

# FOOD SAFETY RECOMMENDATIONS FOR COMMUNITY SUPPORTED AGRICULTURE (CSA)







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The Community Supported Agriculture (CSA) model of direct marketing is a relative newcomer to the field of direct farm marketing, but has been rapidly growing in importance to both producers and consumers. The concept of CSA calls for the farmers to pre-sell shares, similar to a subscription, of the upcoming harvest to CSA members. These members will receive a share of food from the farm, each week, during the harvest season. Memberships are prepaid before the season begins, allowing the farmer to have cash on hand at the time of ordering seed and supplies. It also allows the farmer to plan and prepare for the upcoming season with a clear idea of how many shares he will need to produce for the participating members. CSA members understand that they are sharing in the risks of farming, and will share the losses if and when they occur. They also share in the success of a good harvest, often receiving more value than their dollars would normally purchase.

There are as many different models of CSA as there are CSA farmers. Each incorporates different elements to accommodate their own farm needs, CSA member needs, and the individual personality of the farm. For example, distribution of the weekly harvest share can be done on-farm, where consumers pick up at the farm during specified hours; off-farm at pre-arranged locations and times; or direct delivery to members' homes. In addition, some CSAs have a pre-packed box of food each week, while other CSAs offer members choices of what is included in each week's box. Some CSAs require members to perform a share of the farm workload, whether it be weeding, harvesting, packing boxes, distributing boxes or promotion. Each of these differences has its own impact on the safety of the foods CSA members receive.

In order to reduce food safety risks and prevent the likelihood of foodborne illness outbreaks at your farm direct marketing venue, each farmer needs to understand how to identify risks and implement practices to mitigate these risks. This document is intended to help farmers understand what microbiological, chemical, and physical hazards exist on their farms, assess the risks associated with these hazards, and adopt outlined recommendations that can reduce these risks. Each farmer must perform their own risk assessment and determine which

guidelines are appropriate for their operation.

### POTENTIAL SOURCES OF CONTAMINATION

# 1. POTENTIAL SOURCE OF CONTAMINATION: DISTRIBUTION METHODS

CSA members enjoy the opportunity to connect to the farm through their harvest share. They learn the seasonality of the farm, meet and become a part of the farm family and may develop a shared sense of community with the other CSA members. A CSA farmer encourages this kind of bond and protects that relationship by providing safe foods in a safe environment. A farmer's vigilance with food safety practices will ensure high-quality, healthy foods for the CSA members and minimize their own liability, as farmers will be held responsible for the quality and safety of the foods being distributed, regardless whether foods are picked up on the farm or an off farm location. Many food safety practices also improve end product quality, so implementing Good Agricultural Practices can reduce risks AND improve quality.

**On-farm distribution** sites have an advantage that other distribution methods do not. The farmer has access to the farm cooler or other means of cold storage, where CSA boxes can be held while waiting for member pickup. This allows proper cold temperatures to be maintained for meats, cheeses, eggs, dairy products and any other foods that should be maintained at 41° F or less. The farmer also has access to wash facilities to ensure all foods are clean and free of soil or other debris, and all containers can be maintained in a clean and sanitized manner.

Those farms that are providing consumer choices for the CSA box contents should maintain the foods as though in a farmers market style setting:

### **RECOMMENDATION:**

- Displays of foods should be supervised to minimize consumer handling and contamination.
- All foods should be kept off the ground or floor.
- Maintain displays of raw produce separately from potentially hazardous foods, such as meats, poultry, cheese, eggs, etc.
- Display containers and tables should be cleaned and sanitized between uses.
- Bags for foods should be new and free from chemicals that would be inconsistent with food products.
- While on display all hot foods MUST remain hot, 140°F\* or above, cold foods MUST remain cold, 41° or below, with shell eggs held at 45° or below, and frozen foods MUST remain frozen, 0°F or below.\*
- Any foods requiring temperature control and held outside of the recommended temperature ranges for 2 hours or longer should be destroyed.
- Cooler walls, ceilings and floors should be easily cleanable and periodically cleaned and sanitized to eliminate the build-up of dirt, debris and mold.
- Foods should be stored off the cooler floor and not in direct contact with the cooler walls.
- Condensation within a cooler should be prevented from dripping on food products or food containers.

