

Title: CAFO Assessment		SOP No.		Page 1/2	
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Approved by:			Supersedes Date:		

PURPOSE: Identify issues related to leafy greens fields adjacent to Concentrated Animal Feeding Operations (CAFOs) that may impact produce safety before planting (pre-season) and during pre-harvest/harvest operations.

SCOPE AND FREQUENCY: This assessment must be completed prior to planting, within one-week prior to harvest and during harvest of leafy greens.

RESPONSIBILITY: A food safety professional must update and revise this SOP annually or as needed. This assessment must be completed by a food safety professional, designated food safety personnel or by a qualified third party on behalf of growers near a specific CAFO.

PROCEDURE: A pre-season assessment must be conducted/documented before planting operations. A pre-harvest assessment must be conducted/ documented to confirm no changes from the pre-season assessment, before harvest and during daily harvest operations. Below are steps/consideration to conduct these assessments.

Pre-Season Assessment

1. When conducting a pre-season assessment of all field adjacent to a CAFO focus on circumstances and activities such as the following:
 - Can a discharge from CAFO into surface ag water sources occur?
 - May unusual weather events increase risk of pathogen transfer via wind, runoff, etc.?
 - Can unusual activity or noticeable changes in activity within a CAFO increase the potential for pathogen transfer to adjacent fields?
 - Are there changes in water quality and potential routes of contamination?
 - Is there manure or compost storage near water sources or produce fields?
 - What is the potential for cross-contamination by animal (e.g., insects, birds, rodents, etc.) movements from CAFO to fields?
 - Is adjacent land use a source of pathogens (such as weedy areas, adjacent incompatible crops (offering animal harborage potential), etc.?)

2. Document your findings on areas, activities and events observed.

3. If you determine that any activities/events have the potential to cause contamination of produce fields adjacent to a CAFO, take actions to mitigate that risk. Some actions include, but are not limited to the following:
 - If surface water quality is or could have been negatively impacted, treat the water before it is used for spray applications or irrigation that directly contacts the crop. Only use approved sanitizers and follow label instructions for accurate use and to avoid adverse environmental impacts.

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- If you note practices that pose a food safety risk to a produce field, contact the CAFO owner or manager to establish viable/practical solutions for mitigating the risk.
- Limit production area access of insects, birds, and animals other than cattle that may cause gross cross-contamination; for instance, discourage bird movement between CAFO and leafy green fields with use of sound devices, reflective tape, etc. Large populations of flies and other animals may also carry pathogens and should be monitored. Consider also animal burrows that may serve as a contaminant conduit between a CAFO operation and surface ag water sources.
- Consult with federal, state, and local wildlife authorities before taking any remedial actions that involve wildlife.
- Consider produce testing before harvesting, as appropriate, as a tool to detect gross-contamination.
- If a food safety risk is identified and a remedial action cannot be taken to control or eliminate the risk, destroy the block by disking under the crop.

Pre-Harvest/Harvest Assessment

1. In addition to events or conditions identified during your pre-season assessment, also evaluate the stage of the crop and/or any visual damage you may observe.
2. Confirm that the mitigation measures employed during the pre-season Environmental Assessment (if any) have been implemented and are still in place.
3. Document your findings on areas, activities and events observed.
4. If you determine that any activities/events have the potential to cause contamination of produce to be harvested adjacent to a CAFO, take actions to mitigate that risk.
 - Consider produce testing before harvesting if crop damage is noted and as a tool to detect gross-contamination. If extensive damage to crops is observed, do not harvest.
 - If a food safety risk is identified and a remedial action cannot be taken to control or eliminate the risk, destroy the block by disking under the crop.

VERIFICATION:

A Food Safety Professional must verify a pre-harvest assessment is conducted as outlined in this procedure one week prior and during daily harvest operations.

EQUIPMENT/TOOL REQUIRED:

- A copy of this SOP
- A Food Safety Assessment Form
- A pen / pencil or electronic devices.

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SAFETY CONSIDERATIONS:

Follow your worker safety polices to safely perform this assessment.

RECORD KEEPING:

Food Safety Assessment Forms should be kept for a minimum of 2 years or as determined by the company policy. These forms must be completed and signed as soon as feasible after completion.