CDFA Inspection Process:

What to Expect and How to Prepare

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Produce Safety Program (PSP)

Agenda

- **CDFA Produce Safety Program (PSP)**
- **Who** is impacted by the **Produce Safety Rule (PSR)**?
- **What** is a PSR inspection?
- **What** is the PSR inspection process like?
  - **Where** will a PSR inspection take place?
  - **When** will a PSR inspection take place?
- **How** do I prepare for a PSR inspection?
- **Q&A**

Produce Safety Program (PSP)
Produce Safety Rule (PSR)

cdfa PRODUCE SAFETY PROGRAM

FDA

U.S. FOOD & DRUG ADMINISTRATION

cdfa PRODUCE SAFETY PROGRAM

1 EDUCATE

The California Department of Food and Agriculture is committed to educating California produce farmers on how to follow the Produce Safety Rule >>

2 IMPLEMENT

All required food safety practices under the Produce Safety Rule must be followed on California produce farms >>

3 REGULATE

The Produce Safety Rule is now mandatory. Any produce farm found to be out of compliance may be subject to regulatory action >>

CDFA Services Offered

Produce Safety Alliance (PSA) Grower Trainings

Free courses offered for Californians

On-Farm Readiness Reviews (OFRR)

Free, educational review before an official inspection

CDFA Technical Assistance Program

Free technical assistance with UC specialists

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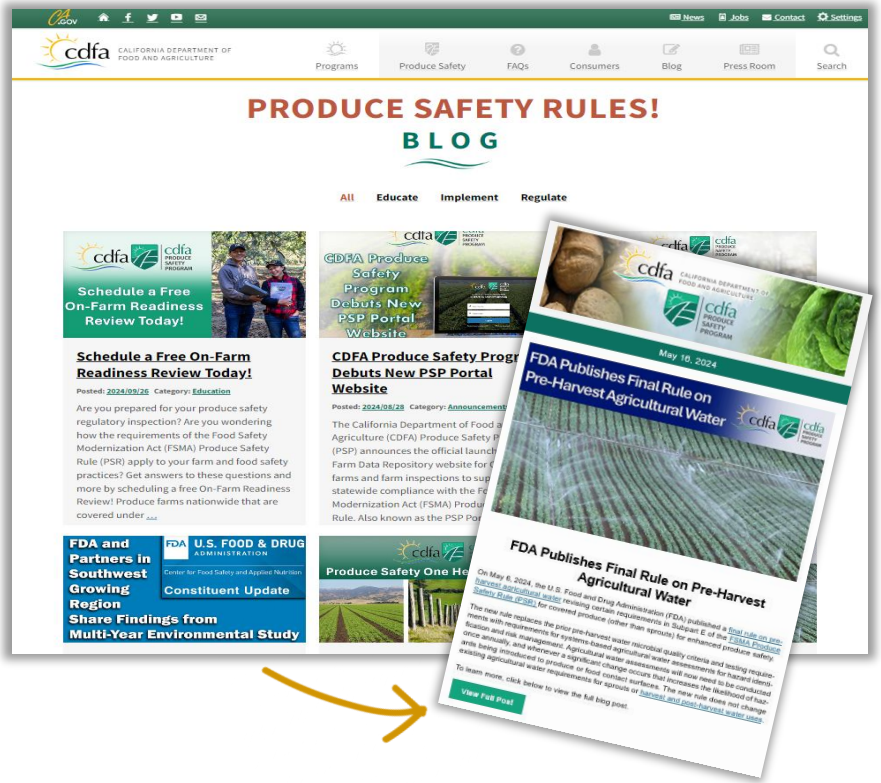
Email: producesafety@cdfa.ca.gov

Call Us: 916-654-0466



CDFA PSP Portal

www.cdfa.ca.gov/producesafety/pspportal

CDFA PSP Portal

What is the PSP Portal?

The PSP Portal is a digital farm data repository website that allows California produce growers and handlers covered under the Food Safety Modernization Act (FSMA) Produce Safety Rule to view their own farm information online and have on-demand access to their digital produce safety inspection reports related to their own farms.

