



Visitor Policy Language for Food Safety Manuals

Whether looking to pass a GAP audit or comply with FSMA Produce Safety Rule (PSR) requirements, visitors can pose a significant food safety risk. In many cases, visitors are not aware of the things they do to impact the safety of the food you produce. Because of this, it is very important that a visitor policy is thought through and written down to ensure consistent application to all visitors, time and time again. This guidance document will help you understand the necessary components of a field visitor policy and how to craft one.

21 CFR 112.33 offers the only language of the FSMA PSR regarding visitors:

(a) You must make visitors aware of policies and procedures to protect covered 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.

(b) You must make toilet and hand-washing facilities accessible to visitors.

[21CFR§112.33(a) and (b)]

The first step in thinking about visitor food safety is to define who actually qualifies as a visitor. If a person is reasonably likely to enter the production area, then they should really be practicing food safety and made aware of your practices. From a FSMA perspective, a patron to a farm stand that never enters into the fields or a wash/pack area could easily not be considered a visitor. The case can be made for excluding this person from food safety protocols under GAPs as well.

When writing a visitor policy there are a number of questions you need to answer. Who is required to sign in? Specifying that farm workers and the grower are exempt from signing in may be a good policy. If you use the sign in sheet to document hours worked by farm workers, it may not be such a good policy. You may also want to exempt or have a single sign in for any crop scouts that make regular trips into the field that could be trained in food safety much like the farm workers. An example field visitor policy extracted from the Northwest Horticultural station's GAP boilerplate is shown below.

Field Visitor Policy

Any non-farm employee, service employee, or person(s) who frequents the farm on a regular basis, is instructed at the beginning of the season on proper health and hygiene practices and is required to sign a visitor log once. Visitors who are on the farm longer than 30 minutes will be instructed to follow proper health and hygiene practices and will be required to sign the Visitor Log sheet.



If you are a u-pick operation, you may wish to be more specific about the rules. You'll probably want to come up with a small list of rules that every customer must be made aware of and spell them out in your GAP Manual. A sample U-pick policy from an AIB GAP Manual guidance document is shown below.

U- Pick Operations Policy

Rules for customers that come to buy will be posted at the field entrances and will be presented by the attendant to the customer. One entrance/exit point for U-pick will be open to capture all traffic in and out of the field.

BEFORE entering the fields, customers or visitors will be informed about the rules of the operation:

- *Rules will be posted at the field entrances.*
- *Visitors/buyers will be instructed first to wash hands properly with soap and water before picking.*
- *Visitors will be instructed not to pick fruit on the ground or touching the ground, as they may be contaminated.*
- *All picking containers for use with the u-pick stand will be cleaned and disinfected prior to use*
- *Outsiders will not be allowed to bring their own containers, as they may be sources of contamination.*
- *Potable drinking water, clean toilet and hand washing facilities will be available within ¼ mile of the picking area for visitor use.*
- *Signs indicating where the facilities are located will be clearly posted throughout the picking area.*
- *Ideally no children will be allowed loose in the fields.*
- *NO pets will be allowed in the fields.*

All U-pick customers will be instructed that washing hands is for FOOD SAFETY purposes and is part of our Good Agricultural Practice. Signs will be posted in the u-pick lots reminding customers about this. Hand washing posters are often available from local health departments. Parents will be asked to closely supervise children when they are in the fields.

Remember that you need to outline a policy that you can consistently deliver on and document compliance against. If the policy is too restrictive, you may not be able to follow through with it. Writing your manual is only the first step. Implementing the policy is the second step. Documenting compliance is the last step.