

On-Farm Readiness Review



Introduction

The walk around questions (WAQ) are intended to help assessor(s) solicit information from the grower. It is not intended to cover all aspects of the Produce Rule, but what is considered the most important portions. The WAQ is to be used with the OFRR Resource Manual. The assessor(s) should have a good understanding of the produce rule and the manual before doing any readiness reviews.

The assessor should first talk to the grower about what portions of the Produce Rule apply to them. Use the OFRR Decision Tree which is located at Tab 4 in the manual. This will allow you and the grower to determine which parts to use for the walk through. Each Tab in the manual from 4-15 covers a different section of the Rule with a corresponding WAQ. The WAQ documents are setup as a series of questions. At the start of most questions is a section number in brackets i.e. [112.51] which refers directly to the Rule under that tab in the manual. If a written document is required, the section number will be followed by a capital D in parenthesis i.e. (D).

At the end of the walk through the assessor(s) should meet with the grower to review what was observed and make suggestions for improvement. The goal is not to point out everything that the grower may need to change, but the most important changes needed.

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Walk Around Questions (WAQ)

Health & Hygiene

Potential locations – immediately upon arrival if asked to sign an acknowledgment of food safety practices document, employee break area, hand wash station, restroom

[112.31]; How do you prevent ill or persons you suspect of being sick from coming into contact with produce and food contact surfaces? Do you have a sick leave policy?

[112.32]; What sort of hygiene expectations do you have for all your employees? Do you have glove, jewelry, or other similar policies?

[112.33]; What are your visitor policies or procedures related to health and hygiene.

[112.129; 112.130]; Where are your toilet and hand washing facilities?

[112.131]; How do you manage potential human waste spills, including septic spills?



Walk Around Questions (WAQ)

Biological Soil Amendments of Animal Origin (BSAAO)

Potential locations – compost pile, compost storage, composting area

[112.52(a), 112.52(b)]; Does your farm use any soil amendments of animal origin, including agricultural tea?

[112.52]; If yes, how is it stored and handled prior to application?

[112.51(b)(5), 112.54] (D); Do you test the water for the tea and if so what for?

Do you spike the tea with anything (nutrients or other additives)?

[112.51, 112.54]; What type of soil amendments do you use? (Note to assessors: probe deeper regarding use of human waste, sewage sludge biosolids, manure, compost, bone meal, feather meal, fish emulsion, table waste, pre-consumer vegetative waste, etc.)

[112.52] When do you apply your amendments?

[112.56]; Do they contact the harvestable portion of the crop during or after application?

[112.56(a)(1)(i)]; How long do you wait before harvesting after application?

[112.53] (D); Does your farm use any human waste or sewage sludge biosolids?

[112.60(b)(1), 112.60(b)(2)] (D); Do you produce your own compost or purchase it pre-treated?

[112.60(b)(1)] (D); If you buy treated compost amendments, do you maintain a certificate or document from that supplier the microbial quality of the product at least annually?

[112.54, 112.55]; Is the process used to treat it scientifically valid (Ex.'s physical process (ex. thermal), chemical process (ex. High alkaline pH), biological process (Ex. composting) or a combination of these, and validated to show no detectable *Listeria monocytogenes*, *Salmonella* species and fecal coliforms or *E. coli* O157:H7 for purchased compost?

If you produce your own compost, where do you produce it and how is it stored?

[112.60(b)(1)(i)], [112.60(b)(1)(iii)], (D); Do you have a record of the process used to treat the amendment?

[112.60(b)(1)(ii)] (D); Do you have a record of the handling and storage of the amendment?



Walk Around Questions (WAQ)

Wild and Domestic Animals

Potential locations – working animals, animal deterrents, walking field perimeter

[112.81]; Does your farm operation grow, pack or hold produce in an outdoor area or partially enclosed building? (May be obvious upon visiting farm operation)

[112.83]; Does your farm use grazing animals, working animals, or have animals entering production areas during the season?

[112.83(a)]; What steps do you take if you suspect that grazing animals, working animals, or animal intrusion will contaminate covered produce?

[112.83(b)]; How do you assess potential contamination during the season?

[112.112]; If contamination is found, how do you evaluate whether produce can be harvested?

* [112.22(b)(1); 112.30(b)]; What type of training do workers receive on dealing with contaminated produce at harvest?

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Walk Around Questions (WAQ)

Preharvest Worker Training

Potential locations – employee break area, hand wash station, restroom

*[112.21(a), 112.22(a)(1)]; When do you train your workers on hygiene? What do you cover?
How often do you retrain? How do you handle new employees during the season?

*[112.21(b)]; What type of training to you or the supervisors of the workers receive?

