

Audits and Inspections for Specialty Producers

Tue, 4/26 11:41AM 20:33

SUMMARY KEYWORDS

inspection, farm, angela, iowa state, produce, audit, iowa, voluntary, inspectors, inspect, schemes, food, cider, entity, rule, extension, food safety, folks, restaurants, based

SPEAKERS

Speaker 3, Dr. Angela Shaw, Christa Hartsook, Joe Hannan

C Christa Hartsook 00:15

Hello, and welcome to the small farms podcast, a production of the small farms program at Iowa State University Extension and Outreach. Our podcast covers the opportunities and challenges associated with real life.

J Joe Hannan 00:29

I am Joe Hannon, commercial horticulture field specialists with Iowa State University Extension and Outreach and welcome to the small farm sustainability podcast. With me today is Dr. Angela Shaw. She's an associate professor in Food Science and Human Nutrition at ISU. Welcome, Angela. Thanks for joining me on the show today.

D Dr. Angela Shaw 00:48

Well, thank you for having me. I'm excited.

J Joe Hannan 00:52

Yeah, I should be a fun chat here today. I guess this is your first time on the podcast. So I think we should really take a minute here to have you describe what you do at Iowa State.

D Dr. Angela Shaw 01:06

So what I say is I'm Extension and Outreach, as well as a professor. And I do all things food safety. So from the farm all the way through the retailer, handling all FDA foods. So basically everything that's not meat and eggs. I help with I'm a microbiologist, and I love food law and regulations.

J Joe Hannan 01:29

Cool. And you're also team lead for the Iowa produce safety team at Iowa State we work together with the North Central Region FISMA center, you do some research as well, right?

D Dr. Angela Shaw 01:40

Yes, I do research and my research focus is food safety, or prevention of foodborne illnesses from getting into our food supply. So everything we can do to prevent it.

J Joe Hannan 01:53

You're a busy person. So today, Angela, I want to just take a few minutes to kind of set the stage as we talk about gaps, audits, inspections, on farm readiness reviews, what I'm starting to see our farms are starting to see a lot of different people coming out to their farms, both for in light of food safety, but also in light of labor and various other things. What really brought my attention to this discussion today was last summer, I was visiting an orchard and I had just politely reminded them that, hey, FSMA inspections are probably going to be starting next year. We should chat this winter and just make sure everything is up and stuff and ready to go for inspections, because you're probably going to be one of those folks. And during that discussion, they're like, oh, no, no, we just had our FSMA inspection this year. And I I took a step back. I'm like, I'm okay, no, he didn't have a Produce Safety Rule inspection. When I did it did a little digging in it. It wasn't a produce safety rule inspection. And really how I came about that decision is that a it wasn't one of our FDA folks that do produce safety rule inspections, being the inspector never actually walked through the farm field. So I knew it wasn't a priority safety.

D Dr. Angela Shaw 03:08


Yeah.

J Joe Hannan 03:09


But so that that leads to, you know, the thought that there's some challenges, understanding what, what inspections, what audits, what farm readiness reviews are, there's a lot to keep track of for a farm.

D Dr. Angela Shaw 03:26


It can be very, very challenging, especially since we see so many of our farmers that have diversified farms, they might have livestock, they might have grocery stores or restaurants. And so the who's there, why are they there? It gets so confusing from time to time. And there's so many different rules.

 Joe Hannan 03:48

It can be state, federal, or or county, right. I mean, it could be any of those folks that are coming on an on farm.

 Dr. Angela Shaw 03:55

Yes, it can be.

 Joe Hannan 03:58

So let's take a minute and start with a very basic beginning here, Angela, because our audience is really broad reaching across across the state, everywhere from just small acreage owner farms to some very large farms to an end of these podcasts. So would you take a moment to define or tell me what the difference between an Audit and Inspection and an on farm Readiness Review is?

