



University  
of Idaho

# SANITATION BASICS

AN INTRODUCTION TO THE  
FSMA PRODUCE SAFETY SERIES

Webinar will begin at  
10 am PST | 11 am MDT  
April 2020



# HOUSEKEEPING



**Close all other programs running on your computer**



**Check your sound – problems with clarity, speed, etc. switch to the phone**

Call-in number provided in the welcome email

Mute computer sound when using phone



**Type in questions for speakers (or for help with viewing & sound) into question box**

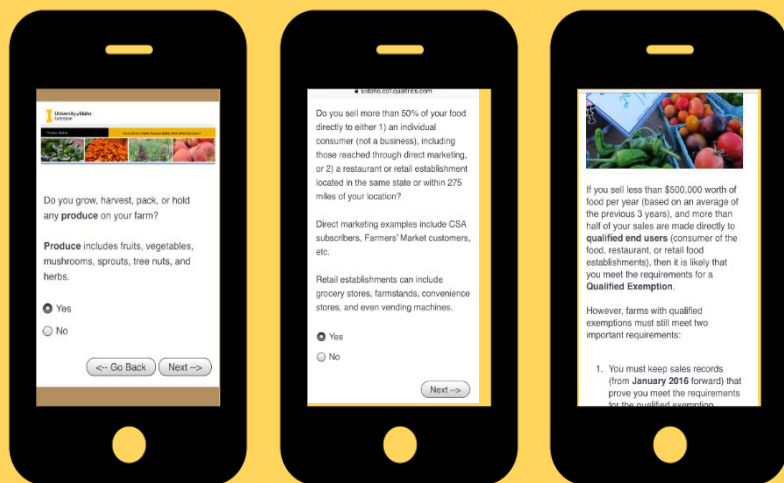


**Handouts are available to download on your computer**



**This webinar and Q&A will be focusing only on the FSMA Produce Safety Rule**

# STILL UNCLEAR ON THE PRODUCE SAFETY RULE?



**YOU'RE NOT ALONE.**

<https://www.uidaho.edu/extension/food-safety-for-produce-growers>

## Food Safety for Produce Growers

Resources and information for produce growers impacted by the Food Safety Modernization Act and the Produce Safety Rule.



Produce Safety Rule

LEARN MORE



Education & Training

NEXT TRAINING



Training Resources in Spanish

Ver todos los recursos de capacitación en español

VISIT ISDA

## Learning Tools

UI Extension and ISDA have partnered to create a variety of online and hard copy resources to help produce growers navigate the Food Safety Modernization Act and the Produce Safety Rule. What other resources would be helpful for you in your operation? Let us know by filling out the online [Produce Growers feedback form](#).

## Training videos

Idaho State Department of Agriculture and University of Idaho Extension have partnered to create training videos that illustrate several important key aspects of the Produce Safety Rule. These videos were provided to those who attended a Produce Safety Alliance Training.



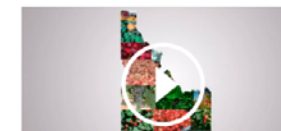
Idaho Produce Safety Video Series

Part 1 — Introduction to the FSMA, Produce Safety Rule



Idaho Produce Safety Video Series

Part 2 — Idaho Produce Safety Recordkeeping



Idaho Produce Safety Video Series

Part 3 — Recordkeeping — Agricultural Water

## About Exemptions

### Information for Qualified-Exempt or Exempt Growers

Not all growers are fully subject to the FSMA Produce Safety Rule (PSR) — various exemptions exist for some growers depending on what they grow, whether it is processed, how much they sell, and whom they sell to.

### Related links

[Decision Tool questionnaire](#) >

[Forms on ISDA](#) >



## Produce Safety Rule Resource Links

[University of Idaho Extension Produce Safety website](#)

[UI Produce Safety Rule Online Decision Tool](#) – How does this affect me?

