

LOUISIANA DEPARTMENT OF HEALTH AND  
HOSPITALS  
AND THE LOUISIANA DEPARTMENT OF  
AGRICULTURE AND FORESTRY

**FOOD SAFETY  
MODERNIZATION ACT  
STUDY COMMITTEE  
REPORT  
RECOMMENDATIONS  
FOR IMPLEMENTATION  
OF THE FDA FOOD  
SAFETY  
MODERNIZATION ACT**

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REPORT PREPARED IN RESPONSE TO SCR  
NO. 178 OF THE 2014 REGULAR SESSION  
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TABLE OF CONTENTS

EXECUTIVE SUMMARY	PAGE 3
INTRODUCTION: SCR 178 OVERVIEW	PAGE 4
SCR 178 STUDY COMMISSION MEMBERS	PAGE 6
FOOD SAFETY MODERNIZATION ACT BACKGROUND	PAGE 7
THE CHALLENGE OF FSMA REGULATIONS FOR LOUISIANA	PAGE 11
CONCLUSION: STAKEHOLDER CONCERNS	PAGE 15
RESOURCE NEEDS FOR IMPLEMENTATION OF FSMA	PAGE 16
Louisiana Department of Agriculture and Forestry	PAGE 16
Southern University Agriculture Center	PAGE 19
Louisiana State University Agriculture Center	PAGE 21
Louisiana Department of Health and Hospitals	PAGE 24
APPENDIX	PAGE 29
August 28, 2014 Meeting Agenda and Minutes	PAGE 30
September 23, 2014 Meeting Agenda and Minutes	PAGE 33
October 6, 2014 Meeting Agenda and Minutes	PAGE 37
October 20, 2014 Meeting Agenda and Minutes	PAGE 41
January 7, 2015 Meeting Agenda and Proceedings	PAGE 45
FSMA SWOT ANALYSIS	PAGE 49
LETTERS FROM INDUSTRY	PAGE 52
Louisiana Pecan Growers Association	PAGE 52
Louisiana Retailers Association	PAGE 55
Louisiana Meat Processors Association	PAGE 56
ACKNOWLEDGEMENTS	PAGE 57

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## EXECUTIVE SUMMARY

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Pursuant to Senate Concurrent Resolution No. 178, which was deemed to supersede House Concurrent Resolution No. 168 of the 2014 Regular Session of the Legislature of Louisiana, the Food Safety Modernization Act Study Committee (the Committee) has prepared a report to summarize the study of the Food Safety Modernization Act (FSMA). The goal of the Committee was to make recommendations as to how the FSMA should be implemented in Louisiana and the economic impact of compliance by all affected stakeholders.

The intent of the Food Safety Modernization Act is to protect and inform the public about the United States food<sup>1</sup> supply both those produced domestically and imported into the United States. While the intent of the FSMA is to protect public health, the State must make sure that it does not make quick decisions that may have unexpected or unintended consequences. As expressed throughout this report, rules for the FSMA *have not been finalized* and are still under review. Concerns expressed for the current FSMA proposed rules may seem tentative, but have merit.

The most commonly expressed concern involves on-farm inspections and the ability to have procedures in place to address possible disputes. Both the Louisiana Department of Health and Hospitals and the Louisiana Department of Agriculture and Forestry are committed to working with the industry to ensure they are informed and prepared to comply with the FSMA. The two state agencies will assume responsibility for the implementation of the FSMA in Louisiana when resources become available.

<sup>1</sup> FDA defines “food” as articles used for food or drink for man or other animals. In this document, the word “food” is used to reference both human food and animal feeds, which includes pet foods. The term “food facilities” is used to reference those facilities which manufacturer or distribute “food”.

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## FSMA STUDY COMMITTEE REPORT

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### INTRODUCTION

#### SCR 178 OVERVIEW

Pursuant to Senate Concurrent Resolution 178 of the 2014 Regular Session of the Louisiana Legislature, the Food Safety Modernization Act Study Committee (the committee) prepared this report to summarize the study of the Food and Drug Administration's (FDA) Food Safety Modernization Act (FSMA) and make recommendations as to how it can be implemented in Louisiana. The committee consisted of a diverse group of stakeholders located throughout the State with a similar goal to identify the various strengths, weaknesses, opportunities and needs in order to properly implement the FSMA in Louisiana.

The Food Safety Modernization Act Study Committee legislation was sponsored by Senator Johns during the 2014 legislative session. The Committee met on the following dates: August 28, 2014, September 23, 2014, October 6, 2014, October 20, 2014, and January 7, 2015.

Minutes of these meetings are contained in the appendix of this report. Presentation materials and background materials that comprise the basis for this report can be made available by contacting the Louisiana Legislature.

The Louisiana Legislature acknowledges and accepts as fact the following statistics: according to the Centers for Disease Control and Prevention, each year, approximately 48 million people, or one in six Americans, get sick, 128,000 are hospitalized, and 3,000 die from foodborne diseases.

The Legislature also appreciates that these diseases are largely preventable and when not prevented the economic and personal costs are very high. The costs include but are not limited to medical services, loss of income, and negative media coverage affecting our world-renowned culture and distinctive cuisine.

The passage of the Food Safety Modernization Act (FSMA) has and will create Federal rules and regulations that will change and increase the State's current regulatory agencies' roles in inspecting and monitoring food safety from farm to table.

The purpose of this document is to define the requirements for compliance with FSMA as requested by Senate Concurrent Resolution NO. 178. These requirements are:

- to provide a document to the Louisiana Legislative body defining/outlining the FSMA and why it was passed into law;
- to hold public meetings with stakeholders such as pecan and fruit growers, manufacturers and distributors of food products and the retail food industry to gather information regarding their concerns and possible limitations in adopting these new Federal requirements;
- to determine which FSMA rules/regulations will be adopted by the state regulatory agencies; specifically the Louisiana Department of Agriculture and Forestry and the Louisiana Department of Health and Hospitals in order to determine what rule(s) and/or inspections and monitoring requirements will be conducted by state inspectors through contractual agreements with the Federal Inspection Program (FIP) and which of the requirements will be met using federal inspectors;
- to determine how the state regulatory agencies will implement and manage the increased workload of the number and complexity of the food safety rules and inspections;
- to outline and identify the anticipated resources needed in order to attain and sustain compliance as these new Federal requirements are implemented over the next several years to summarize “what we know vs. what we do not know” as most of these Federal rules are still open for public comment and some have yet to be written.

**SCR 178**  
**Study Committee Members**

Tenney Sibley Director, Office of Public Health Louisiana Department of Health and Hospitals	Rep. John F. “Andy” Anders Louisiana House of Representatives
Tessa Dixon Food and Drug Administrator Louisiana Department of Health and Hospitals	Senator Ronnie Johns Louisiana Senate
Dr. Carrie Castille Associate Commissioner Louisiana Department of Agriculture and Forestry	Mark F. Keiser, MBA, MHA, MPH, FACHE Executive Director/CEO ACCESS HEALTH LOUISIANA
Pam St. Pierre Vice President of Member Services Louisiana Department of Health and Hospitals	Rep. Bob Hensgens La House Committee on Health and Welfare
J.H. Campbell, Jr. President Associated Grocers, Inc.	Josh Yarborough La Meat Processors Association
Jessica Elliott Director of Government Affairs Louisiana Retailers Association	Brian Breaux Associate Commodity Director Louisiana Farm Bureau Federation, Inc.
Natalie Babin Isaacks Executive Director La Oil Marketers and Convenience Stores Assn	Brandt Robin La Fruit and Vegetable Growers Association
Eric Baumgartner Director, Policy and Program Planning Louisiana Public Health Institute	Mike Montgomery Vice President La Pecan Growers Association
Dr. Gina Eubanks Program Leader LSU AgCenter	Copper Alvarez BREADA and Red Stick Farmers Market
Dr. Adell Brown Southern University Ag Center	

## FOOD SAFETY MODERNIZATION ACT BACKGROUND

According to recent data from the Centers for Disease Control and Prevention, each year, about 48 million people (one in six Americans) get sick, 128,000 are hospitalized, and 3,000 die each year from foodborne diseases. This is a significant public health burden that is largely preventable. This point was made clear by a series of very high profile food safety incidents in the mid-2000s involving various produce as well as manufactured human foods and animal feeds. These incidents illustrated the need for changes to the ways these products were regulated and monitored.

The Food and Drug Administration's (FDA) Food Safety Modernization Act (FSMA) was signed into law in 2011 and enables the FDA to strengthen the food safety system by building a new system based upon prevention. It enables the FDA to focus more on preventing food safety problems rather than relying primarily on reacting to problems after they occur. The law also provides the FDA with new enforcement authorities designed to achieve higher rates of compliance through prevention and risk-based food safety standards, and to better respond to, and contain, problems when they do occur. The law also gives the FDA important new tools to hold imported foods to the same standards as domestic foods and directs the FDA to build an integrated national food safety system in partnership with state and local authorities.

The new law focuses the FDA's efforts in the areas of prevention, inspection and compliance, response, imports, and enhanced partnerships. The FDA's key new authorities and mandates are briefly described below under these categories and will be implemented through a series of promulgated rules to address the relevant sections of the law.

### PREVENTION

- For the first time ever, the FDA will have a legislative mandate that requires comprehensive, science-based preventive controls across the human food and animal feed supply. This mandate includes:
  - **Mandatory preventive controls for food and feed facilities:** These facilities are required to implement a written preventive control plan. This involves: (1) evaluating the hazards that could affect food safety, (2) specifying what preventive steps, or controls, will be put in place to significantly minimize or prevent the hazards, (3) specifying how the facility will monitor these controls to ensure they are working, (4) maintaining routine records of the monitoring, and (5) specifying what actions the facility will take to correct problems that arise.

