



FSMA Produce Safety Rules

Update on Agricultural Water

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Where are we with FSMA?

- Produce Safety Rule finalized November 27
 - Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption
- Implementation Phase
 - FDA will develop guidance information for how to interpret and comply with rules
- Compliance Dates

Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption

- Growing, Harvesting, Packing and Holding Activities
- Biological Soil Amendments of Animal Origin
- Domesticated and Wild Animals
- Worker Training and Health and Hygiene
- Equipment, Tools, and Buildings
- Sprouts
- **Agricultural Water**

Agricultural Water Requirements

- All agricultural water must be safe and of adequate sanitary quality for its intended use (§ 112.41).
- Agricultural water is defined in part as water that is intended to, or is likely to, contact the harvestable portion of covered produce or food-contact surfaces (§ 112.3(c));
- Require certain records, including documentation of inspection findings, water testing results.

Compliance Dates

- Clock starts ticking – January 26, 2016
- Compliance Dates depend on Farm Size

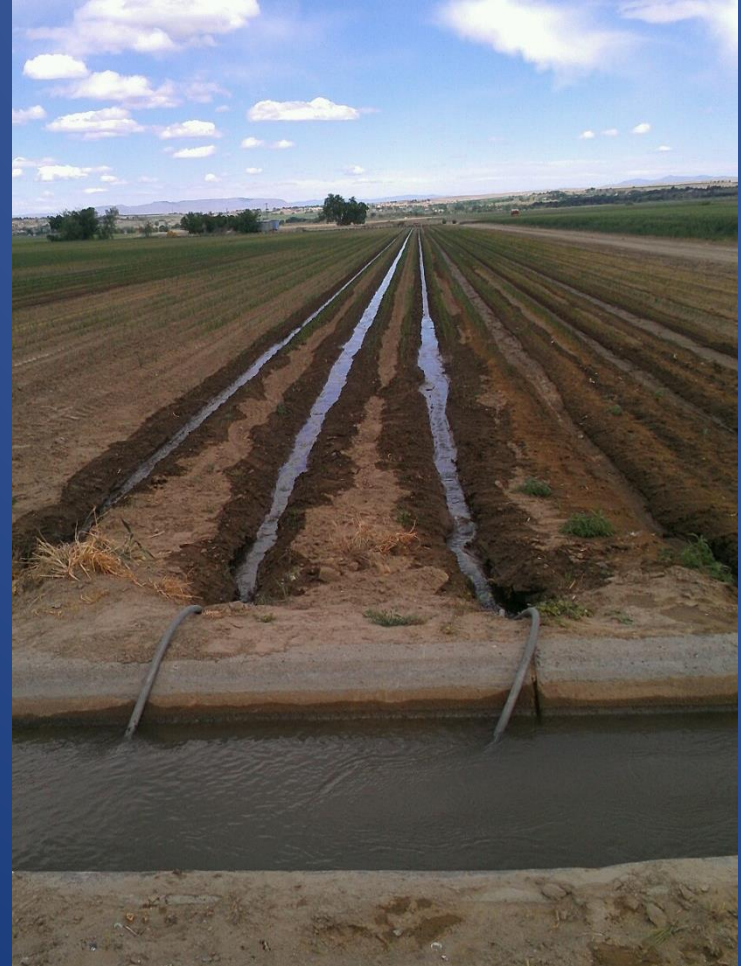
Farm Size and Compliance Dates

- Very small businesses: \$25,000 – \$250,000 in average annual **produce sales** during the previous 3 years:
4 years (2020)
- Small businesses: \$250,000 – \$500,000 in average annual **produce sales** during the previous 3 years:
3 years (2019)
- Larger farms: **2 years (2018)**
- 2 years from these dates to establish water quality profiles

Water Quality Profile

Surface Water

- Initial Profile:
- 20 samples over 2 years
- After:
- 5 samples per year
- Use most recent 20 samples for profile
 - Rolling Average