Key Benefits

- ✓ View your own farm inspection reports online at any time
- ✓ Engage and respond to inspection-related action items digitally
- ✓ Communicate conveniently with CDFA PSP staff members

Who is impacted by the PSR?

- **Farms that Grow, Harvest, Pack, or Hold Produce**
- **Over $25K annual sales (adjusted for inflation)**
- **Produce = Fruits, Vegetables, Tree Nuts, Peanuts, Mushrooms, Herbs, Sprouts**

Who is impacted by the PSR?

Exemptions

Produce is Rarely Consumed Raw

$25K* or less annual sales

*adjusted for inflation

For Personal Consumption Only

Qualified Exemption

- Less than $500K* Annual Sales
- Majority sold direct to consumer or only restaurants/retail stores within same state or 275 miles of farm

*adjusted for inflation

Commercially Processed

(Ex: Kill Step, Pasteurized)

- Must maintain documentation
  (Ex: processing statement, written disclosure)

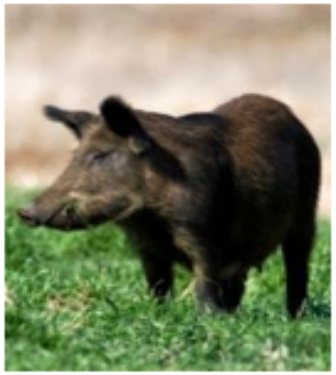
What is a PSR inspection?

- Mandatory inspection
- Conducted by credentialed FDA or State inspectors
- Evaluates farm's compliance with minimum federal produce safety standards of PSR
- Goals =
  - Prevent foodborne illness
  - Improve public health

What is a PSR inspection?

Humans

Soil



Produce

Animals

Buildings
Equipment
Tools

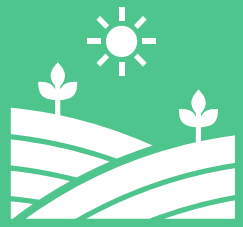
Water

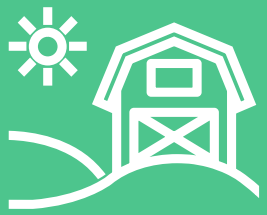
Source: PSA

What is the PSR inspection process like?

Inspection Scheduling

Inspection Day*





*Typically 1 day but may be extended as needed

Post-Inspection

Inspection Scheduling

- Farm verification via phone call from CDFA representative
  - Online verification = Farmer Questionnaire, PSP Portal
- Verify PSR coverage status
  - Farm information, covered produce, farm size (annual sales), exemptions
- If covered, inspection will be scheduled and confirmed via email
- If not covered, PSP Portal farm account will be updated

Inspection Day

- Meet at the planned starting location
- Introduction Meeting
  - Credentials, FDA Form 482 issued at start
- Inspect farm and areas where covered activities take place
  - Ranches, Packinghouses, Cooler, Equipment/Materials Storage
  - Includes **records review** + **farm walkaround**
- Closing Meeting
  - Discuss observations and next steps, FDA Form 4056 issued at the end

