



# What's "On Tap" for the PSA: Updates and Future Prospects



Produce Safety Educators'  
Call #68  
January 29, 2024



# Instructions

- All participants are muted.
- There will be time for questions and discussion at the end of the meeting.
- Feel free to use the chat box to ask questions as well!
- This session will be recorded and the presentation will be shared via the listserv and on our website after the call.



# Agenda

- PSA Funding and Impacts on Outreach
- PSA Team Updates
- Harvest and Postharvest  
Agricultural Water
- New/Upcoming Resources
- Reminder about QE
- Next PSA Educators' Call





# PSA Funding Updates

- PSA currently has funding until June 30, 2024
- FDA released an RFA for a new three-year PSA Cooperative Agreement in December
  - First year of funding in RFA is \$1 million
  - This is less than 1/3 of the level PSA needs to be fully functional
- This means things must change now
  - Need to prioritize activities while we have a full team
  - Complete projects that have been initiated by June 30, 2024



# Resources In Development

- Two peer-reviewed publications need submitted
- Updating Required Records Document
- Translation of More than Words Illustrations
- Fact Sheets... a few examples but there are others
  - Importance of Taking PSA Grower Training Course
  - Certificate of Conformance for Municipal Water
- International Training Commitments
- Scheduled trainings, webinars, meetings



# Relevant Team News

- Tommy Saunders and Davis Blasini are on paternity leave until May 2024
  - Partial workload relief
- Donna is on partial medical leave
- PSA will merge the SW and NW positions into a Western Regional Extension Associate Position
  - Collins will serve as the Western Regional Ext Assoc.
  - Thais Ramos has left the PSA; Collins Bugingo is planning to not renew contract in June; Neither position will be filled
  - This aligns with the Regional Center Model
  - Concern because of the level of production in the west



# PSA Funding Updates

- Changes moving forward
  - As proposal is written we are assessing what objectives are possible after June 30, 2024
- The RFA lists objectives but without the funding and the personnel, all of them cannot be included or completed
- Working with FDA to gather input about priorities
- Focusing on things that keep all the PSA Trainings moving forward, priority on PSA Grower Trainings



# PSA Priority #1: Keep the Team Together

- If the team dissolves, the PSA is done. It does not matter if funding becomes available in the future
- Team is actively working to secure other funding to keep everyone employed
  - Multi-State Specialty Crop Block Grant
  - Food Safety Outreach Program (FSOP)
- This will only be done for 1 year
  - Grants just do not have enough to fund personnel
- Not sure this is going to work





# Reality of This Plan

- Even if we can keep the team together, all the new proposals have new objectives
- This means we are not doing PSA objectives, so this is not a way to fund the PSA activities
- This is a way to stay together in hopes full funding will be available in 2025



# PSA Funding Impacts on You

- Hard to know exactly at this point, but here are a few likely things
- Registering courses with AFDO will remain the same
- PSA LTA process will stay in place
- Maintain the website
  - No new fact sheets
  - Limited updating of fact sheets/resources
- Keeping subsidy for Spanish Online PSA GT Course
  - Fairness in comparison to English Online PSA GT Course



# PSA Funding Impacts on You

- Very limited # of PSA TTT Courses led by PSA Team
- Not sure about ToT evaluations
- Evaluation sharing should stay in place
- Reporting assistance/data sharing impacted
- Likely no Educators Calls
- No ability to serve as PSA Lead Trainers without covering time and travel
- No Subpart E Preharvest Water Updates
  - No Curriculum V2; No update trainings



# Questions?



# PSA Training Numbers Through December 31, 2023

Train-the-Trainer Courses					
	Domestic Hosted			International Hosted	
	In-Person	Remote		In-Person	Remote
<b>Total TTT Courses</b> 136	80	26		28	2
<b>Total TTT Course Participants</b> 3,714	2,201	370		1,107	36
<b>Average TTT Course Size</b>	28	14		40	18
Grower Training Courses					
	Domestic Hosted			International Hosted	
	In-Person	Remote	Online	In-Person	Remote
<b>Total GT Courses</b> 4,413	2,063	741	55	1,036	518
<b>Total Grower Course Participants</b> 92,038	42,288	10,954	750	29,536	8,510
<b>Average GT Course Size</b>	20	15	14	29	16
Where PSA Courses Have Been Hosted					
	Domestic			International	
	In-Person	Remote		In-Person	Remote
<b>TTT Courses</b>	35 States	3 States		13 Countries	2 Countries
<b>GT Courses</b>	50 States; 2 Territories	46 States; 2 Territories		26 Countries	15 Countries
PSA Trainers & Lead Trainers					
	Domestic			International	
<b>Total PSA Trainers</b> 3,118	2,171			947	
<b>Total PSA Lead Trainers</b> 527	295			232	



