



FOOD SAFETY

TRACEABILITY & RECALLS

The concept of traceability and recalling already sold produce (or other products) from the marketplace is not something many small-scale direct market growers have had to think about, let alone implement in an emergency. But it is something that deserves a closer look for the potential benefits it offers to your operation in terms of valuable information and risk management. And it could save a life (and your farm) if a worst-case scenario were to occur.

TRACEABILITY

In the most basic terms, traceability means being able to follow your product one step backward and one step forward in the production and distribution chain. This obviously has a different connotation and scale for a produce grower selling at one farmers market per week as opposed to a large and complex commercial operation selling to a national chain grocer or fast-food restaurant. But since microbes that cause foodborne illness can potentially occur in any size farm, knowing where your product is going, and the details about where it came from is important in any size farm. In addition, being able to trace a known quantity of produce when it leaves the farm benefits growers by providing a way to better understand how much product is being sold through various marketing channels and how quality is maintained throughout the process.

RECALL

A recall identifies a distinct portion, or “lot,” of a product sold that must be retrieved due to a known or suspected defect or error and removes it from commerce and potential customers. Sounds simple, but the actual practice can be very time consuming, costly, and confusing. And again, the procedure will look quite different according to

size, scale, and scope of an operation or product volume.

TRACING ONE STEP FORWARD, ONE STEP BACK

It would not be reasonable, or even possible, for a grower to know exactly where every individual produce item ends up once it enters commerce. However, with recordkeeping and a system of managing distinct lots of produce, it is possible to know details about how it was produced and where it went first when leaving the farm. For example, a grower does not need to know the identity of every person who purchased one of their peaches, but they should know the orchard block where the fruit was harvested, when it was harvested and packed, and at which farmers market the peaches were sold. If this grower sold their peaches to a local independent grocery store with several locations, it would be the retailer’s responsibility to be able to trace back to which farm the peaches were purchased from, and at which of their retail locations the peaches were sold to customers.

ESTABLISHING LOTS

To trace a distinct portion of a crop, it needs to be organized into “lots.” There is no recipe for how to set lot size or identify a lot. The larger the lot, the less recordkeeping may be required, but the harder it would be to recall all of the lot, especially if it was sold to multiple buyers. Some growers may choose to establish lots based on the crop type, day harvested, field or orchard block, or may establish several lots daily separated by cleaning breaks on packing lines. Give each lot a code that contains key information about that lot. For example, a lot code could contain a combination of letters and numbers that indicate the crop and variety, the day

harvested, the crew responsible, the field located, the day packed (if different from the day harvested), and any other pertinent information that could be useful in identifying key details about that portion of the crop.

LABELING

A lot code can only be useful if it follows the crop. Labeling the sellable container, whether that is a box, bag, clamshell or even the individual fruit or vegetable, ensures that the lot information stays with the crop when sold. Remember to include your farm name and business address on any labeling as well. One reason is that the FSMA Produce Safety Rule requires Qualified Exempt Growers to prominently and conspicuously display—on a label, poster, sign, placard or documents delivered contemporaneously with the produce at the point of purchase—the name and complete business address of the farm where the produce was grown. In practical terms, this can help a buyer find you more easily if there is an issue with your products, or, and this is more likely, quickly identify where to order from again in the future!