- **Mandatory produce safety standards:** The FDA must establish science-based minimum standards for the safe production and harvesting of fruits and vegetables. Those standards must consider naturally occurring hazards, as well as those that may be introduced either unintentionally or intentionally, and must address soil amendments, hygiene, packaging, temperature controls, animals in the growing area and water.
- **Authority to prevent intentional contamination:** The FDA must issue regulations to protect against the intentional adulteration of food, including the establishment of science-based mitigation strategies to prepare and protect the food supply chain at specific vulnerable points.

## INSPECTION AND COMPLIANCE

The FSMA recognizes that preventive control standards improve food safety only to the extent that producers and processors comply with them. It mandates the FDA to provide oversight, ensure compliance with requirements and respond effectively when problems emerge. The FSMA provides the FDA with important new tools for inspection and compliance including:

- **Mandated inspection frequency:** The FSMA establishes a mandated inspection frequency, based on risk, for food facilities and requires the frequency of inspection to increase immediately.
- **Records access:** The law states that the FDA will have access to records, including industry food safety plans and the records firms will be required to keep documenting implementation of their plans.
- **Testing by accredited laboratories:** The FSMA requires certain food testing to be carried out by accredited laboratories and directs the FDA to establish a program for laboratory accreditation to ensure that U.S. food testing laboratories meet high-quality standards.

## RESPONSE

The FSMA recognizes that the FDA must have the tools to respond effectively when problems emerge despite preventive controls. New authorities include:

- **Mandatory recall:** The FSMA provides the FDA with authority to issue a mandatory recall when a company fails to voluntarily recall unsafe food after being asked to by the FDA.
- **Expanded administrative detention:** The FSMA provides the FDA with a more flexible standard for administratively detaining products that are potentially in violation of the law.

- **Suspension of registration:** Facilities that produce food already were required to be registered with the FDA however now the FDA can suspend the registration of a facility if it determines that the food poses a reasonable probability of serious adverse health consequences or death. A facility that is under suspension is prohibited from distributing food.
- **Enhanced product tracing abilities:** The FDA is directed to establish a system that will enhance its ability to track and trace both domestic and imported foods. In addition, the FDA is directed to establish pilot projects to explore and evaluate methods to rapidly and effectively identify recipients of food to prevent or control a foodborne illness outbreak.
- **Additional Recordkeeping for High Risk Foods:** The FDA is directed to issue proposed rulemaking to establish recordkeeping requirements for facilities that manufacture, process, pack, or hold foods that the Secretary designates as high-risk foods.

## IMPORTS

The FSMA gives the FDA unprecedented authority to better ensure that imported products meet U.S. standards and are safe for U.S. consumers. New authorities include:

- **Importer accountability:** For the first time, importers have an explicit responsibility to verify that their foreign suppliers have adequate preventive controls in place to ensure that the food they produce is safe.
- **Third Party Certification:** The FSMA establishes a program through which qualified third parties can certify that foreign food facilities comply with U.S. food safety standards. This certification may be used to facilitate the entry of imports.
- **Certification for high risk foods:** The FDA has the authority to require that high-risk imported foods be accompanied by a credible third party certification or other assurance of compliance as a condition of entry into the U.S.
- **Voluntary qualified importer program:** The FDA must establish a voluntary program for importers that provides for expedited review and entry of foods from participating importers. Eligibility is limited to, among other things, importers offering food from certified facilities.
- **Authority to deny entry:** The FDA can refuse entry into the U.S. of food from a foreign facility if the FDA is denied access by the facility or the country in which the facility is located.

## ENHANCED PARTNERSHIPS

The FSMA builds a formal system of collaboration with other government agencies, both domestic and foreign. In doing so, the statute explicitly recognizes that all food safety agencies need to work together in an integrated way to achieve public health goals. The following are examples of enhanced collaboration:

- **State and local capacity building:** The FDA must develop and implement strategies to leverage and enhance the food safety and defense capacities of state and local agencies.
- **Foreign capacity building:** The law directs the FDA to develop a comprehensive plan to expand the capacity of foreign governments and their industries.
- **Reliance on inspections by other agencies:** The FDA is explicitly authorized to rely on inspections of other federal, state and local agencies to meet its increased inspection mandate for domestic facilities. The FSMA also allows the FDA to enter into interagency agreements to leverage resources with respect to the inspection of seafood facilities, both domestic and foreign, as well as seafood imports.

Most of the above information is abridged from the FDA's website on the Food Safety Modernization Act (<http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm239907.htm>) and additional details on the laws and associated rules, which are still currently under development, can be found at <http://www.fda.gov/Food/GuidanceRegulation/FSMA/default.htm>.

## **THE CHALLENGE OF FSMA REGULATION FOR LOUISIANA**

The passage of the Food Safety Modernization Act (FSMA) was Congress' attempt to establish enforceable regulations to stop or reduce food-borne pathogens such as Salmonella, E-Coli and Listeria from entering the food chain and contaminating human and animal food products. The Federal Food and Drug Administration (FDA) is the Agency charged with enforcement of FSMA and will contract enforcement of the FSMA to state agencies in Louisiana. The Louisiana Dept. of Health and Hospitals (LDHH) and the Louisiana Dept. of Agriculture and Forestry (LDAF) will divide duties of FSMA enforcement based on each agencies expertise with the DHH primarily regulating food processing and LDAF primarily regulating food production.

The challenge for Louisiana is that FSMA enforcement conducted by LDHH and LDAF will enforce new regulations on areas of crop production, food product storage, food processing and food distribution on farms and businesses in Louisiana. The problem is that most farms and food processing, storage and distribution facilities were not designed to comply with the new proposed regulations contained in the FSMA. The majority of the FSMA legislation and regulations have been crafted by FDA and representatives from academia focused on closing contamination pathways to keep pathogens out of the food chain with only minor consideration of costs and impact to the FSMA regulated community. However, food crops produced in fields for example is not necessarily conducted in a totally sanitary environment and well intentioned regulations to mandate use of more sanitary water for crop production, restrictions on wildlife in fields and prohibitions against crops coming into contact with untreated biological soil amendments will be costly and difficult to achieve timely compliance. The FSMA compliance concerns among Louisiana farms, food storage facilities, transportation, distribution facilities and food processors are numerous and cited below.

### **POTENTIAL IMPACTS, PROBLEMS AND QUESTIONS CITED BY FSMA TASK FORCE**

#### ***Costs***

1. What will be the cost to modify systems at regulated farms and businesses to comply with the FSMA?
2. Will the costs to comply with the FSMA be too great for some farms and businesses forcing some to close?
3. Will the addition of FSMA compliance costs be passed into the cost of the product placing some businesses at a competitive disadvantage?

4. Could FSMA compliance costs endanger businesses operating out of older facilities?
5. Could greater FSMA compliance costs endanger businesses operating in older facilities that compete with businesses operating in newer facilities?
6. Could FSMA business closures cause a domino effect of harm to other businesses and farms in Louisiana? For example, if a food processor closes that is the only nearby market for a crop or product, could it hurt the producers, truckers, and distributors who rely on the operation of that business?

### **EFFECTIVENESS OF FSMA AND LACK OF PROTECTION AFFORDED FOR FSMA COMPLIANCE**

1. There are questions whether FSMA compliance will be effective at keeping pathogens out of the food chain since there are other avenues where food contamination can occur in the food chain.
2. FSMA Task Force members were also concerned that FSMA may provide a false sense of security to consumers and greater emphasis was needed to encourage consumers to wash unclean food products before consumption.
3. Producers and processors are very concerned that after paying additional costs to fully comply with FSMA, the FSMA does not afford any measure of protection to those who comply with FSMA.

### **EXPOSURE TO FSMA RELATED LITIGATION AND LACK OF A FSMA APPEAL PROCESS**

1. A big concern is that a FSMA regulation and violations create a new legal avenue for litigation against farms and businesses.
2. No current insurance policy protects a farm or business against lawsuits resulting from a FSMA violation.
3. FSMA does not provide a stated appeal process for producers and processors improperly cited in a FSMA violation.
4. Concerns are that a producer or processor could be improperly cited or have their product embargoed for an alleged FSMA violation when the origins of the pathogenic contamination did not come from their operation?

### **FSMA EMBARGO OF FOOD PRODUCTS WITH SUSPECTED PATHOGENIC CONTAMINATION**

1. The FSMA authorizes agencies to stop the sale and embargo food products that are suspected of being contaminated.

2. Producers and processors who are unable to sell their crop or product under a FSMA embargo could be faced with huge economic losses since they have already incurred all production costs to produce the product before the product was FSMA embargoed due to suspected contamination.
3. The FSMA regulations are ambiguous regarding what evidence of contamination would be used to trigger a food product embargo.

### **LACK OF SCIENTIFICALLY-PROVEN TREATMENTS AND METHODS TO COMPLY WITH FSMA**

1. Currently there is a lack of scientifically-proven methods, treatments and chemicals that provide alternative methods to comply with FSMA.
2. Development of alternative FSMA compliance measures such as post-harvest and in-process treatments as well as alternative chemicals have not been developed and approved to provide cost-effective alternative to comply with FSMA.
3. Additional research in Louisiana is needed to develop and tailor alternative FSMA compliance systems, procedures, treatments and cost-effective chemicals that meet Louisiana's unique needs for alternate ways to comply with FSMA regulations. FSMA regulated farms and businesses also need development of additional kill step methods and products to effectively destroy pathogens.

### **FSMA TASK FORCE STAKEHOLDERS RECOMMENDATIONS:**

Our recommendations are that the State of Louisiana through its Agencies and Universities begin FSMA outreach to farms and businesses as soon as the FSMA regulations are made final.

The State of Louisiana should provide the resources to the LDHH, LDAF, the LSU Ag Center and Southern University Ag Center to instruct farms and businesses on how to modify their production and processing systems to come into FSMA compliance.

