

# Balancing Food Safety and Domesticated Animals on Produce Farms

While domesticated and wild animals are part of many farm landscapes, animals pose food safety concerns because they can carry human pathogens and spread contamination as they move. This factsheet describes Food Safety Modernization Act (FSMA) Produce Safety Rule (PSR) requirements and produce safety best practices to consider when assessing domesticated animal presence on produce farms.

## **FSMA Produce Safety Rule**

The Produce Safety Rule is part of FDA's Food Safety Modernization Act that establishes minimum standards for the safe growing, harvesting, packing, and holding of fruits and vegetables grown for human consumption in an effort to prevent contamination from foodborne pathogens. Produce Safety Rule requirements are marked with a § symbol throughout this document. Not all produce farms are subject to the PSR¹, but produce safety best practices can be applied to any produce farm.

## Why are animals a food safety risk?

The PSR is divided into several sections, called subparts, and includes requirements related to domesticated animals on produce farms. While both working animals and pets are important to many farms, domesticated animals may carry human pathogens in their feces, including *E. coli* O157:H7, *Listeria*, *Salmonella* and *Cryptosporidium* and can spread contamination around fields, buildings, and equipment as they move, which can result in foodborne illnesses. Considering these risks, it is important to establish procedures and protocols to reduce the likelihood of contamination from domesticated animals.

# Working Animals 77

The PSR does not prohibit the use of working animals; however the risks they may pose to produce safety should be considered and minimized. Consider the following:

- Prevent working animals in the fields close to harvest and when the edible portion of the crop is growing.
- Establish paths to minimize contact with growing areas.
- § Assess growing areas for evidence of potential contamination as needed during the growing season.
- Develop standard operating procedures (SOPs) for animal and manure handling. *E.g. handwashing procedures and cleaning and sanitizing tools*.
- § Any workers in direct contact with working animals must take appropriate steps to minimize the likelihood of produce contamination and thoroughly wash hands after touching animals or handling animal waste.
- Have an SOP that outlines practices to take if an animal defecates in the field near or on produce.
- § If significant evidence of potential contamination is found (such as observation of animal excreta or crop destruction), you must evaluate whether the produce can be harvested in accordance with the PSR requirements of § 112.112 and not harvest produce that is likely to be contaminated.

# Pets 🙀

The PSR does not prohibit pets on a farm; however there are requirements pertaining to their presence in areas used for produce harvesting, washing, packing, and holding.

- § In fully-enclosed buildings, exclude domesticated animals from where produce, food contact surfaces, or food-packing material is exposed; OR,
- § Separate domesticated animals by location, time, or partition.
- Just like working animals, pets should not be in growing areas.
   If they do enter the growing area, prevent them from entering close to harvest and when the edible portion of the crop is growing.

The best practice is to exclude pets from produce fields and areas used for washing, packing, and holding all together. If this is not possible, other best practices include:

- Close observation of pets location and habits and assessments
  of potential contamination risks. E.g. A farm dog that is trained
  not to enter production fields and not to enter wash, pack, and
  storage areas in fully enclosed buildings.
- Manage the risk of contamination by establishing a clean break between when the animal is present and when activities occur.

#### What is an SOP?

A **Standard Operating Procedure** (SOP) is a document that captures the standard set of steps and actions required to perform a routine task. An SOP is usually accompanied by an activity log to document the activity that was completed with date, time, person responsible and any significant challenges or findings.









### **Farm Visitors and Pet Policies**

Visitors are excited to be on farms but may not realize that their actions, and those of their pets, can lead to unintentional food safety risks. When it comes to visitors and pets, the PSR requires farms that are covered under the rule to:

- § Make visitors aware of policies and procedures to protect produce and food contact surfaces
  from contamination by people and take all steps reasonably necessary to ensure that visitors
  comply with such policies and procedures, and;
- § Make toilet and hand-washing facilities accessible to visitors.

Consider establishing a farm policy that asks visitors to leave their pets at home and encourage visitors, either verbally or through signs, to wash their hands before engaging with pick-your-own activities. Visitors should also be advised to not visit the farm when ill.





NO PETS BEYOND THIS POINT, PLEASE.

#### **Service Animals**

The Americans with Disabilities Act (ADA) and Vermont public accommodation statutes makes provisions for service animals. Service animals are trained to perform specific jobs or tasks for individuals, and in general, therapy, emotional, and comfort animals that have not been specifically trained are not considered service animals. Under the ADA, in situations where it is not obvious that the dog is a service animal, staff may ask only two specific questions: (1) is the dog a service animal required because of a disability? and (2) what work or task has the dog been trained to perform? Staff are not allowed to request any documentation for the dog, require that the dog demonstrate its task, or inquire about the nature of the person's disability. For further details, see the U.S. Department of Justice's document "Frequently Asked Questions about Service Animals and the ADA" by visiting https://go.usa.gov/ xQu6f and the Vermont public accommodation statutes by visiting https://go.usa.gov/xQu6d (URLs are case sensitive).



## Where should I go for more information?

Vermont Agency of Agriculture, Food & Markets Produce Program agriculture.vermont.gov/produceprogram

**UVM Extension Produce Safety Portal** uvm.edu/extension/produceportal

UVM Extension AgEngineering Blog go.uvm.edu/ageng

Produce Safety Alliance producesafetyalliance.cornell.edu



<sup>1</sup> If you are a Vermont produce farm and need assistance in determining whether your farm is subject to the FSMA Produce Safety Rule, contact the Vermont Produce Program at AGR.FSMA@vermont.gov or (802) 828-2433.

You can read the full text of the FSMA Produce Safety Rule at: https://go.usa.gov/xyatT (URL is case sensitive)

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