# FDA Subpart E Compliance Dates

- FDA will begin enforcement for harvest and post-harvest agricultural water requirements
- "Educational" inspections were the 1<sup>st</sup> year

Business Size	Water Related Enforcement Dates
All other businesses (>\$500K)	January 26, 2023
Small businesses (>\$250K-500K)	January 26, 2024
Very small businesses (>\$25K-250K)	January 26, 2025

**SUPPLEMENTAL MATERIAL**



# New PSA Resources: Harvest/Postharvest Ag Water

- Resources Related to FSMA PSR Requirements for Agricultural Water Used During Harvest and Postharvest

## Resources Related to Food Safety Modernization Act (FSMA) Produce Safety Rule (PSR) Requirements for Agricultural Water Used During Harvest and Postharvest (21 CFR 112 Subpart E)

The Produce Safety Rule covering the requirements for agricultural water used during harvest and postharvest. This list is not exhaustive. Additional resources are available.

### General information

- U.S. Food and Drug Administration. 2015. [Produce Safety Rule: Agricultural Water](#)
- Includes compliance information
- U.S. Food and Drug Administration. 2015. [Compliance with the Produce Safety Rule](#)
- Specifies the requirements for agricultural water
- U.S. Food and Drug Administration. 2015. [Agricultural Water](#)
- Introduces the requirements for agricultural water
- U.S. Food and Drug Administration. 2015. [Agricultural Water](#)

### Industry practices for water quality management in specific settings

- International Fresh Produce Association. Undated. [Food Safety Commodity-specific Resources](#)
- Fogarty, S. 2023. [Produce Safety in Hydroponic and Aquaponic Operations: Harvest and Postharvest Handling](#)

### § 112.41 What requirements apply to the quality of agricultural water?

- No guidance or other resource focused on this requirement was found.
- Important information is found in the U.S. Food and Drug Administration. 2015. Preamble to the Produce Safety Rule, response to comment 180.
  - "In this regard, we consider the agricultural water that does not meet the microbial quality requirement in final § 112.44(a) also does not meet the general requirement of safe and of adequate sanitary quality in final § 112.41."
  - "... agricultural water that meets the microbial water quality criterion in § 112.44(a) may not necessarily be safe or of adequate sanitary quality for its intended use."
  - "That is, agricultural water that meets § 112.44(a) may not be safe or of adequate sanitary quality, for example, due to the presence of pathogenic organisms."

### § 112.42 What requirements apply to my agricultural water sources, water distribution system, and pooling of water?

- Produce Safety Alliance. 2023. [FSMA Produce Safety Rule: Agricultural Water System Inspection is Different from the Proposed Agricultural Water Assessment](#)
- Tocco, P. 2022. [Water System Inspections](#)
- Callahan, C. 2020. [Backflow Prevention for Produce Farms](#)

### § 112.43 What requirements apply to treating agricultural water?

- Produce Safety Alliance. 2018. [Introduction to Selecting an EPA-Labeled Sanitizer](#)
- Produce Safety Alliance. 2023. [Labeled Sanitizers for Produce - Excel Tool](#)
- Callahan, C. 2021. [Web/Mobile Sanitizer Dose Calculator](#)
- Critzer, F. and Wszelaki, A. 2021. [Food safety considerations for postharvest washing of produce and sanitation of packing areas](#)



# New(er) PSA Resources: Harvest/Postharvest Ag Water

- FSMA Produce Safety Rule Water Requirements: Insights to Get You Organized! Focus on Harvest and Postharvest Uses
  - Updated to reflect harvest/postharvest water requirements
- Agricultural Water System Inspection is Different from the Proposed Agricultural Water Assessment
- Documentation Requirements for Water Laboratory Analysis Results

**Produce Safety**  
ALLIANCE

**FSMA Produce Safety Rule Water Requirements: Insights to Get You Organized!  
Focus on Harvest and Postharvest Uses**

*Don Stoeckel, Ph.D., Donna Clements, M.S., Connie Fisk, Ph.D., Gretchen Wall, M.S., Elizabeth A. Bihn, Ph.D.  
May 2019; Updated November 2023*



This article is intended to enhance understanding of what is written in the Food Safety Modernization Act (FSMA) Produce Safety Rule (PSR) about agricultural water used during harvest and postharvest activities. More information is coming from FDA on the topic of agricultural water, including regulatory guidance for agricultural water use and final requirements for pre-harvest agricultural water. This article summarizes agricultural water requirements including key terms and phrases marked in bold; some may be new to you so now is a good time to learn them.

