable factors, such as number of wildlife allowed in fields. Instead, the PSR mandates covered produce not be harvested when contaminated by feces (e.g., bird dropping on a tomato intended for fresh market). Standards are set for: agricultural water; biological soil amendments; sprouts; wildlife and domesticated animals; worker health, hygiene, and training; equipment, tools, and buildings; among others. Here, we describe the PSR standards for worker health, hygiene and training.

### Worker Health, Hygiene and Training

The PSR (subpart D) describes minimum standards for health, hygiene and training programs for workers. Contamination of produce may occur when bacteria, viruses or parasites are transferred from a person, animal, or food contact surface to the produce. There are many ways workers may introduce contamination including hands, clothing, footwear, feces, equipment, tools, injury and illness. For example, ill persons may contaminate produce or food contact surfaces, which may result in the spread of pathogens. Training is an effective way to communicate contamination risks and ways to minimize those risks. Worker training programs can be extremely effective in risk reduction on-farm because workers are participating in daily activities and thereby identify risks when they occur. Listed below are key requirements of the worker health and hygiene subpart in the PSR, though we encourage farms pursuing FSMA PSR compliance to read the full regulation and attend a Produce Safety Alliance course.



Photo Credit: Laura Strawn

### Key Requirements

The farm food safety person or owner (if farms do not have designated food safety person) is required to take a standardized produce safety course that is approved by the Food and Drug

Administration (FDA) to meet the training requirement outlined in the PSR. Currently, the only FDA approved produce safety course is the Produce Safety Alliance Grower Training curriculum (<https://producesafetyalliance.cornell.edu/training/grower-training-courses>) and is offered by Cooperative Extension in each state. Additionally, all employees who handle produce and work around food contact surfaces must complete training and follow good health and hygiene practices (farm should have policies or procedures describing health and hygiene). This training requirement may be provided by the farm food safety person, or using external resources, such as Cooperative Extension videos, specialists or agents, among other resources. It is important to remember all employees can help identify and reduce risks, and training can assist employees.

***Employees (in contact with produce or food contact surfaces):*** must be trained in the principles of worker hygiene and safety. For example, all employees should recognize symptoms of foodborne illness. Employees must be trained at least once annually (training programs need to be easily understood by all employees, see **tips**) and trainings must be supervised by a qualified individual. For example, if an employee is hired mid-season, it is required they be trained. All workers must be qualified for their duties through education, experience, or training. It is required that farms identify a supervisor to ensure PSR compliance by employees. Follow up training must be provided if employees are not meeting policy or procedural standards (identified by the supervisor), as documented in PSR subpart C. Records are required to demonstrate training activities including the names of those trained, the date they were trained, and the topics that were covered. Additionally, employees must adhere to the following:

**TIPS**

- Provide training in native language
- Use a variety of learning tools (visual, audio, and hands-on)
- Reinforce food safety with signs and re-fresher trainings

- Maintain personal cleanliness
- Avoid contact with animals (other than working animals)
- Maintain gloves in a sanitary condition, if used
- Remove or cover hand jewelry that cannot be cleaned
- Not eat, chew gum, or use tobacco in an area used for a covered activity
- Alert supervisor if ill
- Wash hands (before starting work, before putting on gloves, after using toilet, upon return to the work station after breaks, after touching animals or feces, and any time hands may have become contaminated)

***Employees (who conduct harvest activities for covered produce):*** must be trained to identify covered produce that must not be harvested. For example, produce that is visually contaminated with feces or has dropped to the ground (see section 112.112 and 112.114 in the PSR). Employees must also be trained to inspect harvest containers and equipment before use to ensure they are clean, in good condition, and in working order. Lastly, employees must be able to correct problems with harvest activities, or alert supervisors.

**Farms:** must provide toilets and handwashing stations (according to Occupational Safety and Health Administration standards), toilet paper, soap, clean water, paper towels, container to catch greywater, garbage cans, first aid kits, and break areas. Toilet and handwashing stations must be serviced by the farm or by an outside source, based on frequency of use. Relevant supplies must be monitored daily



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(when toilets and handwashing stations are being used) to ensure proper use of facilities/stations. For example, refilling soap, restocking paper towels, or emptying garbage cans. Also, different cultures may have varying health and hygiene practices (for example, toilet practices), so it is helpful to post signage (for example, demonstrating proper toilet use, and disposal of toilet paper).

**Visitors:** must be aware of the farm's policies and procedures in place that are there to protect covered produce and food contact surfaces from contamination. Displayed signs can be used to help communicate those policies and procedures. Bathroom and hand washing facilities must be available for visitors. Every effort must be taken to ensure visitors comply with rules, or they should not be allowed on the farm.

### **Records**

Records must be kept for employee trainings (date of training, topics covered, and names of employees trained); facility monitoring including toilets, handwashing stations, and first aid kits; and worker illness and injury reporting. All records must have the following information:

- Name of farm/log/activity
- Date and time the activity was completed
- Name of person completing the activity
- What task was performed
- Materials associated with the activity
- Signature space for supervisor, or designated food safety employee

Some records may require further specific information and requirements that are listed in PSR subpart O (112.161). It is also helpful to integrate recordkeeping into routines and place logs (with pens attached) in logical places, such as places where activities occur.

## **References**

US Food and Drug Administration Office of the Federal Registrar. 2015. Standards for the Growing, Harvesting, Packing and Holding of Produce for Human Consumption. Available from: <https://www.gpo.gov/fdsys/pkg/FR-2015-11-27/pdf/2015-28159.pdf>. Accessed May 23, 2017.

Produce Safety Alliance. 2017. Grower Training Courses. Available from: <https://producesafetyalliance.cornell.edu/training/grower-training-courses>. Accessed May 24, 2017.