FOOD SAFETY INSIGHT

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Everybody eats... Everybody cares about food safety!

A Publication of Perry Johnson Registrars Food Safety, Inc.

PrimusGFS: A Global Food Safety Initiative Scheme

What is PrimusGFS?

PrimusGFS is a Global Food Safety Initiative (GFSI) benchmarked and fully recognized audit scheme covering both GAP and GMP scopes as well as food safety management systems (FSMS). PrimusGFS standard is a food safety auditing standard that applies to all levels in the agricultural food chain.



Unlike other GFSI standards, which are classified into primary production or manufacturing categories, a PrimusGFS audit offers certification along the entire supply chain (focusing on agricultural and minimally-processed products), from production on the farm to processing and storing operations. A PrimusGFS audit uses a scored audit approach, as opposed to the standard 'minor' and 'major' nonconformances that Food Safety Managers may be familiar with. This approach allows organizations to steadily improve their score over time, while still meeting the base score needed to pass the audit.

Who should have it?

Large retailers and Food Companies seeking auditing schemes that are universally accepted, resulting in a desired goal of global food safety harmonization, Good Agricultural Practices (GAP), Good Manufacturing Practices (GMP) scopes, and Food Safety Management Systems (FSMS).

(PRIMUS CONT. ON PG 4)

GFSI Requirements: Food Fraud & Food Defense – What's The Big Deal?

One notable change coming to GFSI requirements is the necessity of policies regarding food fraud and food defense. But just what would that entail? Both fraud and defense with regard to food relate to the intentional adulteration of products, as opposed to unintentional adulteration (food quality and safety). Fraud and defense can be differentiated easily based on the motivations of the perpetrators; food fraud is economically driven and motivated by gain, whereas food defense is ideologically driven and motivated by harm.



Food fraud is further broken down into different types of fraud, ranging from substitution or dilution to mislabeling or counterfeiting. Some examples of these types of food fraud can be relatively harmless to consumers (e.g. sales of excess unreported product) while others

(FRAUD CONT. ON PG 5)



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Perry Johnson Registrars Food Safety, Inc.

Headquarters 755 W. Big Beaver, Suite 1390 Troy, Michigan 48084

> Phone: 1-877-663-1160

Email: pjrfsi@pjrfsi.com

Website: www.pjrfsi.com

Publisher: Terry Boboige

Editor: Tami Carr Lauren Malonev

Writers: Tami Carr • Amy Wayne Olivia Debus

> Layout & Design: Jason Millbrand

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Coming Soon From GlobalG.A.P. – The FSMA Produce Safety Rule Add-On

GlobalG.A.P. is now looking for participants to join in trial assessments for the FSMA Produce Safety Rule Add-on module. FSMA's Produce Safety Rule is crucial for producers both within the United States and exporting to the US, and this early trial can be a great indicator of preparedness. Participants in the trial assessments will not be



charged the certificate license fee if later audited to the final version, and gain the advantage of knowing where they stand on the rule.

To learn more about the specifics of this new add-on, visit GlobalGAP.org. If you are interested in participating in the trial assessments in your next IFA audit, contact PJRFSI at 1-877-663-1160 or pjrfsi@pjrfsi.com. ◆

Proposed Agricultural Water Compliance Date Changes

A rule has been proposed by the FDA that may extend compliance dates for Produce Safety Alliance (PSA) agricultural water requirements by two to four years for produce other than sprouts. This extension will give agencies time to reevaluate water standards to better ensure they are feasible for farmers nationally while still protecting public health. Under the proposed rule, the largest farms would have a compliance date of January 26, 2022. Small and very small farms would have an additional year each, with respective compliance dates of January 26, 2023 and January 26, 2024. ◆





Client Spotlight: RBW & HPT



With a combined experience of over 150 years, the powerhouse that is Henry P. Thomson, Inc. and RBW Logistics is a shining example of food safety in action. A family-owned tea company that has imported and blended teas for more than 100 years, Henry P. Thomson, Inc. began working in conjunction with RBW Logistics in 2005 for storage and distribution purposes, and began making specialty tea blends together a year later. Together they worked toward and achieved SQF Certification with PJRFSI.

SQF Certification can be quite challenging, as is widely known, but the hard work was worth the reward, according to Marketing & QA Coordinator Dana Caruso – "Since becoming SQF certified, RBW & HPT have worked together to maintain an environment capable of producing safe tea. We have leveled playing fields with other tea businesses who are SQF certified and feel extremely proud to have come this far." The teamwork needed to have achieved certification certainly strengthened the partnership between RBW & HPT, and the assurance that the processes put in place are also used by other companies helps add confidence in consumer safety.