The main points of this article are:

- Understand when water meets the definition of **agricultural water**.
- Understand compliance dates and quality requirements for agricultural water used during harvest and postharvest activities.
- Describe the quantitative water quality requirement. What it is, how many samples you need, and what resources are out there to help you implement practices.
- Know your options when agricultural water quality does not meet standards for harvest/postharvest use.

**The Definition of Agricultural Water**

Here is the exact definition from the FSMA PSR.

*"Agricultural water means water used in covered activities on covered produce where water is intended to, or is likely to, contact covered produce or food contact surfaces, including water used in growing activities (including irrigation water applied using direct water application methods, water used for preparing crop sprays, and water used for growing sprouts) and in harvesting, packing, and holding activities (including water used for washing or cooling harvested produce and water used for preventing dehydration of covered produce)."*

Notice a couple of things in that definition.

- **Agricultural water** is used during **covered activities on covered produce**. Covered activities refer to activities that are described in the rule (i.e., growing, harvesting, packing, holding covered produce). Covered produce has a specific definition in the PSR; generally, fresh produce that is not otherwise exempt or excluded (e.g., subject to a kill step, on a list of "rarely consumed raw" produce) and is a raw agricultural commodity (e.g., uncut strawberries, apples, carrots, celery, leafy greens).





# PSA EPA-Labeled Sanitizers for Produce

- Tool was designed as a resource to help produce growers (and those who support them) review and select sanitizers based on their EPA label
  - Originally released in 2017 as an Excel file; limitations on usability
- Adapted the resource into a web tool
- Funded in part by the Local Food Safety Collaborative (LFSC)
- <https://resources.producesafetyalliance.cornell.edu/sanitizer/>

Total results found: 105

Type to search (e.g., product name, active ingredient)

Compare Reset

Compare	Product Name	Name on EPA Master Label	Active Ingredient (% Strength)	EPA Master Label Details							Product Information			
				EPA Master Label		Preharvest Labeled Uses	Postharvest Labeled Uses			Efficacy Statement	Product Information			
				EPA Registration Number	Labeled Use Info Based on Version Date	Labeled For Use in Irrigation Water Systems	Labeled For Use on Non-Porous Food Contact Surfaces	Labeled For Use on Postharvest Water Distribution Systems	Labeled for Use in Fruit and Vegetable Wash Water	Labeled to Control Human Pathogens	Organic Materials Review Institute (OMRI) Listing	Quantity Purchasable per EPA Label	Manufacturer/Distributor	Notes
<input type="checkbox"/>	<a href="#">Aegchlor 310</a>	<a href="#">Aegchlor 310</a>	Sodium hypochlorite (12.5%)	2792-62	5/23/12	No	Yes, see page 7	No	Yes, see page 7	No	Not listed	Gallons: 55	<a href="#">Deco US Post-harvest, Inc.</a>	None
<input type="checkbox"/>	<a href="#">Alpet D2 Surface Sanitizer</a>	<a href="#">Alpet D2</a>	Isopropyl Alcohol (58.6%); Quaternary Ammonium (0.0075%, see label)	73232-1	4/21/20	No	Yes, see page 6	No	No	For Food Contact Surfaces	Not listed	Information not available	<a href="#">Best Sanitizers, Inc.</a>	None
<input type="checkbox"/>	<a href="#">Alpet D2 Quat-Free Surface Sanitizer</a>	<a href="#">Alpet D2 Quat-Free Surface Sanitizer</a>	Ethanol (82.5%); Isopropanol (7.5%)	73232-4	8/16/21	No	Yes, see page 5	No	No	For Food Contact Surfaces	Allowed with restrictions	Information not available	<a href="#">Best Sanitizers, Inc.</a>	None
<input type="checkbox"/>	<a href="#">Anthium Dioxide</a>	<a href="#">Anthium Dioxide</a>	Chlorine dioxide (5.0%)	9150-2	4/9/20	Yes, see page 22	Yes, see page 23	Yes, see page 12	Yes, see page 9	No	Not listed	Information not available	<a href="#">International Dioxide, Inc.</a>	None
<input type="checkbox"/>	<a href="#">Antimicrobial Fruit &amp; Vegetable Treatment</a>	<a href="#">Antimicrobial Fruit and Vegetable Treatment</a>	Lactic Acid (17.3%); Quaternary Ammonium (1.2%, see label)	1677-234	10/31/17	No	No	No	Yes, see page 6	For Washing Fruits and Vegetables	Not listed	Ounces: 4, 64, 96 Gallons: 1, 2.5, 4	<a href="#">Ecolab, Inc.</a>	None