The State of Louisiana should provide funding to the LSU Ag Center, Southern University Ag Center, LDAF and LDHH in the form of outreach grants to assist farmers and processors with FSMA compliance.

The State of Louisiana should provide the LSU Ag Center and Southern University Ag Center with research grants to enable researchers to develop alternative, cost-effective FSMA compliance options, treatments and chemicals that effectively eliminate pathogens for FSMA regulated farms and businesses.

For farms and businesses with a longer FSMA compliance timeline, we recommend that the LSU Ag Center and Southern University Ag Center assist farms and businesses to manage the required FSMA modifications over multiple years.

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## CONCLUSION

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### STAKEHOLDER CONCERNS

The main concerns addressed by the Committee focuses on two key points: resource needs and compliance efforts. Whether the affected group is the regulated industry, a state regulatory agency or academia, the impact of these new regulations will require each group to focus on resource needs such as funding, personnel, and training.

Those in the regulated industry that are expected to comply with these new regulations have grievances regarding the financial impact on their businesses. The costs associated with adopting these requirements and the efforts needed to train their personnel on these new regulations will be significant. The current draft status of the new rules has raised more questions than answers regarding what is to be expected of all impacted facilities.

Those who are charged with enforcing these new regulations on the State level have also identified resource needs necessary to ensure industry compliance with these new regulations. Field inspection staff and program personnel will need to be trained to perform inspections based on all FSMA Regulations that will impact the regulated industry. Analytical laboratory capabilities must be assessed to ensure that methods and practices are available if sampling and testing are required in response to these new rules.

Though the uncertainties and questions are numerous, the current relationships between the affected stakeholders in Louisiana are fundamental in addressing these concerns. The Louisiana Department of Health Hospitals and the Louisiana Department of Agriculture and Forestry are committed to ensuring communication between the regulatory agencies within each department to facilitate compliance efforts. Each department has a unique area of expertise in food regulation and the combined experience will facilitate industry and academia outreach meetings in regards to assisting with the interpretation of the new rules. The benefits of the combined effort, with those organizations and groups that provide the FSMA related outreach to the affected industry, will allow all parties to address the immediate and long-term needs of the Louisiana stakeholders to ensure regulation compliance.

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## RESOURCE NEEDS FOR THE IMPLEMENTATION OF THE FSMA

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Key components of implementation of the FSMA in Louisiana include laboratory analysis, outreach/education, and enforcement/inspection. The State agencies and universities have some existing capabilities, but will need additional resources to successfully fulfill the mandates of the FSMA. The agencies and universities that will have a role in the implementation of the FSMA were asked to provide their resource needs to the study committee which is discussed below.

The costs discussed herein are only an estimation based upon current information. The costs will be *recurring annually*, except in such cases as initial purchases of computers and lab equipment, (e.g., initial costs) that will entail replacement costs in future years.

Note: *The following rules have not been included in this assessment: Foreign Supplier Verification (FSV) Program and the Sanitary Transportation Rule.*

### LOUISIANA DEPARTMENT OF AGRICULTURE AND FORESTRY (TOTAL ESTIMATED NEEDS: \$458,100.00)

#### SUMMARY OF COSTS FOR THE FSMA IMPLEMENTATION

Produce Safety Rule, Preventive Controls for Animal Food Rule and Sanitary Transportation Rule

Cost related type	Total Cost
Analytical	\$106,000.00
Rule-making	<i>unknown</i>
Inspection/Enforcement (FTEs)	\$347,100.00
Outreach and Education	\$5,000.00
<b>Total</b>	<b>\$458,100.00</b>

#### ANALYTICAL

In order to increase the performance of the LDAF Agricultural Chemistry Laboratory in response to proposed regulations of both the Produce and Animal Feed Rules, the potential increase in sample numbers would require an additional laboratory FTE (full-time equivalent employee) to perform analysis on regulatory samples. A Professional Chemist 2 would be necessary to handle analytical work. Costs

include: Salary: \$45,000; Benefits: \$18,000; Training Costs: \$3,000; and Supplies & Equipment: \$40,000.  
**Total: \$106,000.**

### **INSPECTION/ENFORCEMENT**

The LDAF will be responsible for on-farm inspections related to the Produce Safety Rule. To accomplish a statewide inspection program for the Produce Safety Rule, LDAF will need four (4) FTE – three (3) inspectors (Agricultural Specialist (1/2)) would be needed to handle three specified geographic areas within Louisiana, and one (1) Agricultural Specialist Manager 1 will be needed to develop and coordinate the program. The inspectors would need vehicles and data equipment to perform these duties.

Costs for the three (3) Agricultural Programs Specialist positions include: Salary: \$96,000; Benefits: \$38,400; Training Costs: \$20,000; Vehicle Leases: \$15,000; Fuel: \$6000; Data Equipment: \$6000.

**Total: \$181,400**

Costs for one (1) Agricultural Specialist Manager position include: Salary: \$48,000; Benefits: \$19,000; Training Costs: \$5,000; Vehicle lease: \$5000; Fuel: \$1800 Data Equipment: \$2500.

**Total: \$81,300**

In regards to the Feed Regulatory Program, one (1) additional program specific FTE would be necessary in order to respond to the changes affecting the regulated industry in regards to proposed rules and the revision of current rules that affect animal feed manufacturers. Thus, LDAF anticipates the need for an Agricultural Environmental Specialist Administrative Coordinator. Costs include: Salary: \$51,000; Benefits: \$20,400; Training Costs: \$10,000; Supplies & Equipment: \$3,000.

**Total: \$84,400.**

### **RULE-MAKING**

Rule-making may be required if we are to adopt any of the enacted or proposed FSMA rules. Currently the Louisiana Feed Law and Agricultural Chemistry and Seed Commission Rules and Regulations make reference specific parts of Title 21 Code of Federal Regulations (CFR) parts 225 and 226. The 21 CFR references would have to be updated and changed to 21 CFR 225 and 226. The current cost is unknown as an assessment has not been performed to determine the necessary changes due to the fact that the final regulations have not been published.

**OUTREACH AND EDUCATION (\$5,000)**

The LDAF plans to partner up with the LADHH, LSU Ag Center, Southern University Ag Center, extension services and other regulatory agencies to share the costs of outreach. At this time it is unknown the true costs associated with outreach for the FSMA implementation so an estimate of \$5,000.00 will be used at this time.

## **SOUTHERN UNIVERSITY AG CENTER (TOTAL NEEDS: \$727,200)**

The major goal of the SU Agricultural Research and Extension Center's FSMA implementation plan is to integrate research and outreach/training programs in order to provide accurate and timely regulatory compliance issues to underserved small and minority farmers in Louisiana. Such an undertaking will ensure the delivery of safe and healthy agricultural products (plants and animals) from the farm through processing and marketing, thus safeguarding the public health. The specific objectives are:

1. To assess and quantify good agricultural practices (GAPs) and good handling practices (GHPs) employed by underserved small and minority producers.
2. To evaluate the perceptions of underserved small and minority producers' level of awareness and willingness to adopt new management practices under the FSMA guidelines through survey-based research.
3. To identify the factors affecting/limiting the adoption of food safety practices on small farms in Louisiana.
4. To implement a training program that incorporates GAPs and GHPs for underserved small and minority farmers across the state of Louisiana.
5. To identify several small farms cooperatives and establish/implement a model GAPs and GHPs on these farms.

### **RESOURCES NEEDED**

<b>Item</b>	<b>Description</b>	<b>Expense</b>	<b>Fringe Benefit</b>	<b>Total</b>
Personnel	Microbiologist	\$70,000	\$30,800	\$100,800
	Research Associate (2) x \$40,000	\$80,000	\$35,200	\$115,200
	Extension Associate	\$40,000	\$17,600	\$57,600
	Graduate Students (2) x \$20,000	\$40,000		\$40,000
	Total Personnel	\$230,000	\$83,600	\$313,600
Travel	Travel expenses to different locations for conducting assessment and trainings (at least once a month), \$12,000; Travel expenses for GAP and GHP			\$18,000

	certifications for SU Ag Center staff, \$6000			
Materials and Supplies	Supplies for educational and evaluation materials for the GAP and GHP trainings and certification programs for small and minority farmers (papers, binders, printer, cartridges, computer, refreshments, etc.), \$15,000; Water and soil sample collection supplies for analysis in the laboratory for confirmation using ICP and AA in the food analysis laboratory at SU Ag. Center, \$10,000; Supplies for Nitrogen analysis (N2 analyzer in the food lab), \$5000.			\$30,000
Equipment	Purchase portable water treatment/testing and microbiological testing equipment for measuring the microbial counts and pH in water, \$7,000; Portable soil testing equipment, \$5,000; Updating existing Atomic Absorption equipment in the food analysis laboratory at SUAREC for testing lead, arsenic and other trace elements, \$25,000; Purchase of the standards and gases for running Inductively Coupled Plasma (ICP) equipment for mineral (Sodium, Phosphorous, etc.) analysis in the food analysis laboratory at SUAREC, \$10,000; Portable hand washing stations for conducting proper hand washing procedures. \$5,000			\$52,000
<b>Total Cost</b>	<b>Per one Year</b>			<b>\$727,200</b>

## **LSU AG CENTER (TOTAL NEEDS: \$605,460)**

The Louisiana State University Ag Center is uniquely positioned to collaborate with growers, Southern University Agricultural Center, Louisiana Cooperative Extension Service, Louisiana Department of Agriculture and Forestry, Louisiana Department of Health and Hospitals, Farm Bureau and the Produce Safety Alliance to disseminate information and provide technical assistance in the understanding of farm food safety risks. In the wake of several high-profile outbreaks associated with fresh produce, growers and industry members are seeking immediate solutions to mitigate risk and prevent outbreaks from occurring in fresh fruits and vegetables produced in the state. With many producers' businesses at stake, the immediate need for educational materials and training assistance is greater now than ever. Providing access to GAPs educational materials, tools for conducting on-farm food safety risk assessments, and training opportunities is critical to helping Louisiana's fresh produce growers understand produce safety concerns as well as comply with the proposed produce safety regulations set by the FSMA.