Now on their third audit cycle with PJRFSI, Caruso was emphatic about the positive experiences in their certification process. "You know once you have been audited with PJRFSI that your certificate was earned and not just given," she stated, citing "knowledgeable, firm, and fair" auditors as a great asset to their experience.

For those who are looking to become SQF certified, Caruso emphasized the importance of organization and open communication to avoid confusion. Training, too – "it's better to understand the code upfront than floundering with incorrect comprehension." ◆



How to Achieve PrimusGFS:

1) Check that your operation's products are within the PrimusGFS GFSI-recognized scope

2) Decide on kind of operation type(s) you need to have audited:

- 2.1) GAP Growing Area (Ranch or Greenhouse), Harvest Crew.
- 2.2) GMP/HACCP Cooling & Cold Storage, Packinghouse, Processing Storage & Distribution.

3) Review relevant documents on the PrimusGFS website, especially:

- 3.1) General Regulations.
- 3.2) Checklist and Expectations.
- 3.3) Relevant Interpretation Guidelines (in order to better understand questions and expectations in the audit).

4) Choose a certification body (CB) to work with.

- 4.1) Talk with the CB about your audit needs and double check that you have the correct audit scope & operation types. Extending the scope of an audit post-certification is difficult & not always possible; it is important to have all your products & processes covered in the audit you are booking.
- 4.2) Talk with the CB about auditor availability, expense costs, & audit costs.
- 4.3) Consider an optional Pre-Assessment Audit if you feel it would be beneficial.
- 4.4) Book your audit, but remember that new auditees need at least 3 months of paperwork records available at the time of the audit to obtain full conformance.
- 4.5) Several steps of the certification process use PrimusGFS online software e.g. application, and corrective action recording. Your chosen CB will assist in the set up your online account and provide assistance using the PrimusGFS auditee software.

5) Perform a self-audit.

We strongly recommend performing a full self-audit on your operation(s). A good self-audit will allow you to detect potential nonconformances and implement corrective actions before a formal audit, thus improving your performance on the day of the audit.

6) Audit performed.

The auditor will perform an opening meeting, tour and audit the operation, audit documentation, and then hold a closing meeting. We recommend that you ensure the auditor leaves you a document/emails you copy of the detected nonconformances either on the day of the audit or within 24 hours of the audit, so that you are immediately ready to start the corrective action completion phase.

7) Completion of corrective actions.

- 7.1) Completing corrective actions can help improve your audit score.
- 7.2) Auditees have thirty (30) days from the day of the audit to complete and record corrective action work

8) Certification decision.

- 8.1) Once the audit report and corrective actions are competed, the CB will review all of the details in readiness for the certification decision.
- 8.2) CBs are supposed to issue certificate decisions within forty-five (45) days of the audit date.
- 8.3) Note that CBs can refuse certification not only because of failing overall or section audit scores, but also if critical food safety issues not covered in the audit scheme have been detected. Additionally, a CB can also refuse to certify for issues such as falsified records, inappropriate auditee behavior, etc.
- 8.4) Auditees can (in writing) appeal audit reports and certification decisions with their CBs if they wish to do so (ask your CB for a copy of their appeals, complaints and dispute procedure(s) and form(s)).

9) PrimusGFS Certificates

- 9.1) Certificates usually valid for 12 months from the day of the certification decision (check certificate detail).
- 9.2) Certificates are sent via email along with a copy of the final audit report. \blacklozenge

PJRFSI Career Opportunities – Watch us Grow!

Food Safety Auditor Positions available in California and Pacific Northwest!

Seeking sub-contract individuals with knowledge of HACCP, USDA/FDA requirements to conduct GFSI (SQF, BRC, IFS and FSSC 22000) audits. Qualified candidates must have a minimum of five years full-time work experience in the food-chain-related industry, two of which must be in quality assurance or food safety. Undergraduate degree required in general microbiology and general chemistry, as well as coursework in the food chain industry such as: food processing, food chemistry, crop production, etc.



In addition, due to our continuous growth, we are seeking auditors in both the United States and Canada that meet minimum qualification requirements for SQF, BRC Food, BRC Packaging and FSSC 22000!

