

Food Safety Practices to Expect from Your Fresh Produce Distributor

School nutrition operators should ensure that fresh produce is purchased from reputable suppliers that adhere to the Food and Drug Administration's (FDA) Current Good Manufacturing Practices (cGMPs). Key school nutrition staff involved in purchasing activities should visit their fresh produce distributor at least annually to observe their food safety practices, inspect facilities, and ask questions regarding the food safety requirements for their suppliers. Consider organizing the site visit with other school district purchasing staff or purchasing cooperative members to reduce the number of visits to the facility. To be considered a reputable supplier, all facilities should be properly licensed and in compliance with local, state, and federal food safety regulations.

This document defines terms and common language used by distributors and other wholesalers to help you communicate more effectively. This guidance document also identifies practices that should receive close attention during your visit. Use this information to determine if a potential or current supplier is a reputable source of fresh produce for your school nutrition program. Finally, the section outlining specific food safety policies and practices to observe will help you ask questions on your visit to ensure that you have confidence in the fresh produce distributor's food safety program. Although this document focuses on fresh produce distributors, many of the food safety policies and practices are also applicable to other types of food distributors.

DEFINITIONS

Backhaul - Product is picked up from supplier(s) after delivering product to customers. This process improves transportation efficiency by delivering product and picking up product to return to distribution center. For example, Vendor A may deliver fresh produce and other supplies to its customers, and take back fresh produce to the distribution center from Farm A at the end of the route.

Chain of custody - The documentation of a food item showing each step in the process: acquisition, transfer, handling, and disposition.

Clean - Visually free of dust, dirt, food residues and other debris.

Good condition - Close to the original condition of an item or piece of equipment; good condition and not in disrepair.

Current Good Manufacturing Practices (cGMPs) - In September 2015, the FDA modernized the CGMPs and established them in new Part 117 (21 CFR Part 117), along with new requirements for hazard analysis and risk-based preventive controls which were issued as part of the implementation of the FDA Food Safety Modernization Act (FSMA). Available at: <https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-117>

Good Agricultural Practices (GAPs) and Good Handling Practices (GHPs) - US Department of Agriculture (USDA) and FDA best practices to verify that fruits and vegetables are produced, packed, handled, and stored in the safest manner possible to minimize risks of microbial food safety hazards.

Hazard Analysis and Critical Control Points (HACCP) - A preventative system to reduce the risk of foodborne illness through appropriate food handling, monitoring, and record keeping.

HACCP Plan - The written document based upon principles of HACCP specific to a facility that identifies procedures to be followed to prevent foodborne illness.

Product item purchased from a vendor - This can include produce items, non-produce items, packaging supplies, paper goods, dairy, eggs, etc.

Repacking - Sorting and packaging of product to meet a customer's specifications such as color of tomatoes, ripeness of avocados, and/or packaging of product into smaller amounts.

Trace back Ability - to trace the produce one step back in the chain of custody. For example, Vendor A would track fresh produce back to the distribution center, which in turn can identify their source of product. This information is needed in the event of a recall or food borne illness outbreak.

Trace forward Ability - to trace the produce one step forward in the chain of custody. For example, Farm A would track fresh produce forward to the distributor, which in turn can track produce forward to the purchaser.

PLANNING THE DISTRIBUTOR VISIT

As a current or potential buyer, it is recommended you visit the warehouse of your produce distributor at least once a year to observe their food safety practices and documentation of those practices, specifically in the following areas: Receiving and storing; cleaning and sanitizing; employees' health and hygiene; employees' food safety training; and the recall and traceability program.

Initial Steps

- If you are not already buying from the supplier, contact the produce distributor to explain who you are and your role as a potential buyer for your school nutrition program.
- Ask whether the distributor is interested in being a potential seller to your district.
- Determine if appropriate state and/or federal licenses are current.
- Provide the distributor with an estimated volume of produce served/purchased on a weekly or monthly basis. Share information about your school district, such as the number and locations of schools to communicate buying power, as well as presence or location of central kitchen or warehouse facilities.
- Discuss payment process, delivery expectations, including day(s), time frame of delivery, and specific required receiving temperatures.
- Explain that your responsibility as a school nutrition director is to ensure that food is purchased from suppliers who follow and document recommended cGMPs.
- Ask how many people can be accommodated on the visit.
- Establish a form of communication. Ask whether it is best for future contact to be by telephone or email.

