



INTRODUCTION

Food safety has quickly risen to the forefront of consumers' minds as many new regulations for organizations in the food and feed industry have been implemented. In efforts to fulfill the growing consumer demand to know more about their food, the products being used, and ensure confidence in its safety, the Food Safety Modernization Act (FSMA) was signed into law in 2011.

The focus of these U.S. based regulations is to ensure food safety and quality is at its highest by taking a proactive approach to prevent contamination instead of responding to it. It's time to ensure with confidence your company has its food safety programs improved and ready to go!

1 BUILD A TEAM

The first step you should take when creating a food safety program is building a team. Include team members from multiple departments with different subject expertise to properly represent the entire organization.

This not only allows different knowledge and viewpoints to be represented from a structural standpoint, but creates ownership and accountability from all departments in your program. Be sure to assign each team member a different role or job within your program to reinforce ownership and accountability.

PREVENTATIVE CONTROLS QUALIFIED INDIVIDUAL (PCQI)

It is a requirement that a PCQI must assist in developing a Food Safety Plan. *This can be either an employee of the organization who is qualified or hired from an outside source (see next page.)



A "PREVENTIVE CONTROLS QUALIFIED INDIVIDUAL" (PCQI) MUST DEVELOP (OR OVERSEE THE DEVELOPMENT OF) THE FSP. A PCQI IS A PERSON WITH THE EDUCATION, TRAINING, OR EXPERIENCE (OR A COMBINATION OF THESE) TO DEVELOP AND APPLY A FOOD SAFETY SYSTEM. A PCQI CAN BE QUALIFIED THROUGH JOB EXPERIENCE OR BY COMPLETING TRAINING EQUIVALENT TO THE STANDARDIZED CURRICULUM RECOGNIZED AS ADEQUATE BY FDA (E.G., THE FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE (FSPCA) TRAINING). THE PCQI DOES NOT NEED TO BE AN EMPLOYEE OF THE FACILITY.

-HAZARD ANALYSIS AND RISK-BASED PREVENTATIVE CONTROLS FOR HUMAN FOOD: DRAFT GUIDANCE FOR INDUSTRY, FDA

THIRD PARTY PCOI

Companies that do not have qualified employees on staff or the resources to have an employee properly trained, can hire a third party PCQI to oversee the development of a Food Safety Plan. DEKRA Insight has trained PCQIs on staff who can assist in the development of your FSP. Contact us for more info.

2 DEVELOP POLICIES

Your organization will need internal policies to set the groundwork for awareness and expectations to meet the requirements of FSMA regulations. Your food safety team should first review the policies you currently have in place to assess and decide what new policies need to be created in order to meet all standards and regulations. Use the knowledge of all departments represented on your food safety team to develop policies that will best serve your organization and cover all necessary aspects of the program.

POLICY MANAGEMENT - When developing your policies, be sure to put a process in place to efficiently roll out the new policies to all affected locations, remove old policies no longer in place, and update as your organization grows and changes. Having a centralized management system, such as a web-based software, is an easy and effective way to update, version, and recall old polices.

PQCI - Be sure your PCQI (Preventative Controls Qualified Indivdual) oversees the development of these policies.

3 CREATE A PLAN



It is critical that organizations create a scheduled plan and process to follow through with tasks that need to be completed in order to stay in compliance. Create an audit schedule to verify the tasks are being completed up to standard and employee knowlege is being maintained. Other critical tasks your program should have set schedules for are: training, data capture, and program reviews.

ORGANIZATION IS KEY - Keeping a record of everything you do is essential to running a successful food safety program. Knowing exactly when and where tasks are completed not only keeps your organization in compliance, but allows you to review and improve on your processes and the quality of your product. Good practice is to have upper management review all documents and sign off.

4 TRAIN YOUR EMPLOYEES



Training your employees on the Food Safety Plan is essential. More importantly, make sure your employees can prove competency before being signed off as trained. Implement quizzes or field tests into training that can prove your employees truly know the information and can apply it in live situations. Training should be implemented from management all the way to frontline employees.

SCHEDULE AND KEEP RECORDS - All trainings should be kept on a frequency (annually, quarterly, etc.) and all trainings should be documented and stored. Using a management system that notifies employees when trainings are coming up can be extremely helpful keeping all employees up to date on training as well as for documentation purposes.

5 TRACK YOUR DATA

Reveiw the regulations your organization is required to follow and find out exactly what information you need to track. Having a system in place can simplify data collection and organization. Be sure to set expectations with employees and management on who, what, when, and where data is to be collected and kept. When it comes to data collection and storage, web-based systems are often the most efficient and effective ways to keep data as well as make it easily accessible to anyone throughout the organization.

OUTAGES - Do you have a process for documenting outages? Be sure to keep track of all outages and information associated with them.

ACTION ITEMS - Do you have a process for tracking action items? Action items are critical to fixing issues or following through with preventative action plans. Develop a system that will allow your organization to identify issues and follow up on them to completion.

6 CREATE A RECALL PLAN

When creating a recall plan, the first course of action should be to develop a recall team. Include a member of every department that can be affected by a recall. This team should walk through the policies and procedures that need to take place during a recall. Document this plan! Once you have this plan solidified and documented, initiate scheduled practices of the procedures on a frequency to ensure knowledge and action is quick.

7 AUDIT YOUR PROGRAM



Auditing is one of the most important parts of the Food Safety Plan and plays a huge roll in preventing incidents from taking place. Auditing not only ensures you are completing tasks correctly, but also allows your organization to catch potential hazards. Audits should be designed to reinforce your policies and standards. Be sure to properly document and keep all audits on file.

SCHEDULING AUDITS - All audits should be set on a scheduled frequency to be sure all aspects of the program are being audited with the proper amount of time and attention.

CORRECTIVE ACTIONS - Being able to identify a potential risk or barrier to food safety is the most important aspect of auditing. Implement a process and plan of action to follow up with issues identified during audits and track those issues to completion.

8 STAY ORGANIZED

The key to a successful Food Safety Plan is through proper organization. Implementing plans and processes for all aspects of the program will keep your products and employees the safest they can be. Documenting those plans and processes and creating easy access for your employees is what ensures your programs will run to maximum efficiency. Being organized reduces the possibility of mistake and allows for more time focusing on creating safer and higher-quality products.

PROVE YOUR METHODS - By keeping updated and organized documentation of your Food Safety Plan, you can easily prove you are taking proper course of action to provide quality products, as well as using the information to improve your programs.

9 ENSURE STUSTAINABILITY

Food safety can be a tedious and cumbersome process to take on. By assigning tasks to proper role types and engaging employees (from management down) in the process can pay huge dividends to ensuring sustainability in your program. When establishing your programs, be sure to discuss the importance of food safety and providing quality products to your consumers. Besides audits and other required facets of the food safety program, schedule employee reviews of food safety topics and focus on improvements made.

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SAY WHAT YOU DO, DO WHAT YOU SAY, AND PROVE IT.

DEKRA CAN HELP

For more information about the Insight Via[™] Food Safety Management System or how DEKRA experts can help build your Food Safety Plan, give us a call at 800-888-9596 or visit us at www.dekra.us/sms.