*[112.22(b), 122.22(b)(3)]; Do you give different types of training for your field and packinghouse crews? If so what?

*[112.30] (D); Do you keep records of your trainings?

*[112.129]; What type of toilet facilities and handwashing stations do you provide?

*[112.130]; What supplies are included with the toilets and handwashing facilities

*[112.129(b)(2)]; How are they serviced?

*[112.129(b)(1), 112.131(c)]; What do you do if a portable toilet leaks, tips, or spills?

*[112.129(a)]; Where are toilets in relation to the work being done and how many do you have?

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Walk Around Questions (WAQ)

Preharvest Sanitation

Potential locations – production equipment, chemical storage, walking the field

[112.111]; Do you grow crops that are covered and not covered under the produce rule? If so, do you clean any shared equipment before using on covered produce?

[112.112]; Do you do a preharvest inspection of the growing area? What do you look for? What are your corrective actions if you find a problem? How do you ensure contaminated produce will not be harvested?

[112.123] (D); Do you inspect and maintain equipment, and when necessary clean and sanitize equipment used in the field before harvest? (Distinguish between cleaning and sanitizing). How do you do it? What sort of sanitizer do you use? How often?

112.140]; Do you keep records of equipment sanitation?

[112.132] How do you dispose of waste in the field to prevent contamination of produce and ag water?

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Walk Around Questions (WAQ)

Preharvest Water

Potential locations – water source (well or surface), water treatment system, distribution system

How do you use water before the harvest of crops on your farm (i.e., is it considered *agricultural water*)?

[112.42(a)(1)] (D); What are the sources of water used throughout the season [Municipal, Groundwater (i.e., wells), Surface Water (lakes, ditches, rivers or streams), How many?]

Think about all the water used for irrigation, crop protection, frost protection, and dust abatement. How do the sources change during different times of year or with how you use the water?

[112.42(a)] (D); Do you inspect your water system? If so how often? What things do you look for in the inspection? (Ask the grower to walk through a typical inspection with you.)

[112.42(a)(4)] (D); What are the specific activities near the source or through the conveyances that impact the quality of these water sources (On this farm, from adjacent land)? How likely will these activities contaminate the water source?

[112.42(c)]; How do you protect your water sources? (physical access, backflow prevention)

[112.46] (D) How do you assess water quality for preharvest uses? Testing? How frequently and when? What test(s) [target organism, testing method] are you using? Do you know what your water unit testing is?

[112.47(b)]; How do you take your water samples?

Note: Exact requirements listed below are under review by FDA and may change. Also, water requirements do not go into effect for four years after implementation dates based on produce sales.

Municipal Source (a record of the annual testing from the municipality)

Ground water sources (4 tests total with 1 per year, per source)

Surface water sources (20 tests total with 5 per year, per source)

[112.44(b)] (D); Are you calculating a Geometric mean and STV?

[112.44(b)] (D); Does your water meet the *E. coli* criteria established in the PSR? (<126 CFU GM & <410 CFU)?

[112.45]; If your water happened to exceed the *E. coli* criteria, what corrective measures would you use to lower the risk?

[112.45(a)(1)] (D); If it did exceed the criteria, did you reinspect the system to look for problems before performing a corrective action?

* [112.45(b)(1)(i)(A)] (D); Are you applying a preharvest interval? How many days?

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(D) Does your crop go to commercial processing? Is your buyer aware that risky produce (ie. high micro load water application preharvest) needs to be handled differently?

[112.45(b)(1)(ii)] (D); Postharvest treatment or storage? Do you have a validation to show its efficacy?

[112.45(b)(2)] (D); Re-inspecting the water system?

* [112.45(a)(2)] (D); Do you treat the water? If so, how?

[112.45 (b)] (D); Have you had to take any Corrective Actions this season?

[112.12 (a)] (D); Do you use an alternative to a requirement?

[112.49 (a)] (D); Alternative microbial Indicator? Do you have scientific data to support it?

[112.49 (b)] (D); Alternative preharvest die-off? Do you have scientific data to support it?

[112.49 (c)] (D); Alternative minimum sample number in initial survey? Do you have scientific data to support it?

[112.49 (d)] (D); Alternative minimum sample number in annual survey? Do you have scientific data to support it?



Walk Around Questions (WAQ)

Harvest Worker Training

Potential locations – employee break area, hand wash station, restroom, watching harvest

[112.112]; Do you inspect fields at harvest for signs of animal feces? What do you do if feces is found on or around the produce?

[112.113]; How do you protect the produce from becoming contaminated during harvest?

[122.22(b)(2), 122.22(b)(3)]; What does a worker do if he/she finds containers that were not properly cleaned when harvesting?