 04:25


Yes. So an audit is voluntary. It's done by a third party and you have to request it, it can be nutritional base, it could be food safety base, it could be production base. Some examples of some audit schemes are good agricultural practices, or the USDA gaps program. You can also have organics is considered an audit, as well as SQF which is a standard for if you're going into like a Walmart or a whole foods. So these are all voluntary basis. Third party auditors are going to come in and do those, that's versus an inspection and inspection is by a government body. And that government body can be state, County, or federal level, that is not voluntary, that is written from a law for them to come for a specific purpose. So that might be based on the Food Safety Modernization Act, or FISMA. And so there's, there are 10 rules right now under that from produce to Preventive Controls for Human Food, animal food. But then we also have USDA based inspection schemes that might be for your livestock or eggs or milk. And then we have schemes from things like restaurants, if you have, that's under the food code under FDA, that's an inspection. So these are written by law require, you don't have a choice behind whether they come or not. Now, the on farm Readiness Review is something specific for produce growers. And it's focused on the growing in the processing of produce items. It's voluntary, it's Iowa State or whatever university you're with, as well as your government party, and it's voluntary. We're coming in based on a rule to help you get ready for that inspection. So those are the three main differences between those.

 Joe Hannan 06:28

So Angela, would you talk a little bit about who pays for an Audit and Inspection and who pays for an on farm Readiness Review? Just to kind of put that in perspective for the farmers?

 06:39


Yes, so an audit once again, you have to request that's fee based every program has a different fee associated with it, versus an inspection, inspections are free, they're required under the law. So they're budgeted under our Congress, the onfarm Readiness Review is also free. And we're, it's free right now through our grant program, through USDA and FDA to be able to provide those. So audits again, fee based, voluntary inspections, free required on farm readiness, voluntary, free,

 Joe Hannan 07:19

perfect. And then so we talked a little bit about audits being voluntary, that's a lot of that is really opening is is intended to help open up and get into markets as often kind of what we say there is you agree with,

 07:31


I agree, it's all about market, whether you're going into the organic gaps, or you're going into a specific entity, like I said, you know, the Walmarts, the costcos to Trader Joe's, those are all market opportunities, um, with the audits versus the inspections, which is required note, you don't have any say in those.

 Joe Hannan 07:55

And then, of course, your own farm Readiness Review. So

 07:59


the on farm Readiness Review helps you get ready for the inspection. So you can say, I beat that inspection with flying colors, nothing was new, that they asked me. And that's

 Joe Hannan 08:09


we really do try to do that. So I I am one of those ofr folks. You're one of those ofr folks. So as I think everybody on our team does all of ofrs, right?

 08:20


Yes, yeah. So we know the rule forward, backward, flip it up. So when we come onto your farm, we're able to say, okay, they're gonna probably ask about this, they're gonna probably ask about that. So that nothing's a surprise as well as you have a little bit of time to clean up some things if you need to, while you're on the farm, when you're with us friendly extension people.

 Joe Hannan 08:43

That said, we got to get up in your business pretty well, when we're doing a lot more hours, because it's intended to proactively get things under in check before FDA shows up. So yes, but again, those are those are available outside Iowa too through your local extension and Department of Ag service, just in case we have a few outside of Iowa, folks, do you want to dive into any more on the different types of inspections that a farm might get? Or did you cover everything you want to chat there?

 09:09

No, let me go into a little bit of detail. No more detail with that just briefly. So what I would say is look at your operation and all the entities that you possess. So whether you are producing apple cider, whether you have a restaurant, whether you have livestock, whether you are just doing produce, whether you're processing it, maybe putting in a bag, you might be one of the people who has like vegetables and you're canning it. So each of these has a different inspection scheme behind them. Let me give you an example. So if you are a winery, then your grapes itself would be exempt from the Produce Safety Rule meaning they would come out and see that you are processing your grapes so if you're growing your grapes, so then you would be exempt from that. But we do have some wineries that are actually producing them for table grapes, and for wine. So they would inspect the grapes under the Produce Safety rule, the wine again would go under our tobacco regulations and your winery be under that regulation as well. So preventive controls, if you're a winery, and you also have a store on site, you are under retail. And so under retail, it's the food code. And so any restaurants or or any of those entities, you'll be under retail. So what I just described is three different inspections. Now I'm using word inspection because they're based on law, your grapes were under produce safety, your wine is under the FSMA preventive controls rule, as well as the tobacco and alcohol rule. And then your grocery store is under the food code. So if all that's confusing, call us here at Iowa State and we will help you out within that.