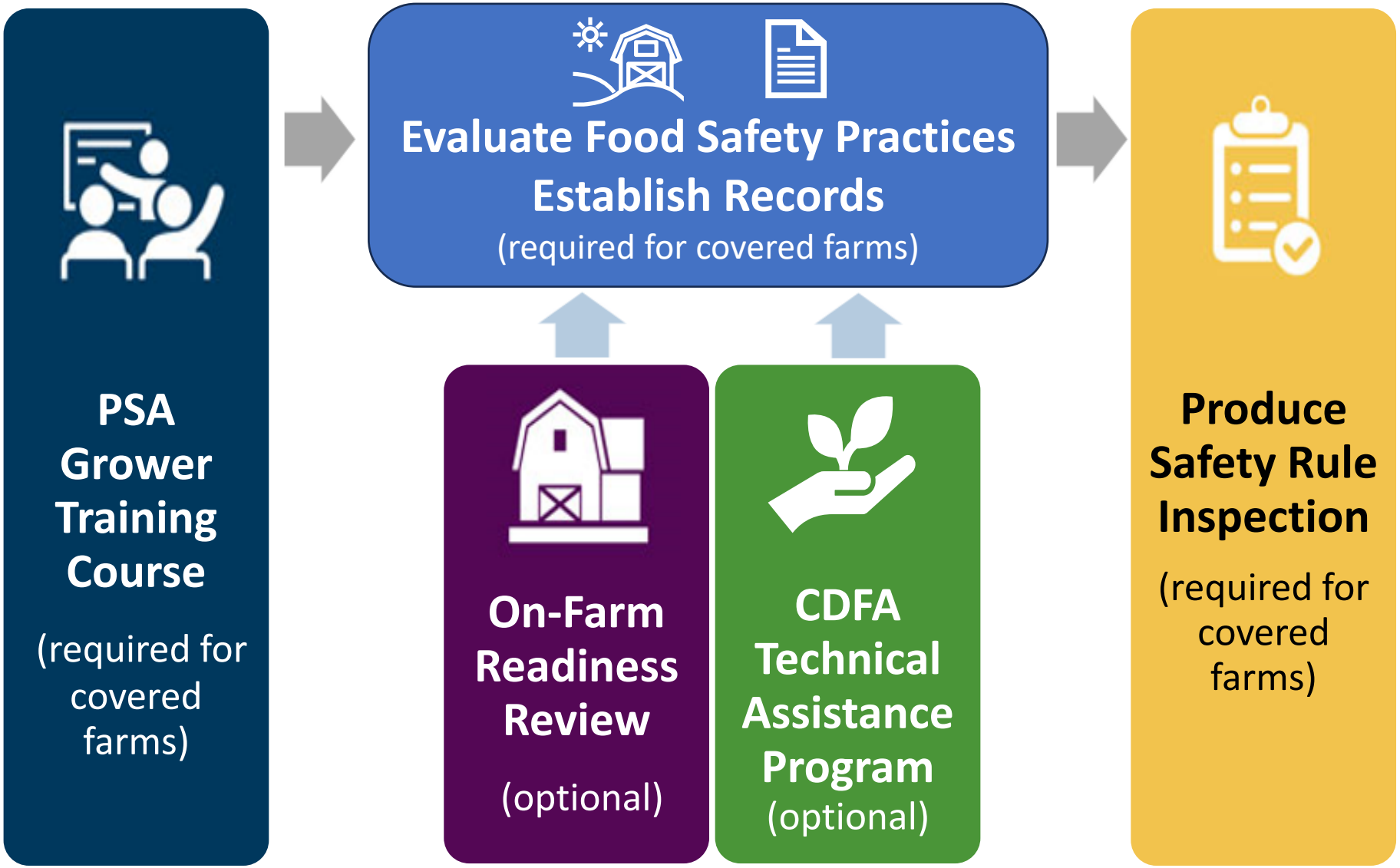
Post-Inspection

- Produce Farm Inspection Report (PFIR) issued via email
  - Farm information, inspection summary, and observations
- PSP Portal
  - Welcome email and account sign-up
  - View your farm account information and inspection history
  - Access digital versions of your FDA 482, FDA 4056, PFIR
  - Upload corrective actions in response to inspection

When will a PSR inspection take place?

- All covered farms receive an initial inspection
- Risk-based, randomized selection approach

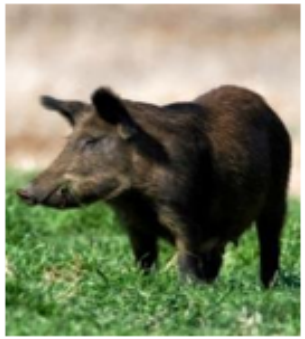
How do I prepare for a PSR inspection?



How do I prepare for a PSR inspection?