Scheduling the Visit

- Determine a good time to schedule the visit. Be flexible on the day and time. If you would like to see specific activities, such as receiving, or loading customer orders, your visit may need to take place outside of normal business hours. Produce operations typically receive produce and fill orders late at night and very early in the morning.
- Discuss any specific activities that you would like to observe, for example:
 - Receiving produce from suppliers
 - Filling and loading customer orders
 - Repacking of product
 - Handling customer returns
- Ask if any local farms are current produce suppliers. If yes, determine if a site visit is possible. See resource Verifying on Farm Food Safety available at: <https://www.fns.usda.gov/ofs/verifying-farm-food-safety>.
- Discuss how much time will be available for the tour, and how much time will be available after the tour for additional questions.
- Request that the tour be conducted by someone who is knowledgeable about the company's food safety policies and practices, and receiving and loading procedures.
- Ask whether the distributor has a visitor policy and/or dress code that should be reviewed in advance. For example, closed-toed shoes may be required.
- Be sure to get the distributor's address, driving directions and instructions on the best location for parking. Discuss arrival security procedures, such as whether identification will be necessary for entry (i.e. driver's license).
- Answer any questions the distributor may have regarding the site visit and your expectations.

Preparing for the Distributor Visit

- Wear appropriate attire and bring items that may be needed, such as comfortable, closed-toed sturdy shoes, hat, jacket (some storage areas are cold), gloves, notebook and pen/pencil.
- Ask whether there are areas of concern for those with mobility restrictions.
- Ask the distributor for permission before taking photographs or videos. Explain how they may be used, such as appearing on the school district's website. If the photographs or videos will be used on a website, a signed release form is recommended.
- Confirm employer insurance policies for accidents or injuries that could occur during the site visit.

SPECIFIC FOOD SAFETY POLICIES AND PRACTICES TO OBSERVE

As you walk through the distributor's facility, pay close attention to the specific food safety policies and practices listed in each of the sections below. You may not be able to observe all food safety practices in your short visit; therefore this list will help you to focus on the most critical areas of concern.

Discuss the employee training program. If you observe a policy or practice that is inconsistent with their policies or information in this document, you should discuss the concern with the distributor and ask how the policy or practice could be improved to meet your standard. If you observe multiple policies and practices that are inconsistent with the information in this document, you may determine that the company is not a reputable supplier. Use the list outlined below as documentation of your supplier approval process.

General

- Facility access is limited and secure from non-authorized persons.
- Drinking, eating, smoking, and/or chewing gum are only permitted in designated break areas.
- Toilet facilities are clean, in appropriate locations, and adequate in number. All toilet facilities include a hand washing station stocked with soap, single-use paper towels or hand air dryer, and covered garbage receptacles. Potable, running, warm water is available at all hand washing stations. See Occupational Safety & Health Association for more information on number of required toilet facilities: <https://www.osha.gov/restrooms-sanitation>.
- Hand washing stations are clean, easily accessible, and adequate in number. All hand washing stations should have potable, running, warm water, and be stocked with soap, single-use paper towels or hand air dryer, and covered garbage receptacles.
- Employee personal items are not stored in produce receiving and storing areas.
- Safety Data Sheets (SDS – formerly known as Material Safety Data Sheets or MSDS) for detergents, sanitizers, and pesticides are kept in a readily available location for employee reference.
- Pallets and other containers are clean and in good condition.
- Forklifts, pallet jacks, and floor cleaning equipment are clean, do not leak or emit fumes, and are operated either inside or outside to prevent cross contamination.
- Water used for chilling produce and/or to make ice is a municipal water source. All other water sources (i.e. well or tanks) are tested at least annually and meet the Environmental Protection Agency's (EPA) standards for potable water. For more information on potable water go the EPA website, available at: <http://water.epa.gov/drink/contaminants/basicinformation/pathogens.cfm>

Facility Exterior

- Facility is enclosed, and the entrance and access doors are kept closed when not in use.
- Facility perimeter security is maintained with fence, cameras, lighting, etc.
- The area around any dumpster or trash areas is clean. Garbage and culled produce are frequently removed on a regular schedule.
- Outside garbage receptacles and dumpsters are kept covered or closed.
- The area immediately outside the facility is free of litter, tall vegetation, and standing water which may attract pests.
- Exterior doors and entrances have adequate closure seals