### **TRAININGS AND WORKSHOPS THAT WILL HELP IMPLEMENT FSMA**

Training and workshops that will help implement the FSMA include: FSMA proposed rules and requirements; Employee health, hygiene and sanitation; Good Agricultural Practices and Good Handling Practices; Development of a farm food safety plan; On-farm risk assessments; and Record keeping/documentation of farm activities.

### **ANALYTICAL AND RESEARCH LABORATORIES**

Meeting agricultural water microbial water quality, as proposed by the FSMA produce safety rule, is one of the major concerns with the growers and processors. There is an uncertainty among growers as to where to test their samples and how to analyze the result to know the appropriate harvesting date or holding period between last day of irrigation and harvesting. To help with this, LSU AgCenter has begun utilizing its water quality testing laboratory which will provide services to growers and producers to test their irrigation water for generic *E. coli* levels and other potential waterborne bacterial pathogens. The test will be reliable and affordable by the growers. The LSU AgCenter will also provide expert consultation on science based alternatives to growers not meeting proposed water quality standards.

LSU AgCenter is working on establishing a food safety research laboratory that will focus on on-farm food safety issues as it relates to growing, harvesting, handling, packing, and holding of fresh produce. The

FSMA proposed rule would allow farms to establish alternative practices or alternative standards for certain specified requirements of the rule and still be in compliance with the rule. This laboratory will work on farm food safety issues and help the growers with food safety practices that are specific to Louisiana commodities and environmental conditions.

### **RESOURCES NEEDED**

Funding and additional resources will be critical because so much of what proper implementation of the FSMA is going to require is training and research to develop science based alternatives to preserve the interest of Louisiana producers as well as maintain food safety. In order to conduct these duties, the LSU AgCenter will need additional resources as describe below:

#### **EXTENSION PERSONNEL:**

One extension associate at each of the five LSU AgCenter regions. The extension associate will help the LSU AgCenter Extension Food Safety Specialist to conduct food safety trainings, on-farm visits, work closely with growers on food safety issues and GAPs, and train farm workers on health, hygiene and sanitation requirements. The Extension associate will also assist the faculties to collect samples for research activities. \$48,000 per year + \$20,160 fringe benefits = \$68,160/Extension associate per year. For five Extension associates = 5 x \$68,160 = **\$340,800 Total.**

#### **LABORATORY PERSONNEL: RESEARCH ASSOCIATE:**

This position would be responsible for farm food safety research activities, will help the faculty for processing samples, data analysis, and publications. They would also answer any questions the farmers would have related to their water testing results. \$48,000 per year + \$20,160 fringe benefits = **\$68,160 Total.** Laboratory equipment for farm food safety research lab = **\$100,000 Total.**

#### **TRAVEL:**

Travel for food safety workshops and on-farm visits will be required. Field visits for extension specialists and associates to assist growers, collect samples for research activities and for implementation of farm food safety practices \$15,000 Total. Travel for extension associate at regional level = \$10,000/Extension associate per year. For five Extension associate = 5 x \$10,000 = \$50,000. **Travel total = \$65,000.**

**SUPPLIES:*****Training materials:***

Supplies cost for educational training materials such as developing training videos, fact sheets, handouts and food safety posters: **\$10,000 Total.**

***Supplies for extension associates: \$15,000 Total***

***Computers: For the farm food safety and water quality testing lab. \$4,500 Total***

**COMMUNICATIONS:**

\$2000 will be required for mailing, postage, and express mail while communicating with growers and producers.

**LOUISIANA DEPARTMENT OF HEALTH AND HOSPITALS (LDHH TOTAL  
NEEDS: \$543,759.27)**

The needs analysis and associated costs provided below are only provided for the impact of the FSMA Preventive Controls for Human Foods. *The following rules have not been included in this assessment: Foreign Supplier Verification (FSV) Program and the Sanitary Transportation Rule.* It is unknown at this time the impact the two above rules will put on the LDHH. It may be safe to assume that the FSV Program will have minimal impact as it will just require additional records review and currently Sanitarian Services does not have jurisdiction over vehicles in transit.

**SUMMARY OF COSTS FOR THE FSMA IMPLEMENTATION**

Preventive Controls for Human Foods:

Cost related type	Total Cost
Analytic	<i>Unknown</i>
Rule-making	\$2,160.00
Inspection/Enforcement (FTE's)	\$430,451.20
Equipment	\$67,418.07
IT Resources	\$9,690.00
Training	\$29,040.00
Outreach and Education	\$5,000
Total	<b>\$543,759.27</b>

**ANALYTICAL (COST = UNKNOWN)**

The LDHH laboratory costs associated with proposed testing requirements are unknown since product finished sampling (non-milk & dairy products) or environmental sampling is not currently performed. The burden will likely be placed on the business owner unless the LDHH adopts the regulations and they are mandated under the LDHH's authority. At present time the LDHH laboratory does not have the capacity to conduct routine surveillance testing.

**RULE-MAKING (COST = \$2,160.00)**

Rule-making will be required if the LDHH is to adopt any of the enacted or proposed FSMA rules. Currently the Louisiana Administrative Code (LAC) Part VI. Manufacturing, Processing, Packing and Holding of Food, Drugs and Cosmetics only makes reference to specific parts of Title 21 Code of Federal Regulations (CFR) Part 110. The 21 CFR references would have to be updated and changed to 21 CFR 117.

The Office of State Registrar, effective November 1, 2014, charges \$216 per page. At an estimated ten (10) pages to be published for rule-making, the estimated cost = \$2,160.00. Note: this number is not met with 100% confidence as the proposed rules and final impacts are not known at this time.

**INSPECTION/ENFORCEMENT/ADMINISTRATIVE (FTES) (\$430,451.20)**

The LDHH will be responsible for expanded records review during routine and federal Food Safety contract inspections under the proposed Human Preventive Controls Rule. As a result, the Food & Drug and Seafood Programs will require additional full time employees to ensure the new mandated requirements under the FSMA are monitored and regulated for. The table below outlines the specific staffing needs of these programs; the positions are not separated by program as they are shared responsibilities under the Division of Specialty Operations.

<b>Position</b>	<b>Pay-range</b>	<b>Mid-range Salary</b>	<b>Fringe Benefits (est @ 28%)</b>	<b>Number of Positions</b>	<b>Total Salary</b>
Sanitarian 4 (TS 313)	Mid-range	\$62,660.00	\$17,544.80	2	\$160,409.60
Sanitarian 5 (TS 314)		\$67,049.00	\$18,773.72	1	\$85,822.72
Program Manager 1-A-DHH (AS 620)	1st Quartile	\$56,717.00	\$15,880.76	2	\$145,195.52
Administrative Coordinator 4 (AS 611)		\$30,487.00	\$8,536.36	1	\$39,023.36
<b>TOTAL</b>				<b>6</b>	<b>\$430,451.20</b>

**EQUIPMENT: FIELD AND VEHICLE (COST = \$67,418.07)**

The Sanitarian positions will require additional field equipment. The associated costs are outline in the table below.

<b>Item</b>	<b>Cost</b>
Thermocouple	\$72.99
Dial Thermometer	\$10.00
Digital Thermometer	\$60.00
Infrared Thermometer	\$75.20
Flashlight (black light)	\$100.00
Sanitizer Strips	\$56.00
Alcohol Preps	\$20.00
Inspection Mirror	\$15.00
Hair Restraint	\$15.00
Shirts	\$35.00
Business Cards	\$13.50
<b>TOTAL</b>	\$472.69 X 3 positions <b>=\$1,418.07</b>

The Sanitarian Positions will also require vehicles to conduct inspections. A total of 3 vehicles would be necessary. Projected transportation costs are not included in this table but are expected to be \$66,000 (based on an average of \$22,000 per vehicle under the current state purchase rate).

**INFORMATION TECHNOLOGY RESOURCES (\$9,690.00)**

The implementation of the Preventive Controls for Human Foods Rule will impact the Specialty Operations Division, specifically the Food & Drug and Seafood programs. The rule implementation will require the purchase of information technology resources for the additional 6 FTEs. The table below outlines the total associated costs.

Item	Cost	# FTEs requiring	Total Cost
Field computer/tablet	\$1,000.00	3	\$3,000.00
Printer	\$250.00	6	\$1,500.00
Desktop Computer	\$800.00	6	\$4,800.00
Camera	\$100.00	3	\$300.00
Wireless Mouse	\$15.00	6	\$90.00
	\$2,165.00	Total	<b>\$9,690.00</b>

### **TRAINING (\$29,040.00)**

The Specialty Operations Division anticipates training three (3) new field inspectors, two (2) program managers and an existing twenty-five (25) inspectors regarding the Preventive Controls for Human Foods Rule requirements, for a total of thirty (30) field personnel. Additionally, the Division plans to provide basic and advanced inspection training which is designed to enhance the overall efficiency and effectiveness of the inspection process. The training plan will have to be further designed in regard to implementation of a training plan. The table below represents the associated costs with inspector training events (per individual). Note that the estimates are based on Baton Rouge rates.

