

U-pick scenario summary

Discussed w/ Calibration Committee via email on 10/8/18

Scenario:

- Apple farm has initial commercial harvest in apple block
- Same block then used for **U-pick**
 - Participants read a sign with U-pick instructions/hygiene practices that they're required to follow; employee monitors U-pick activities from a booth
 - Handwashing required by U-pick customers
 - U-pick customers are not given ladders
- Apple farm has second commercial harvest to capture any remaining apples in same block after U-pick
- **Is this amount of training documentation sufficient for visitors?**

Summarized response:

- Applies to standard **1.10.2** (not 1.4 since visitors are not workers; therefore written evidence of training is not required)
- **Consensus that U-pick operations could be allowed to harvest commercially following a U-pick operation, but practices should be in place to mitigate the risk**
 - Requirements may be followed as written in the standard; documentation does **not** need to be a requirement
- Examples were discussed of *best practices* (not requirements) that could be followed to mitigate potential risk associated with visitors in the orchard
 - Train harvesters to only pick above a certain line (ex: above what is reachable by ladder)
 - This may not be applicable depending on the type/height of tree
 - Visitors who are picking could be required to watch a short food safety video, and then given colored wristbands to identify they received training and are allowed to pick. They also go past hand-washing stations prior to entering the orchard
 - U-pick area could be a separate, dedicated area from what is commercially harvested, or harvest commercially first and remainder is dedicated for U-pick

Other points of discussion

- Customers are likely to touch some apples that they do not pick – there is some risk associated with this
 - There should be some sort of 'intake' process (i.e. training)
- With respect to monitoring:
 - It may be difficult to monitor all visitors to ensure they are following hygienic practices; however, this is no different than monitoring harvest employees at all times (or lack of ability to do so)
- Summary of this situation (a sign letting visitors know hygiene requirements, no written documentation of training, U-pick staff designated to oversee visitors): compliant
- **Note:** This was not discussed in the calibration committee call, however the 2018 released FDA PSR draft guidance ([Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption: Guidance for Industry](#)) gives examples on communicating "Visitor Awareness of Policies and Procedures" on pages 55-56. This draft guidance gives flexibility for instruction to be verbal, written, graphic, or a combination.