



ISLAND COUNTY PUBLIC HEALTH

Environmental Health

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NOTICE

May 28, 2021

Bell's Farm
c/o Kyle Flack
892 West Beach Rd
Coupeville, WA 98239

Re: Bell's Farm

I'd first like to introduce myself. I'm Aneta, the lead Environmental Health Specialist for the Drinking Water Program but also assist the Food Program. Thank you for clarifying your intention regarding your licensing. I'll be reviewing the plans submitted for both the warehouse and the farm stand as one entity. Be advised additional information, such as a septic inspection report, will be required to complete your application.

For licensing purposes, did you want to change the name of your food establishment (as will be present on your license once issued)? We currently have the license name "Bell's Farm" as indicated on your application. If so, please let us know so that we may accommodate your licensing change.

As you've provided a statement and a number of questions, I've taken the liberty in categorizing sections to respond in an accurate and complete manner for the best understanding possible.

You are saying any farm stand operating in Island county needs to have an ICPH license with fee, septic, site plan, full list of all products, and the way they are packaged etc.?

To clarify the plan review process, all food establishment as defined in WAC 246-215 (including farm stands) would require to undergo a plan review process to ensure the establishment is set-up for adequate food safety and that it is in compliance with WAC 246-215 along with other applicable local codes and regulations. Not all food establishments would be required to submit the septic inspection report, "full list of all products, and the way they are packaged." Each food establishment is unique in their own way but *in general*, all food establishment would need to list their menu or a general list of foods that are handled/served/sold.

What about CSA models that farmers offer customers?

To be clear, CSA (Community Support Agriculture) is a description on operations in which consumers are able to purchase local, seasonal food directly from a farmer. According to some research (<https://www.localharvest.org/csa/>), this basics consists of: a farmer offering a certain number of "shares" to the public where the "share" consists of a box of vegetables, but other farm products may be included. Interested consumers purchase a share (aka membership or a subscription) and in return receive a box (bag, basket) of seasonal produce each week throughout the farming season. Under a search of RCWs, WACs, and WSDA's website, there is no indication in which CSAs are exempt from food safety regulations. Per the 7/15/20 investigation, potentially hazardous food (a.k.a. time/temperature control foods for safety) which as

milk, cheese, and seafood with other food entities brand was found in Bell's Farm's refrigerator and/or freezers located in the stand. This particular activity does not exempt CSAs from any food safety regulations. Should a farm stand sell foods that are not potentially hazardous (a.k.a time/temperature control foods for safety) such as whole fruits and vegetables (1st agricultural cut for leafy greens), then the farm stand would not meet the definition of a food establishment per WAC 246-215.

Also does Haggen, or Red apple or any of the major grocers have all of their products listed with the source, and type of packaging? This would imply that an operation such as Haggen should have hundreds if not thousands of products listed with you, as well as sources and types of packaging, and updated frequently as they rotate products?

Yes we do ask for a list of foods and sources from all food establishments including grocery stores, convenient stores, and restaurants alike. The most recent stores has been required to provide a list of foods, their food sources, and explain their food process flow. The larger markets such as Safeway, Haggens, Saars, Grocery Outlet and Walmart, often receive foods from their "main headquarters" which is verified as an approved source (licensed by either a city, county, state, or federal entity). If they also receive foods from local vendors, they would need to provide a list of their sources during the plan review process. Most small "mom & pop" type of stores or restaurants, would often list one or two warehouses (i.e. Costco, or previously known as Cash & Carry) as their source – which is also an approved source. In few instance do we have establishments that receive foods directly from a variety of sources. We're asking the same thing we're asking all applying food establishments – sources of foods to ensure you're providing foods from approved source as required by WAC 246-215-03200 (1-7). A full reasoning for approved source can be found in FDA Food Code 2017 3-201.11 pages 403-408. In short, by providing food source information we can determine if your facility is aware or have procedures in place to determine if a food vendor is appropriately licensed. If not, Island County Public Health can provide information on how you can make these determinations especially when adding new food vendors.

For the record as it's been explained to me, Margaret Barton from WSDA called Chanelle's office asking what, at the time, she currently know of your operations. Chanelle provided the information as mentioned via your in-person, phone, and video conferences between you, Chanelle, and EHS directors(s). If it has been determined by WSDA that WIGC and/or Bell's Farm does not qualify for a WSDA license, it is not Island County Public Health jurisdiction to argue otherwise. If you are still interested in a WSDA license and need assistance in coordinating with WSDA, please let me know. A conference call between WSDA, Island County Public Health, and representatives of WIG/Bell's Farm (including yourself) can be arranged.

Should you have any questions regarding any portion of this email and/or the application process, please feel free to contact me. I'd also like to extend an invitation to have a consultation with our drinking water program, septic program, and myself now that we're going to include your warehouse under the Island County Public Health Food Safety licensing. Please contact me to schedule a time for a consultation.

I've attached the Food Establishment Licensing Information Packet in case you've not already received it.

Thank you,

Aneta Hupfauer, Ph.D.
Environmental Health Specialist
Island County Public Health Environmental Health
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