[Recordings of past webinars and videos](#)

[On-Farm Readiness Review sign-up](#)

[Information for Qualified-Exempt farms](#)

[UI Produce Safety Newsletter subscription](#)

[Idaho State Department of Agriculture FSMA website](#)

[FSMA forms and worksheets](#)

[Cornell Produce Safety Alliance website](#)

[Produce Safety Alliance Grower Course information](#) – online course list



[FDA FSMA website](#)

[CFR - Code of Federal Regulations Title 21](#)

[FSMA Rules and Guidance for Industry](#)

# IMPORTANT PSR DATES



Business Size	 Compliance Dates for Sprouts	 Compliance Dates For Most Produce	 Water Related Compliance Dates <sup>1</sup>	Compliance Date for Qualified Exemption Labeling Requirement <sup>2</sup>	Compliance Date for Retention of Records Supporting a Qualified Exemption
All other businesses (>\$500K)	1/26/17	1/26/18	1/26/22	1/1/2020	1/26/16
Small businesses (>\$250K-500K) <sup>3</sup>	1/26/18	1/28/19	1/26/23		
Very small businesses (>\$25K-250K) <sup>4</sup>	1/28/19	1/27/20	1/26/24		

<sup>1</sup> According to the [Proposed Rule](#) issued 9/13/17, Compliance dates for Subpart E, Agricultural Water, allow an additional four years.

<sup>2</sup> A farm eligible for a qualified exemption must notify consumers as to the complete business address of the farm where the food is grown, harvested, packed, and held.

<sup>3</sup> A farm is a small business if, on a rolling basis, the average annual monetary value of produce sold during the previous 3-year period is no more than \$500,000.

<sup>4</sup> A farm is a very small business if, on a rolling basis, the average annual monetary value of produce sold during the previous 3-year period is no more than \$250,000.

Before the compliance date, every covered farm that does not qualify for an exemption must have a supervisor (such as a farm owner/operator) complete a standardized food safety training program. You can find out more about food safety training from the Produce Safety Alliance. <https://producesafetyalliance.cornell.edu/training>

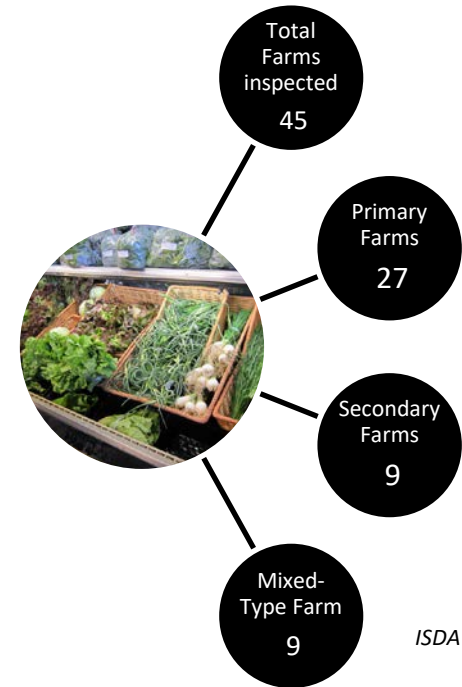
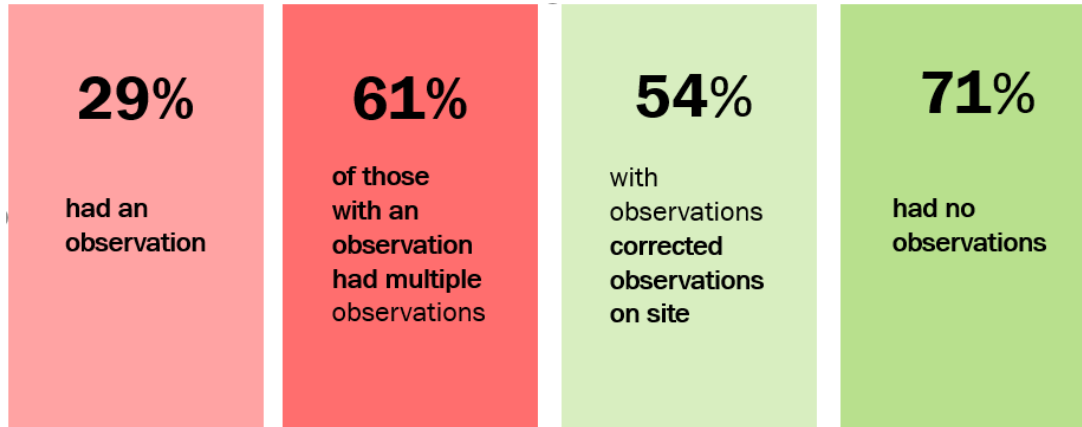
Revised 10/09/17

Business Size	Dates for Inspection
All other businesses (>\$500K)	2019
Small businesses (>\$250K-\$500K)	2020
Very small businesses (>\$25K-\$250K)	2021



# FSMA INSPECTIONS IN IDAHO | 2019

Of the 45 inspected farms...



