



NATIVE FOOD SAFETY FOOD SUPPLY CHAIN 101

FSMA Considerations for American Indian/Alaska Native Food Growers and Processors Producing Food for Human Consumption



On farm agriculture production in Indian Country is a \$3.5 billion industry.

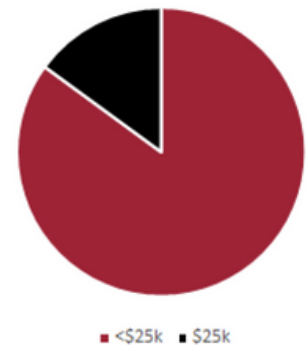
As Tribal nations, enterprises, and food growers scale and explore value-added opportunities, regulations under the Food Safety Modernization Act (FSMA) may apply. Commercial markets are also requiring growing operations to meet certain FSMA practices. Even where operations do not specifically need to follow FSMA regulations, doing so may reduce the risk of foodborne illnesses contracted by your intended consumers.

Do Indian Country Food Systems Need to Comply with FSMA?

American Indian/Alaska Native (AI/AN) producers carry an extensive history of feeding their communities and in facilitating trade relations with nearby nations. The 2017 Census of Agriculture indicates that AI/AN producers comprise approximately 3% of all farms nationwide, with approximately 15% carrying an annual market value of sales over \$25,000.

Many AI/AN producers are scaling operations, with communities across Indian Country looking at the potential for food processing facilities to feed their people and reclaim food economies. Incorporating traditional and recent food safety practices will support the longevity and viability of these operations.

% AI/AN Farms by Annual Market Value Sales



Who Must Generally Comply?

Fresh fruit and vegetable growers earning over \$25,000*/yr. in annual produce sales must meet active PSR requirements starting in January 2020.

Facilities that manufacture or process worth over \$1,000,000* food intended for human consumption must follow PCHF requirements. Segments of farms that manufacture or process foods to create a distinct must apply comply with PCHF (some exemptions apply).

Covered food processing facilities must register with FDA at <https://www.fda.gov/furls>.

Vendors/distributors who touch your food on its way the consumers should be aware of where they fall under FSMA and Tribal, state, and local food codes to reduce the risk of causing a foodborne illness outbreak.

*adjusted for inflation

What is Generally Required in these Rules?

While the specifics vary in each rule, both the Produce Safety Rule (PSR) and Preventive Controls for Human Foods (PCHF) rule require agricultural operations require growing operations and agricultural enterprises take action to address food safety risks. The PSR looks particularly at biological food safety risks, such as toxigenic e.Coli (e. Coli 0157-H7); however, the PCHF rule calls operations to address biological hazards, chemical hazards (e.g. allergens); and physical hazards (e.g. glass, metal fragments).



ASSESS RISKS & HAZARDS:

- Understand the food safety risk factors relevant to
 - the surrounding environment;
 - the food being grown, packed, or processed;
 - the practices, tools, and equipment used in these operations; and
 - what vendors down the supply chain will do to mitigate these risks.

PERFORM:

- Develop and implement food safety practices that reduce risk factors.
- Designate at least one qualified individual to oversee food safety practices. These persons must take training recognized by FDA for their type of operation.
- Workers must have the training, education, and/or experience necessary to complete their duties.
- Note: A food safety plan detailing operation activities is recommended under the PSR and required under the PCHF.

MONITOR & ADJUST:

- Affirm that activities on operation are being conducted and are effective.
- Inspect whether fencing, facilities, tools, equipment, etc. meet food safety standards (e.g. no pests, no animal feces, no fencing/equipment breakage, water quality testing)
- Conduct corrective actions as necessary.

RECORD:

- Document food safety activities, trainings, monitoring findings, corrective actions as they occur.



The Tribal Food Safety Center at the Indigenous Food and Agriculture Initiative serves as a national resource for Indian Country on the FSMA Produce Safety Rule and Preventive Controls for Human Foods rule. Food safety resources, webinars, and training information are available online at www.NativeFoodSafety.org.

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