Facility Interior

- Visible surfaces, fixtures, and equipment are clean and in good condition. If you observe an area that is not clean, inquire about cleaning standard operating procedures. If possible, review the master sanitation schedule, written cleaning procedures, and/or sanitation logs. Ask if you have questions about types of chemicals used for these steps.
- All exposed materials, including produce and packaging, are protected from overhead contamination from fans, motors, condensation, lubricants, leaking pipes, flaking paint, corrosion, rust, or any other potential food hazards.
- Plastic strip curtains are maintained in good condition. The curtains are clean and mounted so that tips are not touching the floor.
- Strip curtains must run the entire width of the opening with sufficient overlap between flaps (½ inch).
- All storage areas are clean, especially racking structures, lights, ceilings, floor areas by the walls, and other hard-to-reach areas.
- Interior lighting is sufficient, in good condition, and enclosed in shatter-proof coverings or shatter-proof bulbs are used.
- Floor surfaces are in good condition, with no standing water or cracks, and are easy to clean.
- Floor drains are free from debris and standing water; this indicates functioning drainage.

Pest and Animal Control

- Facility is free from presence of pests such as rodents, birds, reptiles, and insects, and evidence of pests, such as droppings or nesting materials.
- Preventative measures are in place to prevent pest entry, such as sealed doors, window screens, and entry air curtains. Floors, walls, and ceilings are free from holes or cracks that could allow pest entry.
- Cracks or holes shall be sealed and doors and windows shall close tightly with no opening larger than 1/4" to prevent entry.
- Pest control devices, such as rodent traps and insect light traps, are located away from exposed food products, and monitored on a scheduled basis. A plan for corrective action is in place. Routine service reports from licensed pest control operator are available.
- Other animals, including pets, are restricted from areas where produce is located.

Personnel

- Employees and visitors are required to follow the distributor's food safety health and hygiene policies.
- Employees are trained on the company's health and hygiene policies, sanitation practices, and cGMPs. Training logs are maintained and include topics covered and attendee list.
- Employees are trained to report any cuts or wounds to their supervisors with a defined procedure in place.
- Employees are trained to report specific health symptoms or illness to their supervisors that may be a contamination risk to the product, with appropriate steps taken and documented.
- Employees are following proper health and hygiene and sanitation practices, and cGMPs.
- A supervisor not involved in documenting implementation of the food safety plan, or any corrective action taken, ensures that records are maintained daily, weekly, or as required.

Receiving

- Incoming transport vehicles are inspected for cleanliness, possible cross contamination risks, and pests. Deliveries that do not meet specifications are rejected.
- The distributor upholds a policy to reject fresh produce that does not meet quality, condition, temperature, or other requirements.
- Rejected or on-hold product or materials are clearly identified and kept segregated from other product.
- Produce is only received from approved suppliers. A list of approved suppliers and dates of delivery of produce and packaging supplies is maintained.
- Third-party audit reports such as GAPs, cGMPs, and HACCP certifications and/or letters of guarantee for products are required from suppliers and maintained by the vendor.
- Fresh produce is received by trained, designated employee(s), and inspected for quality, condition, temperature of product, and compliance with distributor's specifications, including information for traceability such as harvest date and supplier identification.
- Inspection results are recorded on receiving log or invoice.
- Produce is date-marked with rotation codes to ensure for First In; First Out (FIFO) stock rotation, such as receipt or harvest dates, manufacture dates, etc., and placed into recommended temperature storage area(s).
- Product is not left sitting on dock in temperatures that adversely affect food safety and quality.

Storing

- The storage area is restricted to food products and packaging supplies only. No personal items are mingled with inventory.
- Products and packaging supplies are rotated using a FIFO policy. In the event Last In produce will expire prior to First In produce, the policy of First In; First Expired will be applied.
- Pallets of iced product are not stored above other product.
- Storage areas are maintained at appropriate temperatures for the specific product. Storage temperatures of areas are recorded on temperature logs and checked at least daily.
- Non-glass and non-mercury thermometers are present in all refrigerators with at least one located in the warmest area of the refrigerator (nearest the door).
- Refrigeration units, including coils, are clean, floors are free from standing water, condensation units are not leaking, and fan guards are dust-free.
- Detergents, sanitizers, lubricants, and pesticides are labeled correctly and securely stored away from product.