ISDA 2019

## The Biggest Non-compliance Sections

- I Subpart D – Health and Hygiene – 6 Observations
- I Subpart L – Equipment, Tools, Buildings, and Sanitation – 19 observations
- I Subpart O – Records – 2 observations

What does it mean to have an observation?

a condition is observed that is in violation of the FDA's requirements



# **PSR SUBPART L**

**Equipment, Tools, Buildings, and Sanitation**

# SECTION REVIEW – SANITATION BASICS



## I Cleaning and Sanitizing

- You must maintain, clean, and when necessary and appropriate, sanitize all food contact surfaces of equipment and tools used in covered activities as frequently as reasonably necessary to protect against contamination.
- Equipment and tools must be **cleaned** before they are **sanitized**.
- If you use a sanitizer, you must use an appropriate sanitizer in accordance with the label guidelines – *PSA guidelines handout*
- Vehicles used for transporting covered produce must be adequately cleaned before use in transporting covered produce and **adequate for transporting**.
- If you use packing materials, you must use products that are adequate for their intended use, which includes being **cleanable (if reused) or designed for single use**. Materials must be unlikely to support growth or transfer of bacteria.





# SECTION REVIEW



## I Maintaining Equipment | Storage

- Equipment and tools must be stored and maintained to protect covered produce from contamination.
- You must also maintain and clean all nonfood contact surfaces of equipment and tools.
  - inspecting for chipping paint, peeling tape, loose bolts, debris build up, etc.

## I Growing Covered and Non-Covered Produce

- Equipment must be adequately cleaned, and when appropriate, sanitized when switching from non-covered (excluded) to covered produce.
- Designate equipment, resources permitting
- Keep covered produce separate from non-covered (excluded) produce, except when they are placed in the same container for distribution.



# SECTION REVIEW

## I Waste Management

- Trash, litter and waste must be appropriately disposed of to prevent contamination of produce and Agricultural water.
- Trash must also be emptied on a regular basis to minimize pests.
- This includes the removal of trim, culls and wastewater

## I Employee Training

- Inspecting equipment and correcting problems that may arise
- Dropped covered produce
- Don't harvest contamination

## I Pest Management

## I Sanitation Records



Idaho Produce Safety Series Part 6: Equipment, Tools, Building, and Sanitation

<https://www.uidaho.edu/extension/food-safety-for-produce-growers>

# What can non-compliance look like regarding sanitation?

(And how can I fix it?)



1.

## Tools aren't being sanitized at the necessary intervals

*112.123(b)(2)* - equipment and tools must be stored and maintained to protect covered produce from contamination

*112.123(d)(1)* - you must maintain and clean food contact surfaces of tools

## Observation Example

An inspector observes an employee use a tool to stab a dropped piece of produce off the ground to throw it away. The employee did not clean said tool afterward.

## Outcome

Dropped produce that has come in contact with the ground has now come in contact with the tool with no cleaning step afterward.

### Rule Review:

- You must protect produce from becoming contaminated and from known contaminants.
- Tools must be cleaned and (when necessary) sanitized when a potential contaminant is introduced.

### Dropped Covered Produce:

Cannot be harvested, but potential contamination was not entirely controlled for in this situation.



# ARE YOU USING THE RIGHT SANITIZER?

## NOT ALL PRODUCTS ARE CREATED EQUAL

- I Refer to the Produce Safety Alliance handout\*
- I Look for EPA registration numbers on the bottle in order to identify a product
- I Only use products labeled for use on non-porous food contact surfaces
- I The recommended sanitizer to use is Clorox® Regular Bleach<sub>2</sub>, which is safe for fruit and vegetable use
- I Look out for labels that are specialty bleaches – they are not food grade
  - Scented, colored, enhanced stain removal varieties, etc.

\*Produce Safety Alliance, *Introduction to Selecting an EPA-Labeled Sanitizer* (2018).