For immediate consideration please call us today or email cover letter and resume to: Imaloney@pjrfsi.com. ◆

(FRAUD CONT. FROM PG 1)

can have significant health impacts (e.g. olive oil diluted with tea tree oil – which is potentially toxic.) The challenges of complex food supply chains and the increasingly globalized nature of the industry, combined with a tumultuous economy, has increased pressure for suppliers to give in to the temptation to commit food fraud. Today, the most fraud-riddled sectors of the food industry include milk, fish, olive oil, and honey, according to GFSI; overall the global cost to the industry is estimated at \$30-40 billion.



How, then, to mitigate the risks of product adulteration, whether economically or ideologically driven? Altered products can cause widespread loss of trust in producers, illness, and even deaths. The key elements of mitigation fall under two clauses in the GFSI Guidance Document: the Food Fraud Vulnerability Assessment and Food Fraud Mitigation Plan. By having in place documented vulnerability assessment procedures to identify potential points of fraud perpetration and a plan in place to mitigate public health risks, producers can ensure consumer confidence and continued protection of product.

With the addition of food fraud and defense requirements in GFSI, Food Safety Management Schemes are adding their own guidance and requirements on the topic. To learn more about specific schemes and the policies they bring to the table, reach out to PJRFSI by telephone or email, at 1-877-663-1160 and pjrfsi@pjrfsi.com.







Join PJRFSI at an Upcoming Tradeshow!



 $P_{\rm JRFSI}$ will be at the following tradeshows. Come to the shows and visit one of our PJRFSI representatives to discuss how we can help you.

FOOD SAFETY SUMMIT 2018

Donald Stephens Convention Center Rosemont, IL May 7-10, 2018 Booth #414

FOOD SAFETY AMERICAS 2018

Loews Vanderbilt Hotel Nashville, TN May 22-23



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PJRFSI 2017 Annual Auditor Training

Perry Johnson Registrars Food Safety, Inc.'s 2017 Annual Auditor Training took place at our World Headquarters in Troy, MI on December 7th and 8th. Attendees participated in several sessions such as: Food Safety Culture - Why is it important in the food supply chain?, Packaging Materials - How food safe are they?, PJRFSI Administrative Procedures -An update, Equipment Design and Food Safety, Food Storage and Distribution - A Comparison of GFSI Standards. Are you in compliance with the Sanitary Transportation Rules?, Food Fraud - What do you need to Know?, and Food Defense - An Overview.

These sessions were conducted by our V.P. of Product Safety and Research, Dr. Rama Narasimhan and Food Safety Program Accreditation Manager Lauren Maloney. Dr. Rama gave enlightening technical presentations on Food Safety whereas Maloney gave an educational administrative presentation. Notably, Dr. John Spink, Director of the Food Fraud

Initiative at Michigan State University, gave an informative presentation on Food Fraud. Additionally, the Food Safety Auditors were able to partake in an Organic Certification training session.

With another successful annual training completed, the entire PJRFRI team is looking forward to a successful and prosperous 2018. PJRFSI would like to extend gratitude to all who attended the training and helped to facilitate this highly valuable experience for our auditors. Stay tuned to PJRFRI's website and social media for new on the 2018 annual training as it become available.



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PJRFSI Training!

Perry Johnson Registrars Food Safety, Inc. offers a wide variety of training classes. For more details on any of the following courses or to register, please go to our website at www.pjrfsi.com. ◆

Implementing SQF Systems Manufacturing (Version 8.0) – Troy, MI - May 7-8, 2018

Implementing SQF Systems for Manufacture of Food Packaging – Troy, MI - June 11-12, 2018





Perry Johnson Registrars Food Safety, Inc. 755 W. Big Beaver, Suite 1390 Troy, Michigan 48084 USA



Call: 1-877-663-1160 or Visit our website: www.pjrfsi.com

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Upcoming FREE Webinars from PJRFSI

PJRFSI is hosting a series of free, educational webinars in the coming weeks and months. Check out what's coming up below! Go to our website www.pjrfsi.com now to register.

Friday, May 11, 2018

GlobalG.A.P. IFA Crops Certification Overview

Keep checking back to our website for newly added webinar dates.



In the event you cannot attend a webinar at its scheduled time, we have the recordings available to download from our website at www.pjrfsi.com/webinars/past-webinars. We currently have the following webinars available for download:

- 3/15/2018 Food Fraud in Food Packaging Material Manufacturing
- 2/12/2018 Food Safety Culture Why is it Relevant to Food Safety?
- 11/10/2017 A Roadmap for Successful Implementation of GFSI Standards
- 9/15/2017 Hygienic Design of Food Processing Equipment