Lodging @ 5 days/wk # days per week	Mileage (avg RT)	Per Diem/Meals	Tolls	Materials	Total Cost
\$485.00	\$200.00	\$255.00	\$3.00	\$25.00	\$968.00

The number of persons to be trained for the Food & Drug program is: 20

The number of persons to be trained for the Seafood program is: 5

Plus the new FTEs for implementation of the Preventive Controls for Human Foods Rule: 3

$$2 \text{ one week sessions at } \$968.00 \times 30 \text{ personnel} = \$29,040.00$$

**OUTREACH AND EDUCATION (\$5,000)**

The LDHH plans to partner with the LSU Ag Center, Southern University Ag Center, the LDAF, extension services and other regulatory agencies to share the costs of outreach. At this time it is unknown the true costs associated with outreach for the FSMA implementation. The estimated costs will however include travel (\$1000), communications (\$1000) training materials (\$1000), supplies (\$1000), laptop computer (\$1120), and associated salary costs. This estimate is given without much confidence as it is not known to the degree the LDHH will resource this internally. An estimate of \$5,000.00 will be used at this time.

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**APPENDIX**

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**I) AGENDA AND PROCEEDINGS FOR AUGUST 28, 2014 MEETING**

**FSMA Study Committee  
Bienville Building  
Room 118  
628 N. Fourth Street, Baton Rouge  
August 28<sup>th</sup>, 2014  
1:00 PM**

**AGENDA**

- I. Call to Order
- II. Roll Call
- III. Public Comments
- IV. Welcome - Commissioner Strain and Assistant Secretary Lane
- V. SCR 178 Legislative Overview - Senator Johns
- VI. Study Committee Member Introductions
- VII. Responsibilities as Study Group Members – David McKay, Louisiana Department of Health and Hospitals
- VIII. FSMA history and overview – Kevin Armbrust, Professor, Louisiana State University
- IX. Discussion of state agency responsibilities for food safety
  - a. DHH – Tessa Dixon
  - b. LDAF – Meagan Davis
- X. Roundtable policy/FSMA discussion
- XI. Next Steps and set next meeting date
- XII. Other Business
- XIII. Public Comments
- XIV. Adjournment

THIS NOTICE CONTAINS A TENTATIVE AGENDA AND MAY BE REVISED PRIOR TO THE MEETING. REVISED NOTICES CAN BE REVIEWED OUTSIDE ROOM 118 OF THE BIENVILLE BUILDING IN WHICH THE MEETING IS TO BE HELD.

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J.T. Lane, Assistant Secretary, Office of Public Health

**FOOD SAFETY MODERNIZATION ACT STUDY COMMITTEE**

**Bienville Building**

**Room 118**

**August 28<sup>th</sup>, 2014**

**1:00 pm**

**MINUTES**

**I. Call To Order**

Dr. Castille called the meeting to order at 1:03 pm.

**II. Roll Call**

Ms. Pearson called the roll.

**MEMBERS PRESENT:**

Tenney Sibley

Tessa Dixon

Dr. Carrie Castille

Pam St. Pierre

J.H. Campbell

Jessica Elliot

Eric Baumgartner

Dr. Gina Eubanks

Adell Brown

Representative John F. “Andy” Anders (Arrived during Commissioner’s Strain’s welcome)

Senator Ronnie Johns (Departed the meeting after the SCR 178 overview)

Mark F. Keiser

Josh Yarborough

Brian Breaux

Brandt Robin (Arrived during Commissioner Strain’s welcome)

Mike Montgomery

Copper Alvarez

**MEMBERS ABSENT:**

Natalie Babin Isaacks

Representative Bob Hensgens

**OTHERS PRESENT:**

Mike Strain, DVM, Commissioner of Agriculture and Forestry

Todd Parker, Assistant Commissioner, Agricultural & Environmental Sciences, LDAF

John Walther, Assistant Commissioner, Animal Health and Food Safety, LDAF

Dane Morgan, Assistant Commissioner, Management and Finance, LDAF

Meagan Davis, Director of Feed, LDAF

Mark LeBlanc, Director of Agricultural Chemistry, LSU AgCenter,

Angelle Pearson, LDAF

Jason Schmidt, LDAF

Eric Lee, LDAF  
 Kevin Armbrust, PhD., LSU  
 Dr. Jimmy Guidry, DHH  
 Gordon LeBlanc, DHH  
 David McKay, DHH  
 Sheree Taillon, DHH

### **III. Public Comments**

Dr. Castille called for public comments. There were no public comments.

### **IV. Welcome – Commissioner Strain**

Commissioner Strain welcomed the committee members to the first meeting of the Food Safety Modernization Act Study Committee. Commissioner Strain thanked Senator Johns for the passage of Senate Concurrent Resolution No. 178 during the 2014 Legislative Session. Commissioner Strain spoke on the importance of the Committee members discussing the effects that could be seen from implementation of the FSMA.

### **V. SCR 178 Legislative Overview – Senator Johns**

Senator Johns gave an overview of Senate Concurrent Resolution 178 of the 2014 Regular Session of the Louisiana Legislature to the Committee.

Dr. Castille introduced Dr. Jimmy Guidry of the Louisiana Department of Health and Hospitals to the Committee. Dr. Guidry spoke briefly to the Committee about DHH's responsibilities.

Ms. Sibley spoke to the Committee on behalf of Mr. J.T. Lane, Assistant Secretary, Louisiana Department of Health and Hospitals, due to Mr. Lane's unexpected absence from the meeting. Ms. Sibley emphasized the importance of committee members sharing their concerns over implementation of the FSMA and that everyone work together as a group and partnership. Representative Anders briefly spoke to the Committee on the FSMA.

### **VI. Member Introductions**

Dr. Castille asked all members and guests to introduce themselves.

### **VII. Responsibilities of Study Group Members – David McKay**

David McKay, an attorney for the Louisiana Department of Health and Hospitals, discussed the responsibilities of the Committee under the public meetings law.

### **VIII. FSMA History and Overview – Dr. Kevin Armbrust**

Dr. Armbrust gave a synopsis on the origins of the FSMA to the group.

### **IX. Discussion of State Agency Responsibilities for Food Safety**

#### *a. Louisiana Department of Agriculture and Forestry*

Ms. Davis, director of the feed program, gave an overview of the LDAF and its role in food safety.

#### *b. Louisiana Department of Health and Hospitals*

Ms. Dixon, sanitarian officer, gave an overview of the DHH and its role in food safety.

**X. Roundtable Policy / FSMA Discussion**

Dr. Castille asked for questions and comments for the expert panel from the Committee members. The expert panel consisted of Tenney Sibley, Tessa Dixon, Dr. Carrie Castille, Dr. Kevin Armbrust, and Meagan Davis. The members discussed various ways of doing education and outreach on the FSMA. Members shared their personal experience with enforcement of regulations and gave feedback concerning how they felt the FSMA could impact their industry. The members agreed that the industry would best served by assistance and support for the FSMA provided at the state level.

**XI. Next Steps and Set Next Meeting Date**

Dr. Castille informed the members that SCR No. 178 states that the study committee should meet as necessary and then report its findings to the legislature by January 30<sup>th</sup>, 2015. Dr. Castille asked the members if they felt that three more meetings would suffice to discuss all the issues thoroughly enough. Dr. Castille said that information would be distributed to the members prior to the next meeting.

The next meeting of the Food Safety Modernization Act Study Committee was tentatively set for September 30, 2014 at 9:00 am at the Louisiana Department of Agriculture and Forestry.

**XII. Other Business**

There was no other business.

**XIII. Public Comments**

There were no public comments.

Dr. Castille adjourned the meeting at 3:45 pm.

## II) AGENDA AND MINUTES FOR SEPTEMBER 23, 2014 MEETING

**FSMA Study Committee  
Louisiana Department of Agriculture and Forestry  
Veterans' Memorial Auditorium  
5825 Florida Boulevard, Baton Rouge, LA  
September 23, 2014  
9:00 AM**

### AGENDA

- I. Call to Order
- II. Roll Call
- III. Public Comments
- IV. Approval of Minutes
- V. Welcome – Tenney Sibley and Dr. Carrie Castille
- VI. FSMA Update – Kevin Armbrust, Professor, Louisiana State University
- VII. What takes place during an inspection?
  - a. DHH – Tessa Dixon
  - b. LDAF – Meagan Davis
- VIII. FSMA Produce Rule Outreach – Dr. Achyut Adhikari, LSU AgCenter
- IX. Roundtable policy/FSMA discussion
- X. Next Steps and set next meeting date
- XI. Other Business
- XII. Public Comments
- XIII. Adjournment

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**FOOD SAFETY MODERNIZATION ACT STUDY COMMITTEE**  
**Louisiana Department of Agriculture and Forestry**  
**Veterans Memorial Auditorium**  
**September 23rd, 2014**  
**9:00am**

**MINUTES**

**XIV. Call To Order**

Ms. Sibley called the meeting to order at 9:03 am.

**XV. Roll Call**

Ms. Davis called the roll.

**MEMBERS PRESENT:**

Tenney Sibley  
 Tessa Dixon  
 Meagan Davis  
     Designee for Dr. Carrie Castille  
 Pam St. Pierre  
 J.H. Campbell  
 Achyut Adhikari  
     Designee for Dr. Gina Eubanks  
 Dr. Renita Marshall  
     Designee for Adell Brown  
 Representative John F. “Andy” Anders  
 Representative Bob Hensgens  
 Josh Yarborough  
 Brian Breaux  
 Brandt Robin  
 Sherman Richardson  
     Designee for Mike Montgomery  
 Copper Alvarez

**MEMBERS ABSENT:**

Jessica Elliot  
 Eric Baumgartner  
 Senator Ronnie Johns  
 Mark F. Keiser  
 Natalie Babin Isaacks

**OTHERS PRESENT:**

Todd Parker, Assistant Commissioner, Agricultural & Environmental Sciences, LDAF  
 John Walther, Assistant Commissioner, Animal Health and Food Safety, LDAF  
 Mark LeBlanc, Director of Agricultural Chemistry, LSU AgCenter,  
 Angelle Pearson, LDAF

Jason Schmidt, LDAF  
 Kevin Armbrust, PhD., LSU  
 J.T. Lane, DHH  
 James “Trey” Decker, La. Pecan Growers Association

#### **XVI. Public Comments**

Ms. Sibley called for public comments. There were no public comments.

