

Research Report to the Michigan Department of Agriculture & Rural Development

Key Results and Recommendations

Artisan Agrifood Processing and Food Safety Regulation: A Study of Handcrafting Processors and Inspectors in Michigan

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This report presents key results and recommendations of a qualitative study on the food safety regulation of small and medium food processors in Michigan. The study focused specifically on artisan processors—relatively small processors who use handcrafting techniques. Section I provides an overview of the study and key results. Section II summarizes recommendations to the Michigan Department of Agriculture & Rural Development (MDARD).

I. Study Overview and Results

The study. Semi-structured interviews were conducted with MDARD Food and Dairy inspectors and artisan food processors between January 2012 and March 2013. Participants included 19 inspectors (13 from the Food Section and 6 from Dairy) and 27 processors (10 bread bakers, 6 jam producers, and 11 cheesemakers). In addition, 12 inspections involving a selection of these participants were observed, as were production operations.

The inspector-processor rapport. As artisans and inspectors described their experiences working with each other, both groups highlighted the importance of the inspector-processor rapport, a little-recognized aspect of the regulatory process. Artisans and inspectors who formed positive relationships reported working together to identify ways in which these processors could comply with requirements while pursuing (as much as possible) their own styles of production.

The study's outreach to producer audiences has emphasized this finding.

Reinforcing MDARD's strengths. MDARD's Food and Dairy inspectors take an assistance approach to their work, helping food manufacturers improve operations. This approach has earned them—and by extension MDARD—the trust and respect of many small and medium sized food manufacturers. These are important strengths of the Department.

Department resource constraints. It must be noted that this approach demands considerable inspector time and agency resources. Many smaller processors rely on inspectors for technical assistance, quality assurance, advice on locating small-scale equipment, and other matters not directly related to regulations. Not all inspectors see extensive assistance as a good use of their time. Budget increases and/or further development of Department connections with other resources, such as selected educators and experienced small processors, may help address this issue.

The quality of the rapport between a producer and inspector is as important as the producer's knowledge of regulations.

Fostering trust and mutual understanding between processors and their inspectors appears to have considerable potential for improving the regulatory process for small and medium food processors in Michigan.

II. Recommendations

These recommendations are intended to reinforce the value of practices that are already in place and to suggest others that may be useful, as Department resources allow.

A. Inspector training

Inspectors described the challenges that small and medium food manufacturing plant evaluations pose. Training and experience with large plants does not prepare inspectors for the different equipment and techniques that smaller operators use. Inspectors want to know what to look for so that they do not fail to note critical risks.

1. New inspectors

- Train new inspectors by sending them to accompany several different experienced inspectors so that they learn different styles and approaches. Conduct small establishment inspections together, and go over these operations together in their entirety.
- Have a plant's previous inspector walk a new inspector around and explain how the plant was set up.
- Be clear on whether to apply the CFRs or the Food Code. Some plants may come under the CFRs (which are more flexible) and not the Food Code (which is more specific).

2. Greater familiarity with small manufacturing plants

- Offer inspectors a training specifically on small manufacturing plants: how to set them up, what to look for, questions to anticipate, problem areas.
- Offer to send Dairy inspectors to a cheesemaking course, such as at Michigan State University. Alternately, send at least one inspector, who can then serve as a resource for other inspectors.

3. Soft skills training

Inspectors emphasized the importance of people skills, and the time and experience that it takes to develop these skills. They indicated a need for:

- Training on day-to-day communication, for example identifying different people's personality types and learning to work with different types of people.
- Conflict resolution.
- Deescalating tense situations.

B. Effective inspection approaches

Inspectors described approaches that are effective in evaluating small and medium food manufacturing plants:

- Working to understand *how* processors do things, and not being afraid to ask questions. Not rushing.
- Engaging with processors as people, on a human level.
- Working *toward* compliance, improving things gradually over time. Inspectors let operators know that they, as inspectors, are willing to walk through that process together with them. Addressing basic food safety concerns first, and then going to the next level.
- Things to avoid doing: sounding argumentative or blaming; bearing grudges; taking things personally or emotionally; nitpicking or overwhelming the operator; telling operators that they're doing things wrong.
- If inspectors mark a violation: explaining how to correct the problem, or finding the information needed in order to correct the problem. Explaining *why* is important, so that the producer understands.
- Starting an inspection with compliments.

III. Thank You

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