**Off Farm Distribution** sites might include direct home delivery or a central drop-off site. Many farmers, especially those with large memberships, use **central drop off points** within the community to make their program more accessible to busy members who cannot easily get to the farm. The drop off may be a community business or it might be the back porch of a CSA member. Wherever this central drop off site is located, the farmer bears the responsibility for the safety of the foods being delivered and must take steps to ensure the foods in each CSA box maintain their quality and safety while being transported to the drop-off site, awaiting pick up and as they are picked up by the member. To limit liability, CSA farmers should make arrangements with caretakers at central drop off sites to dispose of CSA boxes that are not picked up on time, such as notifying the farmer to pick up leftover boxes, or donating them to a local food pantry or needy family.

<u>RECOMMENDATION</u>: The CSA boxes awaiting pick-up should be protected from adverse weather elements; including direct sun, rain, wind; and any other airborne contaminants. They should also be enclosed to protect against pests and rodents.

RECOMMENDATION: All foods should be kept off of the ground or floor.

**RECOMMENDATION:** Food that requires cooling should be kept cool during distribution by using coolers or some other means of cooling.

**<u>Direct delivery</u>** brings the weekly CSA box right to the home of each member. The member knows the approximate time their box will arrive and can make plans accordingly to receive their box and optimize food safety.

<u>RECOMMENDATION</u>: CSA boxes should be left in a location that protects them from the elements, sun, wind, rain, etc. Members should be encouraged to leave a cooler in a shaded location for the CSA box to be left.

<u>Transportation</u> Whether the CSA box is delivered direct to the member homes or left at a central drop off point, food safety issues arise with transportation.

<u>RECOMMENDATION</u>: Truck beds used to transport products for consumption should be free from dirt, food residue, livestock or domestic animal manure and dander, chemicals, fertilizers and all other potential contaminants. Further, all loads should be covered or enclosed for transporting food products, either with an enclosed truck body, a truck cap or with a tarp to minimize exposure to the elements during transportation. The truck's enclosed space should be brought to the proper temperature for foods being transported before loading.

<u>RECOMMENDATION</u>: Proper temperatures must be maintained while en route and awaiting pick up. If using ice, there should be accommodations to allow melted ice to run off to ensure food products are not immersed in melted ice water.

<u>The CSA Contract</u> To help members understand the food safety issues involved in the delivery of their foods, the CSA contract should address the need to protect the quality and safety of foods they are receiving. The contract should help CSA members understand their role in helping the farmer keep their foods safe and free from contamination.

<u>RECOMMENDATION</u>: A clause should be added to the CSA contract that states, "Food safety is a priority on [Name of Farm]. As such, no food will be left at a CSA member's home without access to a cooler, refrigerator or other appropriate protection from the elements, to maintain the quality and safety of the foods being delivered.

### References:

Food Safety Begins on the Farm: Good Agricultural Practices for Fresh Fruits & Vegetables, <a href="https://www.gaps.cornell.edu/">www.gaps.cornell.edu/</a>

Food Safety at Farmers Markets and Agritourism Venues: A Primer for California Operators, <a href="http://sfp.ucdavis.edu/farmers">http://sfp.ucdavis.edu/farmers</a> market/food safety.pdf

Farmers Market Guidelines: Minimum requirements for food safety, Oregon Dept of Agriculture, <a href="http://oregon.gov/ODA/FSD/docs/pdf/guide\_farmer\_mkt.pdf">http://oregon.gov/ODA/FSD/docs/pdf/guide\_farmer\_mkt.pdf</a>

Food Safety Regulations for Farmers Markets, Purdue Extension, <a href="http://www.ces.purdue.edu/extmedia/EC/EC-740.pdf">http://www.ces.purdue.edu/extmedia/EC/EC-740.pdf</a>

Safe Food Handling at Open Markets, Kansas State University Extension, <a href="http://www.ksre.ksu.edu/library/fntr2/FOODASYST/8market.pdf">http://www.ksre.ksu.edu/library/fntr2/FOODASYST/8market.pdf</a>

**<u>Attachments</u>**: Temperature Logs

### 2. POTENTIAL SOURCE OF CONTAMINATION: CONTAINERS

The containers used for distributing the weekly harvest share to CSA members are an important line of defense against food contamination. The CSA farmer should be diligent in providing a container that can be easily cleaned and sanitized. For that reason, it is recommended that consumers be given containers rather than using something brought from home where the farmer has no control over the cleanliness of the container. However, if the container stays in the possession of the consumer, the farmer should ensure the container is clean and free of any visible dirt or debris before placing any foods inside.