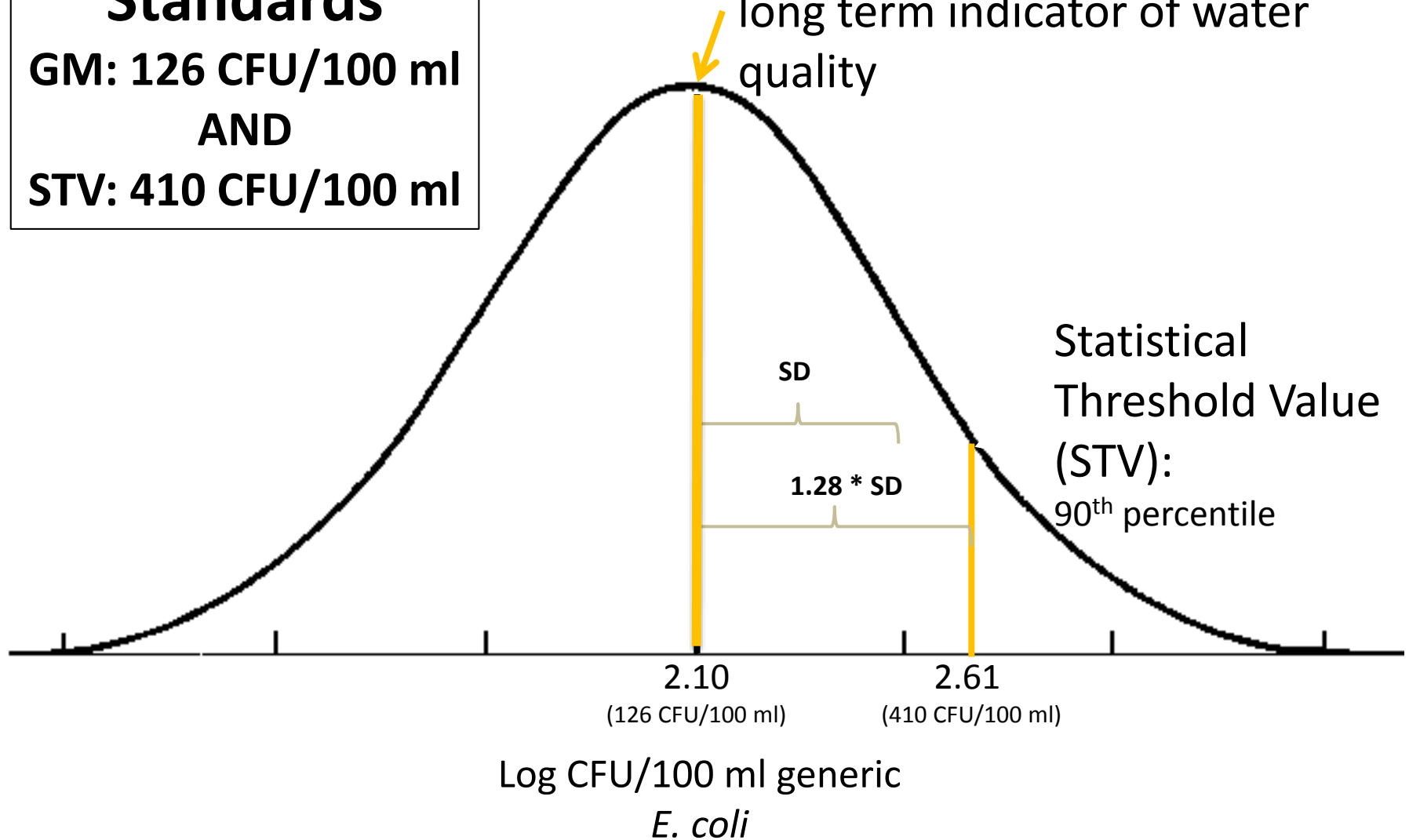
Standards

GM: 126 CFU/100 ml

AND

STV: 410 CFU/100 ml

Geometric Mean (GM):
