

AT A GLANCE: KEY POINTS IN THE PRODUCE SAFETY RULE DRAFT GUIDANCE

CHAPTER 2: PERSONNEL QUALIFICATIONS AND TRAINING (SUBPART C)

What is the goal of this chapter?

Workers can introduce contamination while handling produce or food contact surfaces. All personnel should not only be qualified to perform their assigned duties, but should understand how their actions impact food safety and the regulatory requirements that apply to their assigned duties. This chapter will help farms comply with the personnel qualifications and training requirements in the Produce Safety Rule.

References to “you” in this document (as well as in the Produce Safety Rule and draft guidance) mean the owner, operator, or agent in charge of a covered farm that is subject to some or all of the requirements of the rule. In addition, unless otherwise specified, we’re only talking about produce covered by the rule.

Who does this most affect?

Farm personnel, who handle produce or food contact surfaces, and those who supervise such activities.

What are some of the requirements and recommendations for personnel qualifications?

All personnel who handle produce or food contact surfaces, or supervise such activities, must have a combination of training, education and experience necessary to perform their assigned duties in a way that helps ensure compliance with the Produce Safety Rule.

Farm owners or those in charge of a farm covered by the rule should consider the breadth of activities and how workers perform these activities. They should evaluate which duties are subject to the rule’s requirements, whether their workers are qualified and if they need additional training, experience or education.

For example, workers assigned to pack produce should understand and be able to apply knowledge related to:

- the health conditions that could result in contamination of produce;
- the appropriate level of personal cleanliness for their assigned duties;
- the need to avoid contact with animals other than working animals;
- proper handwashing procedures;



- the use of adequate food-packing materials;
- proper handling of harvested produce; and
- the maintenance of food-contact surfaces.

What are some of the training requirements and recommendations?

All personnel who handle produce or food contact surfaces, or engage in the supervision of such activities, must receive training upon hiring, periodically (at least once annually) and on an as-needed basis when observations or information indicate that they are not meeting the standards set forth in the Produce Safety Rule. You should also identify additional personnel who would benefit from training because they work on a produce farm, even if it is not required for their specific duties.

You can determine the appropriate timing and frequency for refresher training to ensure continued awareness of food safety and hygiene principles and the requirements of the rule. For example, you could give staggered, periodic training to smaller groups of workers, or conduct periodic training more frequently than once a year for certain personnel. The draft guidance reviews factors that could influence your decisions on training frequency, which include the type, number and timing of crops for planting, harvesting and packing.

Personnel should also be trained when changes occur in practices or procedures, or when new information on best practices for food safety becomes available.

For more information and examples, see the “Training Frequency” section in Chapter 2 of the draft guidance.

How should the training be conducted?

Training must be conducted in a way that can be easily understood by the workers being trained. The training should be:

- in the language that the workers customarily speak;
- tailored to the education level of participants;
- relatable to assigned duties and relevant to your farm; and
- structured in a way that will be most effective for the specific participants. Some recommendations include:
 - providing short sessions to cover specific, targeted topics or longer sessions to provide more in-depth information or to cover complex topics
 - repeating key points in successive sessions
 - conducting training in or near the work area
 - using pictures or graphics
 - utilizing hands-on experiences or demonstrations

You should also consider posting signs or visual aids to reinforce training concepts.

What training topics are required and recommended?

At a minimum, personnel who handle produce and food contact surfaces and those who supervise such activities are required to receive training that covers food hygiene, food safety, health and personal hygiene, and the standards established throughout the Produce Safety Rule that are applicable to the employees' job responsibilities. These topics represent the minimum content that must be included in required training. However, there are other topics that should be included, such as farm procedures, potential routes of contamination so workers can recognize the impact of poor practices, and how training topics relate to a worker's specific job duties. For example, workers who clean and sanitize packing equipment must receive training that relates to requirements for equipment cleaning and sanitizing. These workers should also receive training on farm procedures, including how to prepare cleaning and sanitizing solutions, and how their actions during cleaning and sanitizing, if not performed properly, could lead to contamination.

For more information and examples, see Chapter 7 of the draft guidance, which covers Equipment, Tools, Buildings and Sanitation.