Containers should be of an appropriate material to help maintain the temperature of the product it contains. Foods, such as cheese and dairy products, must be maintained at 41°F or lower, eggs must be 45°F, or below and frozen meats must be maintained at 0°F. Providing insulated containers or coolers that will maintain a cold temperature will ensure a safe product

once the consumers have picked up their share and placed the products in their own refrigerators or freezers. Likewise, a container that is awaiting consumer pickup, whether on-farm, at a central drop off site or on a consumer's door step, should be kept in a cool place, rather than out in the sun where produce and other products may rapidly deteriorate.

If farmers provide containers for their members for the season, members should be reminded to only use the container for food from the CSA to reduce the likelihood of cross contamination. If the CSA provides fresh produce and a potentially hazardous food such as eggs, members should be reminded to transport these foods separately and if containers are provided, they should be labeled to prevent cross contamination. Some farms choose to color code containers to reduce the confusion if multiple food items that require segregation are part of the CSA.

<u>RECOMMENDATION</u>: CSA containers should be easily washable and sanitized. Containers should be cleaned and sanitized between each use.

RECOMMENDATION: A clause should be placed in the CSA contract that indicates, "Food safety is a priority on [Name of Farm]. Any container brought to the farm with visible dirt and debris will not be filled for re-use. The members are asked to clean any containers they bring to the farm to be refilled with foods."

<u>RECOMMENDATION</u>: A cooler or insulated container should be used to distribute foods that require cold or frozen temperatures to be maintained. These can be provided by the CSA farmer or a requirement of the CSA member to make available.

<u>Products Within the CSA Container</u> Consumers join a farm CSA because they believe the foods they receive will be fresh and healthy for their families. Farmers need to protect that trust by ensuring the food they provide is clean, as well as protected against any potential contamination.

<u>RECOMMENDATION</u>: Know and understand GAPs standards and utilize GAPs best practices in production and post-harvest handling of fruits and vegetables.

<u>RECOMMENDATION</u>: Separate boxes should be used to segregate raw produce from potentially hazardous foods such as meats, cheeses, eggs, etc.

<u>RECOMMENDATION</u>: CSA share containers should be covered to eliminate pests, rodents and other contaminants from entering the box.

# **References:**

Food Safety Begins on the Farm: Good Agricultural Practices for Fresh Fruits & Vegetables, <a href="https://www.gaps.cornell.edu/">www.gaps.cornell.edu/</a>

Food Safety at Farmers Markets and Agritourism Venues: A Primer for California Operators, <a href="http://sfp.ucdavis.edu/farmers">http://sfp.ucdavis.edu/farmers</a> market/food safety.pdf

Farmers Market Guidelines: Minimum requirements for food safety, Oregon Dept of Agriculture, <a href="http://oregon.gov/ODA/FSD/docs/pdf/guide\_farmer\_mkt.pdf">http://oregon.gov/ODA/FSD/docs/pdf/guide\_farmer\_mkt.pdf</a>

Food Safety Regulations for Farmers Markets, Purdue Extension, <a href="http://www.ces.purdue.edu/extmedia/EC/EC-740.pdf">http://www.ces.purdue.edu/extmedia/EC/EC-740.pdf</a>

Safe Food Handling at Open Markets, Kansas State University Extension, <a href="http://www.ksre.ksu.edu/library/fntr2/FOODASYST/8market.pdf">http://www.ksre.ksu.edu/library/fntr2/FOODASYST/8market.pdf</a>

### 3. POTENTIAL SOURCE OF CONTAMINATION: WORK SHARES

One of the reasons consumers seek out a CSA farm is the opportunity to be a part of the farm experience. Many CSA farmers provide that experience through a work share. The member gets a reduced price on the food share by being part of a "volunteer" work force on the farm. There are legal issues to be considered for each work environment, such as workers compensation and disability insurance on "volunteer" laborers, as well as liability issues. Issues related to food safety are addressed here.