long term indicator of water
quality

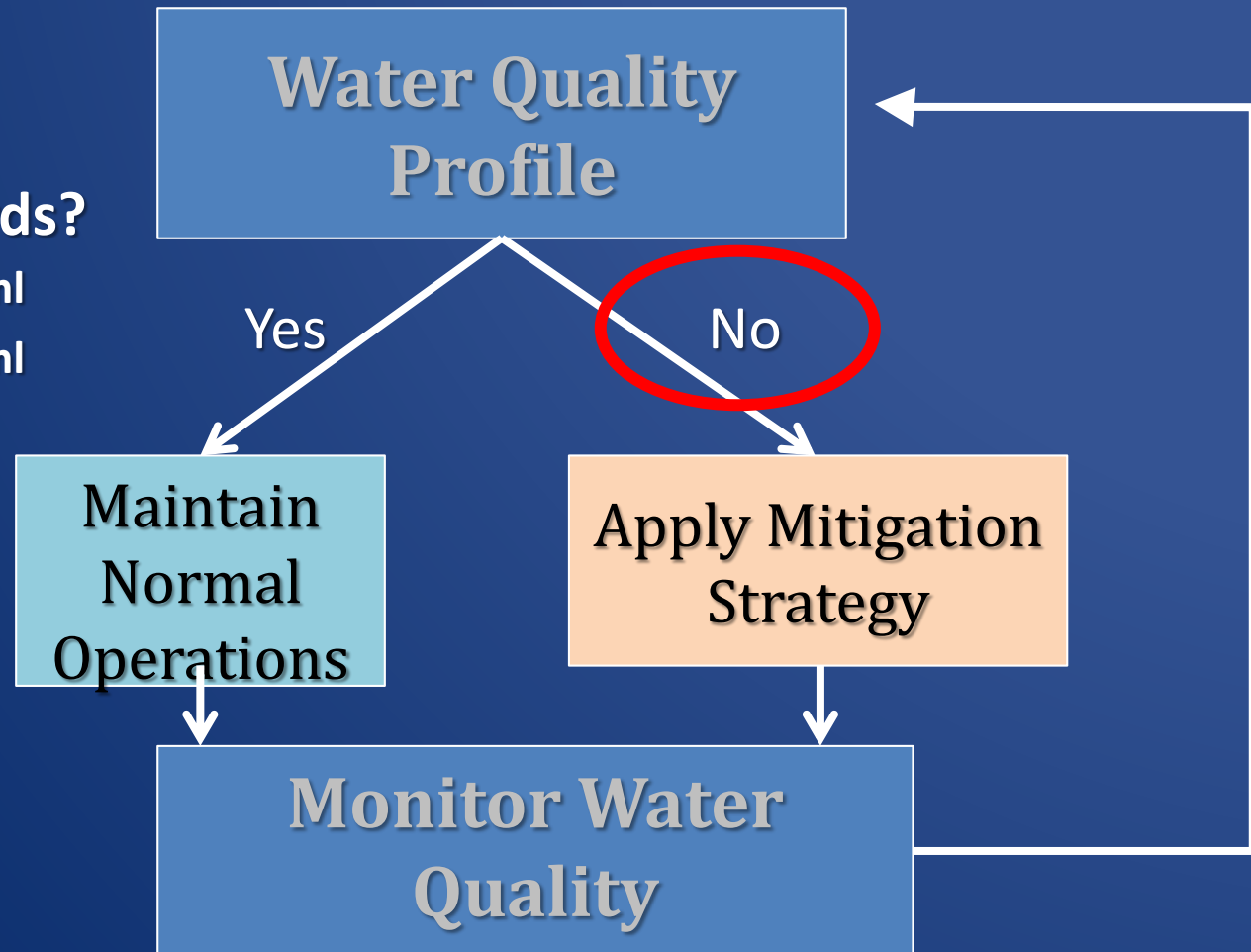


Water Quality Decision Tree

Meets Standards?