**CONCENTRATED Clorox® Clean Linen® Bleach**

USE 1/2 CUP per load

Not for sanitization or disinfection. To sanitize and disinfect, use Clorox® Regular-Bleach.

For Laundry	Product	Water	Instructions	
	Bleachable Fabrics Avoid bleaching wool, silk, mohair, leather, spandex and nonfast colors.		1. Sort laundry by color. 2. Add detergent. 3. Fill bleach to max line in dispenser or add 1/2 cup bleach to wash water. 4. Add clothes and start wash. 5. For best results, add to wash 5 minutes after the wash cycle has begun.	
For Floor and Deodorizing		Floors, Tiles, Bathtubs, Showers, Kitchen Sinks, Nonporous Toys		Pre-wash surface, mop or wipe with bleach solution. Allow solution to contact surface for at least 5 minutes. Rinse well and air dry.

DO NOT use this product full strength for cleaning surfaces. Always dilute strictly in accordance with label directions. For prolonged use, wear rubber gloves. \*vs. detergent alone in HE machines

**WARNING: EYE IRRITANT.** May cause skin irritation. Avoid contact with eyes. For sensitive skin or prolonged use, wear rubber gloves. Use with adequate ventilation. **FIRST AID: EYES** – Immediately rinse with water for 15 minutes. Call a doctor. **SKIN** – Rinse with water. If irritation persists, call a doctor. **IF SWALLOWED** – Drink a glassful of water. Call a doctor or poison control center. Do not induce vomiting unless told to do so by a poison control center or doctor. **KEEP OUT OF REACH OF CHILDREN AND PETS.** Do not use or mix with other household chemicals such as toilet bowl cleaners, rust removers, acids or ammonia-containing products, as hazardous gases may result. **CONTAINS:** Sodium hypochlorite and sodium hydroxide. Contains no phosphorus. Not harmful to septic systems. **STORAGE:** Reclose cap tightly after each use. Store this product upright in a cool, dry area away from direct sunlight and heat to avoid deterioration. Questions or Comments? Visit us at [www.clorox.com](http://www.clorox.com) or call 1-800-292-2200. For more product ingredient information, visit [www.IngredientsInside.com](http://www.IngredientsInside.com). Mfd. for The Clorox Company, 1221 Broadway, Oakland, CA 94612. © 2007, 2016 Made in the U.S.A. Clorox is a registered trademark of The Clorox Company.

Empty & Replace Cap  
ourrecycle  
PLASTIC BOTTLE  
196574 035

**FOR POSITION ONLY**  
UPC@90%  
0-44600-30772-5

# Label Information Tool

Last revised: 8/13/2019

This work product was supported under cooperative agreement number 12-25-A-5357 between USDA-AMS and Cornell University. The information and viewpoints in this product do not necessarily reflect the viewpoints and policies of the supporting organization, cooperating organizations, or Cornell University.

To suggest edits, updates, or additional products, please contact Donna Clements (dmp274@cornell.edu, 909-552-4355).



**LABEL INFORMATION**

**Single Product Sheet**

[Back to MAIN PAGE](#)

			EPA Registration Details						
Product Name		Alternative Brand Names	Active Ingredients	EPA Label			Labeled Uses		
				EPA Registration Number	Link to EPA Label	EPA Accepted Date	Labeled For Use on Non-Porous Food Contact Surfaces	Labeled For Use in Fruit and Vegetable Wash Water?	Labeled For Use in Irrigation Water?
CLB	Clorox Regular Bleach 2 Clorox Mold Attacker Clorox Mold Blaster Clorox Mold Destroyer Clorox Mold Eliminator Clorox Mold Killer Clorox Mold Remover			5813-111	<a href="#">Label PDF</a>	5/25/2018	Yes See Page 16	Yes See Page 16	No



# What can non-compliance look like regarding tool storage?

(And how can I fix it?)



## 2. Tools are being inappropriately stored

*112.123(b)(2)* equipment and tools must be stored and maintained to protect covered produce from contamination

### Observation Example

An inspector observes hoses strewn in various places on the property, one of which is piled up adjacent to a runoff drain.

### Outcome

Tools are not being stored as to protect from the potential spread of contamination and may also create a harborage point for wastewater runoff, affecting proper drainage.

