

What to Expect During a Produce Safety Regulatory Inspection

The Georgia Department of Agriculture (GDA) Produce Safety Program, will be conducting routine produce inspections on a yearly basis. These inspections are required and are different than yearly 3rd party audits. The GDA Produce Safety Program may conduct follow-up or for-cause inspections to verify corrective actions have been implemented. Inspections are an integral part of the GDA's commitment to produce safety, along with seeking to provide education, outreach, and technical assistance to farmers and producers around the state.

This document provides the farm owner and/or produce safety manager with an overview of the steps that state or federal inspectors may take during a routine Food Safety Modernization Act (FSMA) Produce Safety Rule (PSR) inspection, and should address any questions that you may have. If there are additional questions after reading this document, please contact the GDA Produce Safety Program at 229-386-3488.

Scheduling the Inspection

Typically, a GDA inspector will contact the farm owner or produce safety manager to schedule an inspection. The designated owner or manager will serve as the main point of contact and you should work with inspectors to schedule and support the completion of the inspection.

Pre-Inspection Call

During a pre-inspection call, the inspector will ask some questions to make a preliminary determination about whether the PSR applies to your farm. The inspector will formally introduce themselves, explain the reason for contact (i.e., to schedule a routine Produce Safety Rule inspection), and provide a high-level overview of the goals and purpose of the routine PSR on-farm inspection. For additional information, please use the FDA decision tree here:

www.georgiaproducesafety.com.

During the call, the inspector will discuss topics including:

- Farm size (produce and/or food sales), to determine if the farm is subject to the rule or meets the requirements for a qualified exemption;
- Whether the farm grows produce covered under the PSR ;
- Whether the farm conducts activities covered under the PSR (e.g., growing, harvesting, packing or holding produce), or meets the requirements for a processing exemption;
- If the farm is growing one or more “**priority produce commodities**” (if so, the inspection will be scheduled to focus on those types of priority produce); and
- Determine if farm has more than one growing season, and what those timelines generally look like.



If the farm is determined to be exempt or qualified exempt, the inspector may schedule a time to perform an exemption verification to review records that support the farm's status. Please see more details about the records required for this under the FSMA Produce Safety Rule at www.georgiaproducesafety.com.

Who on the Farm Should Participate?

It is recommended and preferred that the farm owner, person in charge (PIC), and/or produce safety manager are all available and on-site during the inspection. These people are also encouraged and recommended to participate in the inspection process.

A person from the farm who is readily knowledgeable in the growing, harvesting, packing and holding activities (preferably the person responsible for produce safety), should plan to accompany the inspector during the entire inspection process. This will aid in providing all the details about the farm's operations to help the inspector better understand the farm practices.

Announced Inspections

After the pre-inspection call, if the produce grown on the farm is covered by the rule, the inspector will schedule an inspection date that works for the inspector and the farm's PIC. It will be important for the inspector and PIC to discuss any farm biosecurity practices, hazards, safety protocols, and other requirements that inspectors should be aware of, and adhere to, prior to visiting.

In most cases, the inspection will be scheduled within five (5) business days of initial contact with the PIC. If the PIC is not the produce safety/quality expert, the inspector will suggest the individual also be present for the inspection. Again, it is critical to have a representative from the farm who is knowledgeable in the growing, harvesting, packing and holding activities (preferably the person responsible for produce safety) available to escort the inspector around the farm during the inspection.

Upon arrival, the inspector will verbally explain the general flow of the inspection, what the inspection will cover and records that may be reviewed.

Unannounced Inspections

Most inspections will be announced; however, there are circumstances when unannounced inspections may need to be conducted. The following are some examples of when an unannounced inspection may occur:

1. If the farm is unresponsive (no contact within five (5) business days after reasonable contact attempts have been made), or unwilling to set a reasonable date for the inspection; in these cases a **refusal letter** will be mailed or hand-delivered to the farm;



2. If the farm has had produce safety issues in the past and the issue has not been corrected within established timeframes;
3. If a follow-up inspection is needed and an unannounced inspection is necessary to observe the corrective actions/changes being made; or
4. If the inspector is responding to a complaint, recall event, or foodborne illness outbreak investigation.

The Day of the Inspection

When an inspector arrives on your farm, the inspector will ask to speak to the owner or PIC. The inspector will introduce themselves (name, title, agency), show the farm staff their official identification/credentials, and announce the reason for the visit. A written “Notice of Inspection” or similar document may be provided to the farm, depending on any state regulations or if the FDA is conducting the inspection.

Initial Interview

The inspector will provide a brief description of the reason for, and scope of, the inspection, and the activities the inspector will be conducting during the visit. The amount of time an inspection takes varies; it depends on the type of inspection, farm activities, size of the farm, and what is observed during the inspection. The inspector will also want to spend time discussing the farm’s organization, and any specific activities performed by the farm on the day(s) of the inspection (such as planting, harvesting, packing or holding, etc.).

Walk-Through During the Inspection of the Farm

During the inspection, the inspector will observe farm operations, working with the owner to coordinate the timing of the inspection in order to view various aspects of farm operations. An inspector may also ask questions about farming practices and operations, which they are not able to observe during the inspection.

Throughout the inspection, the inspector will explain what is being looked at and why. If there are any regulatory concerns, the inspector will discuss them with the PIC and explain the reason(s) for each regulatory concern and the public health significance.

Inspectors will take notes, and may take pictures, collect samples, and will review and may copy records, such as training and biological soil amendment records.

Exit Interview

The exit interview will ideally occur with the PIC, farm owner, manager, and/or produce safety manager. The inspector will go over any regulatory concerns and findings and provide information on resources and technical assistance.



PRODUCE SAFETY

If the PIC is able to make corrections during the inspection, the inspector will document the corrections that have been implemented immediately on-site. If the deficiency cannot be corrected during the inspection, the inspector will work with the owner or manager to determine a reasonable timeframe to implement preventive measures and corrective actions.

During the exit interview, the inspector will also identify preventive produce safety practices and conditions on your farm that align with the requirements of the PSR. The inspector will take time to answer any questions you may have regarding the inspection. They will also provide the owner or manager with an inspection sheet and agency contact information that documents everything they noted during the inspection. If any follow-up inspection is required, they will explain the process for that as well.

Throughout the year, your inspector should serve as a resource for you. Feel free to contact them or the GDA Produce Safety Program's main line (229-386-3488) if you have questions, changes in operation that may initiate the need to schedule a re-inspection, or other issues that the GDA can support.