Humans

Soil



Produce

Animals

Buildings
Equipment
Tools

Water

How to Prepare for a PSR Inspection: Worker Training

- All personnel who contact covered produce or food contact surfaces must be **trained <u>upon hire, at least once annually, and when training gaps are observed</u>**

- **Training topics** must include:
  - Principles of food hygiene and food safety
  - Importance of health and personal hygiene
  - PSR subpart standards applicable to their role

- **Harvesting personnel's training topics** must also include:
  - Recognizing contaminated produce that must not be harvested
  - Inspecting and correcting issues with harvest containers/equipment

How to Prepare for a PSR Inspection: Worker Training

- **Supervisor Requirement**
  - Must identify supervisor who will ensure compliance with the requirements of this part
  - Each farm is required to have **at least 1 supervisor** that has **completed food safety training** at least equivalent to that received under **standardized curriculum recognized as adequate by the FDA (PSA Grower Training)**
- **Worker Training Required Records:**
  - Supervisor Training
  - Worker Trainings Records
    - Must include:
      - Date/Time of training
      - Topics covered
      - Person(s) trained
      - Subpart O Requirements

How to Prepare for a PSR Inspection: Visitors

- **Visitors**
  - You must make visitors aware of your policies and procedures to protect covered produce and food contact surfaces from contamination
  - You must make toilet and hand-washing facilities accessible to visitors

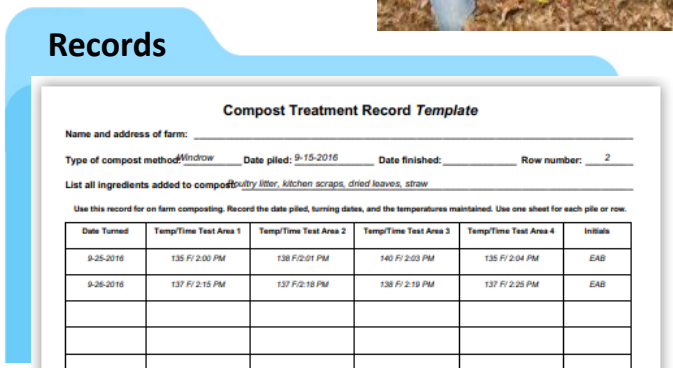
How to Prepare for a PSR Inspection: Soil Amendments

- **BSAAOs = Biological Soil Amendments of Animal Origin**
  - Soil amendment derived from animal materials
  - Ex: manure, compost, chicken pellets, fish emulsion, table waste
- Must be applied, handled, and stored in a manner to prevent contamination
- Human waste is prohibited (except EPA treated biosolids)
- Untreated Raw Manure must not be applied to the harvestable part of crop

How to Prepare for a PSR Inspection: Soil Amendments

- **Treated Compost** – treatment parameters and microbial standards are defined in PSR to ensure produce safety

- **BSAAO Required Records:**
- **If you create your own compost:**
  - Compost treatment parameters with time, temperatures, turnings
  - Subpart O Requirements
- **If you receive BSAOOs from a supplier:**
  - Annual Certificate of Conformance or Letter of Guarantee



How to Prepare for a PSR Inspection: Wild & Domesticated Animals

- Must assess risk and evidence of potential contamination onto produce from wild and domesticated animals
- Monitor during growing season and immediately prior to harvest
- If evidence of potential contamination is found (e.g., animals observed, fecal matter, crop destruction), must prevent harvesting contaminated crop
- Written records are best practice, but not mandatory under PSR

How to Prepare for a PSR Inspection: Cleaning & Sanitation

- **Food Contact Surfaces (Equipment, Tools, Containers)** must be of adequate design to be adequately cleaned and properly maintained to prevent contamination
- **Cleaning and Sanitizing Required Records:**
  - Must be established for any food-contact surfaces used during covered harvesting, packing, or holding activities
  - Must include:
    - Method of cleaning/sanitizing
    - Date/Time
    - Subpart O Requirements

How to Prepare for a PSR Inspection: Water

- **Agricultural Water =** Water that is intended to, or is likely to, contact produce or food contact surfaces during covered activities
- All water must be safe and of adequate sanitary quality for its intended use

Pre-Harvest

Harvest/Post-Harvest

How to Prepare for a PSR Inspection: Water

Compliance Dates

Pre-Harvest Agricultural Water

Business Size	Pre-Harvest Agricultural Water Related Compliance Dates
Large Farms (>$500K)	April 7, 2025 ✓
Small Farms (>$250K-500K)	April 6, 2026
Very Small Farms (>$25K-250K)	April 5, 2027