### Rule Review

- Store equipment and tools in a way that protects them from becoming contaminated or spreading contamination.
- Hoses, rakes, shovels and other tools and equipment should be stored off the ground, out of the dirt and away from standing water.
- It is best to have designated places for tools (i.e. onion topping knives) and a cleaning schedule to ensure maintenance.
- **Wedging tools with exposed food contact surfaces into conveyer belts, pant pockets, cement walls, buckets, etc., for temporary storage only creates more food contact surfaces to we wary of.**

# What can non-compliance look like regarding waste?

(And how can I fix it?)



## 3. Trash is not being adequately managed or disposed of

*112.132* you must provide appropriate disposal of trash, minimize the potential to attract pests, protect against contamination of covered produce.

### Observation Example

An operation has bottles, wrappers, cans, water bottles, etc. spread throughout the property.

### Outcome

Trash can become a pathogenic hazard in areas where covered produce is present.

### Rule Review

- Trash accumulation can become a pathogenic risk, a drainage barrier, and a working hazard due to tripping.
- Do not throw trash on the ground and remove waste from the field, ditches, packinghouse, etc., whenever it is present.
- This includes monitoring and maintaining culled produce, trim, and dropped produce, which can become a harborage / attractant for pests.
- Empty trash on a regular interval and prioritize use of trash cans with lids when stored outside.

# What can non-compliance look like regarding pests?

(And how can I fix it?)



5.

## You have a fully-enclosed building and no pest management

**112.128** You must take measures necessary to protect covered produce, contact surfaces, packing material. Enclosed buildings must take measures to exclude pests.

**112.126** You must implement measures to prevent contamination of your covered produce and food contact surfaces in your building, as appropriate, considering the potential for such contamination through: floors, walls, ceilings, fixtures, ducts, or pipes; and drip or condensate.

### Observation Example

A building has dead animals, nesting birds, and bird feces on the ground. The building is used to store food contact surfaces such as crates and tools.

### Outcome

Dead birds (as well as live birds) present pathogenic risks to food contact surfaces and produce.

This operation has not established pest management nor removed deceased birds.

### Rule Review

You must take steps to deter pests and /or exclude pests in fully-enclosed buildings:

**For fully-enclosed buildings:** you must take measures to exclude pests from your buildings

- Set and monitor traps
- (Optional) Create an SOP to monitor them weekly (or more)
- SOPs should also detail the process to remove deceased pests and sanitize affected areas

**For partially-enclosed buildings:** you must take measures to prevent pests from becoming established in your buildings

- i.e. using screens or by monitoring for the presence of pests and removing them when present



# ADDITIONAL RESOURCES



## ON-FARM READINESS REVIEW

**I** On-Farm Readiness Review (OFRR) is a collaborative project between the University of Idaho and the Idaho State Department of Agriculture intended to help prepare farmers for compliance with the PSR.

**I** On-Farm Readiness Reviews:

- Assist farmers with understanding how the PSR applies to their operation.
- Are voluntary, non-regulatory reviews to prepare farmers for regulatory inspections if they are covered by the PSR.
- Provide specific educational tools to individual operations on how to comply with the PSR.
- Contact Lu Hauger at [Lhauger@Uidaho.edu](mailto:Lhauger@Uidaho.edu) for more information

## UI EXTENSION PRODUCE SAFETY WEBSITE

<https://www.uidaho.edu/extension/food-safety-for-produce-growers>

**I** Training videos

**I** Spanish resources

**I** Templates for documentation

**I** Free on-farm resource online ordering

**I** Produce Safety Newsletter

**I** Webinars



**University of Idaho**  
Extension



## PSR live Q&A with:



**Ariel Agenbroad**  
**Area Extension Educator**  
Community Food Systems and  
Small Farms



**Colette DePhelps**  
**Area Extension Educator**  
Community Food Systems



**Lu Hauger**  
**Associate Extension Educator**  
Commercial Produce Safety



**Casey Monn**  
**FSMA Program Manager**  
Idaho State Department of  
Agriculture

Thank you for all that you do.

## FSMA PRODUCE SAFETY WEBINAR SERIES

Mondays in April @ 10 am PST | 11 am MDT

**April 6**

Creating hygienic habits on the farm

**April 13**

Sanitation basics under the PSR

**April 20**

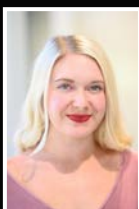
Simplifying recordkeeping



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