<u>RECOMMENDATION</u>: Work share workers need to be treated like employees and be trained on and expected to follow GAPs practices while on the farm.

<u>RECOMMENDATION</u>: All workers must wash hands before they begin work and any time they become dirty; e.g. after using the restroom, handling live animals, or eating and drinking. Note that anti-bacterial gels are not a substitute for hand washing.

**RECOMMENDATION:** All food handlers should have clean body, hair and clothes and be free from any signs of illness or open sores.

# References:

Food Safety Begins on the Farm: Good Agricultural Practices for Fresh Fruits & Vegetables, <a href="https://www.gaps.cornell.edu/">www.gaps.cornell.edu/</a>

### 4. POTENTIAL SOURCE OF CONTAMINATION: FARMER HYGIENE

Farmers must take care to present a positive image to their members. It is as much a marketing tools as it is a food safety precaution. Clean clothes, hair and body present a good image and minimize the risk of spreading bacteria, germs and contaminants from person to product. All eating, drinking and smoking should be done in designated locations to ensure everyone is properly washing their hands before returning to work and that their personal items do not contaminate farm products.

The most important personal hygiene step that can reduce risks on the farm is proper handwashing. All family members and employees need to be trained how and when to properly wash their hands. Before beginning work and after using the toilet, eating and smoking are just a few of the times that all those working on the farm should wash their hands. Injuries including cuts and open wounds should be immediately cleaned and covered with a bandage. Gloves should then be worn as an extra barrier to protect the food from being contaminated with blood or blood-borne pathogens.

**RECOMMENDATION:** All CSA farmers, employees and work share participants should have clean body, hair and clothes and be free from any signs of illness or open sores.

<u>RECOMMENDATION</u>: Everyone working on the farm must wash their hands before beginning work and any time they become soiled, i.e. after using restroom facilities, handling live animals, eating and drinking. Note that anti-bacterial gels are not a substitute for hand washing.

<u>RECOMMENDATION</u>: Smoking should not be allowed while selling and/or handling food. NYS Health Laws prohibit smoking where food is being handled, whether it is preparation or the sale of food.

### References:

Food Safety at Farmers Markets and Agritourism Venues: A Primer for California Operators, <a href="http://sfp.ucdavis.edu/farmers\_market/food\_safety.pdf">http://sfp.ucdavis.edu/farmers\_market/food\_safety.pdf</a>

Farmers Market Guidelines: Minimum requirements for food safety, Oregon Dept of Agriculture, <a href="http://oregon.gov/ODA/FSD/docs/pdf/guide">http://oregon.gov/ODA/FSD/docs/pdf/guide</a> farmer mkt.pdf

Food Safety Regulations for Farmers Markets, Purdue Extension, <a href="http://www.ces.purdue.edu/">http://www.ces.purdue.edu/</a> extmedia/EC/EC-740.pdf

Safe Food Handling at Open Markets, Kansas State University Extension, <a href="http://www.ksre.ksu.edu/library/fntr2/FOODASYST/8market.pdf">http://www.ksre.ksu.edu/library/fntr2/FOODASYST/8market.pdf</a>

### 5. POTENTIAL SOURCE OF CONTAMINATION: FARM EVENTS

Harvest dinners, food sampling, and farm tours are all a valuable part of the CSA experience that helps to build community among members. While these can be a fun experience, they can quickly lead to trouble if proper food safety practices are not followed.

Food events, such as dinners and sampling, can educate consumers about the many ways the farm's foods can be used, while also building the relationship between member and farmer. Food sampling and food demonstration guidelines should be followed. However, licensing is not required IF the food is prepared or provided by members of a group, such as a CSA membership, for members of the group and their invited guests. No additional fee can be charged to members to participate in the event. Once the event is opened to the general public, then it is regulated by NYS Department of Health regulations, inspection and licensing.

**RECOMMENDATION:** Food demonstrations should follow the Food Demonstration Guidelines for Direct Marketing Venues as outlined in the attached reference.

<u>RECOMMENDATION</u>: Food sampling should follow the Food Sampling Guidelines for Direct Marketing Venues as outlined in the attached reference.