Training topics related to health and personal hygiene must include: recognizing the signs and symptoms of applicable health conditions, for example, vomiting, diarrhea, fever, sore throat and open wounds; and hygienic practices to minimize contamination.

For more information and examples, see Chapter 3 of the draft guidance, which covers Health and Hygiene.

Training topics should also include:

- Sources of foodborne pathogens (humans and their waste; animals and their waste);
- Routes of contamination (including animal or pest waste, environmental transfer of contamination, or people who are sick handling produce);
- Preventive measures (to minimize potential contamination); and
- Corrective measures (after produce has potentially been exposed to contamination).

What are some of the other training requirements and recommendations for personnel who take part in harvest activities?

In addition to the requirements above, there are specific training requirements for personnel who take part in harvest activities. This training should help workers understand what to do if they observe harvesting practices that don't align with the Produce Safety Rule. Your training should include the following for these personnel:

- Recognizing harvesting practices that do not align with your procedures or rule requirements, such as harvesting produce that is visibly contaminated with animal excreta, harvesting dropped produce, or observing contact between cut surfaces of produce and the soil during harvest;
- Recognizing covered produce or growing areas that are likely to be contaminated;

- Types of handling and practices that can contaminate food contact surfaces of harvest containers;
- How, when and what conditions to look for during inspection of harvest containers;
- Conditions that indicate harvest containers should be discarded; and
- Encouraging personnel to communicate with supervisors or responsible parties or directly with other personnel when they observe harvesting practices that do not align with your procedures or rule requirements.

Who conducts the training?

The Produce Safety Rule does not specify who can provide training. For example, you can choose qualified farm personnel or have a third party conduct training activities.

What are some of the requirements and recommendations for supervisor training?

At least one supervisor or responsible party must have successfully completed food safety training that is at least equivalent to the FDA-recognized curriculum developed by the [Produce Safety Alliance](#). This curriculum includes an introduction to produce safety, worker health and hygiene, training, wildlife and domesticated animals, land use, agricultural water, produce handling, and sanitation. You can also choose to have additional staff complete this training. For example, if your farm has several supervisors who are responsible for ensuring that your operations follow the rule requirements, you could direct each of these supervisors to complete the standardized or equivalent training.

What are some of the requirements and recommendations for supervisor qualifications?

Supervisors assigned to oversee the handling of covered produce and food contact surfaces should have sufficient knowledge, through training, education and experience, of food safety and hygiene practices to ensure that workers know the requirements of the Produce Safety Rule and to effectively determine whether they are conducting activities in a way that complies with the rule. For example, a supervisor assigned to oversee produce handling should be able to recognize when workers report or are showing symptoms of an [applicable health condition](#), have an understanding of the farm's procedures for excluding or reassigning workers based on health concerns, and be able to implement those procedures.

They should also be able to recognize whether personnel need additional or more frequent training.

Do farms have to designate specific personnel to ensure compliance with the rule?

Yes, farms must assign or identify personnel who will supervise the farming operations to specifically ensure that the requirements of the Produce Safety Rule are being followed. These personnel can include full-time, permanent, temporary, part-time, seasonal, contracted, or other personnel that you designate. These supervisors should be able to evaluate whether other personnel are conducting activities in ways that comply with the rule, and ensure corrective actions are taken when necessary. For example, if they notice that a worker is not following a food safety protocol, they should make sure that the worker

receives immediate corrective training. You should evaluate your operations and identify personnel to supervise each aspect of your operations that is related to a provision of the Produce Safety Rule. You may find that you will need multiple individuals to fill this role or, on some farms, just one person could perform the necessary duties.

Are farms required to keep records of personnel training and qualifications?

Yes, farms are required to keep records of required training that document the date of training, topics covered, and the person(s) trained. One example of a record that would meet the requirements under the rule would be an attendance sheet for a training session that includes the date of the training, a list of personnel in attendance, and a list of the topics covered. If you contract with a company to provide the training, you should request training documentation from the provider and maintain the records to demonstrate compliance with the training requirements in the rule.

For more information and examples, see Chapter 8 (subpart O) of the draft guidance, which covers Records.

*For further explanation of the underlined words, see the **Key Terms Glossary**.*

*The **draft guidance** contains more details and examples of FDA's recommendations and current thinking. It is recommended that you review the draft guidance for complete information.*