# PSA EPA-Labeled Sanitizers for Produce Web Tool

- Updates include:
  - Addition of product labels, when available
    - More accurate in identifying labeled uses for each sanitizer product
  - Hyperlink to manufacturer/distributor contact information
  - Search bar
  - Compare function
- Video tutorial and factsheet coming soon
- Plan to highlight the tool (and lessons learned during development) in a future Educators' Call

Total results found: 105





				EPA Master Label Details						
				EPA Master Label		Preharvest Labeled Uses	Postharvest Labeled Uses			Efficacy Statement
Compare	Product Name	Name on EPA Master Label	Active Ingredient (% Strength)	EPA Registration Number	Labeled Use Info Based on Version Date	Labeled For Use in Irrigation Water Systems	Labeled For Use on Non-Porous Food Contact Surfaces	Labeled For Use on Postharvest Water Distribution Systems	Labeled for Use in Fruit and Vegetable Wash Water	Labeled to Control Human Pathogens
<input type="checkbox"/>	<a href="#">Agchlor 310</a>	<a href="#">Agchlor 310</a>	Sodium hypochlorite (12.5%)	2792-82	5/23/12	No	Yes, see page 7	No	Yes, see page 7	No
<input type="checkbox"/>	Alpet D2 Surface Sanitizer	<a href="#">Alpet D2</a>	Isopropyl Alcohol (58.6%); Quaternary Ammonium (0.0075%, see label)	73232-1	4/21/20	No	Yes, see page 6	No	No	For Food Contact Surfaces



# Spanish-language Resources: ¿Qué vaina con la inocuidad?

- Series of six Spanish-language podcasts
  - Training new workers in food safety
  - Impact of the FSMA PSR on small produce growers
  - Establishing a food safety culture on the farm
  - Reducing risk when using harvest and postharvest water
  - Composting: how to use scientifically-valid methods
  - Integrated Pest Management and produce safety
- Funded in collaboration with LFSC





# Spanish-language Resources: FSMA PSR Preamble

- FSMA PSR Preamble has been translated into Spanish
  - Hyperlinks in the Table of Contents allow for easy navigation
- Preamble gives insight into FSMA PSR interpretation
  - Valuable for growers and PSA Trainers
- Translated by Laura Acuña and reviewed by Yulie Meneses
- <https://es.producesafetyalliance.cornell.edu/fsma/fsma-resources/>

Traducción del documento original en inglés del preámbulo de los Estándares para el cultivo, cosecha, empaque y almacenamiento de los productos agrícolas frescos para el consumo humano

Descargo de responsabilidad:

La FDA ofrece esta traducción como un servicio para un amplio público internacional. Esperamos que encuentre útil esta traducción. Mientras que la agencia ha tratado de obtener una traducción lo más fiel posible a la versión en inglés, reconocemos que la versión traducida podría no ser tan precisa, clara o completa como la versión en inglés. La versión oficial de este documento es la fuente original en inglés:

<https://www.regulations.gov/document/FDA-2011-N-0921-18558>

En este documento se utilizó el término huerta para traducir la palabra 'farm' según se define en § 112.3 de la Norma de inocuidad de los productos agrícolas frescos de FSMA.

También se puede entender por huerta cualquiera de los siguientes términos, entre otros, utilizados por una diversidad de hispanoparlantes, siempre y cuando el uso de dicho término corresponda con la definición de 'farm' según se define en § 112.3: explotación agrícola, empresa agrícola, campo, finca, fundo, granja, hacienda, huerto, rancho, parcela, plantación, predio, terreno agrícola o unidad de producción.