Repacking

- Confined to a designated and enclosed area of the facility.
- Equipment design, materials, and condition of work surfaces (non-porous, smooth surfaces, non-toxic materials, and no wood) facilitate effective cleaning and maintenance.
- Only appropriate food contact containers (i.e. new or sanitized) made of appropriate materials that protect the integrity of the food are used for product repacking
- Employees avoid bare hand contact with ready to eat food. When handling food products employees are appropriately attired with clean aprons, hair coverings and a beard restraint, where applicable.
- Packed product is coded to maintain traceability of product.

Shipping/Transportation

- Outgoing transport vehicles are regularly inspected for cleanliness and pest infestation.
- Vehicle storage areas are at the appropriate temperatures for products, and loaded in a manner that prevents cross contamination.
- Outgoing transport vehicles are loaded to prevent cross contamination of fresh produce from other products, such as dairy or eggs.
- Company has backhauling procedures to ensure appropriate product temperatures are maintained, and to prevent cross contamination.
- Banana quality and condition is maintained during shipment through the use of banana blankets to protect against cold temperatures.

Traceability

- Company has a product tracking system, enabling one link of food chain trace back and trace forward of products.
- Company has a recall program, including written procedures, recall team responsibilities, and 24/7 contact information. The company conducts a mock recall at least annually to test the plan and ensure effectiveness.

Food Defense

The following measures are taken to minimize intentional contamination of product.

- Distributor has assessed food defense threats and has a documented plan of action should a threat be identified.
- Vulnerable points in the facility have been identified and are subject to additional access control. Examples of access control include locked doors, limited access to specific areas, security cameras, sensors, guests required to be escorted inside the facility, etc. For more information and details about food defense, visit the Food Safety and Inspection Service's page, available at: <https://www.fsis.usda.gov/food-safety/food-defense-and-emergency-response/food-defense>.
- HVAC equipment and water supply systems are protected from intentional threats.
- Employees and visitors wear identification badges issued only after confirmation from a government issued photo identification document.
- Background checks on all employees are conducted prior to hiring, or during employment if concerns arise.
- Staff are trained about potential(s) for intentional contamination of products and encouraged to “see something, say something”.

FOOD SAFETY AND PURCHASING DISCUSSION TOPICS

Consider discussing the following topics with the distributor to gain additional information that may help to determine reputable vendor status.

- Is produce purchased from GAP certified farms, and/or are farms inspected for good agricultural and good handling practices?
- How often are food safety site visits of suppliers conducted?
- Ask to review the distributor's HACCP plan. Based on your observations, discuss monitoring and verification procedures for a randomly selected area such as pest control or storage temperature control.
- Does the distributor have a third-party audit certification? Ask to review the site visit report. Note date visit occurred; if longer than one year then the certification may not be valid.
- What is the company's liability insurance holding?
- What are the liability insurance requirements for company's suppliers?
- What are the liability insurance requirements specified by the school district for suppliers?
- Does the company have previous or current involvement with recalled produce items, and if so, how were the recall(s) handled?
- Has the company been previously or is it currently named in a lawsuit linked to contaminated produce?
- What is the policy on customer returns due to product quality and/or condition factors?
- What is the policy for returning product involved in a recall?
- Ask to review records from the most recent mock audit recall, and request an explanation of how the process works. If a mock recall has not occurred in the past year, ask why.
- What are the company's ordering and payment schedules?
- What is your preferred delivery schedule (day of the week, time of day)?
- What procedures must be followed at your district for deliveries?
- What types or levels of background or screening checks are conducted on employees prior to hire and/or during employment?

AFTER THE VISIT

- Thank the vendor and invite the vendor to visit your facility.
- Provide any additional information requested by the vendor.

RESOURCES

U.S. Department of Labor Occupational Safety & Health Administration – General Working Conditions: https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=202

U.S. Environmental Protection Agency - Basic Information about Pathogens and Indicators in Drinking Water: <http://water.epa.gov/drink/contaminants/basicinformation/pathogens.cfm>

U.S. Food and Drug Administration – Guidance for Industry: Food Producers, Processors, and Transporters: Food Security Preventive Measures Guidance: <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-food-security-preventive-measures-guidance-food-producers-processors-and->

U.S. Food and Drug Administration- Guidance for Industry: Guide to Minimize Microbial Food Safety Hazards for Fresh Fruits and Vegetables: <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-guide-minimize-microbial-food-safety-hazards-fresh-fruits-and-vegetables>.

U.S. Department of Agriculture, Agricultural Marketing Service - USDA GAP & GHP Audit: <https://www.ams.usda.gov/services/auditing/gap-ghp/audit>.