

# Balancing Food Safety and Organic Requirements for: Recordkeeping - Fully Covered Farms

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## Introduction

Organic growers already keep a variety of records required by the National Organic Program (NOP) Regulations. Some of those records can fulfill recordkeeping requirements

for farms that are fully covered by the Food Safety Modernization Act's (FSMA) Produce Safety Rule.

## Requirements for Each Regulation

### National Organic Program

■ NOP requires records to document compliance with practices described in the farm's Organic System Plan (OSP). These records cover:

- Materials
- Sales
- Harvest
- Input purchase receipts
- Post-harvest handling
- Input application
- Crop production and rotation
- Natural resources and biodiversity conservation



Photo by E. Chris Wisner

### FDA FSMA Produce Safety

FDA requires that FSMA Fully Covered Farms keep records on:

- Personnel Training
  - Employees receive food safety training applicable to their job and that training topics covered are recorded, employees sign and date form after they receive training
- Water\*
  - Water test results
  - Water treatment monitoring (if applicable)
  - Corrective actions taken after a surface water test result that exceeds allowable range (if applicable)
- Biological Soil Amendments of Animal Origin
  - Purchased amendments: Certificate of Conformance from supplier for product
  - Amendments made on-farm: Records to show time, temperature, and turning requirements were met
- Equipment
  - Date and method of cleaning and sanitizing growing, harvesting, and packaging equipment used in production
- Sprouts
  - Documentation of seed treatment
  - Results from sampling tests from each production batch
  - Records of corrective actions after positive pathogen tests

*\* At time of publication the water requirements were under review by FDA and may change in the future. Please check with CAFF, an extension agent, and/or online to verify the records listed above are still required.*

## Recordkeeping Requirements

Each of the food safety records kept for FSMA must:

- Be created at the time an activity is performed or observed
- Be accurate and written legibly
- Be dated and signed by the person who created the record
- Include, as applicable:
  - Name and location of farm
  - Actual values and observations during monitoring
  - Description of covered produce included in the record (e.g. crop type)
  - Location of growing area
  - Time and date of documented activity

## Example Worker Training Record

FSMA requires farms to document employee training and include all of the relevant information needed to fulfill the FSMA recordkeeping requirements (listed above). An example of a record that fulfills FSMA's requirement for employee training recordkeeping is provided below. Note that the employee training record

is one of the records in FSMA that must be reviewed by a supervisor and signed off on. FSMA does not say how soon after a record is created a supervisor has to review it. The law says the record must be reviewed within some reasonable amount of time.

Name and address of farm: Lettuce Feed You Farm Date: 11/28/17  
 Trainer(s): Sam Smith Training Time: 10 am  
 Training language: English  
 Training Materials: Attach any printed materials used during the training and any given to training attendees. Also, attach any relevant SOPs or Farm Food Safety Plan parts applicable to the training.

Print Employee Name	Topic(s) Trained On	Employee Signature
1. <u>Alexa Martin</u>	<u>handwashing</u>	<u>Alexa Martin</u>
2. <u>Joe Shaw</u>	<u>handwashing, harvest protocol</u>	<u>Joe Shaw</u>
3. <u>Katie Fee</u>	<u>harvest protocol</u>	<u>Katie Fee</u>
4. <u>Ken Fort</u>	<u>harvest protocol</u>	<u>Ken Fort</u>
5.		
6.		

Reviewed by: Cindy Fox Title: Co-Owner Date: 12/15/17

## Frequently Asked Questions

### **What topics are employees required to be trained on? What does training applicable to their job mean?**

There is another factsheet in this series that goes into specifics on these questions. Please read the, “Worker Training and Health and Hygiene” factsheet for more info.

### **Can the records be both hand written and electronic?**

Yes, you can have both hand written and/or electronic records. Make sure the records are either the original, a true copy (e.g. photocopy, picture), or electronic.

### **Do all records have to be stored onsite at the farm?**

No, you can store records offsite. Please note that if the authorities ask to see your records you have to make them available within 24 hours, so don't store them too far away.

### **If I'm already keeping a record for my OSP (or another reason) do I need to keep a duplicate record for FSMA food safety?**

No, you're allowed to use an existing record as long as all of the required documentation is on that record and you format it in a way that includes the recordkeeping requirements listed above. For example, if you already have an input application log that includes time, temperature, and turning records for each batch of compost that is made and applied on-farm, it will also meet the “biological soil amendments of animal origin” record requirement.

### **What does the Certificate of Conformance (CoC) from a supplier of an amendment that contains an animal based ingredient need to state?**

Suppliers of biological soil amendments of animal origin (e.g. manure based compost, feather meal, bone meal, fish emulsion, etc) need to supply a CoC that states that they have:

- Treated the amendment using a scientifically valid process.
- Handled and stored the product in a manner and location that minimizes the risk of contamination to the product by another product that has not been treated yet.

### **What time, temperature, and turning records are required if you make your own compost on-farm?**

Learn more about this topic by reading one of the other factsheets in this series called, “Soil Amendments of Animal Origin.” There are two methods, static composting and turned composting, and each has clear time, temperature, and turning requirements.

### **How often do records have to be reviewed by a supervisor?**

According to the text in the Produce Rule records that are required to be reviewed by a supervisor must be reviewed within a reasonable time after the records are made. The farm will have to determine what reasonable means for their unique situation, which is influenced by the frequency of times that a record is kept and the topic it's kept on. For example, a farm may decide to require supervisors to check that the sanitation company is recording their cleaning of the bathrooms every two weeks. If for some reason the company stops coming and cleaning, that will be discovered by the supervisor (if an employee does not report it first) the next time she goes to review the bathroom cleaning logs.

## Conclusion

Organic farms fully covered by the Produce Rule will need to start keeping additional records beyond what they are already keeping for organic certification. There may be some overlap between organic and food safety records, and farms are encouraged not to duplicate records for food safety if they are already tracking those details in their organic recordkeeping.

## Resources

1. CAFF Food Safety Website Pages: <http://www.caff.org/programs/foodsafety/>
2. Produce Safety Alliance resource that explains records required for FSMA Fully Covered Farms as well as provides some recordkeeping templates. Found at: <https://producesafetyalliance.cornell.edu/>

## References

1. The FDA states the training requirements in Subpart C of the Federal Regulation of Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption in parts §112.21-112.30. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2112>
2. The FDA states the agricultural water requirements in Subpart E of the Federal Regulation of Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption in parts §112.241-112.50. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2149>
3. The FDA states the biological soil amendments of animal origin and human waste requirements in Subpart F of the Federal Regulation of Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption in parts §112.51-112.60. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2231>
4. The FDA states the equipment, tools, buildings, and sanitation requirements in Subpart L of the Federal Regulation of Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption in parts §112.121-112.140. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2278>
5. The FDA states the sprouts requirements in Subpart M of the Federal Regulation of Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption in parts §112.41-112.150. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2278>
6. The FDA states the records requirements in Subpart O of the Federal Regulation of Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption in parts §112.161-112.167. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2427>

## Acknowledgments

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Check out CAFF's additional factsheets in this series:  
FSMA 101 ■ Monitoring Animals ■ and other topics!  
Learn more at [www.caff.org/foodsafety](http://www.caff.org/foodsafety)