DEPARTAMENTO DE SALUD Y SERVICIOS HUMANOS DE LOS EE. UU. (DEPARTMENT OF HEALTH AND HUMAN SERVICES, HHS)

Administración de Alimentos y Medicamentos de los Estados Unidos (Food and Drug Administration, FDA)

Partes 11, 16 y 112 del título 21 del Código de Reglamentos Federales (Code of Federal Regulations, CFR)

[Expediente No. FDA-2011-N-0921]

RIN 0910-AG35

Estándares para el cultivo, cosecha, empaque y almacenamiento de los productos agrícolas frescos para el consumo humano

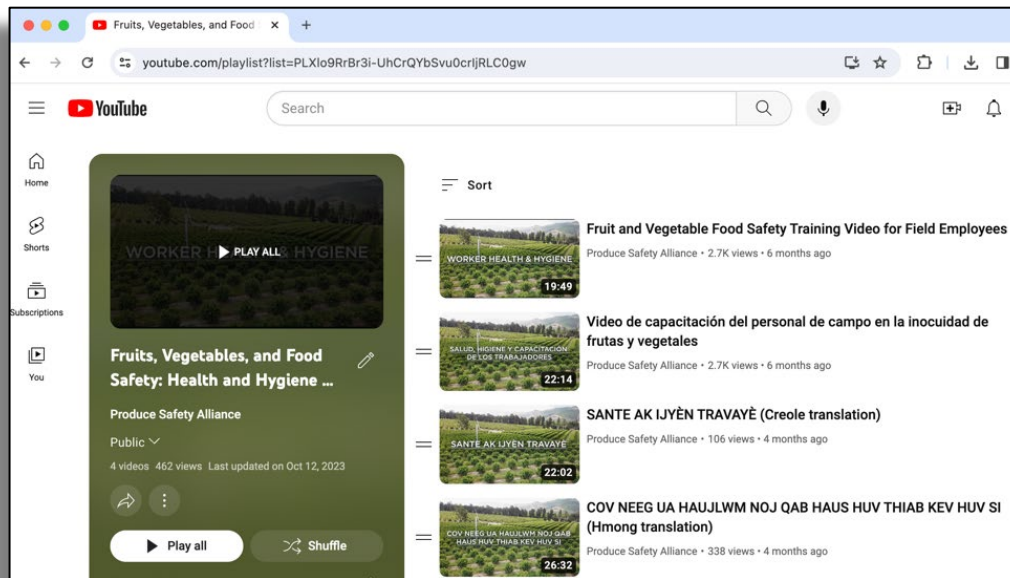
AGENCIA: Administración de Alimentos y Medicamentos de los Estados Unidos, HHS

ACCIÓN: Norma final.



# Worker Training Videos

*Fruit and Vegetable Food Safety Training Video for Field Employees*



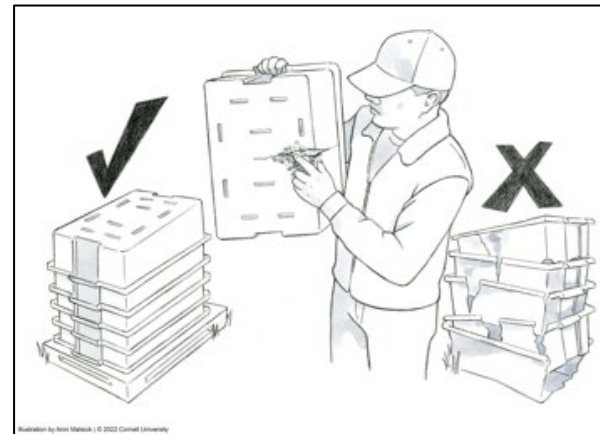
Available in:

- English
- Spanish
- Creole
- Hmong
- Chinese



# More Than Words en Español

- This is one of the projects that is initiated and will be completed shortly
- Both notes and words in illustrations in Spanish
- Will be accessible as one download (Eng and Spa)



*Reminder:*

*These slides are available to you!*

*We have been getting some questions so  
wanted to touch on this!*



# QE Eligibility in 2025 and Beyond

The Enforcement Discretion policy ended **Nov 7, 2023**

- Qualified exemption eligibility in 2024
  - Farms must have records confirming less than \$500,000 rolling-average total food sales for the prior three years
    - 2020-2022 inflation-adjusted value for the cut-off is \$610,182
  - **Keep records of sales to qualified end-users starting in 2024**
- Qualified exemption eligibility in 2025 and beyond goes back to pre-COVID documentation requirements
  - Continued documentation related to total food sales cut-off
  - **Records and calculations to support that majority of food sales were to qualified end-users beginning in 2024**
    - The records and calculation build to 3-year rolling average over time