#### **XVII. Approval of Minutes**

Mr. Brandt Robin motioned that the minutes of the August 28, 2014 meeting be approved. Ms. St. Pierre seconded the motion, and with no objections, the minutes were approved.

#### **XVIII. FSMA Update – Dr. Kevin Armbrust, Professor, Louisiana State University**

Dr. Armbrust gave an update on the current status of the Food Safety Modernization Act. Dr. Armbrust explained the importance of the comment period to the members and provided information to the members via fact sheets provided in their folders.

#### **XIX. FSMA Produce Rule Outreach – Dr. Achyut Adhikari, LSU AgCenter**

Dr. Achyut Adhikari, LSU AgCenter, presented a brief background on the FSMA Produce Rule. Dr. Adhikari explained that there are six major produce control rules and he gave an overview of the key revisions to the members. Dr. Adhikari spoke about the LSU AgCenter’s Outreach plan that will begin in spring 2015 across the state of Louisiana. Outreach will include training and education on the FSMA produce safety requirements.

#### **XX. What Takes Place During an Inspection?**

##### *c. Louisiana Department of Agriculture and Forestry*

Ms. Davis, director of the feed program, gave an overview of the LDAF’s inspection programs. Ms. Davis stated that the main goal of the LDAF and DHH is to gain compliance through education and that all efforts to provide information to those affected by the FSMA made available and easy to understand.

##### *d. Louisiana Department of Health and Hospitals*

Ms. Dixon, sanitarian officer, gave a presentation on DHH’s inspection programs. Current Louisiana law enforced by DHH (Title 51 Part VI Section 125) states that all food processing plants operating in Louisiana shall maintain an onsite written food processing plan. This law is similar to what is required for the FSMA’s Preventive Control Rule for Human Food. Ms. Dixon provided a broad overview of how inspections are performed by the DHH and the LDAF for food and feed facilities with a focus on the visual inspection and facility record-keeping, not sampling.

#### **XXI. Roundtable Policy / FSMA Discussion**

Ms. Sibley asked that members be vocal to the DHH and the LDAF about their wants and needs in preparation of FSMA. Ms. Sibley asked for questions and comments from members and she stated that it is important that everyone thinks about what is needed to be effective.

## **XXII. Next Steps and Set Next Meeting Date**

The members spoke about the importance of recognizing that their report to the Legislature is about food safety. Clear delineation of who is in charge of enforcing the Produce Rule – DHH or LDAF – is needed and necessary. The members discussed the value in finding a certified authority, perhaps the LSU AgCenter, to act as a third party to review plans established by firms to meet FSMA requirements. Members discussed the value in making a trainings calendar and made plans to develop one.

At the next meeting, the group will develop the components of a report that identifies the concerns, needs, and resources for both the state and industry. The final report will be sent to the legislature.

The next meeting date of the Food Safety Modernization Act Study Committee was not determined during the meeting.

## **XXIII. Other Business**

Ms. Sibley asked if for further questions or comments. There was none.

## **XXIV. Public Comments**

There were no public comments.

## **XXV. Adjournment**

Mr. Brian Breaux made a motion to adjourn the meeting at 12:10 pm. Ms. Davis seconded the motion, and with no objections, the meeting was adjourned.

### III) AGENDA AND MINUTES FOR OCTOBER 6, 2014 MEETING

**FSMA Study Committee  
Louisiana Department of Agriculture and Forestry  
Veterans' Memorial Auditorium  
5825 Florida Boulevard, Baton Rouge, LA  
October 6, 2014  
1:00 PM**

#### **AGENDA**

- I. Call to Order
- II. Roll Call
- III. Public Comments
- IV. Approval of Minutes
- V. Welcome – Tenney Sibley and Carrie Castille
- VI. Roundtable Discussion – Identifying key components for report to the Legislature
- VII. Next Steps and set next meeting date
- VIII. Other Business
- IX. Public Comments
- X. Adjournment

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**FOOD SAFETY MODERNIZATION ACT STUDY COMMITTEE**  
**Louisiana Department of Agriculture and Forestry**  
**Veterans Memorial Auditorium**  
**October 6th, 2014**  
**1:00pm**

**MINUTES**

**I. Call To Order**

Dr. Castille called the meeting to order at 1:06 pm.

**II. Roll Call**

Ms. Pearson called the roll.

**MEMBERS PRESENT:**

Tenney Sibley

Tessa Dixon

Dr. Carrie Castille

Pam St. Pierre

J.H. Campbell, Jr.

Achyut Adhikari

Designee for Dr. Gina Eubanks

Mark F. Keiser

Josh Yarborough

Brian Breaux

Brandt Robin

Mike Montgomery

Copper Alvarez

**MEMBERS ABSENT:**

Jessica Elliot

Natalie Babin Isaacks

Eric Baumgartner

Adell Brown

Representative John F. "Andy" Anders

Senator Ronnie Johns

Representative Bob Hensgens

**OTHERS PRESENT:**

Todd Parker, Assistant Commissioner, Agricultural & Environmental Sciences, LDAF

John Walther, Assistant Commissioner, Animal Health and Food Safety, LDAF

Mark LeBlanc, Director of Agricultural Chemistry, LSU AgCenter

Bobby Fletcher, LDAF

Jim Jenkins, LDAF

Eric Lee, LDAF

Angelle Pearson, LDAF

Jason Schmidt, LDAF  
 Kevin Armbrust, PhD., LSU  
 Sherman Richardson, La. Pecan Growers Association

### **III. Public Comments**

Dr. Castille called for public comments. There were no public comments.

### **IV. Approval of Minutes**

Mr. Mark F. Keiser motioned that the minutes of the September 23, 2014 meeting be approved. Ms. Sibley seconded the motion, and with no objections, the minutes were approved.

### **V. Welcome – Tenney Sibley and Carrie Castille**

Ms. Sibley and Dr. Castille welcomed the committee members and other attendees to the meeting.

### **VI. Roundtable Discussion – Identifying key components for report to the Legislature**

Dr. Castille led the group in discussion of the key components and topics to be expounded upon in the committee's report to the legislature pursuant to Senate Concurrent Resolution No. 178. Through this discussion, a thorough outline for the report, which enumerates the study committee's analysis of the FSMA SWOT (strengths, weaknesses, opportunities and threats) for both the state government and industry, was produced.

### **VII. Next steps and next meeting date**

Dr. Castille asked the members to work with their respective organizations and compose a statement that describes how FSMA will impact their organization's membership and how their organization can work to disseminate outreach to their membership. Dr. Castille asked that the members have this information available at the next meeting.

Mr. Sherman Richardson of the Louisiana Pecan Growers Association stated to the group that he felt there should be opportunity for a period of public comment on the study committee's draft of the report that will be sent to the legislature. The group agreed that a 30 day public comment period to allow feedback for the committee's draft of the report would be beneficial.

Dr. Castille asked for a motion to provide a 30 day period for public comment for the draft of the committee's report.

Mr. Mark F. Keiser motioned that a 30 day period for public comment of the report be provided. Mr. Breaux seconded the motion, and with no objections, the motion passed unanimously.

Dr. Castille told the group that at its next meeting the report would be fleshed out with a goal of a working draft to be completed by November 30<sup>th</sup>, 2014.

The next meeting was set for Monday, October 20<sup>th</sup>, 2014 at 1:00 pm.

After further discussion, the group reconsidered their decision to provide for a 30 day public comment period and agreed that a 15 day public comment period would be more appropriate given time constraints of the report's due date to the legislature. Modification of the motion for a 30 day public comment period to a 15 day public comment period was agreed upon to be necessary.

Mr. Mark F. Keiser motioned that a 15 day period for public comment of the report be provided. Mr. Breaux seconded the motion, and with no objections, the motion passed unanimously.

#### **VIII. Other Business**

There was no other business.

#### **IX. Public Comments**

Dr. Castille called for public comments. There were no public comments.

#### **X. Adjournment**

The meeting adjourned at 3:30 pm.

**IV) AGENDA AND MINUTES FOR OCTOBER 20, 2014 MEETING**

**FSMA Study Committee  
Louisiana Department of Agriculture and Forestry  
Veterans' Memorial Auditorium  
5825 Florida Boulevard, Baton Rouge, LA  
October 20, 2014  
1:00 PM**

**AGENDA**

- I. Call to Order
- II. Roll Call
- III. Public Comments
- IV. Approval of Minutes
- V. Welcome – Tenney Sibley and Carrie Castille
- VI. Roundtable Discussion – Discussion on key components for report to the Legislature
- VII. Next Steps and set next meeting date
- VIII. Other Business
- IX. Public Comments
- X. Adjournment

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**FSMA Study Committee**  
**Louisiana Department of Agriculture and Forestry**  
**Veterans' Memorial Auditorium**  
**5825 Florida Boulevard, Baton Rouge, LA**  
**October 20, 2014**  
**1:00 PM**

**MINUTES**

**I. Call To Order**

Dr. Castille called the meeting to order at 1:10 pm.

**II. Roll Call**

Ms. Pearson called the roll.

**MEMBERS PRESENT:**

Tenney Sibley

Tessa Dixon

Dr. Carrie Castille

Pam St. Pierre

J.H. Campbell, Jr.

