Are you considering getting into loose tea processing? If so, it is critical to understand Hawai‘i law when it comes to food processing (HRS Chapter 11–12, http://tinyurl.com/3epfq3x). This publication explains what it takes to get a Food Establishment Permit (FEP) from the Hawaii Department of Health (DOH), which is required for commercial producers of dried loose tea (and most processed products). There are a number of generic steps you need to take, but in reality, each processing operation is unique and is evaluated and guided by the Hawaii Department of Health’s Sanitation Branch. Each county might also have a slightly different set of requirements, so it is best to do a lot of up-front reconnaissance before you spend any money.

**Step 1.** Look at the chart on the next page to see what is generally required of a processing facility. This is just an overview, and the DOH might require less or more depending on your specific process. If you feel comfortable with this, move to Step 2.

**Step 2.** If you are just starting out in food processing, it might make sense to get some real-world experience by borrowing or renting space in a currently permitted Food Establishment. This could include a community kitchen, church, or other permitted processing business. You will still need to have your own FEP to operate within that permitted establishment and to document that you have permission to use the facility. You might also need a letter from the owner acknowledging their permission to use the facility. Furthermore, permission may be denied if size/facilities are inadequate. Using a DOH “Commissary Agreement” form might be helpful to this arrangement (http://tinyurl.com/3dslxto).

**Step 3.** If you want to process in your own facility, you will need to start working immediately with the Hawaii Department of Health’s Sanitation Branch (a list of contacts is included at the end of this document). It is best to call them for a “coaching” session (as their time allows). If you decide to go forward, you will need to submit building plans primarily to your county building department. Even if your establishment does not require a building permit, DOH still requires plans if you will be building a new structure or extensively renovating an existing one.

From the building department, your facility plans might be routed to DOH Sanitation Branch, DOH Indoor Air & Radiological Health Branch, the Fire Department, and/or other government agencies as needed. There will be a fee for each application—from $50 to several hundred dollars. The routing and review process could take a number of months, so be prepared to wait and to answer additional questions. The amount of review time required will be a function of the workload in each department and the complexity of your building and operational plans.

**Step 4.** Once your facility has been built and/or permitted, you’ll need to begin to work on and perfect your

*any requirement subject to change at any time*
Some minimum physical requirements for a tea-processing facility*
*any requirement subject to change at any time

- **Door**: An opening to the outside, fully touching the floor (with a strip brush, door sweep, or rubber strip) to exclude pests, and a screen door if the solid door is left open during processing.

- **Window(s)**: No specific size requirement, but must meet room ventilation requirements (below).

- **Room ventilation**: Screened windows shall open to the outside air. Mesh size 16 (home type). DOH requires that at least 12% of total sq ft area of floor be in wall ventilation, including screened window and doors and/or air-conditioning that has a 15 CFM/person flow.

- **Walls**: Solid, non-porous, sanitizable surfaces, e.g. finished and painted drywall, painted cinder blocks, painted plywood, fiberglass wall paneling.

- **Processing equipment**: Installed and maintained per manufacturer’s specifications and instructions on any permits. May or may not need a fume hood to vent equipment heat and gases as per DOH Indoor Air & Radiological Health Branch specifications.

- **Ceiling**: Closed, with something like finished and painted drywall, a suspended tile ceiling, paneling, or fiberglass wall paneling.

- **Lighting**: Covered with plastic coverings.

- **Floor**: Solid, tiled, smooth, sealed, sanitizable.

- **Floor drain**: Optional, but needs to be regularly cleaned and maintained if present.

- **Work tables**: Non-porous, sanitizable materials, e.g. stainless steel, plastic resin.

- **Cutting surfaces/boards**: Made of non-porous, sanitizable materials.

- **Hot water unit**: Wash, Rinse, Sanitize, Air drying rack.

- **Equipment washing sink, plus air-drying rack**: Three compartments, with running cold and hot water, is recommended, but one wash/rinse sink might be allowed in certain situations. Stainless steel or other durable and sanitizable surfaces are options. Compartment size should be large enough to fit the largest piece of equipment. Air-drying rack recommended because equipment and utensils may not be wiped dry with a towel.

- **Handwash-only sink**: One compartment, with running cold water, liquid soap, single-use towels, and a covered trash can. More than one handwash sink system may be required, depending on business size/set-up.

- **Potable water in**: Must meet DOH requirements if from a private source. Public water sources must meet Board of Water Supply requirements. Backflow prevention required by City & County.

- **Waste water out**: Must meet DOH requirements if disposing into a private waste water system. If disposing into a public sewer, must meet requirements of City & County.

- **Lavatory and bathroom handwash sink**: Attached or within 200-FT and meeting HRS §11-12-45 and §11-11-9(b) and (c).

- **Pest control measures**: Cleaning supplies storage.
HACCP (Hazard Analysis Critical Control Points) plan for processing. Look at the resources below and consider taking a class on the subject.

**Step 5.** Label your tea package as required by the US FDA labeling requirements (http://tinyurl.com/lmgab3). For more information on this subject, see the CTAHR publication “Required and Optional Labeling for Loose Tea for Sale” (http://www.ctahr.hawaii.edu/oc/freepubs/pdf/FST-47.pdf).

**Links to Helpful Resources**
- Hawaii Department of Health’s Food Establishment Permit application
  http://tinyurl.com/43wmrge

- Hazard Analysis Critical Control Points
  US Food and Drug Administration
  http://tinyurl.com/432fjym

- Some Costs and Considerations for Establishing an Entrepreneurial Community Shared-Use Kitchen for “Test-Kitchen Incubator”
  http://tinyurl.com/3wsa3ax

- UHM College of Tropical Agriculture and Human Resources food processing education programs
  http://www.ctahr.hawaii.edu/aurora/HACCP.asp

**Disclaimer**
Reference to a supplemental information source is not intended as an endorsement or recommendation in preference to other sources that may also be suitable.

**Acknowledgments**
The authors thank Dale Evans for editing assistance. Thank you also to the Hawaii Department of Health for their non-binding suggestions. This publication is funded by USDA-NIFA Agreement no. 2009-34135-20098, Tropical and Subtropical Agricultural Research (TSTAR) for Hawaii and USDA-ARS Agreement no. 58-5320-7-664: Agricultural Postharvest, Value-Added Products and Processing Program.