On-Farm Readiness Review (OFRR): Preparing for FSMA's Produce Safety Rule

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Introduction

In Virginia, the Virginia Department of Agriculture and Consumer Services (VDACS) is enforcing the Food Safety Modernization Act (FSMA) Produce Safety Rule. The FSMA Produce Safety Rule is a regulatory rule by the Food and Drug Administration (FDA) that sets the science-based minimum standards for the safe growing, harvesting, packing, and holding of fruits and vegetables (FDA, 2015). All covered farms are subject to inspection.

VCE has several fact sheets on the FSMA Produce Safety Rule (see resources below), for example: "Is my Operation Covered or Exempt from the FSMA Produce Safety Rule Survey" (https://vce.az1.qualtrics.com/jfe/form/SV_emn hROUpFpiVvlr).

To help prepare for the regulation, operations can choose to have an On-Farm Readiness Review (OFRR). VDACS has partnered with Virginia Cooperative Extension (VCE) to perform OFRRs in Virginia. Since May 2021, VDACS turned the OFRR program in its entirety to VCE as an education and outreach function.

What is an On-Farm Readiness Review (OFRR)?

The OFRR is a program designed specifically to help produce operations align their food safety practices with the FSMA Produce Safety Rule and be prepared for an inspection by VDACS. The OFRR is conducted by a fully trained VCE agent, and lasts no longer than 2 hours, is 100% confidential, and completely free. Ideally the OFRR will happen when the produce operation is in

production, but the OFRR team will work to find a time that works best for the operation's schedule.



Figure 1. Photo Credit Pam Wiley, Virginia Farm Bureau. VDACS Inspector, Mr. Goodman, showing Dana Boyle of Garner's Produce how to use the free OFRR manual.

Before Scheduling an OFRR

The operation needs to have had one employee go through the PSA Grower Training course, or an equivalent course (required in the law).

To find an upcoming course in Virginia; check the Produce Safety Alliance webpage: https://producesafetyalliance.cornell.edu/training/grower-training-courses/upcoming-grower-trainings/ and search "VA," to sign up.

Scheduling an OFRR in Virginia?

- 1. Reach out to Laura Strawn via email at laurakstrawn@vt.edu. She will assist you in scheduling a time with an Extension agent who can conduct the OFRR.
- 2. VCE will have a conversation with you about aspects of your operation to determine the most relevant portions of the FSMA Produce Safety Rule (as portions may not apply to your operation).
- 3. A date and time that works best for the operation will be scheduled. Remember the OFRR is no more than 2 hours of your day, free, and completely confidential.

What Happens at the OFRR?

- 1. The VCE agent will arrive on the farm promptly at the scheduled date/time.
- The grower will describe their operation, and answer questions related to their FSMA Produce Safety Rule preparedness. This is NOT a review of your records, only a conversation.
- 3. At the end of the review, the VCE agent will: leave all notes associated with the review at the operation (confidential), give the operation an educational OFRR manual (free perk), and provide up to three things the operation should work on before the first regulatory inspection.

References

Food and Drug Administration (FDA). 2015. Food Safety Modernization Act Produce Safety Rule.

> https://www.govinfo.gov/content/pkg/F R-2015-11-27/pdf/2015-28159.pdf

Produce Safety Alliance (PSA). 2019. Produce Safety Alliance Grower Training.

Module 5, version 1.2.

https://producesafetyalliance.cornell.edu/curriculum/

Virginia Produce Food Safety Website. 2017. http://www.hort.vt.edu/producesafety/

Virginia Department of Agriculture and Consumer Services: Produce Safety Website: www.VAproducesafety.com

Is my Operation Covered or Exempt from the FSMA Produce Safety Rule Survey? Virginia Cooperative Extension.

Available at:
https://vce.az1.qualtrics.com/jfe/form/SVemnhR0UpFpiVvlr

Visit Virginia Cooperative Extension: ext.vt.edu

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