Jessica Elliott

Melissa Litchfield

Designee for Eric Baumgartner

Dr. Gina Eubanks

Renita Marshall

Designee for Adell Brown

Josh Yarborough

Brian Breaux

Brandt Robin

Sherman Richardson

Designee for Mike Montgomery

**MEMBERS ABSENT:**

Natalie Babin Isaacks

Representative John F. "Andy" Anders

Senator Ronnie Johns

Mark F. Keiser

Representative Bob Hensgens

Copper Alvarez

**OTHERS PRESENT:**

Todd Parker, Assistant Commissioner, Agricultural & Environmental Sciences, LDAF

John Walther, Assistant Commissioner, Animal Health and Food Safety, LDAF

Mark LeBlanc, Director of Agricultural Chemistry, LSU AgCenter

Meagan Davis, LDAF  
 Bobby Fletcher, LDAF  
 Angelle Pearson, LDAF  
 Jason Schmidt, LDAF  
 Achyut Adhikari, LSU AgCenter  
 Kevin Armbrust, PhD., LSU  
 James Trey Decker, La. Pecan Growers Association  
 Cindy Bishop, La. Meat Processors

### **III. Public Comments**

Dr. Castille called for public comments. There were no public comments.

### **IV. Approval of Minutes**

Mr. Robin motioned that the minutes of the October 6, 2014 meeting be approved. Ms. Sibley seconded the motion, and with no objections, the minutes were approved.

### **V. Welcome – Tenney Sibley and Carrie Castille**

Ms. Sibley and Dr. Castille welcomed the committee members and other attendees to the meeting.

### **VI. Roundtable Discussion – discussion on key components for report to the Legislature**

Mr. Achyut Adhikari of the LSU AgCenter gave an overview of the FSMA outreach meetings that will be conducted in areas across the state; there will be five such meetings.

Mr. Breaux asked if state legislation was needed in regards to FSMA. Mr. Parker said that legislation would be more appropriate to introduce during the 2016 session rather than 2015 as more would be known and developed at that time.

Dr. Castille encouraged all the members of the committee and others from their respective organizations to comment during the comment time of the FSMA.

Dr. Castille if any corrections were needed to be made to the Committee’s SWOT analysis. Dr. Castille said that an attempt to make contact with the Louisiana Department of Transportation and Development was made but without success. Ms. Dixon inquired several warehouse facilities she has contact with regarding any information they might have as to if there is a group leading outreach to transportation workers in regards to the FSMA but none had knowledge of such a group. Mr. Breaux said that in the SWOT analysis, where it says “contamination,” it should state “products are traced back to the source.”

Mr. Campbell stated that we should consider including a rate of compliance in the Committee’s final report to the Louisiana Legislature if the FSMA were to be implemented today in order to give legislators an idea of what is needed in order for full compliance to be met. To clarify Mr. Campbell’s ideas, Dr. Castille expanded that in the report layout we need to have a rate of compliance on some of the existing rules already in place, a rate of compliance on the proposed FSMA rules, and most importantly, how do we get to full compliance and what does that timeline look like.

Dr. Eubanks stated that one of the reasons Dr. Adhikari was hired was to be proactive and keep the farmers and producers both informed and educated on the FSMA rules.

#### **VII. Next steps and next meeting date**

Dr. Castille informed the Committee that a draft of the report to be sent to the Legislature would be distributed to the members of the Committee for review and comment.

The next meeting date was to be determined later.

#### **VIII. Other Business**

There was no other business.

#### **IX. Public Comments**

Dr. Castille called for public comments.

Cindy Bishop of the Louisiana Meat Processors Association spoke to the group about the GMO Labeling Bill that Louisiana Representative Ebony Woodruff is a proponent of. Dr. Castille asked the group how they felt about including GMOs in the bill and how it relates to the FSMA.

Mr. Breaux motioned that there be no mention of GMO labeling in the final report to the Louisiana Legislature because the report is based on implementation of the FSMA, which deals with introduction of pathogens into the food supply. Mr. Robin seconded the motion, and with no objections, the motion passed unanimously.

Dr. Castille thanked Ms. Bishop for speaking on behalf of the Louisiana Meat Processors Association to the group.

#### **X. Adjournment**

Mr. Campbell moved to adjourn the meeting at 2:26 pm.

**V) AGENDA AND PROCEEDINGS FOR JANUARY 7, 2015 MEETING**

**FSMA Study Committee  
Louisiana Department of Agriculture and Forestry  
5825 Florida Boulevard, Baton Rouge  
Veterans Memorial Auditorium  
January 7, 2015  
1:30 PM**

**AGENDA**

- I. Call to Order
- II. Roll Call
- III. Approval of Minutes
- IV. Public Comments
- V. Welcome – Tenney Sibley and Carrie Castille
- VI. Discussion and Approval of Draft Report to Final Status
- VII. Other Business
- VIII. Public Comments
- IX. Adjournment

THIS NOTICE CONTAINS A TENTATIVE AGENDA AND MAY BE REVISED PRIOR TO THE MEETING. REVISED NOTICES CAN BE REVIEWED OUTSIDE THE LOUISIANA DEPARTMENT OF AGRICULTURE AND FORESTRY AUDITORIUM IN WHICH THE MEETING IS TO BE HELD.

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**FOOD SAFETY MODERNIZATION ACT STUDY COMMITTEE**  
**Louisiana Department of Agriculture and Forestry**  
**Veterans' Memorial Auditorium**  
**January 7th, 2015**  
**1:30pm**

**Proceedings**

**I. Call to Order**

Dr. Castille called the meeting to order at 1:37 pm.

**II. Roll Call**

Ms. Pearson called the roll.

**MEMBERS PRESENT:**

Tenney Sibley  
Tessa Dixon  
Dr. Carrie Castille  
Pam St. Pierre  
J.H. Campbell, Jr.  
Jessica Elliott  
Natalie Babin Isaacks  
Eric Baumgartner  
Achyut Adhikari  
    Designee for Dr. Gina Eubanks  
    Renita Marshall  
    Designee for Adell Brown  
    Josh Yarborough  
Brian Breaux  
Brandt Robin  
Copper Alvarez

**MEMBERS ABSENT:**

Representative John F. "Andy" Anders  
Senator Ronnie Johns  
Mark F. Keiser  
Representative Bob Hensgens  
Mike Montgomery

**OTHERS PRESENT:**

Todd Parker, Assistant Commissioner, Agricultural & Environmental Sciences, LDAF  
John Walther, Assistant Commissioner, Animal Health and Food Safety, LDAF  
Mark LeBlanc, Director of Agricultural Chemistry, LSU AgCenter  
Meagan Davis, LDAF  
Bobby Fletcher, LDAF  
Eric Lee, LDAF

Angelle Pearson, LDAF  
 Jason Schmidt, LDAF  
 Kevin Armbrust, PhD., LSU  
 Cindy Bishop, La. Meat Processors

### **III. Public Comments**

Dr. Castille called for public comments. There were no public comments.

### **IV. Approval of Minutes**

Mr. Robin motioned that the minutes of the October 20, 2014 meeting be approved. Ms. Elliot seconded the motion, and with no objections, the minutes were approved.

### **V. Welcome – Tenney Sibley and Carrie Castille**

Dr. Castille welcomed the committee members and other attendees to the meeting.

### **VI. Discussion and Approval of Draft Report to Final Status**

Mr. Breaux submitted recommendations to the draft report for the group to consider.

Mr. Breaux made a motion for the report to the legislature to include the statement “For farms and businesses with a longer FSMA compliance timeline, we recommend that the LSU AgCenter and Southern University Ag Center assist farms and businesses to manage the required FSMA modifications over multiple years.” Ms. Alvarez seconded the motion to include Mr. Breaux’s statement. Motion passed unanimously.

Mr. Breaux made a motion to change any mention of Southern University to say Southern University Ag Center. The motion was seconded by Mr. Robin and passed unanimously.

Mr. Robin made a motion to place Mr. Breaux’s amendment to the final draft of the report to be sent to the legislature before the conclusion. The motion was seconded by Mr. Baumgartner and passed unanimously.

Ms. Alvarez made a motion to accept the Committee’s draft report with the additions and also non-substantive changes made as the Committee’s final report to be sent to the legislature. The motion was seconded by Mr. Adhikari and passed unanimously.

### **VII. Other Business**

There was no other business.

### **VIII. Public Comments**

There were no public comments.

**X. Adjournment**

The meeting adjourned at 2:17 pm.

## VII. FSMA SWOT (STRENGTHS, WEAKNESSES, OPPORTUNITIES AND THREATS) ANALYSIS

### Background/Introduction:

- Identify current responsibilities and what are the new responsibilities that each business/agency will have?
- Include levels of inspection both state and federal (equivalencies, etc.)
- New FSMA responsibilities – identify all stakeholders – what agencies are responsible for those stakeholders (state and federal)

### Strengths:

- Ongoing activities from agencies, commission members, universities
- DHH Food Safety Certification Training Requirement for retail food handlers
- Analytical/Laboratory capabilities and those that are federally accredited (but not enough) between private, public (state agency), university
- Relationship with the industry
- Trained personnel in DHH, LDAF
- DHH and DAF Cooperative Agreement
- Relationship with the universities
- Farmers Markets can reach a variety of businesses in the food economy (vendors, chefs, fisherman, agriculture producers, etc)
- Summary of strengths from study commission members

### Weaknesses/Uncertainties:

- Local Food movement (Farm to Table) impact (direct sales and online sales) – cost of compliance
- Farm to School impact – USDA requirements
- Food Bank impact?
- Lacking analytical/laboratory capabilities – identify what agreements are needed
- Are all businesses affected equally (all coverage and enforcement under the same umbrella)
- Identify economic impact of 3 year compliance window
- State does not have an organized statewide farmers market organization

### Opportunities/Needs

- Include FSMA Study Commission member comments as appendix to report
- DHH Food Safety Certification Training Requirement proposed for Managers on Duty
- Include safe food handling training in high school physical education classes (could modify existing Food Safety Training Program)
- Food Safety Certified Manager must be on duty during operational hours
- Draft Report – 30 day comment period
- Identify areas where there will be compliance problems (roadside seafood dealers)
- Identify state public institutions that may be impacted by FSMA
- Identify laboratory capabilities
- Need chart identifying stakeholder categories, applicable rules, agency oversight, timeline for implementation and compliance
- Interagency workgroup
- Develop an interagency training plan for new FSMA rules
  - Identify resources within agencies
  - Identify industry training needs
  - Identify outreach/training opportunities
- Recordkeeping template tailored for each stakeholder category
- Apps, apps
- FDA/USDA and DHH/LDAF needs to develop risk-based types of inspections
- Include economic analysis and impacts of FSMA
- FSMA guidance/handbook/checklist (to include timetables)
- Dispute resolution (example embargoed product) – what is the criteria to embargo? What are the alternative practices and timeline to correct infraction (post-harvest)? Can you now treat or transform product to another state that is now of economic value. State examples in report.