How to Prepare for a PSR Inspection: Water

Compliance Dates

Harvest/Post-Harvest Agricultural Water

Business Size	Harvest and Post-Harvest Agricultural Water Related Enforcement Dates
Large Farms (>$500K)	January 26, 2023 ✓
Small Farms (>$250K-500K)	January 26, 2024 ✓
Very Small Farms (>$25K-250K)	January 26, 2025 ✓

How to Prepare for a PSR Inspection: Water

Pre-Harvest Agricultural (Ag) Water Requirements

Ag Water System Inspection

- **Existing** Requirement
- **Actions:**
  - Inspect water source and system
  - Address maintenance items
- **Frequency:** Once annually (at beginning of growing season)
- **Must be documented**

Ag Water Assessment

- **New** Requirement
  - Replaces prior mandatory pre-harvest water testing
- **Actions:**
  - Evaluate 5 key factors that could impact produce safety
  - Apply corrective/mitigation measures (if necessary)
- **Frequency:** Once annually or whenever significant change occurs
- **Must be documented**

Agricultural Water System Inspection

- Walkthrough and inspect Ag Water System
  - Ag Water System = Source + Distribution System
- Map water system as starting point
- Identify and address maintenance issues and hazards
- Keep water sources free of debris, trash, animals, etc.

Mandatory Considerations of Ag Water System Inspection	
1	**Nature** of each ag water source
2	**Extent of your control** over each ag water source
3	**Degree of protection** of each ag water source
4	Use of **adjacent and nearby land**
5	Likelihood of introduction of known or reasonably foreseeable hazards to ag water by **another user** before the water reaches your farm

Agricultural Water Assessment

Pre-Harvest Ag Water Assessment Factors

1 Ag Water System

- **Use Ag Water System Inspection results**
- **Water Source:** Location and Type (surface, ground, municipal)
- **Type of Water Distribution System:** Open or Closed
- **Degree of protection** from possible contamination sources

2 Ag Water Practices

- **Application Method Type:** Direct contact, no contact
- **Time Interval** from last direct application and harvest

3 Crop Characteristics

- **Type of crop grown and potential risk factors:**
  - Surface adhesion
  - Hazard internalization
  - Food safety incident history (e.g., outbreaks)

4 Environmental Conditions

- **Weather Events:** Frequency of heavy rain, extreme weather events, flooding
- **Air Temperatures**
- **Sun (UV) exposure**

5 Other Relevant Factors

- **Optional:** Pre-Harvest Water Testing to inform assessment
- **Other data** not included in 1-4

How to Prepare for a PSR Inspection: Water

Pre-Harvest Ag Water Assessment
Outcomes follow a risk-based tiered approach

If	*Then…*
Ag water not safe or not of adequate sanitary quality	**Immediately** discontinue use **-AND-** Take **corrective measure(s) before use** at pre-harvest
Condition(s) on adjacent or nearby land uses pose risk related to animal activity, BSAAO, or human waste	Implement **mitigation measures promptly**, and no later than the **same growing season**
Other conditions that may introduce known or reasonably foreseeable hazards, not related to animal activity, BSAAO, or human waste	Implement **mitigation measures as soon as practicable**, and **no later than the following year** **-OR-** **Test water** as part of the agricultural water assessment and implement measures as needed
No known or reasonably foreseeable hazards for which mitigation is necessary	**Inspect and maintain** water system **regularly** and **at least once a year**

Source: PSA

How to Prepare for a PSR Inspection: Water

Harvest/Post-Harvest Ag Water Requirements

Untreated Surface Water must not be used for Harvest/Post-Harvest water uses

Harvest/Post-Harvest Water must be **non-detectable for generic *E. coli***

Ag Water System Inspection

- **Existing** Requirement
- **Actions:**
  - Inspect water source and system
  - Address maintenance items
- **Frequency:** Once annually (at beginning of growing season)
- **Must be documented**