[112.129]; What type of toilet facilities and handwashing stations do you provide?

[112.129]; How close are the toilet facilities located to the field during harvest?

[112.129(b)(2)]; How are they serviced?

[112.130]; What supplies are included with the toilets and handwashing facilities?

[112.129(b)(1), 112.131(c)]; What do you do if a portable toilet leaks, tips, or spills?

[112.129(c)]; If you are growing in a greenhouse where are the toilets and handwashing stations located?

[112.21(a), 112.22(a)(1)]; When do you train your workers on hygiene? What do you cover? How often do you retrain? How do you handle new employees during the season?

[112.21(b)]; What type of training do you or the supervisors of the workers receive?

[112.21(c)]; How do you train workers that may not read or write or understand English?

[112.22(b), 122.22(b)(3)]; Do you give different types of training for your field and packinghouse crews? If so what?

[112.30] (D); Do you keep records of your trainings?

[112.22(a)(2)]; How do you inform visitors (including u-pick) as to the health and safety issues around the operation?



Walk Around Questions (WAQ)

Harvest Sanitation

Potential locations – watching harvest, looking at harvest equipment, looking at where harvest equipment is stored or cleaned

[112.22(b)] (D); What type of training do you give to the harvest crew?

[112.22(b)(1)] (D); What instructions do you give to the harvest crew related to dropped produce or produce which may be contaminated with manure or other animal feces?

[112.111]; Do you grow crops that are covered and not covered under the produce rule? If so, do you handle and/or store the crops together or use any shared equipment?

[112.112]; Do you do a preharvest inspection of the growing area? What do you look for? What are your corrective actions if you find a problem? How do you ensure contaminated produce will not be harvested?

[112.113]; How do you handle harvested produce to prevent contamination?

[112.114]; How do you ensure dropped produce is not distributed?

[112.116]; Do you reuse packing / harvest containers? If so, how are they cleaned and sanitized?

[112.123] (D); How frequently do you inspect and maintain equipment, and when necessary clean and sanitize equipment used in the field before harvest? (Distinguish between cleaning and sanitizing). How do you do it? What sort of sanitizer do you use? How often?

112.140]; Do you keep records of equipment sanitation?

[112.125]; How do you ensure vehicles used to transport produce are cleanable (look for carpet, absorbent material, etc.), clean and/or sanitary?

[112.132] How do you dispose of waste in the field to prevent contamination of produce and ag water?



Walk Around Questions (WAQ)

Harvest Water

Potential locations – water source, point of water use, during harvest

How do you use water (including ice) during the harvest of crops on your farm?

**[112.42(a)(1)] (D); What are your sources of water used at harvest?

Think about all the water used for equipment and direct food contact surface cleaning, hand wash water, for produce quality (freshening greens) and hydrocooling. How do the sources change during different times of year or with how you use the water?

**[112.42(a)] (D); Do you inspect your water system? If so how often? What things do you look for in the inspection? (Ask the grower to walk through a typical inspection with you.)

**[112.42(a)(4)] (D); What are the specific activities near the source or through the conveyances that impact the quality of these water sources (On this farm, from adjacent land)? How likely will these activities contaminate the water source?

**[112.42(c)]; How do you protect your water sources? (cross-connections, backflow prevention)

**[112.46] (D); How do you assess water quality for harvest uses? Testing? How frequently and when? What test(s) [target organism, testing method] are you using? Do you know what your water unit testing is? How do you take your water samples?

**[112.43] (D); Do you treat this water? If so, how?

**[112.45]; What do you do if a water test comes back higher than expected (a positive generic *E. coli* test)? How would you correct this on your farm?

[112.48(a)] Do you re-use or recirculate water? If so, how do you monitor recirculating water? How do you determine when it's time to change recirculated water?

**[112.43] (D); Do you use an antimicrobial (sanitizer, uV)? How do you use them? How do you monitor their effectiveness? How frequently do you monitor it? (Depending on your sanitizer) How do you monitor the pH of this water?

[112.48(b)]; Are you familiar with water turbidity? How do you gauge/measure this?

[112.48(c)]; Based on what you harvest, is the temperature of the water a concern? How do you address it?

*[112.50(a)] (D); What documents do you keep related to your water sources, antimicrobial use, and testing?



Walk Around Questions (WAQ)

Postharvest Worker Training

Potential locations – employee break area, hand wash station, restroom, watching packing

[112.129(a)]; Approximately how many workers do you have in the packinghouse?

[112.129(b)(1)]; Are there toilet facilities and handwashing stations available for the workers during produce packing and where are they located?

Who services the facilities and how frequently?

