

FSMA Frequently Asked Questions: ***Are you required under FSMA to take a farm food safety training?***

1. I run a farm that grows fruits and/or vegetables. Do I have to take a FSMA training?

Before you take a FSMA training, determine whether your farm is even covered by the FSMA Produce Rule. ***If you are not covered, or are qualified exempt, you do not have to take a FSMA Produce Rule training.***

To find out how to tell if your farm is covered by the FSMA Produce Rule, see the FSMA FAQ sheets '***Are You a Farm?***' and '***Is Your Farm Covered by the Produce Rule?***'.

According to the FDA, ***the vast majority of produce farms are not subject to the FSMA Produce Rule, and therefore do not have a legal requirement under FSMA to take a food safety training.***

NOTE: Food safety is important whether you are covered by FSMA or not! Even if FSMA doesn't apply to most farms, we encourage farms to implement food safety practices and take some type of Good Agricultural Practices (GAPs) training. FSMA compliance and good food safety practices for your individual farm **are not necessarily the same thing**. Farms that aren't covered by the Produce Rule should look for training that provide tools for improving food safety practices, instead of trainings focused on FSMA regulations.

CFSA offers proven and effective GAPs training programs in the Carolinas. For more information on our GAP Services, visit <LINK NEEDED>.

NOTE: Even if you are exempt from the FSMA rules, a buyer may require you to comply with food safety requirements that look a lot like FSMA. This is an additional reason why we encourage all farms to consider GAPs training.

2. My farm is covered by the Produce Rule. What are FSMA's training requirements?

If your farm is fully covered Produce Safety Rule, the rule requires that "at least one responsible person" on the farm take a food safety training program accepted by the Food and Drug Administration (FDA), the agency responsible for enforcing FSMA. Your deadline for compliance with the Produce Safety Rule, **including the training requirements**, depends on the value of your farm's **produce sales**:

- If your farm has \$500,000 or more in average annual produce sales during the previous three years then you must be in compliance with the Produce Rule by Jan. 2018, and so you should take a FSMA training by then.
- If your farm has at least \$250,000 but less than \$500,000 in average annual produce sales during the previous three years, you have until Jan. 2019 to meet the FSMA training requirement.
- If your farm greater than \$26,632¹ but no more than \$250,000 in average annual produce sales over the previous three years, you have until Jan. 2020 meet the FSMA training requirement.

3. What is the Produce Safety Alliance training?

The Produce Safety Alliance (PSA) has developed a standardized training program that is *one option* for covered farms to meet the Produce Rule training requirement. **The PSA training is not required:** What's required for fully covered farms is that you take a training determined by FDA to be at least equivalent

¹ The minimum threshold sales value triggering compliance with the Produce Rule is adjusted annually for inflation, so by 2020, the actual number will likely be greater than \$26,632.

to the PSA's standardized curriculum. Completion of the PSA training and payment of certain fees entitles you to a certificate that proves you have met the Produce Rule training requirement.

At this time, FDA has not accepted any other training programs for meeting the Produce Rule training requirement. A drawback of the PSA training is that it is a standardized curriculum, and so is not tailored to the needs of different sizes and types of farms. FDA has acknowledged that more FSMA training alternatives need to be developed for different farm audiences, instead of a one-size-fits-all approach.

The PSA curriculum covers complex issues of FSMA compliance, and is best-suited for farms that already have a high level of food safety knowledge. It has lots of good information that anyone can learn from, but it is not designed to guide farms in implementing food safety planning and food safety risk management.

If your farm is not covered by the Produce Rule, or you have not taken in-depth GAP training in the past, the standard PSA curriculum is not the best program for helping you start a food safety program.

4. How can I tell if the PSA training is right for me?

- a. If your farm currently undergoes third-party food safety audits (USDA GAP, Harmonized GAP, Primus, Global GAP, Leafy Greens Marketing agreement, etc.) or operates under a farm food safety plan (GAP, HACCP, etc.), and \$500,000 or more in annual produce sales, then a taking a PSA training will allow you to meet the Jan. 2018 training compliance deadline.
- b. If your annual produce sales are \$500,000 or more but you don't have a food safety plan or GAP audit, you will have to take an FDA-approved training by Jan. 2018, and right now the PSA is the only option. However, **you should also consider taking advantage of other food safety training and assistance programs** in addition to the PSA to help you establish a food safety plan on your farm.
- c. If your farm is covered by the Produce Rule and your annual produce sales are less than \$500,000, you have until at least Jan. 2019 (*see section 2. above*) before you must be in compliance with the training requirement. Instead of taking the PSA training now, **you can wait to see if FDA-accepted trainings better tailored to your operation become available** before your compliance deadline hits, so you can choose the best training option for your farm. If your farm currently doesn't have a food safety audit or food safety plan, **it is strongly recommended that you pursue other GAP educational programs that will help you implement food safety on your farm** before you have to start complying with the Produce Rule.
- d. If you fall into category (c) above or are not covered by the Produce Rule training requirement, but a customer is demanding that you comply with the FSMA training standard now as a condition of buying from you, then you should take the PSA training, assuming you want to keep the customer. Again, if you don't currently have a food safety audit or food safety plan, you should also consider taking advantage of other food safety training and assistance programs in addition to the PSA to help you establish a food safety plan on your farm.