Untreated Ground Water

- **Test water for generic *E. coli (non-detectable)***
- **Initial year (or growing season):**
  - Test at least 4x
- **If results acceptable:**
  - Test 1x annually
- **If results unacceptable:**
  - Immediately discontinue use
  - Test at least 4x during 1 year (or growing season) until it meets microbial requirement

Municipal Water

- **Annual Water Quality Test Report from Municipal Water Source**

Treated Water

- **Treatment Monitoring Records**
- **Chemical Label or other support documentation** to demonstrate it is effective for intended use

How to Prepare for a PSR Inspection: Water

Harvest/Post-Harvest Ag Water Requirements

Untreated Surface Water must not be used for Harvest/Post-Harvest water uses

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Ag Water System Inspection

- **Existing** Requirement
- **Actions:**
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- **Must be documented**

No Exemption from **Ag Water System Inspection**

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Treated Water

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If your PRE-HARVEST water meets these requirements = Exemption from Ag Water Assessment

Pre-Harvest Agricultural Water Resources

PSA Grower Trainings

OFRRs

CDFA TAP

Contact Us

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PSA Module 5-1 Video Presentation

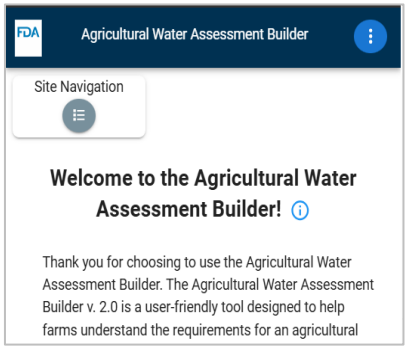
Produce Safety ALLIANCE

FDA Webinar

FDA

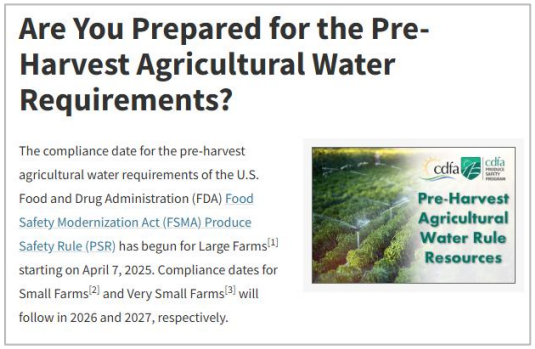
FDA Ag Water Assessment Builder

FDA



CDFA Resources Webpage

cdfa PRODUCE SAFETY PROGRAM



How to Prepare for a PSR Inspection: Summary of PSR Recordkeeping Requirements

Animals	Humans	Soil	Water	Equipment, Tools, Containers	Exemptions

• Routine Monitoring, but written records not required	• **Worker Training Record**
	• Supervisor Training Record
		• **In-House Soil Amendment Treatment Record**
		• Supplier provided letter
			• **Pre-Harvest:**
			  • Inspection
			  • **Assessment**
			• **Post-Harvest:**
			  • Inspection
			  • **Ground water test results** or Municipal Water records
			• **Water Treatment**
			• **Corrective Actions/ Mitigation Measures**
				• **Cleaning and Sanitation Records** (for food contact surfaces used during harvesting, packing, or holding)	• **Qualified Exemption**
					• Commercial Processing Exemption

