The Language and Landscape of Food Safety Planning

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The Cold Chain
Risks and Hazards- What's the Difference?

• 1st- The regulated environment we work in
  ○ FDA-FSMA
  ○ USDA- MPIA

• 2nd- The process of analysis

• 3rd- The level of granularity. Risk based can be very high level, hazards based is very specific
Hazards Mandates Right Now

- Seafood 21 CFR 123
- Juice 21 CFR 120
- Meat and Poultry 9 CFR 417
- Coming soon to all FDA products via FSMA
HACCP

Hazard Analysis for Critical Control Points

- A systematic approach to the identification, evaluation, and control of food safety hazards
- One part of a comprehensive food safety plan
- One of the available tools available for understanding and mitigating the risks of your process
HARPC

Hazards and Risk based Preventive Controls

Uses a risk analysis and hazards analysis to evaluate the food safety of produce, animal feed, and non HACCP regulated value added processes
We regulate hazards, not risks

Hazards are independent of the amount produced
Origin of Hazards Based System

- NASA, Pillsbury and US Army Natick Food Labs developed it to put safe food into space
- FDA systems
  - Low acid
  - Acidified food products
- NAS endorsed it to control microbial hazards in foods in 1985
- Created a committee National Advisory Committee on Microbiological Criteria for Foods
- Codex Alimentarius Committee came in for use in international trade
Pre-Req Programs

Provide the basic environmental and operating conditions that are necessary for the production of safe wholesome food

Based on

- FDA cGMPs 21 CFR 110
- USDA/FSIS sanitation regulations 9 CFR 416.1-416.6

Those are necessary, but not sufficient
Pre-req Programs

- Facilities
- Production and equipment
- Cleaning and sanitation
- Chemical control
- Pest control
- Personal hygiene
- Training
- Supplier Control

- Specifications
- Traceability and recall
- Receiving
- Storage
- Calibration
- sSOPs
- Consumer Complaint process
- Environmental monitoring
Consider the timeframe. You don’t have to do it all at once as you build your business.
Business Description

Facilities- include how your facility promotes food safety and what you are doing to keep facility costs down by using a PM program

How is your facility designed to manage pathogens? Think about sanitation facilities, time and motion of people, HVAC
Operations

How are you going to apply your supply programs to drive down cost?

How does using a written food safety plan affect your inventory records?

Describe how your food safety mitigates the risk of your product
Marketing

What food safety systems does your market demand? How are you going to find out?

Are you going to need a 3rd party audit?

What are your distribution requirements? How are you going to use that knowledge to assure food safety?
Management

Create a culture of food safety

Leverage local experts

Share best practices
Finances

write first, build second

Choose between spending time and spending money
What is the Cost of a Recall?

- Time
- Effort
- Lost Sales
- Brand

48 Million Americans

$225M
7 Things You Need To Know About Food Safety During The Government Shutdown

Does a “filthy, putrid, or decomposed substance” sound like something you might be interested in eating? Good news! The FDA isn’t inspecting any food being imported into the U.S. during the shutdown, so now’s your chance.

The New York Times

Arrests Made in Colorado Outbreak of Listeria

DENVER — The owners of a Colorado cantaloupe farm were arrested on Thursday on charges stemming from a 2011 listeria epidemic that killed 33 people in one of the nation’s deadliest outbreaks of food-borne illness.

Federal prosecutors said the owners, the brothers Eric and Ryan Jensen, were arrested on misdemeanor charges of introducing adulterated food into interstate commerce. The Jensens’ lawyer did not immediately return a call seeking comment.

No Food Safety Program = No Business
Questions?