



Episode Twenty Nine - Recordkeeping

<https://extension.umn.edu/safety/growing-safe-food#plan-templates-and-log-sheets-1355910>

Welcome to episode 29 of Food Safety Bites, brought to you by the University of Wisconsin Madison, and funded by the USDA Food Safety Outreach Program. This is your host Harriet Behar. This episode is **recordkeeping**. In these podcast episodes, I will identify issues, and provide suggestions for how to reduce various fresh produce contamination risks and keep your customers safe. We will not talk in detail about what is required for a GAP audit or a FSMA inspection. If you want more information on those, please see the links on the website where you found these podcasts.

Overview- Many people might not love recordkeeping, and farmers tend to like it less than most. Agricultural work does not usually include spending time with papers or computers and is not what farmers got into this business for. But records can be invaluable when building an historic reference that aids in determining what crops are most lucrative and to which markets, as well as monitoring your produce safety activities. If you are FSMA inspected, or GAP audited, there will be required records of certain activities that will validate your compliance to their standards. I will not go into the specifics here, but there are links on the website to what is required as well as templates you can use or modify for your specific operation. Most importantly, set up your recordkeeping so it is easy to use, accessible to those that need to complete the records and those need to review it, and use them as a guide and reminder when doing your daily activities.

Your records should be constructed in such a way as to validate that you are actually doing produce safety activities, including who has done them, what was done, where and when they were done. The numerous records kept over time, will help you identify problems and patterns of problems so you can take corrective actions to lessen the risk that can cause contaminated produce. The records and type of system you use might be different in the various areas. Some people might choose to carry an iPad out to the field to track your pre-harvest monitoring and harvest activities but use a clipboard in the pack shed to verify how much sanitizer was put in your dunk tank, the results of the testing detailing the concentration was correct, and who did this work. I use legal sized clipboards, with regular sized paper for the record. On the bottom of the clipboard, where no paper is present, I wrote in large letters the type of records on that clipboard, so it each type of record can be found from anyplace in the pack shed.

The basics – The name and location of your farm and the various fields is the first place to start. If a map with the fields numbered would help your workers or an auditor refer to activities done in specific fields, have this numbered field map available as a reference where field records are being completed. As I mentioned before, there are numerous templates available to help you develop records that detail important information, such as a place for the initials of the worker who performed the task. If your farm is covered by the FSMA Produce Safety Rule, then you will concentrate on the records required for the Produce Safety Rule and if you choose to get a GAP audit you would make sure your documentation meets the requirements. But every



farm, regardless of if you are getting an audit or inspection, can benefit from good records. Many farms that do not have a GAP audit or FSMA or organic inspection still keep detailed records, since the records help the farm run more smoothly and track profits, activities and help you make continual improvements. Don't include extra tasks and records that you think would make your food safety plan "look good" but are not actually being done or documented consistently. Your food safety plan and records should be what you are actually doing - not a wish list. In wet environments, be careful to place these records in a place where they will not be damaged. Depending on your type of regulatory oversight, you will need to keep these records for at least 2 years and in some cases, up to 10 years.

What records are top priority? Some of the most important records you will keep are related to cleaning, water and employees. These include records to verify the cleaning and sanitizing of food contact areas, such as washing equipment, counters, sinks, and tools used for harvesting such as containers, knives or clippers. Records should include what was cleaned and sanitized, who did the cleaning activities and when they occurred. You should keep a record of your daily cleaning, which might include things like sorting tables, harvest tools and any post-harvest equipment like brush washers used that day. You should also record cleaning activity that happens occasionally - like coolers, drains and your harvest totes. This will serve as your record that these things happened, so that you can prove you have good sanitation practices if a customer or someone else questioned your produce, and also just to improve efficiency so you don't have to ask what was cleaned and when

You should also keep records to document water testing and periodic visual inspection of your water system to ensure it is not malfunctioning or causing contamination of your irrigation and postharvest water. This might include a visual inspection of your irrigation systems, your well head, your pumps and any other equipment related to your water. These records should show the results of water testing where samples were pulled from, and the date and time it was done and what your inspection entailed.

Worker training is also critical to document. Each worker handling produce, or present in where produce is grown or handled, needs to be trained to understand your produce safety system as well as the details they need to know to perform their specific tasks. For example, a worker who only drives the tractor to and from the field, still needs to know not to smoke or eat in the field, why they should pay attention to not transport manure on the tractor tires and basic produce handling (like clean hands) in case they hop off the tractor to help load the harvest containers onto the wagon. Records detailing who received trainings on which specific topics, when this occurred and who gave the training, should be kept. This helps managers know who can do various tasks correctly, and provides information on who may need to be trained on a task. Workers may be asked during the season to do a new task that they were not originally hired or trained to do.

Here are some additional records that might be useful. Whenever treating water with a sanitizer, the type of sanitizer, the concentration and who, when and where it was done needs to be documented. This will make it more efficient and reduce the amount of communication needed between your staff. If you are applying compost, treated manure or other soil amendments,



retain documents to show how that compost was made, either by you or by your compost supplier. It might also be useful to keep records of what amendments were applied to which fields and when for nutrient management purposes. Records detailing your pre-harvest monitoring for animals would also be useful - you are much better able to manage animal intrusion problems when you know what kind of animals are getting in and when.

If you choose to use surface waters on produce typically eaten raw and harvest, you will need to have records documenting the specific levels of pathogens in the water. In addition, you need to keep clear records that your method and calculations were scientifically based when determining that wait time between the contaminated water contact out in the field and the harvest of that produce. If you are selling produce to one or more processors who will cook or have a kill step because the produce is suspected to have a high risk of contamination, such as damaged peppers after a hail storm, you need to maintain documentation on that harvest and that it was shipped to that buyer. Many people keep a cooler temperature log to document the cooler temp each day. That way you will know if the temperature is rising, and you can fix the problem before you lose product. You might also keep records related to vehicle cleaning for your produce delivery van or trucks- it is handy to know when the vehicle was cleaned last so this important step does not get forgotten. Finally, a log sheet that documents when an injury or illness occurs on the farm can be very helpful. This will be a record to show what the illness or injury was and what was done. If there is ever a question about

If your farm is fully covered under the FSMA produce safety rule, meaning you must comply with the entire rule, you will need to keep the records required by that regulation. If your farm is partially exempt based on how much you sell and where you sell to you do not need to have a FSMA inspection and follow the majority of the rule, but you still need to maintain annual records that show your continued exemption, including any receipts, invoices etc. There is another episode with more detail and where to find information on the specifics of a qualified exemption under FSMA.

So that's it for this episode of Food Safety Bites, this is your host Harriet Behar brought to you by the University of Wisconsin Madison, talk to you next time!