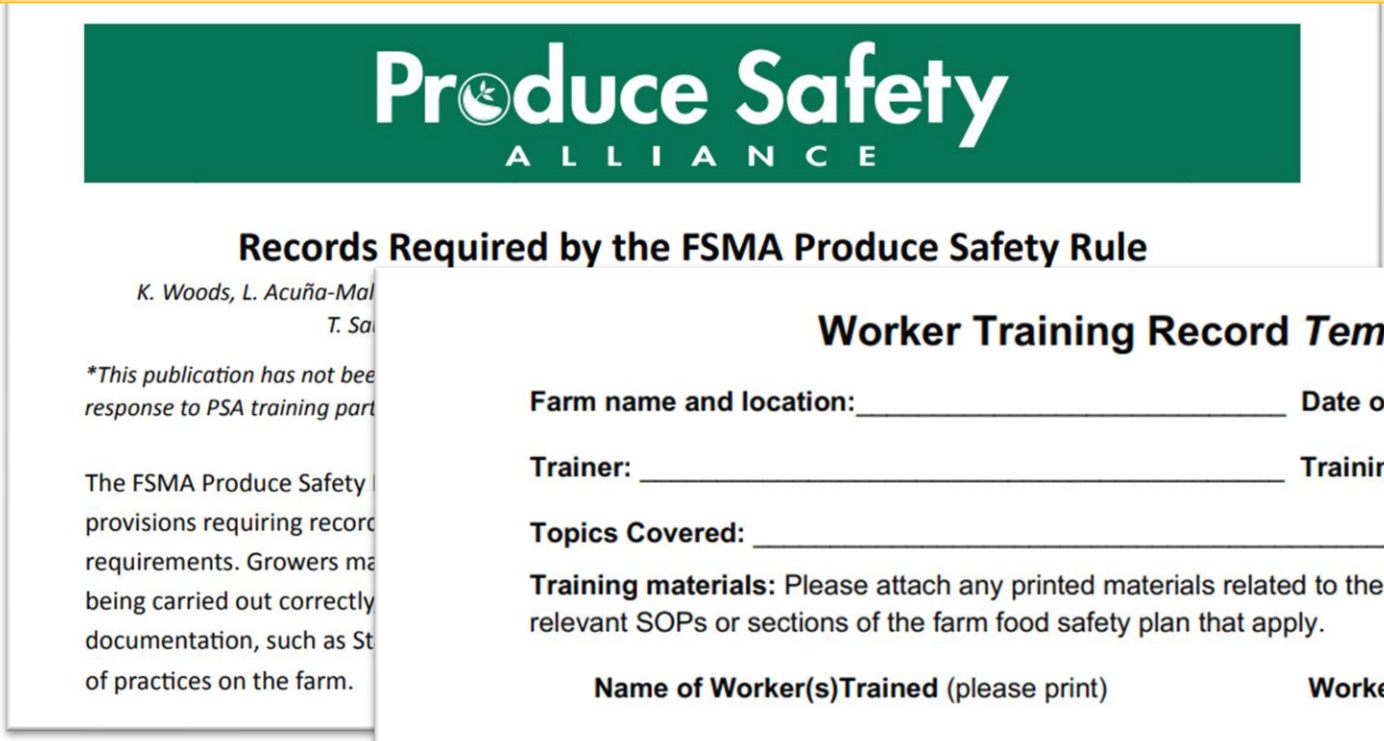
Bolded red indicates records that require a supervisor review date and signature

How to Prepare for a PSR Inspection: Summary of PSR Recordkeeping Requirements

- **Ensure your records include the Subpart O Requirements:**
  - Name & location of farm
  - Actual monitoring values & observations
  - Description of covered produce
  - Location of growing area (if applicable)
  - Date & time of activity
  - Reviewed, dated, signed by supervisor
- **Maintain your records for at least 2 years**
  - Initial groundwater (well) test records = must be kept for 2 years after discontinuing the use of the equipment (well)

Produce Safety Alliance (PSA) Recordkeeping Templates

https://resources.producesafetyalliance.cornell.edu/documents/Records-Required-by-the-FSMA-PSR.pdf

