

Implementation of FSMA at the State Level

The Michigan Department of Agriculture and Rural
Development's Plan

Byron Beerbower

2016 MCAFDO Education Conference,

February 23 and 24, 2016

Agenda

- Produce
- Preventive Controls for Human Food
- Preventive Controls for Animal Feed
- Transportation

Produce - Creating Networks

- Working with a variety of non traditional Ag groups, for example
 - Group GAP – Pilot of Group Gap for small, very small and micro farms, supported and published by MSU Center for Regional Food Safety: http://foodsystems.msu.edu/uploads/files/resources/Group_GAP_Michigan_Upper_Peninsula.pdf
 - Food Hubs also supported by MSU Center for Regional Food Safety: [Michigan Food Hub Learning and Innovation Network | Center for Regional Food Systems](#)
 - Farm to Institution Network: [Michigan Farm to Institution Network | Center for Regional Food Systems](#)
 - Michigan Food and Farming Systems MIFFS
 - Michigan Farmers Market Association MIFMA

Produce - Providing Training

- Train the Trainer using the Produce Safety Alliance Training 2015
- Work with Commodity organizations for example:
 - Apple Growers and Processors Seminar on LM and the FSMA Produce Rule
 - Presentation to the MDARD Ag Commission and Commodity Meeting
- Safe Food A-syst delivered through Conservation District staff
 - Work with MSU extension on training of Conservation District staff
 - Review of Safe Food A-syst as precursor for GAP review
 - [MDARD - Michigan Farmers Safe Food Risk Assessment Program](#)
- Coordination with MSU Extension and MSU CANR on the identification of training needs, offerings and materials

Produce - Funding

- Provide grant to MIFFS for evaluation of training needs of produce growers and evaluation of MEAP against GAP
 - Identify best methods for education of farmers
 - Identify how completion of MEAP four systems will help farm to meet a GAP audit [Michigan Agriculture Environmental Assurance Program](#)
- Identification of overlap of Safe Food A-syst, MEAP, GAP and the Produce Rule through funding from MDARD and Specialty Produce Block Grants.

Produce – Implementation

- Work with NASDA to identify and respond to the produce rule in cooperation with the FDA produce team
 - On Farm Readiness Review using Michigan as a Pilot for On Farm Tool to assess farm readiness to meet the Produce Rule
- Work with FDA as an AFDO representative to the Produce Implementation workgroup
- Proposal for inclusion in the Governor's MDARD Budget
 - Two (2) FTE within MDARD for Produce Implementation
 - Four (4) FTE within MSU Ext. to provide resources, research and education to produce growers of RACs
 - Six (6) FTE for County Conservation Districts to provide on farm assessment and assistance to implement the produce rule with producers of RACs

Preventive Controls for Human Food

- Apply for grant through MFRPs enhancement to educate Food and Dairy inspection staff on PC rule for Human Food
- Identify key staff to take TTT for the PC Rule
 - Will provide course to both Regulatory Staff and Industry
- Outreach and education to industry groups regarding the PC rule
- Use of Michigan Food Safety Defense Task Force and our Food Defense Task Force to get message out and provide educational resources as part of presentation to the group and standing agenda items.
- Identify and coordinate response with the NCIMS so that Dairy regulations will be consistent with the final PC rule.

Preventative Controls for Animal Feed

- Update Michigan's Feed Law – using AAFCO model Feed Law
- Chair AAFCO Feed committee on the PC rule and new GMP rule
 - Chair education committee of AAFCO for regulatory and industry training on both GMP and PC rule
- Goal is to harmonize Model Feed Law with PC rule
- Additionally have identified some gaps in Michigan Feed Law regarding vertically integrated farms and other similar issues.

Transportation Rules

(planned publish date Spring 2016)

- Identify key FDD inspection staff to work with Michigan State Police Motor Carrier division on Food Safety Basics
 - Provide training and updates to MSP Motor Carrier staff as part of new rule
 - Provide training on how to triage trucks/trailers against basic food safety rules
 - Provide contact information for MSP Motor Carrier staff when they identify questionable practices during truck stops
- Provided comments on proposed rule based on our own survey work
 - Identification of types of problems specific to food transportation (temp abuse, mixed loads, cross contamination issues, etc.)
 - Identify problems and issues relating to Driver training and or lack of training
 - Identify problems and issues related to equipment, vehicles and/or lack of proper equipment to monitor and assure safe food handling practices.

Final Thoughts

- Are we going to adopt all of the new CFRs regarding PC Food, PC Feed, Produce, Transportation?
- Are we going to adopt 3rd Party Verification, Foreign Supplier Verification and additional FSMA rules that have been published?
- FDA website for FSMA a great resource: [FDA Food Safety Modernization Act \(FSMA\)](#)

Questions

Byron Beerbower
beerbowerb@Michigan.gov
517-284-5694