 Joe Hannan 11:08

That is certainly confusing. A couple other ones I wanted to ask about what about cider? And what about like those quick serve food places on some of our agritourism farms, where would they fall under.

 11:20

So your quick serve or your they're still considered restaurants on your farm. So whether you're doing hot dogs, or if you're selling food to the public, that is still considered a restaurant facility. So that is under the food code. But then also your apple cider. That is a pasteurized product. So that actually goes under our Iowa Department of Agriculture, there'll be inspecting you under HACCP. So that's a new concept that I'm bringing in. But that's Hazard Analysis Critical Control Point. But that's for anything that's juice related. So if you're bottling any type of juice, which cider would be considered, you would fall under that regulation. The good thing about that is it's the same set of inspectors that will come out if you're doing cider, or you have a restaurant.

J Joe Hannan 12:13

That's good to know that that helps things a little bit and actually was kind of my follow up question. Do you have how does the farm know what they're getting inspected for? And do you have any tips on questions that they should ask specter shows up or Inspector Calls to schedule an appointment?

D Dr. Angela Shaw 12:29

The first thing I would have them ask is, what are you here for? I mean, that basic question are, which part of my operation? Are you here to inspect for? And under what rule really get clarity at the door? Before you let them in? What do they want to see? And what part of your entity because they don't need to see your whole entity, if they're just looking at your, you know, your apples out in the orchard? And they're not concerned about your cider on production inside? So really getting a handle on what are they there for?

J Joe Hannan 13:06

Yeah, that draws back really well to the the example I lead off with where they were there to look at the site or operation that makes sense why they went to walk in through the orchard? And that should cue you into what type of inspection you're you're getting?

D Dr. Angela Shaw 13:19

Yes, very much. So.


J Joe Hannan 13:22

Yeah, that's really helpful. So is there anything that's being done from our regulators or inspectors or auditors? Is there anything that's being done to kind of ease the amount of inspections that are happening on a farm? Or is there any anything being done to make it less times that somebody's coming out to your farm?


D Dr. Angela Shaw 13:45

Yes, there is. So on the state and federal side, they're coming up with shared documents that try to identify farms that have different inspection schemes, so that they can make it in one stop. So for example, I've heard of some of our farms that might have livestock and they have to get pesticide uncertified. And also, they need to go out and look at their actual produce to team up, those inspectors go out together to do it all in one scheme. And so that can even add another layer of confusion. But they are really trying to minimize the number of times they're calling you. And so they have these joint contracts where they're trying to identify which farms are being regulated so they can minimize.


J Joe Hannan 13:54

 Joe Hannan 14:34

Yeah, so it might take a little bit longer if you're doing a joint and inspection and there's multiple auditors out there, but it shouldn't be less total days and ultimately, hopefully less total time to get it all done in one shot.

 Dr. Angela Shaw 14:48

That is the goal. That is the goal to take away the time from you dealing with them so you can do what you're there for profits you're there to produce. So that is the emphasis they want to do.

 Joe Hannan 15:00

So one question I wanted to follow up with that when somebody's coming out to your farm, who can be on your farm with you when an auditor is coming out? Because it can just be you? Or can you have other folks that are out there participating in an audit,

 15:16

you can have anybody you want out for that audit scheme. And what I always say is, if they are out, and it's just you say, it's just you on the farm, and you're a little worried, record it, if they take a picture, you take a picture, if they record something, you ask them, What are they recording, and you record that this is all of your right to take back. And if they're doing something, then ask them. And they have to share that information. So you can have anybody you want on the farm with you. I mean, so you can even call and I've had people call me here at Iowa State and say I'm about to get inspected, come, come help. And I'll come if my schedule allows, or we could have a team member come, but we are here to be a reference and prepare you so you don't need us to be there.