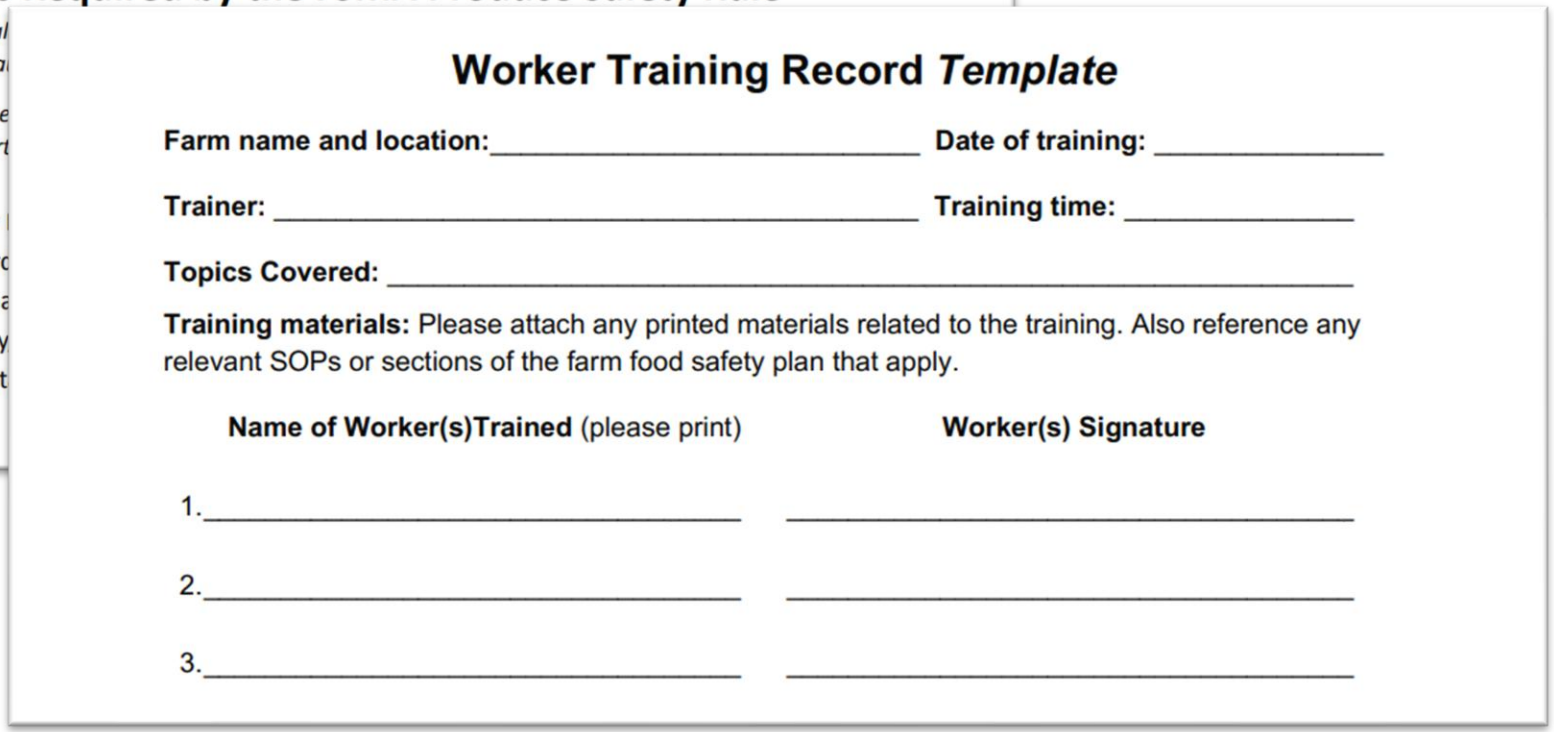

Produce Safety
ALLIANCE

Records Required by the FSMA Produce Safety Rule

K. Woods, L. Acuña-Mal
T. Sa

**This publication has not bee*
response to PSA training part

The FSMA Produce Safety
provisions requiring record
requirements. Growers ma
being carried out correctly
documentation, such as St
of practices on the farm.


Worker Training Record *Template*

Farm name and location:_____ **Date of training:** _____

Trainer: _____ **Training time:** _____

Topics Covered: _____

Training materials: Please attach any printed materials related to the training. Also reference any relevant SOPs or sections of the farm food safety plan that apply.

Name of Worker(s)Trained (please print)	**Worker(s) Signature**
1._____	_____
2._____	_____
3._____	_____

How to Prepare for a PSR Inspection: What if I use a Farm Labor Contractor?

- If the crop is under your ownership and the labor for a covered activity is outsourced, have a discussion with your Farm Labor Contractor (FLC) to verify they are aware and following PSR requirements
- During an inspection, you will be asked for the required records applicable to covered activities while the crop is under your ownership (Examples: training, cleaning/sanitation, water)

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Thank you

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