

Introduction

This appendix is supplied as a supplementary source of information for structuring training programs to comply with the Commodity Specific Food Safety Guidelines for the Production and Harvest of Lettuce and Leafy Greens. The strategy outlined below is discussed in the General Provisions of the Food Safety Modernization Act (FSMA) Subpart C -Standards Directed to Personnel Qualifications and Training. Users of this appendix should be aware that scientific and regulatory authorities are periodically revising information regarding best practices for food safety management issues. They should bear in mind that as knowledge regarding food safety changes, measures to address those changes will also change as will the emphasis on particular issues by regulators and the regulations themselves.

General Qualifications and Training

All personnel (including temporary, part time, seasonal and contracted personnel) who handle covered product or food contact surfaces, or who supervise the above listed personnel; would have to receive training as appropriate to the person's duties. It is recommended the training be conducted upon hiring, at the beginning of each growing season (if applicable) and periodically thereafter.

All personnel (including temporary, part time, seasonal and contracted personnel) who handle leafy greens or food contact surfaces or who supervise the above listed personnel would have to have the training, in combination with education or experience to perform the person's assigned duties in a manner that ensures compliance with the proposed FSMA training requirements.

Training must be conducted in a manner that is easily understood by personnel being trained. Training must be repeated as necessary and appropriate in light of observations or information indicating that personnel are not meeting requirements.

Minimum Training Requirements as Outlined in FSMA

At a minimum, all personnel who handle (contact) covered produce or supervise the conduct of such activities must receive training that includes all of the following:

1. Principles of food hygiene and food safety
2. The importance of health and personal hygiene for all personnel and visitors including recognizing symptoms of a health condition that is reasonably likely to result in contamination of covered produce or food-contact surfaces with microorganisms of public health concern.
3. Standards established by FDA that are applicable to the employee's job responsibilities
4. Persons who conduct harvest activities for covered produce must also receive training that includes all of the following:
 - a. Recognizing product that should not be harvested, including product that may be contaminated with known or reasonably foreseeable hazards;
 - b. Inspecting harvest containers and equipment to ensure that they are functioning properly, clean, and maintained so as not to become a source of contamination of product with known or reasonably foreseeable hazards;
 - c. Correcting problems with harvest containers or equipment or reporting such problems to the supervisor or other responsible party as appropriate to the person's job responsibilities.

5. At least one supervisor or responsible party for the signatory must have successfully completed food safety training at least equivalent to that received under standardized curriculum recognized as adequate by the Food and Drug Administration. The Produce Safety Alliance curriculum will be the standardized format against which FDA intends to compare other training programs.

Specific LGMA Training Best Practices Applicable to FSMA

The current LGMA required training elements for workers harvesting leafy greens are more extensive than those outlined in FSMA. The majority of requirements can be found in the Commodity Specific Food Safety Guidelines for the Production and Harvest of Lettuce and Leafy Greens on pages 36-39, 46. A summary by Issue and Audit Checklist reference are listed.

Issue

Issue 8: Harvest Equipment

Issue 9: Harvest Personnel

Issue 10: Field and Harvest Personnel

Audit Checklist Reference(s)

Field Sanitation FS 01-04

Worker Practices WP01- 04

Supervisor Best Practices under the LGMA

Assign or identify personnel to supervise, or otherwise be responsible for, your operations to ensure compliance with LGMA guidelines. As discussed in FSMA, this person would have to receive training as appropriate to the person's duties.

At this time, the LGMA does not specify what types of training are appropriate, nor is there a metric for evaluating compliance. However, the LGMA provides guidance on the definition of certain types of food safety personnel. A Food Safety Professional is defined as a person entrusted with management level responsibility for conducting food safety assessments before food reaches consumers and requires documented training in scientific principle and a solid understanding of principles of food safety as applied to agricultural production. (See Appendix B). Food Safety Personnel are person(s) trained in basic food safety principles and/or working under the auspices of a food safety professional.

The best practices are to develop a job description(s) for food safety staff, document the professional qualifications of current food safety staff through resumes, compile and maintain records of training and education, and provide for training as appropriate for the person's duties at hiring, at the beginning of each growing season.

Owner, Manager Requirements

Assign or identify personnel to supervise, or otherwise be responsible for, your operations to ensure compliance with LGMA guidelines.

As discussed in FSMA, all personnel that handle or contact covered product, including those who supervise personnel must receive training appropriate to the persons' duties. Since owners and managers are not excluded in the narration, it is likely this will be interpreted to include owners and managers. At this time, the LGMA does not specify what type of training is appropriate, nor is there a metric for evaluating compliance. However, inclusion of training and education topics of a management level on an annual basis should be explored.

The best practices are to attend training as appropriate for the person's duties at hiring, at the beginning of each growing season and periodically thereafter.

Suggestions- demonstrate general knowledge of LGMA guidelines (e.g. test of competency); attend periodic updates when applicable; attend trade association training, participate in internal company food safety meetings; new research related to food safety; field trips.

Recordkeeping

You must establish and keep records as required under LGMA metrics including records of training. Training documentation should demonstrate required training of personnel including the date of training, topics covered, and persons trained. Although evaluations of learning are not required by the LGMA, it is a best practice to utilize pre and post testing periodically to evaluate the effectiveness of training activities and programs.

Supply Chain Training & Education / Public or Consumer Outreach

Every effort to provide food safety information and education to supply chain partners should also be made. (E.g. Field trips, State and County Health Department Resources and Arizona Food Marketing Alliance)

Training Resources

Cornell University: [Produce Safety Alliance](#) (FDA recognized in the Proposed Produce Rule)

Arizona LGMA: [Food Safety Training Kit](#)

California LGMA: [LGMA TECH](#)

University of Arizona: [AZ Land Grant](#)

UCDavis: [CA Land Grant](#)

UCDavis: [Western Center for Agricultural Health and Safety](#)

[Ag Safe](#)

[California Independent Provider Training Center](#)

[Hartnell College](#) : CA Junior College

[Arizona Western College \(AWC\)](#): AZ Junior College

[Campesinas sin Fronteras](#)

Additional Training Resources / Trade Associations

[Produce Marketing Association](#)

[United Fresh Produce Association](#)

[Western Growers Association](#)