- Conduct Louisiana Food Safety Conference
- Develop centralized publicly available list of food safety experts in case of infraction.
- Need to identify agency protocol when products are embargoed
- Immediate Step - Possibility of post-inspection and/or post-infraction resource (third-party arbitrator or process authority) – make list of resources publicly available
- Provide summary of LSU AgCenter outreach meeting comments as appendix in final report
- Post implementation evaluation meeting for FSMA Study commission
- Research on Louisiana specific practices and alternative practices – alternative procedures for compliance
- Add one page addendum to report to identify stakeholders concerns that are not part of FSMA study commission
- Identify State level grant funding for new technology development
- Work with LSU AgCenter/Southern University and study commission to identify stakeholders that are not at the table
- Need to provide summary from each group included in the study commission on how their organization can contribute Louisiana FSMA implementation
- Agency and Stakeholder Training once rules are finalized
- Incorporate FSMA in farmers market training
- Utilize webinars and other types of technology for training for producers
- Identify the costs for agencies to provide authority for FSMA (look at NASDA report)

#### FSMA shortcoming

If contamination – products must be brought back to the source even though it may not be the source of the contamination (may be in transport, processing)

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 LETTERS FROM INDUSTRY | CONCERNS
 

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## I. LOUISIANA PECAN GROWERS ASSOCIATION



November 11, 2014

TO: Louisiana FSMA Study Committee

FROM: Louisiana Pecan Growers Association (LaPGA)

Committee Members;

Thank you for the opportunity to participate in the committee discussions on recommendations to the Louisiana Legislature concerning implementation of the Food Safety Modernization Act in Louisiana. The following items are some of the concerns LaPGA has as to the effects of the Act on fruit and tree nut producers, produce producers and the Louisiana economy in general.

The Centers for Disease Control (CDC) claims 48 million people get sick from food borne diseases each year (this number is strictly a guess), 128,000 are hospitalized and 3,000 die. To put this in perspective consider that the United States population is approximately 320 million persons. Assuming that 300 million will eat three meals per day times 365 days a year gives 328.5 billion meals consumed annually of which only 128000 or 0.00000039% cause hospitalizations and 3000 or 0.000000009% cause fatalities. FDA analysis of CDC data shows that over 14 years (from 1996 to 2010) there were only 131 produce related outbreaks resulting in 1382 hospitalizations and 34 fatalities across the entire United States. This is obviously *not* a significant public health burden and does not require extensive new regulations.

**LaPGA AREAS OF CONCERN**
**ITEM: COST**

Considering the broad range of new rules FDA proposes it is impossible to calculate the true cost of the program. Not only will state agencies require significant increases in manpower and resources to staff and enforce the rules but producers and processors will also have increased costs in their operations. Additionally, consumers will be negatively impacted by significantly higher food costs.

**RECOMMENDATION:** Louisiana accept the minimum Federal guidelines and not place additional economic burdens on produce producers and processors by expanding the rules.

**ITEM: Irrigation Water**

Irrigation water quality guidelines basically restrict water resources to potable water quality. This will place an enormous strain on aquifers already being depleted by municipalities and industry. Louisiana has access to literally millions of gallons of surface water in its rivers and lakes.

**RECOMMENDATION:** Louisiana put in place programs to promote the use of surface water for produce production. This should include a state system of irrigation water reservoirs and distribution avenues as well as financial assistance to growers for construction of their own holding/settling reservoirs. Since irrigation of produce crops is critical with respect to need and timing of the water application, testing laboratories should provide a timely response to irrigation water testing results.

**ITEM: Responsible Agency**

**RECOMMENDATION:** Inspection and enforcement of produce production and processing including on-farm value-added processes be assigned to the Louisiana Department of Agriculture.

**ITEM: Consumer Training**

The numbers cited for food borne illnesses by FDA or CDC do not differentiate between illness caused by contamination in the production or processing of foodstuffs and illnesses caused by improper food handling/storage/preparation by the consumer. Yet the regulations and proposed training are aimed directly at the producer or processor. Consumers must also accept some responsibility for their food safety.

**RECOMMENDATION:** Louisiana high schools teach health and general food safety in 10<sup>th</sup> or 11<sup>th</sup> grade (or both) as a portion of the physical education classes. This allows instruction of both genders. Additionally, the benefits of such a program are that the students are there, the teachers and the facilities are in place and it requires only a minimal investment in teaching materials to eventually educate a majority of the population.

**ITEM: Farmers Markets**

**RECOMMENDATION:** Louisiana promote and encourage the development of Farmers Markets and through Department of Agriculture establish oversight of Farmers Markets and on-farm value-added establishments where farmers sell produce directly to consumers.

**ITEM: Wildlife Monitoring**

The original proposed FDA rules include that in order to further reduce contamination, wildlife must be either restricted from produce growing areas or wildlife presence in the area must be monitored and recorded. The producer is then responsible for any contamination that may have occurred. Restricting wildlife is impractical in a produce growing area. Crows, deer, swine and other varmints may be present in some area at any time. An example given in a summary of the major provisions of the regulations state that “if bird excreta is found on a head of lettuce that lettuce cannot be harvested.” This can lead to significant waste of fresh produce. Monitoring and preventing wildlife intrusion into an orchard (or into a vegetable field) to this degree is wholly impractical if not impossible.

RECOMMENDATION: Louisiana develop a protocol for dealing with wildlife intrusions. An acceptable procedure may be the washing of produce or exposure of produce to some other approved pathogen kill step.

ITEM: Pathogen Kill step

Louisiana Pecan Growers has been informed by FDA that tree nuts are exempt from the regulation if the product passes through a pathogen kill step prior to sale to the consumer.

RECOMMENDATION: Louisiana Department of Agriculture define acceptable kill steps for each category of produce and issue certificates to each producer or processor using approved kill steps.

ITEM: Affected Produce

All produce growers and processors will be significantly impacted by the FDA rules, some, such as vegetable producers, severely. Only those growers and processors involved directly with a specific crop are knowledgeable and fully aware of the challenges these rules will present to their particular enterprise.

RECOMMENDATION: During the Legislature's rule writing process and prior to passage of such rules, each produce grower or processor association registered with the Louisiana Secretary of State be contacted and input solicited on regulations concerning that specific product.

Sincerely,

Sherman Richardson  
President Louisiana Pecan Growers Association

## II. LOUISIANA RETAILERS ASSOCIATION



P.O. Box 44034  
 Baton Rouge, Louisiana 70804  
 225-344-9481 • 1-800-672-2378  
 Fax: 225-383-4145 Email: [lr@retailers.org](mailto:lr@retailers.org)

The Food Safety Modernization Act will bring significant changes to the food safety landscape. Retailers must be aware of and understand the new requirements of FSMA and the effect of those requirements on the supply chain. Food growers, packers and processors will experience significant operational changes due to FSMA, which will result in higher food costs for the consumer. Several aspects of the Food Safety Modernization Act will directly impact food industry retailers operating in Louisiana.

- New food safety certification requirements will impact the training programs of grocery stores and may require staffing changes to comply with new requirements. Retailers should have an appropriate amount of time to comply with any changes to the training requirements and should have opportunities to use various training methods, including online training programs.
- New consumer notification requirements for retailers to follow when a food product is recalled will impact grocery stores. Regulations should be flexible to allow for different means of communication to customers. It is unclear what types of stores will be required to post notices and in what manner the notices must be posted.
- Retailers will be responsible for documentation dealing with supply chains. Retailers must ensure they have a system in place to manage and retain FSMA required records.

Members of the Louisiana Retailers Association include supermarket chains, food wholesalers, food manufacturers, and independent grocery stores. The Louisiana Retailers Association is able to disseminate information to its membership through in person seminars and workshops; electronic communications; website postings; and publications mailed to members.

Jessica Elliott, Director of Government Affairs  
 Louisiana Retailers Association

### III. LOUISIANA MEAT PROCESSORS ASSOCIATION



## Louisiana Meat Processors Association

*A Non-Profit Trade Association Promoting Louisiana Products*

Post Office Box 599  
Covington, Louisiana 70434-0599

Phone/Fax (985) 892-4062  
email: [jolmia@aol.com](mailto:jolmia@aol.com)

Louisiana Meat Processors Association is made up of over 50 processing, distributing and supplying member companies. These companies employ approximately 3,000 statewide. While any changes the bill institutes will primarily affect processing and distributing members, our other members will possibly experience a trickledown effect of any changes in the Food Safety Modernization Act.

  
Josh Yarborough - LAMP Board Member

## ACKNOWLEDGEMENTS

The Study Committee would like to take the opportunity to thank those who provided additional help and guidance in the creation of this report. We would like to show our gratitude to the following people:

Kevin Armbrust  
Achyut Adhikari  
Todd Parker  
John Walther  
Eric Lee  
Mark LeBlanc  
Angelle Pearson  
Meagan Davis

We are extremely grateful for the assistance of these experienced individuals and our deepest gratitude to them as they have directly and indirectly guided us in this assignment.