**SUPPLEMENTAL MATERIAL**





# QE Summary

- The \$500K total food sales is, and remains, in effect it was never under enforcement discretion.
  - Adjustment for avg 2020-2022 is \$610,182
  - Adjustment updates usually available in March-April
- There was no requirement to collect records related to Qualified End Users in 2021, 2022, or 2023 due to enforcement discretion.
  - A farm that did not keep records has no basis to make a calculation in 2024
  - The obligation is that the farm must start preparing for 2025 by keeping records in 2024



# Next Educators' Call

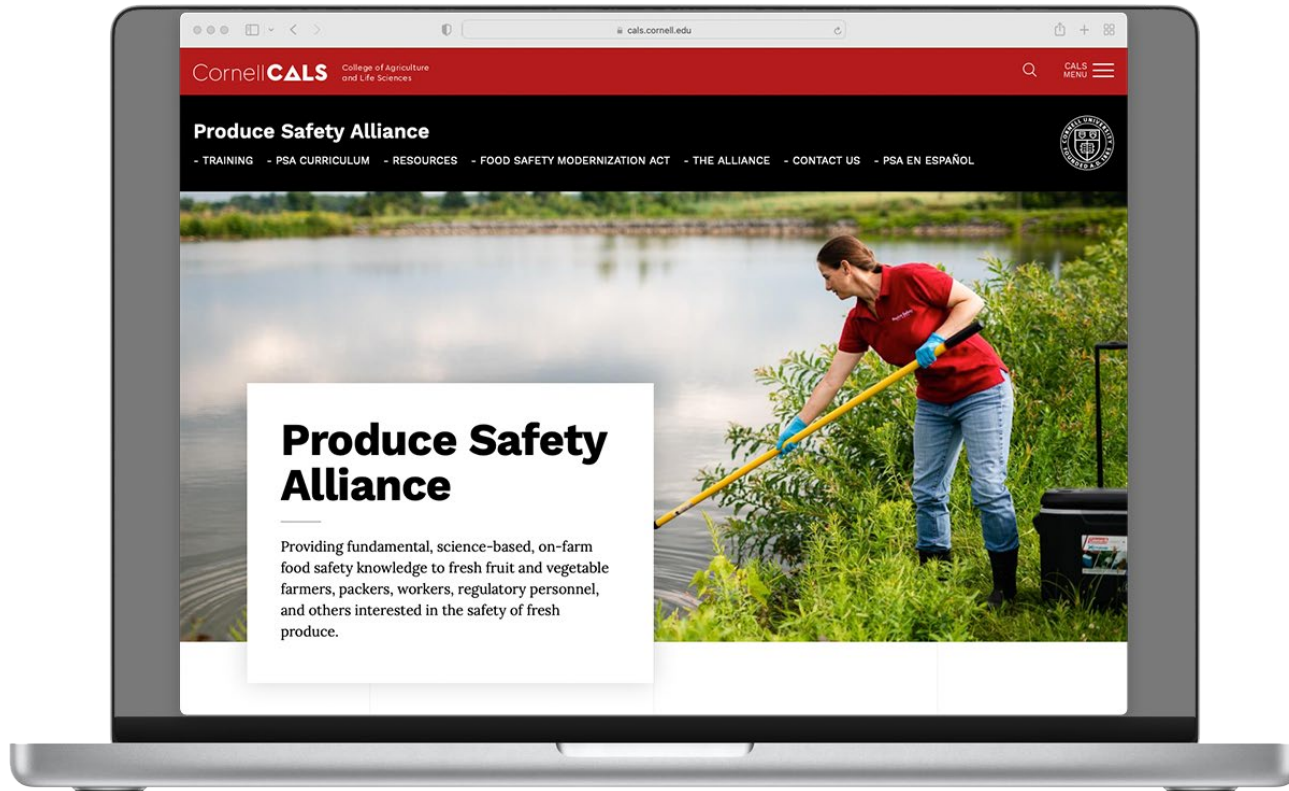
- Next PSA Educators' Group call: *How Can a Farmer Prepare for the FDA Traceability Rule, FSMA 204*
  - Date: Wednesday, February 21, 2024
  - Speaker: Matt Regusci, iFoodDS
- Registration link will be shared by email through the Educators' Group Call mailing list



# The PSA Website

English: [producesafetyalliance.cornell.edu](https://producesafetyalliance.cornell.edu)

Spanish: [es.producesafetyalliance.cornell.edu](https://es.producesafetyalliance.cornell.edu)





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