<u>RECOMMENDATION</u>: Post a sign at the farm indicating members are welcome, but need to adhere to food safety guidelines. The guidelines should minimally include locations on the farm that are open/closed to the public.

### **References:**

Guide to Farming in New York State:

Marketing Regulations, #27, <a href="http://www.smallfarms.cornell.edu/pdfs/Guide/">http://www.smallfarms.cornell.edu/pdfs/Guide/</a> MarketingRegulationsUpdated2-10.pdf

Becoming a Small Scale Food Processor, #28, <a href="http://www.smallfarms.cornell.edu/pdfs/Guide/BecomingASmall-ScaleFoodProcessorUpdated12-09.pdf">http://www.smallfarms.cornell.edu/pdfs/Guide/BecomingASmall-ScaleFoodProcessorUpdated12-09.pdf</a>

Tompkins County Health Dept: Temporary Food Service Permits, <a href="http://www.tompkinsco.org/">http://www.tompkinsco.org/</a> <a href="http://www.tompkinsco.org/">http://www.tompkinsco.org/</a> <a href="http://www.tompkinsco.org/">health/eh/food/tempfood fag.htm</a>

### **Attachments:**

Food Demonstration Guidelines for Direct Marketing Venues Food Sampling Guidelines for Direct Marketing Venues Food Safety Guidelines for Consumers on the Farm



### 6. ADDITIONAL CONSIDERATIONS: INFORMATION SHARING

CSA farmers use information sharing (newsletters, Facebook postings, etc.) as a means to educate their members about agriculture, their farm, and the foods they are receiving each week. Along with news about the farm, many CSAs offer recipes, tips and techniques for using the fresh foods distributed in their weekly box. The farmer can be ultimately liable if information given is inaccurate and causes illness or injury.

<u>RECOMMENDATION</u>: All recipes and information shared should be consistent with federal and state regulations. In addition, cite sources for recipes and information should be shared to mitigate personal liability.

<u>RECOMMENDATION</u>: Information on food preservation should be avoided, instead directing consumers to Cooperative Extension Educators for accurate and up-to-date information.

### 7. ADDITIONAL CONSIDERATIONS: TRACEABILITY

One of the concerns of the FDA in food borne illness outbreaks is the ability to trace the tainted food back to the source of contamination. Farmers should make every effort to identify their CSA, as well as their product, allowing consumers to track where their food comes from and what batches are delivered on what day. This can be done with a paper system or with a more sophisticated electronic system.

A traceability system allows each farm to identify their products and logistics such as how they were grown, harvested, packed and transported. A Harvest Log can be maintained to show all relevant information to help trace the products, should an illness occur.

<u>RECOMMENDATION</u>: A CSA Harvest Log should identify fields, harvest dates, harvest crew(s) and dates and location food was distributed to the CSA members. (See sample log attached.)

Another facet of traceability is being able to identify products from a specific farm. This is not only important for food safety, but important for marketing as well. Farmers should consider ways to identify their products and keep their farm name in from of customers, such as table signage that includes the farm name, container labels or stickers, farm brochures, business cards and name tags on clothing.

<u>RECOMMENDATION</u>: All products from the farm are distributed in boxes with the farm name, address and phone number or other means are used to notify members of this information.

Most CSAs offer only product produced on the farm. However, it is becoming more common for CSA farms to work together to offer each other's products to their members. For example, a farm producing vegetables may partner with a fruit producer so each of their CSA members receive fruits and vegetables each week. Labeling foods from another farm could be as easy as stickers on the bag or container, or other such means to notify consumers.

<u>RECOMMENDATION</u>: Any products offered in a CSA share that is sourced off-farm, should be identified to the CSA member, either through a weekly newsletter announcement, a notice included in the CSA box, or other means of information sharing with members.

<u>RECOMMENDATION</u>: All food providers in CSAs should include farm information that identifies the name of the farm, the location, contact information, and food they provided to the member.

# References:

Food Safety Begins on the Farm: Good Agricultural Practices for Fresh Fruits & Vegetables, www.gaps.cornell.edu/

# **Attachments:**

Traceability Procedures Harvest Logs CSA Log



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