[122.22(b)(2), 122.22(b)(3)]; What does a worker do if he/she finds containers that were not properly cleaned after harvest?

[112.129]; What type of toilet facilities and handwashing stations do you provide?

[112.129]; How close are the toilet facilities located to the packing area?

[112.129(b)(2)]; How are they serviced?

[112.130]; What supplies are included with the toilets and handwashing facilities

[112.129(b)(1), 112.131(c)]; What do you do if a portable toilet leaks, tips, or spills?

[112.129(c)]; If you are growing in a greenhouse where are the toilets and handwashing stations located?

[112.21(a), 112.22(a)(1)]; When do you train your workers on hygiene? What do you cover? How often do you retrain? How do you handle new employees during the season?

[112.21(b)]; What type of training to you or the supervisors of the workers receive?

[112.21(c)]; How do you train workers that may not read or write or understand English?

[112.22(b), 122.22(b)(3)]; Do you give different types of training for your packinghouse crew? If so what?

[112.30] (D); Do you keep records of your trainings?

[112.22(a)(2)]; How do you inform visitors as to the health and safety issues around the operation and do you provide them with toilet and handwashing facilities?



Walk Around Questions (WAQ)

Postharvest Sanitation

Potential locations –observe packing, observe cleaning/sanitation at packinghouse, chemical storage area, cold rooms and other storage areas

[112.111]; Do you harvest and handle both covered and non-covered produce? If so, do you separate covered and non-covered produce? If so, please describe separation (physical, time, handling, cleaning).

[112.113]; How do you handle produce that contacts the ground, packinghouse floor, or other non-food contact surface?

[112.123] (D); Do you clean and/or sanitize equipment?

[112.123(d)(1)]; How do you clean equipment? Do you sanitize cleaned equipment? If so, how?

[112.140]; Do you keep records? If so, what records?

[112.116]; How do you ensure your packaging materials are clean and sanitary?

[112.116(a)]; How do you handle damaged or cracked containers?

[112.115]; Does packaging allow for air flow?

[112.124]; Are you using any monitoring equipment i.e., temperature recorders, pH meters, etc.? If so, do you check their accuracy and how often?

[112.125]; How do you ensure vehicles used to transport produce are cleanable (look for carpet, absorbent material, etc.), clean and/or sanitary?

[112.126]; Are building drains, walls, ceilings and floors checked for leaks or other sources of contamination? How often are they cleaned? Are buildings adequate in size and construction (including adequate partitions and drainage)

[112.126(a)(2)]; Is there standing water? If so, how is it addressed?

[112.133]; Is plumbing sufficient?

[112.128]; Do you have a pest control program in place? If so, describe.

[112.127]; Are domestic animals allowed in the packinghouse?

[112.131]; What type of sewage system (septic, municipal, etc.) do you have for the packinghouse?

[112.132]; How often do you remove culled produce and trash from the packing area?



Walk Around Questions (WAQ)

Postharvest Water

Potential locations – water source (well, connection to municipal), point of water use if during packing (hydrocooler, flume, dump tank, spray bar), sanitation

**[112.42(a)(1)] (D); What are your sources of water used during postharvest operations? (Think about all the water used for equipment and direct food contact surface cleaning, hand wash water, dump tanks, ice making, fluming and hydrocooling.)

**[112.42(a)] (D); Do you inspect your water system? If so how often? What things do you look for in the inspection? (Ask the grower to walk through a typical inspection with you.)

**[112.42(a)(4)] (D); What are the specific activities near the source or through the conveyances that impact the quality of these water sources (On this farm, from adjacent land)? How likely will these activities contaminate the water source?

**[112.42(c)]; How do you protect your water sources (cross-connections, backflow prevention)?

**[112.46] (D); How do you assess water quality for postharvest uses? Testing? How frequently and when? What test(s) [target organism, testing method] are you using? Do you know what your water unit testing is? How do you take your water samples? Are you familiar with the Microbial Water Quality standards required for postharvest water?

[112.48(a)]; Do you re-use or recirculate water? If so, please describe. How do you determine when it's time to change recirculated water?

**[112.43] (D); Do you use an antimicrobial (sanitizer, uV)? How do you use them? How do you monitor their effectiveness? How frequently do you monitor it?

(Depending on your sanitizer) Do you monitor the pH of this water?

[112.48(b)]; Are you familiar with water turbidity? How do you gauge/measure this?

[112.48(c)]; Based on what you harvest, is the temperature of the water a concern? How do you address it?

**[112.45] (D); What do you do if a water test comes back higher than expected (a positive generic *E. coli* test)? How would you correct this in your packinghouse?

*112.50(a) (D); What documents do you keep related to you water sources, antimicrobial use, and testing?