 Joe Hannan 16:09

Perfect. Any other tips that you can think of this morning for our farms preparing for either an audit or an inspection?

 16:17

Well, I would say we have a lot of resources here at Iowa State. Well, of course, you know, with Joe here and myself, we are the Iowa State on farm produce team. But we are also have a lot more depth to our team. So we deal with retailers, we deal with grocery stores with cider production, if you want to go into juices, or any of those entity, we have the expertise, as well as we have CIRAS here on campus. And if you're not familiar with CIRAS, but they're based on business, so they can help you with everything from finding equipment to finding markets here. So they're a great service here that help businesses if you're thinking about expanding, I always recommend people go to CIRAS

J Joe Hannan 17:06

perfect and I'll make sure I get links to our Iowa team. So you can find all the staff and all of the different expertise that we have on our team, as well as CIRAS links in the show notes for folks. So they'll be able to find that information there. The one big tip that I was going to tie in there because so many people out forget to have it or forget to do it is remember that when you're doing an audit inspection and on farm readiness, whatever it may be, remember that those folks that are coming out onto your farm are also guests on your farm, and they should be following your visitor policy. And if you're doing both a gaps inspection or a Produce Safety Rule audit, those are requirements to have. So make sure that you're following your guests policy right from the get go on on there. And, and they will be respectful of that. So

D Dr. Angela Shaw 18:01

yes, and also I want to say that under all of these inspections, we have the they're under the guidance of educate before they regulate. So really, they are there to try and educate as they're on farm. So a lot of people get really scared, especially with inspections. And because of their mandatory that they're going to come and shut me down. Well, no, no, they're their mandate is to make sure that our food is safe. But they also want you to succeed. When they want your products in the supply. We need your products. So really know that they're coming from an educate before they regulate standpoint when they come on farm.

J Joe Hannan 18:44

That's That's an excellent point. And we've seen that in practice across the country. So it's not just something they're talking. They're walking the talk.

D Dr. Angela Shaw 18:54

Yes, and that's good. That feels really good.

J Joe Hannan 18:57

Yeah, Angela, anything else you want to add to this discussion before we wrap up here this morning?

D Dr. Angela Shaw 19:02

No, thank you for having me on. I'm excited.

J Joe Hannan 19:06

Yeah, I appreciate you joining me today. Great information and a short 15 minute nugget or so I know it takes way more time than that to even but I appreciate you coming on and having a

know it takes way more time than that to prep but I appreciate you coming on and having a chat. I'd also like to send a shout out to Christa Hartsock and Olivia Hanlon at the ISU small farms sustainability program for editing and hosting these podcasts. Olivia does all the background work of making us sound good and professional and cleans all this up for you. So thanks to her for putting all the work that we do. Angela, you want to give us the team links. We're going to find more information online.



19:39

So I will fsma@isa.edu is our email if you want to find us as well as I would just say let's go to NCRfsma.org and come and see all the information for all of the states on that website.



Joe Hannan 19:58

Or you can catch us locally at [Safe produce dot cal dot a state.edu](http://Safeproduce.cals.iastate.edu) for our



Dr. Angela Shaw 20:03

Iowa teen link. So yes, for Iowa specific.



Joe Hannan 20:07

Perfect. Well Angela, thanks again so much for joining me today. Everybody that signed in to listen today we much appreciate you tuning in.



Dr. Angela Shaw 20:15

Thank you.



Speaker 3 20:16

This program is brought to you by Iowa State University Extension and Outreach. This institution is an equal opportunity provider for the full non discrimination statement or accommodation inquiries, go to [www dot extension dot i state.edu/diversity/exp](http://www.extension.iastate.edu/diversity/exp)