GM: 126 CFU/100 ml

STV: 410 CFU/100 ml

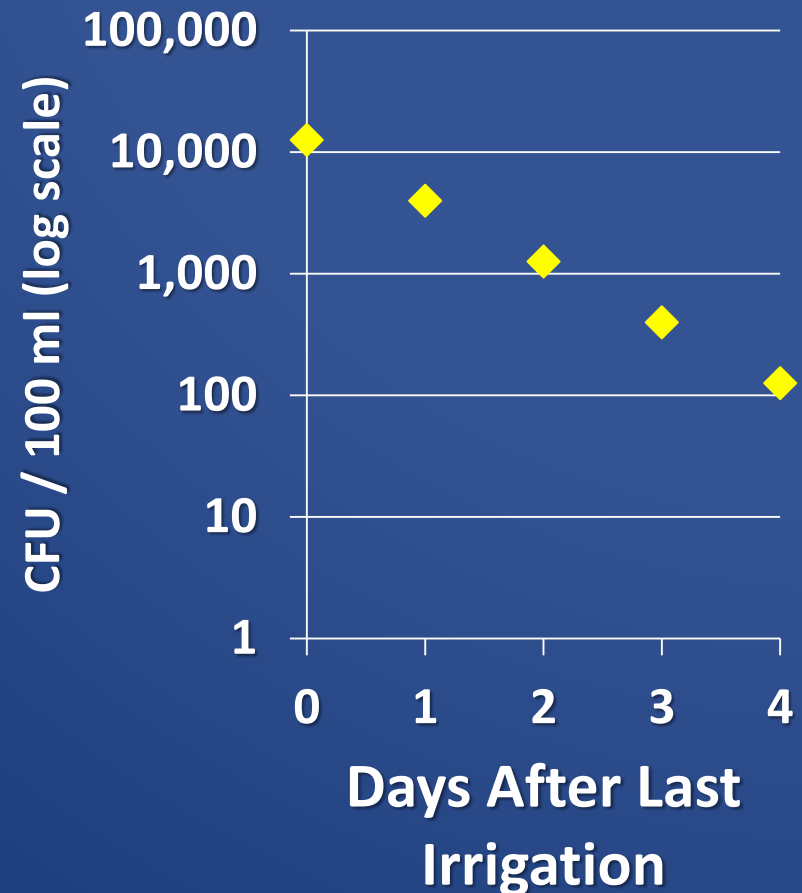


If Water Does Not Meet Criteria

- DO NOT STOP IRRIGATING!
- Corrective actions required as soon as is practicable, but no later than the following year.
- Treating the water.
- Allowing time for microbes to **die off** on the field by using a certain time interval between last irrigation and harvest, but **no more than four consecutive days.**

Die off Rate Allowance

- 0.5 log per day
- 4 days of die off allowed
- 12,600 CFU would be within thresholds



Will Every Farm Need Water Testing?



20

26 201

1741 ft

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Image State of Oregon
Image © 2012 DigitalGlobe

44°00'03.07" N 117°00'32.76" W elev 2190 ft

Google earth

Eye alt 9007 ft

Imagery Date: 8/31/2011

Water Testing Provisions

- Everyone will need their water quality profile(s)
- FDA will allow sharing of water quality results
- FDA will allow 3rd party entities to conduct testing

Summary

- Rules are here, but “we’ve come a long way baby”
- Water testing will be required
- Onions are not exempt from the rules, but compliance can be met
- Stay tuned and keep informed



**"Mr. Osborne, may I be excused?
My brain is full."**

Definition of Farm

- An establishment under one ownership in one general physical location (but not necessarily contiguous) devoted to the growing and harvesting of crops ...

What is Produce?

- Fruits – The harvestable or harvested part of a plant developed from a flower
- Vegetables – Harvested part of any plant or fungus

